



THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

6611 Kenilworth Avenue • Riverdale, Maryland 20737

2025 Conflict of Interest and Ethics Report

April 28, 2026

Maxene M. Bardwell
Chief Administrative Officer
Prince George's County
Headquarters Building
1701 McCormick Drive
Largo, Maryland 20774

Richard S. Madaleno, Jr
Chief Administrative Officer
Montgomery County
Executive Office Building
101 Monroe Street, 2nd Floor
Rockville, Maryland 20850

Craig Howard
Executive Director - Office of the County Council
Montgomery County Council
100 Maryland Avenue, 6th Floor
Rockville, Maryland 20850

David H. Murray
Administrator
Prince George's County Council
14741 Governor Oden Bowie Drive, Room 2027
Upper Marlboro, Maryland 20772

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 2025 through December 2025.

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 Maryland State Ethics Commission. The designated employees submit these affidavits subject to the penalties of perjury. A blank copy of this form is enclosed for your convenient reference.

During the reporting period, approximately 243 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 were required to file represents 10% of the M-NCPPC’s 2025 career workforce of 2,420 employees.

B. Conflict of Interest Inquiries and Issues.

Since 2024, the Commission created a robust Ethics training program which resulted in more inquiries. During the reporting period, M-NCPPC 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):

- The FY 2025 Ethics Training had Non-Commission Employment as one of the main focus areas. Several employees throughout the Commission hold some kind of advisory or voluntary board position, some of which required further analysis of the Non-Commission Business and Employment evaluation under the Ethics Code and occasionally require individual circumstance Conflict of interest evaluations. These include the following examples:
 - A Prince George’s County Planner is on the City of Rockville’s Planning Commission. This was approved as Non-Commission Employment, and the employee checks in with the Office of the General Counsel for potential conflicts with agenda items.
 - A Prince George’s County Planner applied for the Anne Arundel County Planning Advisory Board. This did not need to be approved because the position is truly advisory in nature and therefore is not covered under the Non-Commission Employment process.
- Other, more traditional Non-Commission Employment questions included:
 - A Park Police employee has an approved training business. She was asked by the University of Maryland and the Maryland State Police to speak at a conference in her capacity as an experienced trainer with a PhD. Even though the Conference would not happen during her scheduled work hours, members of the Commission

Park Police would likely attend the conference. The OGC determined it was not a conflict for her to participate as a speaker in her outside business so long as she did so as a representative of the independent business, not the Commission.

- A Certified Playground Safety Inspector who works in that capacity for the Commission and is listed as such on the National Recreation and Park Association CPSI registry. She does not have a side business and did not have an approved Non-Commission Business and Employment form. She was contacted through a connection with a previous employer and asked if she could do an inspection for a private school. She was advised that she could not engage in outside business without approval prior to the start of the business.
- The FY 2025 Ethics Training also focused on gifts. The OGC received several questions about free attendance at events. In most of these cases, the attendance was as a representative of the Commission and was acceptable under the Ethics Code. Some examples of gifts questions include:
 - A Horticulture and Urban Forestry area employee wanted to know if donating Commission plant material to local professional events was a violation of the Gifts policy. It is not, so long as there is manager approval and is fairly distributed among professional organizations to avoid any Conflicts of Interest or inappropriate use of Prestige of Office as dictated by the Ethics Code.
 - A Construction Project Manager was offered free attendance at an event hosted through the Maryland Washington Council of Governments, which the manager was allowed to attend. He was also offered a gift card for attending, which he denied.
- The FY 2026 Ethics Training focuses on Political Activity. The Commission has several politically engaged employees, and here are the related questions the OGC received this year:
 - An employee asked if, as an employee trustee on the Employee Retirement System Board, could attend the NCPERS lobbying day on Capitol Hill in January.
 - A Parks employee is civically involved in many Spanish speaking organizations that benefit children with disabilities. As her role as president in one of the organizations, which was approved through the Non-Commission Employment process, she is often called by media to make statements and to testify. She has been told she cannot do this during work hours, in work clothes, or using M-NCPPC resources.
- A Commissioner is also the Executive Director for Rockville Housing Enterprises (RHE). Because of his position with RHE, he was a voting member for the Montgomery County Claims Settlement Committee. However, since his participation in that committee was because of his membership in RHE, not the Commission, he would have to recuse himself

on decisions impacting the Commission. As such, the Commissioner decided to appoint his RHE Deputy to the committee and removed himself entirely.

- There were several Conflict of Interest analyses conducted at the appointment of the new Chair, as he had many outside employment engagements prior to coming to the Commission. The Chair removed himself from leadership positions and none of his former companies can contract with the Commission for a minimum of 18 months.
- The OGC received a report from a manager that there was an allegation an employee at an ice rink was romantically involved with a vendor, and because of that relationship, gave the vendor extra time on the ice without charge. The supervisor was informed of and investigated under the Use of Prestige of Office and Conflict of Interest sections of the Ethics Code.
- A Planner raised a concern that they knew an architect on a development for which they were assigned because their children are in common extracurricular activities. The Planner asked for a Conflict of Interest analysis. No Conflict was found, but the Planner disclosed the relationship to the planning team.
- A Human Resources professional asked whether it was appropriate to hire an executive coach to work with employees that already has a coaching relationship with one of the members of their team. The HR professional was advised to follow the competitive procurement process and if the coach bid, to remove the team member from the decision process. The discussion included Use of Prestige of Office, Gifts, and Conflict of Interest potential policy violations.

