



2023 ANNUAL REPORT

**BALTIMORE CITY
BOARD OF ETHICS**

REACHING NEW HEIGHTS

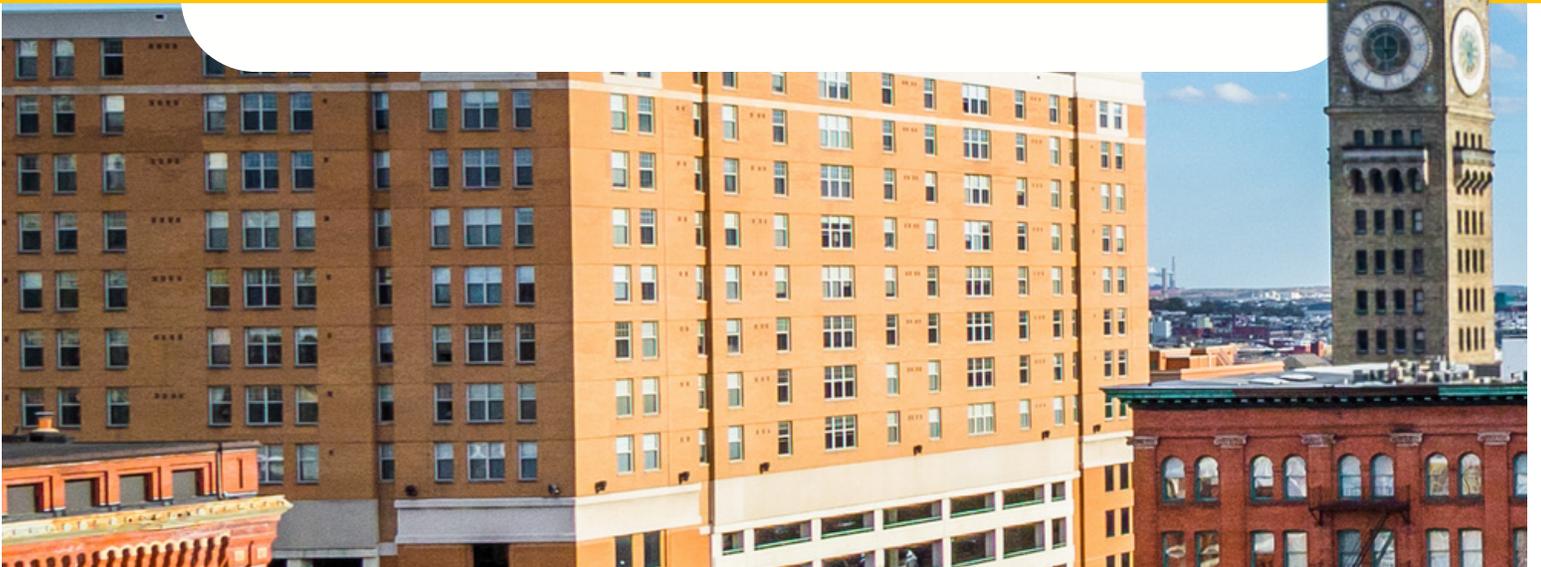


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INTRODUCTION

The Baltimore City Board of Ethics (“Board”) looks back on an eventful Fiscal Year 2023 (“FY23”) as it presents this Annual Report to the Mayor and City Council, and the Citizens and stakeholders of Baltimore City.

The Board continues to carry out its mandate to guard against improper influence, or even the appearance of improper influence, and to ensure public trust in the government of Baltimore City. In achieving this mission, the Board is both proactive (i.e., preventing real or potential conflicts by providing proper training, appropriate resources, and direct guidance), as well as corrective, which means ensuring appropriate enforcement of the Baltimore City Public Ethics Law (“Ethics Law”), as contained in Art. 8 of the Baltimore City Code, wherever concerns or conflicts may arise.

Assisting the Board, the Ethics Director, Ethics Officer, and Special Assistant have continued to improve the tools available to the City’s employees and officials to comply with their obligations under the Law. The Board achieved just shy of 100% compliance with the Ethics Law’s financial disclosure requirements for the third time in a row! Staff also supplemented its existing online Ethics Training by integrating the course as part of the City’s training platform on Workday.

With the welcome additions of John McCauley and Noelle Winder Newman, both attorneys with decades of experience between them, the Board has entered FY24 without a vacancy for the first time in several years and is looking forward to serving the Citizens of Baltimore in the year ahead.

