



THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

6611 Kenilworth Avenue • Riverdale, Maryland 20737

April 16, 2025

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Prince George's County Council  
14741 Governor Oden Bowie Drive, Room 2027  
Upper Marlboro, Maryland 20772-3050

**RE:** Conflict of Interest and Ethics Report

Dear Recipients:

The Maryland Code, General Provisions Article, Section 5-823, requires the Maryland-National Capital Park and Planning Commission (M-NCPPC) to submit a report, on or before April 30 each year, to the governing bodies of Prince George's County and Montgomery County summarizing conflict of interest issues and regulations during the previous calendar year. This letter complies with the reporting requirements and covers the period of January 2024 through December 2024.

I. Conflict of Interest Issues.

A. Financial Disclosure.

The Commission requires designated employees to complete and file financial disclosure affidavits annually utilizing “**Form 1**” promulgated by the agency. The designated employees submit these affidavits subject to the penalties of perjury. For convenient reference, I have enclosed: (1) our current financial disclosure regulations, contained within the M-NCPPC’s Ethics Policy, Commission [Practice 2-24, Code of Ethics](#) and (2) a [blank Form 1 with instructions](#).

During the reporting period, approximately 216 M-NCPPC employees were required to file financial disclosures. These employee disclosures are in addition to disclosures filed by our ten (10) Commissioners who file forms directly with the Maryland State Ethics Commission and respective County administrations. Thus, the number of people who filed represents 9.3% of the M-NCPPC’s 2024 career workforce of 2,327 employees.

B. Conflict of Interest Inquiries and Issues.

In 2024, the Commission created a robust Ethics training program which resulted in more inquiries. During the reporting period, the M-NCPPC’s Office of the General Counsel fielded several disclosure and compliance inquiries regarding potential and actual conflicts of interest that were reported by the employees involved, their managers, or others. The inquiries/disclosures include the following scenarios (in no particular order):

- A supervisor in Prince George’s County Planning Department asked if his employee could list M-NCPPC in his byline in academic articles not related to the Commission that are written on the employee’s personal time. Ultimately, the employee, as well as the Commission employees broadly, were advised that using the Commission in the byline of an article (or other forms of external communication) would lead the general public to believe that the article was endorsed by the Commission and may lead to a conflict of interest. Moreover, an employee who uses their Commission title in order to obtain opportunities unrelated to the Commission was inappropriate use of prestige of office, a violation of Practice 2-24, the Ethics Policy.
- With regards to non-Commission business and employment, several employees from all departments asked if their ownership of rental properties constituted a business under the Ethics Policy. Employees were advised that ownership for the purpose of creating income was a form of business and therefore required submission and approval of the Non-Commission Employment form. Several employees also inquired about outside work related to the Commission and how to avoid conflicts of interest. For example, a residential

architect was approved for non-Commission employment so long as they did not do business in Prince George's or Montgomery Counties.

- A new employee hired by the Prince George's County Planning Board was a member of three different organizations with significant potential conflicts of interest. He holds public office, served as the President of a non-profit organization that the Commission has several contracts with, and worked as an appointed official on behalf of the Commission. Ultimately, the employee left all positions except his public office.
- A Prince George's Planning Board Commissioner sought guidance whether or not they could vote on a planning department filing fee refund for their new neighbor. While the Commissioner did not have a relationship with the neighbor, for the purposes of a potential conflict of interest, the Commissioner recused themselves from the vote.
- A Prince George's Parks employee started as a new bass guitar player for a band that had, in the past, been hired for Commission events. The employee was instructed not to engage in contracts with the Commission, and the employee would find a substitute player at the Commission events.
- A Montgomery County Planning employee was asked to join a board that held large-scale fundraising events. The employee was advised against participation because of the potential conflicts of interest but was able to stay connected with the board so long as they did not engage in fundraising or conflicting events.
- A former employee now works for a private consulting firm, which has several projects with Prince George's County Planning. The former employee did not work on any of these projects while employed with the Commission. The Supervisor inquired if there was a conflict of interest. The supervisor was advised that this was not a violation of the ethics policy, however, if this created an individual conflict of interest with employees, this should be further investigated.
- A conflict of interest when a Montgomery Parks employee represented herself as a pro bono consultant (non-Commission business) for a condominium association (HOA) when discussing landscape design for the condominium property that is impacted by metro construction. The employee's work as a pro bono consultant for the condominium association created a conflict of interest: employee's advocacy favored the private HOA and was counter to the interest of the metro project as it added additional cost and time to the project. MCDOT and MTA contacted Montgomery Parks to notify the Commission of

