



**ETHICS REVIEW PANEL  
BOARD OF EDUCATION OF BALTIMORE COUNTY  
6901 CHARLES STREET, BUILDING C  
TOWSON, MARYLAND 21204  
443-809-4138**

**FINANCIAL DISCLOSURE STATEMENT INSTRUCTIONS**

(Pursuant to Board of Education Policy 8364, Title 5, Subtitle 8 of the Maryland Public Ethics Law, and COMAR 19A.05)

**A MESSAGE TO THOSE WHO ARE REQUIRED TO FILE DISCLOSURE STATEMENTS**

Please read the instructions carefully and be sure to provide all information requested for each interest you are required to disclose on your Statement.

All individuals are responsible for reporting relationships with entities doing business with the Board as required in certain Schedules. If you are aware of any such entity, you must report it, no matter the amount of business conducted with the Board. If you are not certain whether an entity does business with the Board, you may access the vendors doing business with the Board in the amount of \$5,000.00 or more by clicking "Spend Analysis" on the Purchasing web site at: [https://businessservices.bcps.org/departments/fiscal\\_services/purchasing/spend\\_analysis](https://businessservices.bcps.org/departments/fiscal_services/purchasing/spend_analysis).

If you have any questions about a business entity doing business with the Board in an amount less than \$1,000.00, please contact the Office of Purchasing at 443-809-4334 or by e-mail at [bcpspurchasing@bcps.org](mailto:bcpspurchasing@bcps.org).

Financial Disclosure Statements are public records that may be examined or copied by the public. If you wish the Board to notify you of the name and address of any individual who requests to examine or copy your Statement, other than for an internal or external audit, please check the appropriate box on the cover page of the Statement.

If you have any questions about the completion of the Financial Disclosure Statement, you should e-mail your questions to: [ethics@bcps.org](mailto:ethics@bcps.org).

Thank you for your cooperation.

## GENERAL INSTRUCTIONS

### A. Persons Required to File Financial Disclosure Forms

1. The Superintendent;
2. Superintendent's Cabinet Members, including the Deputy Superintendent.
3. General Counsel;
4. Principals;
5. Employees in the positions of senior executive director, executive director, administrator, controller, director, manager, coordinator, fiscal officer, and fiscal supervisor;
6. Purchasing agents., procurement and supply supervisor, third party billing supervisor, and minority business enterprise (MBE) consultants;
7. Any other employees who have authority to make the final decision to commit the school system to the expenditure of public funds; and
8. Other employees so designated by the Board.

### B. When to File

1. Each individual required to file a financial disclosure statement must file a statement **on or before April 30** each year during that person's term in office for the previous calendar year.
2. An individual who is appointed to fill a vacancy in an office for which a financial disclosure statement is required, shall file a Statement **within 30 days** after appointment.
3. An individual who leaves a position or office for which a statement is required shall file **within 60 days** after leaving the position or office:
  - a. A financial disclosure statement for the calendar year immediately preceding the year in which the individual left office, unless a statement covering the year has already been filed; and
  - b. A Separation Statement that covers the portion of the current calendar year during which the individual held the position or office.

**C. Where to File and Where to Obtain a Separation Statement**

The Financial Disclosure Statement must be signed and sent to: Ethics Review Panel, 6901 Charles Street, Building C, Towson, Maryland 21204.

A Separation Statement may be obtained by contacting the office of the Ethics Review Panel; you may contact the office by phone at 443-809-4138 or by e-mail at [ethics@bcps.org](mailto:ethics@bcps.org).

**D. Identifying Information/Profile**

Provide your **name, school system position, home address, office/school name, office/school address, office/school phone number, and work e-mail address.**

**E. Signature**

Willful and false filing is *subject to the penalties of perjury* as provided in § 9-101, Criminal Law Article, *Annotated Code of Maryland*. All Statements filed with the Panel must therefore be signed and dated under the OATH provided on the Statement. Original signatures are required.