Baltimore City Board of Ethics

Stephan W. Fogleman, Chair

Melodie Hengerer

Arnold Sampson

Noelle W. Newman

John A. McCauley



ABOUT THE ETHICS LAW



WHAT IS THE ETHICS LAW?

The Ethics Law is found in [Article 8 of the City Code](#). The purpose of the Ethics Law is to guard against improper influence or even the appearance of improper influence, and to ensure public trust in the government.



WHAT DOES IT DO?

The Ethics Law ensures City employees and officials serve the public with fairness, impartiality, and independent judgement; for these reasons, the law refers to City employees and officials as “public servants.” To accomplish its purpose, the Ethics Law provides minimum ethical standards of conduct, requires many public servants to disclose their financial interests, and requires lobbyists to publicly register and report their activity.



WHERE DOES IT COME FROM?

The Ethics Law must be modeled on the Maryland Public Ethics Law, found in [Title 5 of the General Provisions Article of the Maryland Code](#); however, the City’s Ethics Law may be more strict to account for local concerns.



HOW CAN I LEARN MORE?

To learn more about the Ethics Law, visit the [Board’s website](#).

DID YOU KNOW?

AFTER LEAVING THE CITY, FORMER PUBLIC SERVANTS MAY NOT ASSIST ANOTHER ENTITY WITH A CITY MATTER IF THEY SIGNIFICANTLY WORKED ON THAT SAME MATTER WHILE SERVING THE CITY. § 6-22.
READ [ETHICS OPINION 22-001](#) TO LEARN MORE.



LEGISLATION

Section 3-26 of the Ethics Law requires the Board to submit to the Mayor and the City Council reports with recommendations for legislation, whenever appropriate. In FY23, seven City Council bills were referred to the Board for comment, compared to four in FY22, and two in FY21. The seven bills are hyperlinked and briefly summarized below.

[Bill 23-0347](#) (“**Department of Business Licensing and Consumer Protection**”) and **[Bill 23-0363](#)** (“**Land Bank Authority**”) require additional public servants to file financial disclosure statements, which the Board finds consistent with the Ethics Law. Both bills are still in committee at the time of this report's publication.

[Bill 23-0353](#) (“**Community Reinvestment and Reparations Commission**”), enacted on July 17, 2023, and **[Bill 22-0254](#)** (“**Office of Aging – Independent Agency**”), enacted on September 27, 2023, in relevant part, require public servants of the Community Reinvestment and Reparations Commission and of the Office of Older Adult Affairs and Advocacy, respectively, to file financial disclosure statements.

[Bill 23-0364](#) (“**Baltimore City Fiscal Policy Democratization Task Force – Establishment**”), which is currently in committee, proposes that the Chair of the Ethics Board serve as an *ex officio* member of the Baltimore City Fiscal Policy Democratization Task Force (“Task Force”). The Board found that this provision conflicts with the Section 3-2(b)(2)(ii) of the Ethics Law, which prohibits Board members from otherwise being officers or employees of the City. The Board also recommended that public servants of the Task Force be required to file financial disclosure statements.

[Bill 22-0275](#) (“**Ethics – Conforming Changes**”), which is currently in committee, proposes amending the City Ethics Law to bring it into the required statutory conformity with the the Maryland Public Ethics Law.

[Bill 22-0260](#) (“**Ethics Board Financial Disclosures – Public Inspection – Identifying Information**”) was withdrawn on June 26, 2023. It proposed prohibiting public access to family members' home addresses on financial disclosure statements and eliminating the requirement to identify those who inspect a financial disclosure statement.

On November 28, 2022, the Board provided a letter to the Mayor on **[Bill 22-0292](#)** (“**Elected Officials’ Retirement System - Benefits – Eligibility**”), requesting a delay in implementation of Bill 22-0292 so that the Board could opine on ethics concerns raised by councilmembers' vote to shorten their and future councilmembers' pension vesting period.

ABOUT THE BOARD



The Board is an independent body that oversees and enforces the requirements of the Ethics Law. Originally created by a 1963 Charter Amendment to enforce new prohibitions on conflicts of interest, the Board was established in its current composition in 2010 and is governed by [Article VII of the City Charter](#) and [Article 8 of the City Code](#).

The Board, with assistance of staff, carries out a number of responsibilities, including:



INVESTIGATING ETHICS COMPLAINTS AND IMPOSING REMEDIES AND SANCTIONS;



EDUCATING PUBLIC SERVANTS AND MEMBERS OF THE PUBLIC ON THE ETHICS LAW THROUGH TRAININGS AND MATERIALS;



PROVIDING PUBLIC SERVANTS WITH FORMAL AND INFORMAL GUIDANCE; AND



OVERSEEING AND MANAGING THE FINANCIAL DISCLOSURE AND LOBBYING SYSTEMS AND PROCESSES.

