

# Baltimore City Board of Ethics

# ANNUAL REPORT



**- 2024 / 2025 -**

# Table of Contents

1. Message From the Ethics Board
2. Director's Note
3. Board and Ethics Staff
4. Advisory Opinions
5. Legislative Matters and Complaints
6. Metrics
7. Complaints
8. Filing a Complaint
9. Contact Us



# Message from the Ethics Board



The Baltimore City Board of Ethics looks back on an eventful Fiscal Year 2024-2025 as it presents this Annual Report to the Mayor and City Council, and the Citizens of Baltimore City. The Board continues to carry out its mandate to guard against improper influence (or even the appearance of improper influence) and strives to ensure public trust in the government of Baltimore City.

The Board's mission is to prevent real or potential conflicts by providing proper training, appropriate resources, and direct guidance. Wherever concerns or conflicts may arise, it also may act correctively, by ensuring appropriate enforcement of the Baltimore City Public Ethics Law, as contained in Art. 8 of the Baltimore City Code,

Board Members John McCauley and Noelle Winder Newman (both attorneys with decades of experience between them), and veteran Board members Arnold Sampson and Stephan Fogleman have carried on the business of Baltimore City Ethics and compliance with diligence and dedication. Since Jan. 1, 2024, for 21 months now, the administration has not filled the one vacancy

Once again, the Board has achieved just shy of 100% compliance with the Ethics Law's financial disclosure requirements!

**The Baltimore City Ethics Board**

Stephan W. Fogleman (Chair)

Arnold Sampson

John A. McCauley

Noelle W. Newman

# Director's Note



The Ethics Board has entrusted our Ethics staff with carrying out the Board's day-to-day business. We serve the City's public officials, employees, and members of the various boards and commissions who advise the City's agencies, and offices. Our mission is to enable all of "our" public officials to comply fully with the complex requirements set by the City's Ethics Law. Part of this means making sure that:

- All public officials are familiar with the general provisions of the Ethics Law;
- All public officials are in full compliance with the disclosure provisions of the Ethics Law; and that
- All public officials know where to pro-actively turn for advice before a conflict arises

In the past year, we have supplemented the mandatory online ethics training with personal instruction. Working closely with Human Resources and the IT department, we have reviewed and improved the information flow especially for new hires. Ethics staff receives daily inquiries from City employees, media, and members of the public about the Ethics Law and its application. We are committed to resolving all questions as quickly and thoroughly as possible, providing both formal and informal guidance based on the Law and the growing body of Board Opinions.

Ethics staff consists of Ethics Officer Nayshonn Bond, who is supported by Special Assistant Anetra Moore. Our team is looking forward to serving our constituents competently and responsively for many more years.

Once again, a heart-felt "Thank You!" to the Citizens of Baltimore for trusting both the Ethics Board and your Ethics team to enforce the provisions of the Ethics Law to achieve transparency and accountability!

**J. Christoph Amberger, Esq.**

Director, Ethics Board

[Chris.Amberger@BaltimoreCity.gov](mailto:Chris.Amberger@BaltimoreCity.gov)



# Structure and Personnel

## **Current Board Members:**

- Stephan W. Fogleman, Esq., Chair (term ended December 31, 2026)
- Arnold Sampson (term ended December 31, 2024)
- John A. McCauley, Esq. (term ending December 31, 2027)
- Noelle W. Newman, Esq. (term ending December 31, 2026)

The Board meets on the second Wednesday of each month by conference call via Microsoft Teams to discuss public and administrative matters, including complaints, guidance, and waiver requests. Members of the public are welcome to observe the public part of the monthly Board meeting by joining remotely. (Simply contact us at [ethics@baltimorecity.gov](mailto:ethics@baltimorecity.gov), so we can provide you with a link to the call.) Written and recorded minutes of the Board's public meetings are available online at <https://ethics.baltimorecity.gov/board-meetings>. Video recordings of our public meetings are posted on [youtube.com](https://www.youtube.com).

The Inspector General, Isabel Mercedes Cumming, has served as the Board's ex officio Executive Director since October 10, 2020 pursuant to City Ordinance 20-354 and Section 3-11 of the Ethics Law. She has designated a full-time Director, Ethics Officer, and Special Assistant to carry out the Board's day-to-day work. Special Agents in the Office of the Inspector General are available if needed to assist with ethics investigations. In 2022, Inspector General Cumming appointed former Baltimore City Assistant State's Attorney J. Christoph Amberger to the position of Director. He is supported by Ethics Officer Nayshonn Bond and Special Assistant Anetra Moore.