**F. Request for Inspection**

Please check the box on the Profile Page if you would like to be notified if any individual makes a request, other than for an internal or external audit of the school system, to inspect your statement. If you wish to be notified in the event such request is made, please check the box.

**G. Schedules**

Check "yes" or "no" to each statement listed for Schedules A - J. **Do not leave any statement unanswered.**

(Note: Each statement corresponds to a Schedule. If you have a question as to the meaning of a statement, review Policy 8364 for a more detailed description of the interests involved.)

**H. Please note:**

The amended financial disclosure policy now includes a reporting requirement for a "Quasi-governmental entity" which is defined as: an entity that is created by State statute, that performs a public function, and that is supported in whole or in part by the State but is managed privately. See, Policy 8360 (II)(Z)

## **SCHEDULE A – INTERESTS IN REAL PROPERTY**

You must report all interests in real property held by yourself, or by a partnership, limited liability partnership, or limited liability company in which you have an interest when the real property was held at any time during the reporting period. You must report real property whether it is located in or outside of Maryland. If you own/lease an interest in more than one piece of real property, complete a separate schedule for each real property interest.

You must report your personal residence if it is owned directly by you, attributable to you or rented by you. If you own additional properties (i.e., vacation property, condominium, timeshare, vacant lot/land, etc.), you will be required to report these as well. Note also that all appropriate information (e.g., date, seller, etc.) must be reported for land you own whether or not you have constructed improvements on it.

Partnership property must also be disclosed, without regard to the extent of your interest in the partnership.

You must also report any interest you have in leasehold property, for example, property in which you are tenant, including business offices and personal residences. The following interests are considered to be the interests of the individual making the statement: (1) An interest held by a member of the individual's immediate family, if the interest was, at any time during the reporting period, directly or indirectly controlled by the individual. (2) An interest held, at any time during the applicable period, by: (i) A business entity in which the individual held a (10)% or greater interest; (ii) A business entity described in section (i) of this subsection in which the business entity held a 25% or greater interest; (iii) A business entity described in section (ii) of this subsection in which the business entity held a 50% or greater interest; and (iv) A business entity in which the individual directly or indirectly, though an interest in one or a combination of other business entities, holds a 10% or greater interest. (3) An interest held by a trust or an estate in which, at any time during the reporting period: (i) The individual held a reversionary interest or was a beneficiary; or (ii) If a revocable trust, the individual was a settlor.

Schedule A deals with real property interests only; do not report your interests in business entities here. If real property held by an entity is attributable to you or is a partnership, limited liability partnership, or limited liability company property, do not list your interest in an entity on Schedule A; report your interest in the entity on Schedule B, C, or H (whichever is appropriate) if it falls within the reporting requirements of those schedules.

Answer Schedule A, Questions 1 through 12C. The Ethics Law requires for each property to be disclosed that you provide the location, the type of property, the nature and extent of your interest, the identity of other persons holding an interest in the property, encumbrances, date and manner of acquisition, the identity of the person from whom you acquired the property, and the nature and amount of consideration (e.g., purchase price of property).

Additionally, if you transferred the property during the calendar year, you are required to provide the name of the person to whom you transferred the property, the portion of interest transferred,

and the amount of consideration received. This information is often accessible on the Maryland Real Property Search Web site of the State Department of Assessment and Taxation at: <http://sdat.resiusa.org/realproperty/pages/viewdetails.aspx>

### **SCHEDULE B – INTERESTS IN CORPORATIONS/PARTNERSHIPS**

You must report all interests in any corporation, partnership, limited liability partnership or limited liability company held by you during the reporting period, regardless of whether the entity does business with the Board of Education. If you have more than one interest to disclosure, complete a separate schedule for each corporation/partnership interest.

Examples of frequently disclosed items on this schedule are corporate stocks, corporate bonds, partnerships, and interests in mutual funds (not the individual holdings of the mutual funds).