ABOUT THE STAFF

The Inspector General (“IG”), Isabel Mercedes Cumming, has served as the Board's *ex officio* Executive Director since October 10, 2020 pursuant to [Ordinance 20-354](#) and Section 3-11 of the Ethics Law. In FY23, IG Cumming designated a full-time Director, J. Christoph Amberger, Esq., Ethics Officer, Maura Romo, and Special Assistant, Nayshonn Bond, 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.



MEET THE BOARD

Subtitle 3 of the Ethics Law governs the Board's administration. The Board comprises five City residents of "known personal integrity" with a "recognized knowledge and interest in government and civics."

Of the five members, one is nominated by the City Council President, one by the Comptroller, and the remaining three by the Mayor. At least two of the Mayor's nominees must be licensed attorneys. All members are appointed by the Mayor and confirmed by City Council. No member may be a lobbyist, a government employee or official (other than of a college or university), or a candidate for elected public office. The members serve staggered, five-year-terms and the Chair is elected annually by the Board from among its members.

The Board typically meets monthly to discuss public and administrative matters, including complaints, guidance, and waiver requests. Written and recorded minutes of the Board's public meetings are available on [the Board's website](#).

The Board currently consists of the following members. Their bios are available on [the Board's website](#).

- Stephan W. Fogleman, Esq., Chair (term ended December 31, 2020)
- Melodie Hengerer, Esq. (term ending December 31, 2023)
- Arnold Sampson (term ending December 31, 2024)
- Noelle W. Newman, Esq. (term ending December 31, 2026)
- John A. McCauley, Esq. (term ending December 31, 2027)

John McCauley was appointed to the Board on April 17, 2023 and Noelle Newman was appointed on June 20, 2023.



A SPECIAL THANK YOU!

Donna Davis served on the Board as Vice Chair from January 2020 until February 15, 2023, shortly after the completion of her term. The Board extends its appreciation and gratitude to Donna Davis for her outstanding service on the Board and dedication to upholding the Ethics Law in Baltimore.



REQUESTS & GUIDANCE



Board staff receive daily inquiries from City employees, officials, and members of the public about the Ethics Law and its application. Requests are tracked and categorized as “help desk” matters.

Board staff resolve most questions quickly, providing informal written and/or oral guidance based on the Ethics Law and the ever-growing body of Board precedent. Some requests, however, require formal guidance from the Board.

The Board may provide formal guidance through an advisory opinion. The Board may also grant exemptions as authorized in the Ethics Law. Such exemptions include waivers for certain secondary employment and for the broad solicitation of donations for a charitable or governmental program.

1,314

HELP DESK REQUESTS



8

OPINIONS & FORMAL GUIDANCE LETTERS



25

APPROVED GIFT SOLICITATION WAIVERS



1

SECONDARY EMPLOYMENT WAIVER



DID YOU KNOW?

PUBLIC SERVANTS SHOULD NOT ACCEPT EMPLOYMENT, SUCH AS CONSULTANT WORK, WITH A CONTRACTOR THAT DOES BUSINESS WITH THEIR AGENCY WITHOUT CONSULTING THE BOARD. THE ETHICS LAW GENERALLY PROHIBITS PUBLIC SERVANTS FROM BEING EMPLOYED BY AN ENTITY THAT HAS A CONTRACT WITH THEIR AGENCY, UNLESS THE PUBLIC SERVANTS HAVE RECEIVED A WAIVER FROM THE BOARD OR ANOTHER EXCEPTION APPLIES. §6-11 TO §6-16.

READ [ETHICS OPINION 21-004](#) TO LEARN MORE.