# Advisory Opinions

**Informal Guidance:** The Board is frequently asked to provide informal guidance to the City’s public officials and Citizens, which may be communicated to the requesting party either orally, in emails, or in more formal letters. The issues at hand usually involve potential conflicts of interest inherent in secondary or post-employment situations, as well as gift acceptance and “prestige of office” matters.

For example, in 2024/25, the Board provided informal advice on the following matters:

- The Board received the request to determine if the pertinent provisions of the Ethics Law prohibit a currently registered lobbyist from serving on a City board, commission or similar body.

Art. 8's §8-15 (c) governs service on City boards, commissions etc. by current registered lobbyists: When joining a board or commission (and thus becoming a “public servant” for purposes of the Ethics Law), § 8-15 (c)(1) requires a lobbyist to immediately cease all activity that requires lobbyist registration and terminate his or her registration within 30 days of becoming a public servant.

However, pursuant to § 8-15 (c) (2), this provision does not apply to a lobbyist appointed to an advisory body of limited duration. Art. 8 of the City Code does not vest the Ethics Board with the specific authority to determine the classification, nature, or function of a City board. Because the respective board was classified as “of limited duration” by the administration, the Ethics Law’s § 8-15 (c) (2) exemption applied in this case.

- Because both the City’s and the State’s Ethics Laws specifically regulate individuals, not agencies, the acceptance of unsolicited third-party gifts that are made directly to agencies are outside of the Board’s direct jurisdiction under Art.8. Where these may raise the potential of creating the appearance of conflict. the Board recommends to continue bringing such proposed unsolicited gifts to agencies to the Board’s attention.

# Legislative Matters

In FY2024/25, the Board did not receive any new bills for comment. However, Ethics staff assisted in shepherding Bill 22-0275 through the legislative process. This Bill proposed amending the City Ethics Law to bring it into the required statutory conformity with the State's Public Ethics Law. Art. 8 of the City Code was amended by Ord. 24-368 on Oct. 24, 2024 to reflect those changes.

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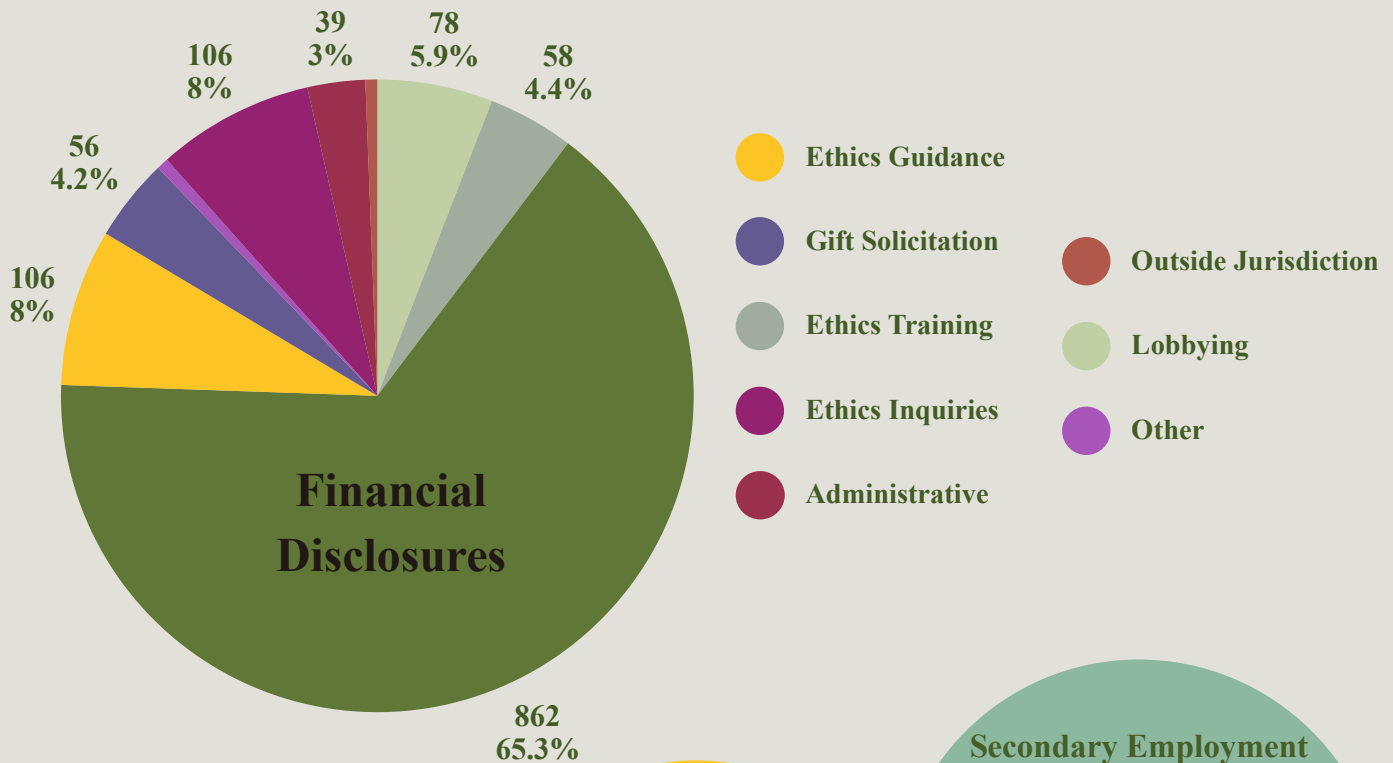
## Complaints

