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**CITY OF LAUREL, MARYLAND
ETHICS COMMISSION**

8103 Sandy Spring Road • Laurel, Maryland 20707

February 9, 2006

Via Regular Mail

[REDACTED]
[REDACTED]
[REDACTED]

*RE: Request for Opinion and/or Waiver
from Section 2-262(e)*

Dear [REDACTED]

Thank you for your letter dated January 3, 2006, requesting an opinion and/or waiver of Section 2-62 of the Ethics Code of the City of Laurel. Also, thank you for attending the Commission meeting of January 24, 2006, and testifying concerning your new position.

Section 2-62 deals with prohibited acts and subsection (e) specifically prohibits acting as a compensated representative of another in connection with any specific matter in which a person participated substantially on behalf of the City. You testified that a small part of your job for the City involved the [REDACTED]. You [REDACTED] from your City position and incorporated yourself to do consulting work.. You, in turn, were contacted by another company who is under contract to Prince George's County to assist it in creating the [REDACTED]. As such, you are under contract to this other company and have been assisting in the creation of the [REDACTED] boards and committee's. You have never appeared before the City or any of its boards or committees and have not lobbied any City official or employee. You stated there would be no reason for you to do any of the above because you are only a consultant to the company working for the County. You further agreed not to do any of the above even if requested.

Based on your letter and testimony, the Laurel Ethics Commission decided by unanimous vote that:

- when you were employed by the City of Laurel you had a substantial role in the City's decision to participate in the creation of the [REDACTED] boards

- Laurel Ethics Ordinance Section 2-62(e) specifically prohibits any city official or employee, within one year following termination of city service, to act as a compensated representative of another in connection with any specific matter in which they participated substantially on behalf of the city
- to date, you will have not represented your company or the company to which your company is subcontracted to support the [REDACTED] system before any official, appointee or employee of the City of Laurel and therefore you have not violated Section 2-62(e)
- there is no expected need for your company to interact with any City of Laurel official, appointee or employee on the [REDACTED] project. Should there come a need for the City of Laurel to interact on the [REDACTED] program in the future, there are others in the larger company to whom your company is subcontracted, who would represent the project to the City
- you are free to advise the company to whom you are subcontracted on their work with the City of Laurel so long as it does not include appearing with them before the City
- this restriction on your personal representation before the City in this project will expire on the day after your one-year anniversary of your last official day as a City of Laurel employee

The Commission thanks and commends you for coming to us to request clarification on this matter. We also thank you for your years of valued service to the City and your subsequent commitment to such an important project that will continue to benefit the citizens of Laurel.

Please feel free to contact us again if we can provide any further advice on compliance with the Ethics Ordinance.

Again, thank you for your cooperation in this matter.

Sincerely,

James Hester
Chairman