HELP DESK REQUESTS

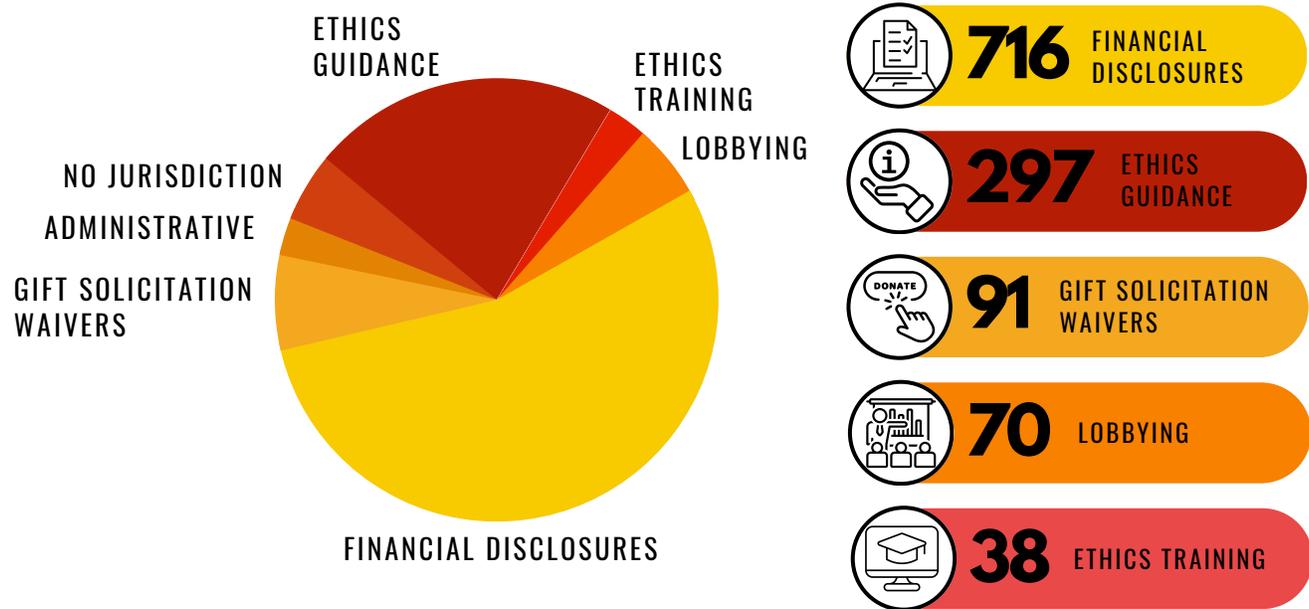
In FY23, Board staff received 1,314 requests for ethics advice and guidance, all of which were resolved in a timely manner, tracked in a database, and categorized by subject matter.

Technical requests about financial disclosure statements continued to decrease in FY23, likely due to additional improvements on the City’s online financial disclosure filing system, as well as users’ growing familiarity with the site. Likewise, technical questions about the Ethics Training decreased by nearly 80%, likely due to the training’s deployment on Workday, the City’s Human Resources and Finance application, and Board staff’s collaboration with the Department of Human Resources (“DHR”) to improve the training enrollment process.

Requests about charitable/governmental gift solicitation waivers saw the largest increase from FY22 to FY23, in conjunction with a record number of waivers approved by the Board.

Overall, the Board is pleased with this year’s metrics, as they demonstrate staff’s efforts to improve its programs and a broad awareness of the Board’s work.

1,314 HELP DESK REQUESTS BY CATEGORY



Board staff also received 36 administrative questions (e.g. forms, deadlines, etc.) and 66 requests that were outside of the Board’s jurisdiction.

ADVISORY OPINIONS

Pursuant to Subtitle 4 of the Ethics Law, any person subject to the Ethics Law may submit a written request for formal guidance from the Board in the form of an advisory opinion.

Moreover, any person subject to the Ethics Law is entitled to rely on an issued advisory opinion, so long as the opinion is reasonably applicable to that person's circumstances and has not been overruled by a later opinion or amendment to the Ethics Law or its regulations.

ONE OPINION & SEVEN LETTERS OF GUIDANCE

In FY23, the Board issued [Opinion 22-003](#), in which the Board determined that an official's acceptance of the unsolicited payment of travel and lodging from a "controlled donor," someone with certain affiliations with the City as defined in the Ethics Law and on [page 11](#), in exchange for the official's attendance at an event, would run afoul of the law's gift restrictions and would not qualify for an exception under the law.



In FY23, the Board provided seven formal letters of guidance on the application of the Ethics Law's conflict of interest provisions.

SECONDARY EMPLOYMENT WAIVERS

The Ethics Law prohibits public servants from holding employment outside of their City position that would raise a conflict of interest. Such includes employment with any entity that is subject to their authority or their agency's authority or that has or is negotiating a contract with their agency or a contract that includes matters related to or affected by their duties, among other restrictions.