In FY2024/25, the Board received 12 individual complaints, 10 of which were closed for lack of jurisdiction. (The Ethics Board is authorized only to investigate complaints that allege a violation of the Baltimore City Public Ethics Law, found in Article 8 of the City Code. )

- Complaint **25-0005-E** alleged that a former member of a City board was violating Art. 8's Post-Employment provisions. After leaving office or terminating employment, former public servants may not assist or represent a party, other than the City, in a case, contract, or other specific matter for compensation if: (1) the matter involves City government; and (2) the former public servant significantly participated in the same matter as a public servant. After mitigation through the Respondent, the complaint was closed.
- Complaint **25-0009-E** alleged the late filing of Entry Statements by a member of the Mayor's Office. The Board assessed an appropriate fine; the complaint was closed after mitigation by the Respondent.

# Metrics

Board staff receive daily inquiries from City employees, officials, media, and members of the public about the Ethics Law and its application. In fiscal year 2025, Board staff received 1,305 requests for Ethics advice and guidance, all of which were resolved in a timely manner, tracked in a database, and categorized by subject matter:



## Gift Solicitation Waiver Applicants

In FY25, the Board approved 13 Gift Solicitation Waivers. By comparison, in FY24 the Board had approved 38 waivers, compared to 25 approvals in FY23, and 15 approvals in FY22.

**Financial Disclosures**  
We are in receipt of 3,392 financial statements. As in previous years, this again reflects a compliance rate of close to 99%.

## Secondary Employment Waivers

In FY25, the Board provided 2 formal letters of guidance (compared to 4 in FY24) on the application of the Ethics Law's conflict of interest provisions.

## Lobbyists

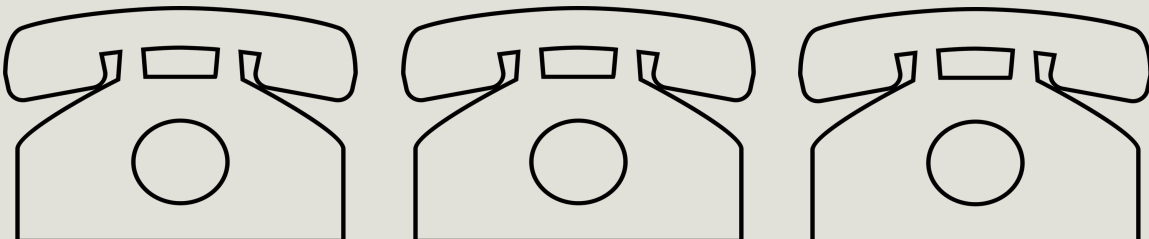
For FY25, Ethics Staff registered 150 Lobbyists.

