



December 18, 2019

**VIA ELECTRONIC MAIL**

Tonya Miller  
Office of the Mayor  
100 N. Holliday Street, Room 250  
Baltimore, Maryland 21202

Re: AFRAM 2020

Dear Ms. Miller:

At its December 11, 2019 meeting, the Ethics Board (the "Board") approved your Application received on November 19, 2019 to solicit sponsors in support of the 2020 AFRAM Festival. This 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 Board Regulation 06.26.1 and your Application.
2. *Reports.*
  - i. A Final 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.
  - ii. Based on your application's stated aggregated value of donations being sought {"between \$50,000 and \$150,000"}<sup>1</sup> and other factors, an Interim Report will be due once every 3 months from December 1, 2019.
3. *Expiration.* This approval expires on the date set forth in your Application, August 31, 2019. After that date, a new Application will be required for any further solicitation efforts.

**Notwithstanding this approval, the Board found your 2019 Final Report to be confusing and inconsistent. Specifically, the amount in Part III of the Report that you stated you received did not match the figures set forth in Part V. Further, the Board notes that you failed to file an interim report as required by the approval letter issued by the Board in for the 2019 solicitation. The Board urges you, prior to submitting any reports in connection with this solicitation, to work with Board staff to ensure that your report is appropriately completed.**

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<sup>1</sup>Your application checks 2 boxes for the appropriate range when you are only to check 1. To allow your office greater flexibility, the Board has placed you in the higher range.



**Please note: A new Application for additional solicitation efforts will not be considered complete and cannot be approved unless all Reports then due under this approval have been completed and filed with the Ethics Board.**

If you have any questions, please do not hesitate to let us know.

Very truly yours,

A handwritten signature in black ink, appearing to read "Tony DeFranco", with a long horizontal flourish extending to the right.

Tony DeFranco  
Deputy Ethics Counsel