Pursuant to Board Regulation 06.12.2, public servants may request a waiver from the Board to hold outside employment that is restricted by the Ethics Law. The Board may grant a waiver if the public servants meet specific criteria demonstrating that they are sufficiently removed from City matters involving the outside employer. In FY23, the Board granted one secondary employment waiver.

ONE SECONDARY EMPLOYMENT WAIVER

CHARITABLE/GOVERNMENTAL GIFT SOLICITATION WAIVERS

Sections 6-26 and 6-26 of the Ethics Law prohibit public servants from soliciting a gift from any person or entity considered a "controlled donor," meaning:

- someone who does/wants to do business with their agency;
- someone who is under the authority or control of their agency;
- someone who has a financial interest that could be substantially and materially affected by their duties; or,
- someone who has lobbied within the last year on matters within their jurisdiction.

Among other exceptions to this general prohibition, Board Regulation 06.26.1 permits public servants to broadly solicit donations for the benefit of an official governmental or charitable program or activity, so long as the program has been endorsed by the Board of Estimates and approved in advance by the Board upon written application. Among other criteria, the application must certify that the solicitation does not specifically target controlled donors and that donors will not receive preferential treatment in exchange for donations. Agencies that receive a waiver are required to periodically report to the Board the program's solicitations, donations, and expenditures.

38 GIFT SOLICITATION WAIVERS

In FY23, 38 charitable/governmental programs had gift solicitation waivers, compared to 25 in FY22. Of these waivers, one was for a workplace campaign, pursuant to Board Regulation 06.26.2, and another was issued in advance by the Board under Section 6-26(b)(2)(ii).

In FY23, 25 waivers were newly approved, compared to 15 approvals in FY22 and 11 approvals in FY21. Review the list of active gift solicitation waivers on the [Board's website](#).



ACCOUNTABILITY & COMPLIANCE



The Ethics Law requires many City public servants to annually file financial disclosure statements with the Board and disclose their interests and other information that could potentially raise a conflict. Additionally, the law requires all lobbyists to publicly register with the Board and to report their lobbying activity. These requirements promote transparency and accountability in the government.

Anyone may file a complaint with the Board if they suspect a violation of the Ethics Law. The Board must investigate complaints about potential violations of the Ethics Law and then take appropriate enforcement actions.

13

ETHICS COMPLAINTS



2,878

FINANCIAL DISCLOSURES FILED
IN 2022 & 2,965+ IN 2023



146

REGISTERED LOBBYISTS
IN 2022 & 133+ IN 2023



99%

FINANCIAL DISCLOSURE
COMPLIANCE IN 2022 & 2023



DID YOU KNOW?

CITY PUBLIC SERVANTS SHOULD NEVER USE THEIR CITY POSITION OR RESOURCES, INCLUDING THEIR TITLE, SIGNATURE, LETTERHEAD, EMAIL, OR CONNECTIONS, FOR THEIR PRIVATE GAIN OR THAT OF ANOTHER, PURSUANT TO § 6-36 OF THE ETHICS LAW.

FOR EXAMPLE, [ETHICS OPINION 14-001](#) DISCUSSES LETTERS OF RECOMMENDATION FOR VENDORS, WHICH COULD RUN AFOUL OF § 6-36.



FINANCIAL DISCLOSURES

Subtitle 7 of the Ethics Law requires many public servants to file a financial disclosure statement upon starting employment or their appointment to a City board, annually while serving the City, and upon their departure from their position. The purpose of the financial disclosure process is to help public servants identify potential conflicts of interest by disclosing their and their relative's interests, and promotes transparency and trust by making this information available to the public.

2,965+ FINANCIAL DISCLOSURES IN 2023

As of January 1, 2023, more than 2,700 public servants who held qualifying positions under the law were required to file an annual financial disclosure statement. As of this report's publication, 2,965 financial disclosure statements—including entry, annual, and departure statements and amendments—have been filled in 2023, compared to 2,878 in 2022. 99% of all required filers filed their annual financial disclosure statement in 2021, 2022, and 2023.

LOBBYING

Subtitle 8 of the Ethics Law requires any individual who communicates with a City public servant for the purpose of influencing any legislative, executive, or procurement action—or who solicits others to do so—to publicly register as a lobbyist with the Board if they meet certain compensation and expense threshold requirements. Registered lobbyists must publicly file periodic reports detailing their lobbying activity, including related compensation and expenses. The purpose of registration and reporting is to ensure that the public is adequately informed about the individuals and entities seeking to influence City policy, procurement, and legislation.