# Complaints

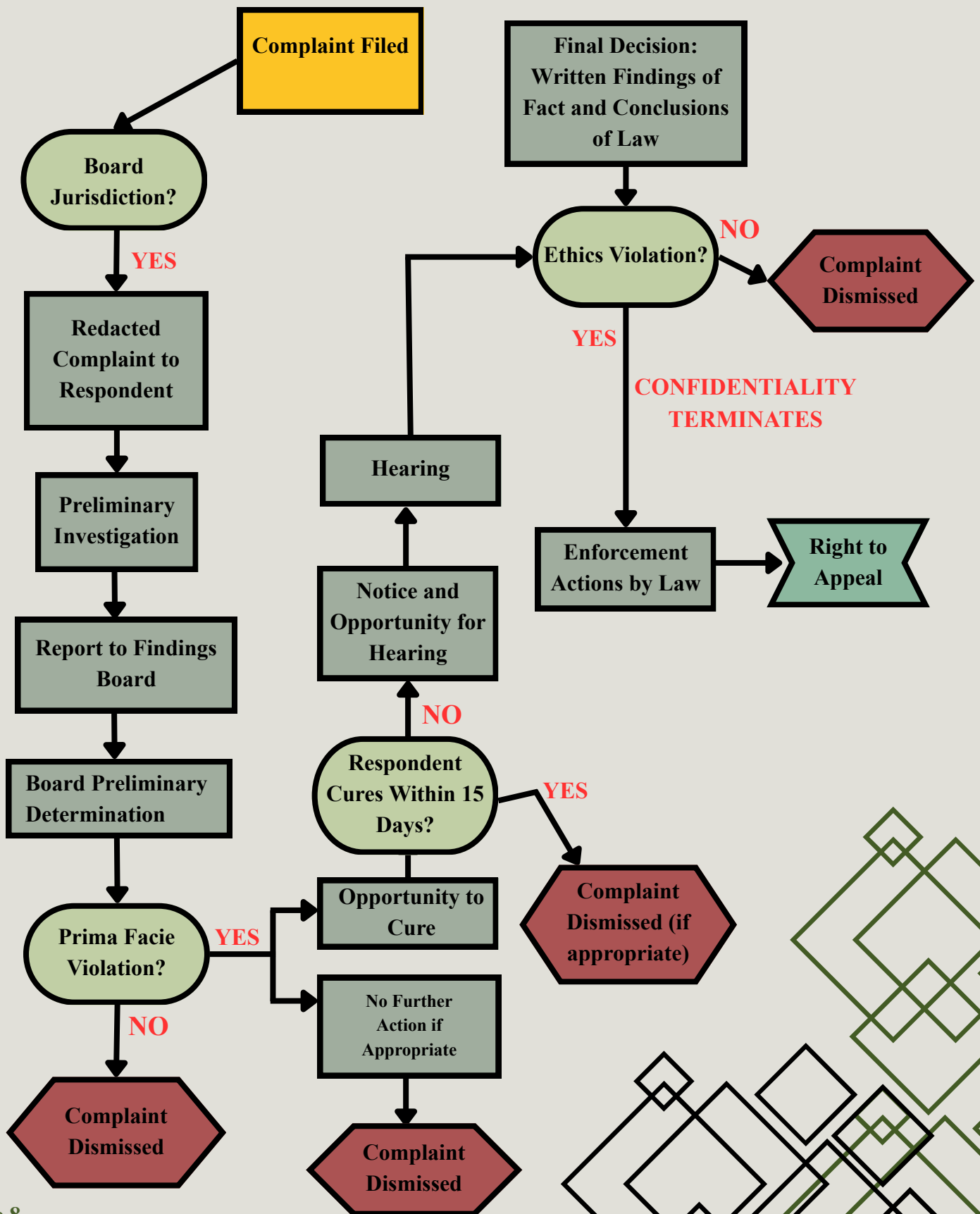
The Ethics staff maintains an active Ethics Hotline for complaints. If the complaint is within the Board's legal jurisdiction, Ethics staff promptly send a copy of the complaint to the respondent after redacting the complainant's name, contact information, and any other identifiable information.

Any complaint that does not correspond to the express authority outlined in the Ethics Law is considered outside of the Board's jurisdiction. Ethics staff will still review it thoroughly but likely dismiss it "for lack of jurisdiction".

If the complaint is not within the Board's legal jurisdiction, it is dismissed and/or referred to another entity, if appropriate. Please note that dismissal does not reflect on the complaint's merits. It just means the Board is not authorized by law to investigate. However, we will make every effort to either forward that complaint to the proper investigative authority or transfer it there ourselves.



# Filing a Complaint



# Contact Us

Please contact the Ethics Board Staff with any complaints or questions.



Board of Ethics  
Room 635, City Hall  
100 N Holliday Street  
Baltimore, MD 21202



[@BaltimoreEthics](#)



410-396-7986



[Digital Complaint Form](#)



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