

Stephan W. Fogleman, Chair  
Arnold Sampson  
John McCauley  
Noelle Newman  
Vacant



Director: J. Christoph Amberger

BALTIMORE CITY BOARD OF ETHICS

April 23, 2024

**Via Electronic Mail**

Ashley Bush, Chief of Special Events and Permits  
Department of Baltimore City Recreation and Parks  
3201 Boston Street  
Baltimore, MD 21224  
Ashley.Bush@baltimorecity.gov

Re: Charm City Lights Charitable/Governmental Gift Solicitation Waiver

Dear Chief Bush,

During the Public Session of its March 13, 2024 meeting, the Ethics Board (“Board”) approved your amended application to solicit in-kind donations in support of Charm City Lights. Approval is contingent on the application’s endorsement by the Board of Estimates. *See* R 06.26.1(B)(2). Approval is subject to the following conditions:

- 1) *In general.* The campaign must be conducted in accordance with the standards, terms, and conditions set forth in your application and in Board Regulation 06.26.1, attached for your reference.
  - a. Of specific importance, please note that all solicitations must be directed at a broad range of potential donors, must not specially target controlled donors, and must be conducted so as to avoid any suggestion that contributors might receive special access or favored treatment from any City agency or official. *See* R 06.26.1.
    - (i) To comply with the requirements above, the Board recommends that you use uniform solicitation material that includes a written disclaimer along the following lines: “Important: Your contribution will in no way result in special access or favored treatment from any City agency or official.”
- 2) *Prestige of Office Prohibition.* Pursuant to the City Code, Art. 8, §6-36, City employees and officials may not intentionally use the prestige of their City position—including, but not limited to, their City title, image, connections, and resources—for the private gain of the beneficiary of this waiver or of any other<sup>1</sup>.
- 3) *Reports.*

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<sup>1</sup> Section 6-36 does not prohibit the performance of usual and customary constituent services, without additional compensation.

- a. A Final, Cumulative Report (due within 30 days after all solicitations and receipt of all anticipated donations) must be filed with the Ethics Board on Ethics Form 627.
- b. An Interim Report is due every three months based on your application’s stated aggregate value of donations being sought (“\$500,000 or more”). Interim reports are due on the following dates:

- |                      |                      |                      |
|----------------------|----------------------|----------------------|
| • June 13, 2024      | • September 13, 2025 | • December 13, 2026  |
| • September 13, 2024 | • December 13, 2025  | • March 13, 2027     |
| • December 13, 2024  | • March 13, 2026     | • June 13, 2027      |
| • March 13, 2025     | • June 13, 2026      | • September 13, 2027 |
| • June 13, 2025      | • September 13, 2026 | • December 13, 2027  |

- 4) *Expiration.* This approval expires on the date set forth in your application, December 31, 2027. After that date, a new application will be required for any further solicitation efforts.

If you have any questions, please contact Ethics Board staff at [ethics@baltimorecity.gov](mailto:ethics@baltimorecity.gov) or 410-396-7986.

Sincerely,

*Nayshonn  
Bond*

Nayshonn Bond  
Special Assistant, Ethics Board