146 LOBBYISTS REGISTERED IN 2022

In calendar year 2022, 146 lobbyists registered with the Board and timely filed their activity reports by the deadlines prescribed in the Ethics Law. The Board collected \$14,600 in registration fees in 2022. So far in FY23, 133+ lobbyists have registered with the Board.



In FY23, in collaboration with BCIT, Board staff revamped the [lobbyist registration and reporting site](#), which provides clearer instructions, has a more user-friendly and modern design, and resolved many technical errors affecting the previous site. The [public list of registered lobbyists](#) even allows users to filter by name, keyword, and year.

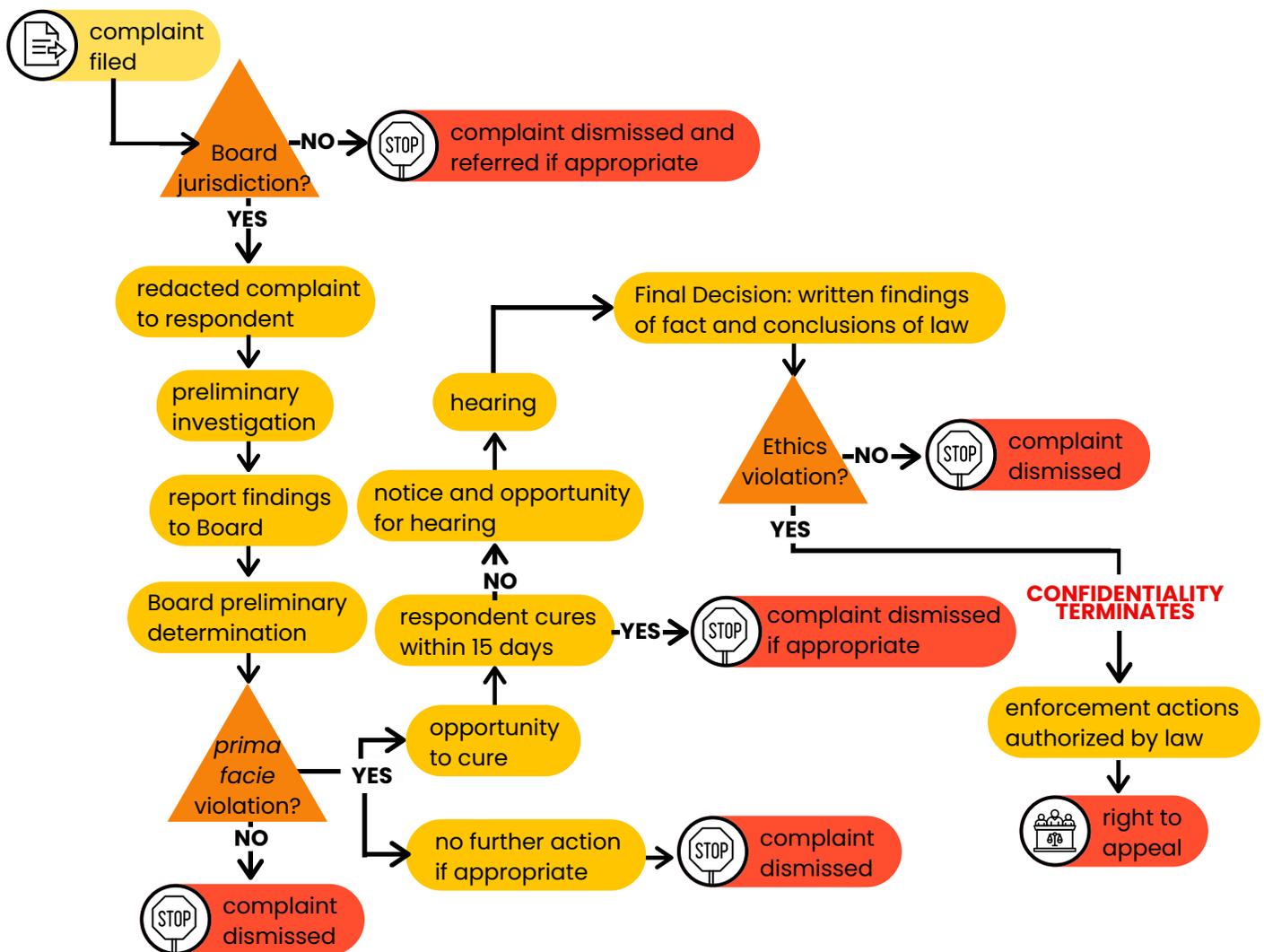
COMPLAINTS & INVESTIGATIONS

Anyone may file a complaint with the Board alleging a violation of the Ethics Law, pursuant to Subtitle 5. By law, the identity of the complainant is confidential. Complaint proceedings are also confidential unless and until the Board makes a final finding of a violation of the law after providing notice to the respondent and an opportunity for a hearing.