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

- The OIG received an anonymous telephone call that reported allegations of 1) conflict of interest, 2) abuse of power, and 3) a toxic work environment. Based on the severity of allegations 1 and 2 the OIG conducted a fraud, waste and abuse investigation. The conflict of interest was related to an appointed official who has a prior relationship with a consultant hired by the Commission which allegedly impacted the results of a solicitation and selection of a 115 Trust Advisor. The abuse of power allegation related to the appointed official allegedly providing an employee with access to the Commission's Enterprise Resource Planning (ERP) cash module in the production environment while not formally notifying Treasury Operations. The OIG reasonably concluded that the actions of the appointed official related to the solicitation and selection of a 115 Trust Advisor and the abuse of power did not support a conclusion of fraud, waste, or abuse.

- An anonymous complaint reported concerns with the Maryland-National Capital Park Police (Park Police) Prince George's County Division's internal procedures for compensating their Field Training Program (FTP) Coordinator. Per the allegation, the FTP Coordinator was fraudulently adding 1.0 hour of comp time earned to his/her timecard each day. The OIG determined the concerns raised were also relevant to Montgomery County Park Police Division. The OIG reasonably concluded, the addition and approval of 1.0 hour comp time earned by the FTP Coordinators does not meet the definition of fraud, waste, or abuse. Both FTP Coordinators believed what they were doing was acceptable and approved by their superiors. However, the OIG does reasonably conclude that the current practice of adding 1.0 comp time earned per day to the timecards is not authorized under Commission policy. Based on the OIG's investigation, the Commission leadership agreed to review the current practice of adding 1.0 hour comp time earned per day to the FTP Coordinators timecard to determine the best way to move forward while protecting the integrity of the FTP and also complying with official Commission Practices.
- The OIG received an anonymous complaint delivered to our office. The allegations were related to wrongdoings committed by a Commission Facility Director with Prince George's County Department of Parks and Recreation (DPR). The allegation indicated that the Commission's Youth and Countywide Sports Division (YCSD) issued field permits to the DPR Facility Director to run his personal soccer program during his Commission work hours. The OIG was unable to substantiate the allegations. However, the OIG identified opportunities to strengthen internal controls over the field permitting internal processes.
- The OIG received an allegation from the Commission's Office of General Counsel involving concerns of a possible conflict of interest and abuse of the American with Disabilities Act (ADA) accommodations and telework privileges by an employee within the Prince George's County Planning Department. The OIG substantiated the allegations and determined the employee's actions resulted in fraud, waste, and abuse. The OIG determined the employee abused his ADA accommodation and telework privileges; did not disclose his secondary employment at three different entities for several years, a perception of a conflict of interest existed due to the employee's role as a Planning Supervisor and a training instructor who provided training to Commission staff; use of the Commission's electronic communications systems (email) for activities related to secondary employment, and committed timecard fraud while participating in his secondary employment during Commission work hours.
- The OIG was contacted by Montgomery County Department of Parks, Management Services Division regarding a concern involving two employees travel expense reports and timecards for their attendance at the April 2025 Maryland Recreation Parks Association conference held in Cambridge, Maryland. The OIG concluded that one of the employee's actions met the definition of fraud, waste, and abuse but the other employee's actions did

not. The OIG determined the employee's actions supported failure to notify supervisors or anyone of his/her illness before leaving a conference and using paid administrative leave; falsifying timecards, and unauthorized meal per diems reported on expense report.

- The OIG received an anonymous hotline allegation involving theft of scrap metal and fraudulent donations of equipment at Rock Creek Regional Park. The allegation involved Commission employees taking scrap metal from Commission property to a scrap metal facility located in Frederick, MD to obtain cash. In addition, the employees donated equipment to a non-profit organization. The donations occurred during the Montgomery County Department of Parks efforts to switch from gas to battery powered equipment. The employees, knowing the equipment was recently donated, then went to purchase the equipment from the non-profit organization for a fraction of the value of the equipment. The OIG determined that the Division Chief and Regional Manager were not aware of the cash payments and the buyback of Commission property. However, the OIG determined that the actions of the employees involved constituted either fraud, waste, or abuse. In addition, during the investigation one of the employees submitted a portion of the cash donated from the unauthorized sale of scrap metal, the OIG recommended the Commission attempt to collect the remaining funds. The OIG identified numerous opportunities to strengthen internal controls over recycling procedures and the disposal of Commission assets.
- The OIG was contacted by Montgomery County Department of Parks Human Resources management to investigate a potential case of fraud, waste, and abuse in the Horticulture, Forestry, and Environmental Education Division that involved theft of wood logs. The OIG was unable to substantiate the allegations. However, the OIG identified opportunities to strengthen internal controls in the Division's work order documentation to ensure work crews comply with instructions when taking wood to Pope Farm.

II. Lobbying Disclosures.

The Commission updated and expanded its *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 2025, fifteen (15) 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 several 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 5-61 – Lobbying Disclosure](#)
- [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](#)

Several 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](#)

The following relevant new policies have been added:

- [Administrative Procedures 25-02 - Filing Complaints](#)
- [Administrative Procedures 25-03 - Conducting Investigations](#)

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.

Sincerely,

A handwritten signature in cursive script that reads "William Spencer". The signature is written in black ink and is positioned to the left of a vertical line.

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
Michael Aniton, Deputy General Counsel
Miti Figueredo, Director, Montgomery County Parks Department
Darius Stanton, Director, Prince George's County Dept. of Parks and Recreation
James Hunt, Director, Prince George's County Planning Department
Jason Sartori, Director, Montgomery County Planning Department
Modupe Ogunduyile, Inspector General
Jennifer K. Allgair, Executive Director, Maryland State Ethics Commission