employee's actions; employee's actions undermined Montgomery Parks' relationship with Montgomery County and MTA on the visible project and affected the department's ability to negotiate further resolutions of ongoing issues to the metro project, including a park project the employee was managing in their work as a Commission employee. This matter resulted in disciplinary action.

Over the reporting period, OIG resolved several hotline complaints and various investigations involving alleged conflicts of interest.

- The OIG was asked to investigate allegations of unauthorized access to the Commission's network by a Commission employee. The OIG confirmed the allegation. Subsequent disciplinary action was taken.
- An anonymous hotline allegation reported a Commission employee steered multiple painting and flooring contracts to a vendor that he/she had a personal relationship with. The report also included allegations of violations of procurement policies. The OIG determined the employee:
  - Was involved in a relationship with the identified vendor and was aware of the Commission's Code of Ethics and did not disclose the conflict.
  - Conspired/colluded with the vendor to steer Commission business to his/her various companies.
  - Received \$79,072 in payments from the vendor over a 5-year period.
  - Violated Commission procurement policies by altering quotes to stay under \$10,000, to avoid review by Corporate Procurement.
  - Instructed the vendor to falsify quotes.
  - Provided confidential external vendor quotes to the vendor.
  - Provided several, material, false statements to the OIG to influence the outcome of the investigation.

These actions meet the legal definition of fraud, waste, and abuse. The employee resigned during the investigation.

- An anonymous hotline allegation reported custodial workers were getting paid for weekend hours they did not work. OIG determined timecard fraud was occurring at a Commission maintenance facility since its opening in April 2021. To counter weekend scheduling difficulties, facility management knowingly entered or approved hours on their employees' timecards for time not worked. Management added a false comment, "Timeclock Not Available" on the employees' timecards. These actions resulted in estimated overpayments of \$47,3764. The OIG identified 4 managers involved in the fraudulent activities; subsequent disciplinary action was taken. The OIG did not find evidence of fraud on the part of the custodial workers.
- Concerns were raised with the OIG alleging a Commission employee used his authority to issue field use permits for a personal soccer program during work hours at the Commission.

The OIG was unable to substantiate the allegations. However, the OIG identified opportunities to strengthen internal controls over the field permitting internal processes.

- Concerns were raised with the OIG regarding the use of an external locksmith when internal locksmiths were available and capable of completing the work; thus, increasing overall costs to the Commission. The OIG did not identify any actions that would support a conclusion of fraud, waste, or abuse. However, the OIG did identify opportunities to strengthen overall controls for improved oversight and management of work the locksmith performs which may lead to opportunities to decrease costs to the Commission.
- An allegation of bid rigging for 8 blind sites for waterfowl hunting was sent to Honorable Anthony G. Brown, Attorney General, State of Maryland, and to Mr. Bill Tyler, Director, Prince George's County Department of Parks and Recreation. The allegation was subsequently forwarded to the Commission's Office of the Inspector General (OIG) for investigation. Based on a preponderance of evidence, the OIG reasonably concluded there was no bid tampering or other irregular actions on the part of the Commission's Park Director or Park Naturalist over the 2024-2025 permitting of the waterfowl blind sites on the Patuxent River in Prince George's County.
- The OIG was notified of a possible conflict of interest involving a Commission employee and a Commission vendor (not-for-profit) who was awarded a professional services contract. It was alleged, the vendor was a close family member of the employee, and the employee provided services for the not-for-profit. The employee did not disclose the potential conflict. The OIG confirmed the allegations. The employee resigned from the Commission during the investigation.
- An anonymous hotline allegation reported possible waste of Commission funds due to the number of personal celebrations held on-site during work hours as well as the collection of donations and party preparation. The OIG identified opportunities to strengthen compliance with Commission policies and procedures, including ensuring employees' timecards reflect leave as needed. Subsequently, the Office of the General Counsel issued a Commission-wide memorandum to provide guidance and advice to Commission employees concerning the funding, use of commission resources, and use of leave for events that are hosted by Commission employees (i.e. team building events, holiday parties, baby showers, wedding showers, promotions, and retirement celebrations).