13 COMPLAINTS

In FY23, the Board received 13 signed complaints, of which eight were outside of the Board's jurisdiction. The remaining five are summarized on the following page, with identifying information removed. Cases 22-0002-E and 22-0003-E, which were reviewed by the Baltimore City Circuit Court, are summarized on [page 17](#).

COMPLAINT PROCESS



COMPLAINT 1 - GIFT SOLICITATION

A complaint alleged that a public servant affiliated with an agency with an active charitable/governmental gift solicitation waiver violated the Ethics Law's gift provisions by directly soliciting a donation from a controlled donor, as defined in Section 6-26 and on [page 11](#).

Section 6-26 of the Ethics Law generally prohibits a public servant from soliciting a gift from a controlled donor. Regulation 06.26.1 exempts the broad solicitation of donations for a charitable or governmental program from the law's restrictions on gift solicitation in Section 6-26 so long as agencies receive approval, by way of a waiver, from the Board and endorsement by the Board of Estimates, as well as comply with specific conditions and reporting requirements. In relevant part, the regulation prohibits agencies from directly targeting controlled donors.



The investigation revealed that the respondent did not solicit any donations for governmental program for which the agency obtained a gift solicitation waiver from the Board. The Board subsequently dismissed the complaint.

COMPLAINT 2 - CONFLICT OF INTEREST



The complaint alleged that officials' vote on proposed legislation violated the Ethics Law's conflict of interest provisions in Section 6-6 and prestige of office prohibition in Section 6-36. The proposed legislation would provide a considerable financial benefit to the respondents to which they were not previously entitled.

After conducting a preliminary investigation, the Board determined that the matter was rendered moot by the proposed legislation's failure to be passed.

COMPLAINT 3 - PRESTIGE OF OFFICE

A complaint alleged that a public servant violated Sections 6-26 and 6-36 of the Ethics Law by sharing a donation link for the public servant’s political campaign on the public servant’s City social media account.

Section 6-26 places restrictions on public servants’ solicitation of gifts, such as donations; however, Section 2-17(b) excludes political contributions from the definition of “gift” under the Ethics Law. Accordingly, the Board determined that the respondent did not solicit a gift by fundraising for the public servant’s political campaign

Section 6-36 prohibits public servants from using the “prestige” of their City position—including City resources, such as official social media accounts, City websites, and City-issued email address—for their private gain. The Board determined that the Ethics Law prohibits the respondent from conducting campaign activities via the respondent’s official social media account. In response to the Board’s determination, the respondent clarified that the social media account is operated by the respondent’s campaign committee and is not the public servant’s official account. Subsequently, the Board dismissed the complaint.

COMPLAINT 4 - PRESTIGE OF OFFICE

A complaint alleged that a public servant’s attendance and at a City hearing, at which the public servant testified, expressing support of a private entity’s application for a City permit, violated Section 6-36 of the Ethics Law, which prohibits public servants from using the prestige of their City position for private gain. This matter was pending at the end of FY23.



COMPLAINT 5 - CONFLICT OF INTEREST

A complaint alleged that a public servant violated the Ethics Law’s conflict of interest provisions by voting on a contract that would benefit a private entity with which the public servant was previously affiliated; the complainant stated that the private entity is a client of the public servant’s previous employer. This matter was pending at the end of FY23.

CASES 22-0002-E & 22-0003-E

On February 13, 2023, Judge Lawrence P. Fletcher-Hill of the Circuit Court for Baltimore City conducted a judicial hearing on the Board's Final Decision in Board Cases 22-0002-E and 22-0003-E. Judge Fletcher-Hill affirmed that the City Council President ("respondent") violated Section 6-26 of the Ethics Law by soliciting or facilitating the solicitation of a gift from a controlled donor, and Section 7-22 by failing to disclose his interest in a business entity on his annual financial disclosure statement. Judge Fletcher-Hill did not find that the respondent violated Section 6-27 by directly or indirectly accepting a gift from a controlled donor.

BACKGROUND

An investigation conducted in FY22 revealed that a special purpose trust was formed to benefit the respondent of two complaints and his spouse, that a representative for the trust established a website that requested viewers to donate to the trust and linked to a fundraising webpage, and that there were no mechanisms in place to verify the identity of the donors or restrict contributions from controlled donors.