## II. Lobbying Disclosures.

The Commission updated and expanded Lobbying Disclosure, Administrative Practice 5-61 on January 19, 2022. The Practice was updated to ensure that lobbying the Commission or its Planning Boards for the purpose of influencing any administrative, legislative, quasi-legislative, or executive action, does not violate ethical norms or erode the highest trust placed by the public in Commissioners, appointees, and employees of the Commission. The revised Practice clarified

and expanded the types of lobbying that would trigger a registration requirement for the lobbyist. During 2024, 24 lobbying registrations were submitted.

The Commission will continue to include its Lobbying policy as part of the Ethics policies that are shared as links in the section below. Updated reporting requirements are also posted on the agency's website.

### III. Ethics Regulations.

Over time, the Commission has promulgated a number of regulations to govern employee conduct and establish ethical standards. Those regulations include the Financial Disclosure rules discussed above, as well as the following documents that are accessible through the links below for your files and convenient reference:

- [Commission Practice 1-31 - Organizations and Functions of the Audit Committee and Office of the Inspector General](#)
- [Commission Practice 3-31 - Fraud, Waste, and Abuse](#)
- [Commission Practice 4-10 - Purchasing Policy](#)
- [Commission Practice 6-10 - M-NCPPC Vehicle Use Program](#)
- [Commission Practice 6-13 - Electronic Communications Policy](#) and accompanying [Administrative Procedures 12-01 - Mobile Technology \(Acquisition, Assignment, and Authorized use\)](#)
- [Commission Practice 6-52 - Use of Commission Facilities by the Public and Staff](#)
- [Financial Disclosure Statement "Form 1" for M-NCPPC employees and appointed staff](#)

A number of policies have undergone review and recent updates. Others were reviewed as part of the comprehensive review of all agency ethics policies, including disclosure requirements, to ensure they continue to reflect organizational needs and current requirements. This comprehensive review and consolidation of the agency's ethics policies is now complete. We have consolidated six policies and procedures into one Ethics Code known as Practice 2-24.

#### [Ethics Code-Practice 2-24](#)

### IV. Conclusion.

We hope the information provided in this report is informative and welcome any comments you have. Please feel free to contact us if you have any questions or concerns.

Mses. and Messrs. Stanton, Madaleno, Howard, and Jenkins  
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Sincerely,

A handwritten signature in cursive script that reads "William Spencer". The signature is written in black ink and is positioned above the printed name and title.

William Spencer  
Acting Executive Director

Enclosures

cc: The Maryland-National Capital Park and Planning Commission  
M-NCPPC Audit Committee  
Gavin Cohen, Secretary-Treasurer  
Debra S. Borden, General Counsel  
Miti Figueredo, Director, Montgomery County Parks Department  
Bill Tyler, Director, Prince George's County Dept. of Parks and Recreation  
Lakisha Hull, Director, Prince George's County Planning Department  
Jason Sartori, Director, Montgomery County Planning Department  
Renee Kenney, Inspector General  
Jennifer K. Allgair, Executive Director, Maryland State Ethics Commission