After conducting a preliminary investigation, the Board determined that the respondent committed *prima facie* violations of the Ethics Law's gift restrictions in Sections 6-26 and 6-27, which generally prohibit a public servant from soliciting or accepting, directly or indirectly, gifts from controlled donors, through an indiscriminate, public, fundraising webpage. The respondent rejected the Board's opportunity to cure the violations, and, following an administrative hearing, the Board unanimously found that the respondent violated Section 6-26 and Section 6-27, as well as Section 7-22 by failing to disclose his beneficiary interest in the trust on his annual financial disclosure statement.

The Board issued an [Administrative Order](#) to address these violations. At the request of the respondent and as authorized by Section 5-8, Judge Fletcher-Hill of the Circuit Court for Baltimore City reviewed the [the Board's Final Decision](#) and supplementary memoranda, and affirmed two of the three determinations in the Board's Final Decision.

COMPLIANCE

Following the issuance of Judge Fletcher-Hill's Final Order, the respondent complied with the Board's Administrative Order, dated May 12, 2022, by providing the requested documents to the Board within the timeframe established by the Board.

OUTREACH & AWARENESS



Section 3-19 of the Ethics Law requires the Board to publicize information about the Ethics Law, its application, and its enforcement.

To that end, the Board must provide a training course on the requirements in the Ethics Law and must make forms and reports accessible to the public, including financial disclosure statements, lobbying activity reports, and deidentified versions of advisory opinions, among others. Pursuant to a 2019 amendment to the Ethics Law, the Board must provide City public servants a written notice of the Ethics Law’s requirements.

To accomplish its requirements, Board staff maintain the Board’s website and collaborate with BCIT and DHR to maintain the City’s Financial Disclosure Site and the Lobbying Activity Site.

465
ETHICS TRAINING ATTENDEES



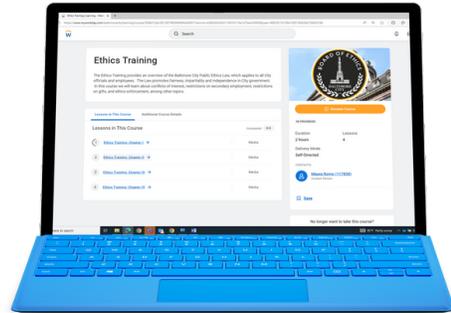
DID YOU KNOW?

PUBLIC SERVANTS SHOULD REFRAIN FROM SHARING ON SOCIAL MEDIA AN ONLINE DONATION LINK FOR A CHARITY, UNLESS THEY HAVE RECEIVED A GIFT SOLICITATION WAIVER FROM THE BOARD. BY POSTING THE LINK, PUBLIC SERVANTS MAY BE SOLICITING DONATIONS FROM CONTROLLED DONORS – INDIVIDUALS AND ENTITIES WITH CERTAIN AFFILIATIONS WITH THE CITY – WHICH IS GENERALLY PROHIBITED BY THE ETHICS LAW. LEARN MORE ABOUT THE ETHICS LAW’S GIFT RESTRICTIONS IN [ETHICS OPINION 16-001](#).



ETHICS TRAINING

Section 3-20 of the Ethics Law requires the Board to provide a two-hour training course on the Ethics Law and its requirements. In FY23, in collaboration with DHR, Board staff deployed the Ethics Training as an automated, virtual course on Workday. The training includes videos on the Ethics Law and interactive quizzes.



Board staff also created a new training enrollment webform, which directs public servants and members of the public to the training on Workday or, if they do not have access to Workday, to an alternative training on the Board’s website.

465 ETHICS TRAINING ATTENDEES

In FY23, 465 public servants completed the Ethics Training, of which 379 public servants enrolled in and completed the training via Workday; the remaining 86 individuals completed the training via the Board’s website.

SOCIAL MEDIA

Board staff maintain the Board’s social media accounts, including an X (Twitter) account and a YouTube channel, to share information about the Board and the Ethics Law. On the [Board’s YouTube channel](#), you can watch recordings of public meetings, financial disclosure tutorial videos, Ethics Law educational videos, and the Ethics Training.

 **YOUTUBE CHANNEL:** [@BALTIMOREETHICS](#)

 **X (TWITTER) PAGE:** [@BALTIMOREETHICS](#)

 **WEBSITE:** [HTTPS://ETHICS.BALTIMORECITY.GOV](https://ethics.baltimorecity.gov)





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