Filers are not required to disclose:

1. An interest held in the capacity of a personal agent, custodian, fiduciary, personal representative or trustee, unless the holder has an equitable interest in the subject matter;
2. An interest in a time or demand deposit in a financial institution;
3. An interest in an insurance policy, endowment policy or annuity contract under which an insurance company promises to pay a fixed number of dollars either in a lump sum or periodically for life or some other specified period;
4. A common trust fund or a trust which forms part of a pension or profit sharing plan which has more than 25 participants and which has been determined by the Internal Revenue Service to be a qualified trust under the Internal Revenue Code;
5. A qualified college savings plan under section 529 of the Internal Revenue Code; or
6. A mutual fund that is publicly traded on a national scale unless the mutual fund is composed primarily of holdings of stocks and interests in a specific sector or area that is regulated by the individual's office.

Answer Schedule B, Questions 1 through 8C. The Ethics Law requires for each interest to be disclosed that you give the name and address of the entity, the nature and extent of your interest, the amount of the interest, other interests held in the entity, and any encumbrances or conditions.

Additionally, if the interest was acquired during the calendar year, the date and manner of acquisition, the identity of the person from whom you acquired the interest, and the nature and amount of consideration will need to be disclosed. If the acquisition solely consists of an addition to an existing, public traded corporate interest acquired by dividend or dividend reinvestment is less than \$500, you need not provide any additional information.

Finally, if you transferred the interest during the calendar year, the name of the person to whom you transferred the interest (if known), the portion of interest transferred and the amount of consideration received.

The following interests are considered to be the interests of the individual making the statement:  
(1) An interest held by a member of the individual's immediate family, if the interest was, at any

time during the reporting period, directly or indirectly controlled by the individual. (2) An interest held, at any time during the applicable period, by: (i) A business entity in which the individual held a (10)% or greater interest; (ii) A business entity described in section (i) of this subsection in which the business entity held a 25% or greater interest; (iii) A business entity described in section (ii) of this subsection in which the business entity held a 50% or greater interest; and (iv) A business entity in which the individual directly or indirectly, through an interest in one or a combination of other business entities, holds a 10% or greater interest. (3) An interest held by a trust or an estate in which, at any time during the reporting period: (i) The individual held a reversionary interest or was a beneficiary; or (ii) If a revocable trust, the individual was a settlor.

### **SCHEDULE C – INTERESTS IN BUSINESS ENTITIES DOING BUSINESS WITH THE BOARD OF EDUCATION**

You must report all interests in any non-corporate business entity not disclosed on Schedule B that does business with the Board of Education. A sole proprietorship is the type of entity that is included on this Schedule. If you have more than one business interest to disclose, complete a separate schedule for each business interest.

Doing business with – means

1. Having or negotiating a contract that involves the commitment, either in a single or combination of transactions, of \$5,000.00 or more of school system funds;
2. Being subject to the authority of the Board or school system;
3. Being registered as a lobbyist with the Board; or
4. Pursuing commercial financial transactions with the school system.

Answer Schedule C, Questions 1 through 6C. The Ethics Law requires for each interest in any non-corporate business entity doing business with the Board of Education that you give the name and address of the entity, the nature and extent of your interest, the amount of the interest, other interests held in the entity, and any encumbrances or conditions. Additionally, if the interest was acquired during the calendar year, the date and manner of acquisition, the identity of the person from whom you acquired the interest, and the nature and amount of consideration will need to be disclosed.

All individuals are responsible for reporting relationships with entities doing business with the Board of Education, as required in certain schedules. If you are aware of any such entity, you must report it, no matter what the amount of business with the school system. If you are not certain whether or not the entity does business with the school system, you may access the names of vendors doing business with the Board of Education or the Baltimore County Public Schools in the amount of \$5,000.00 or more by clicking “Spend Analysis” on the Purchasing Web site at: [https://businessservices.bcps.org/departments/fiscal\\_services/purchasing/spend\\_analysis](https://businessservices.bcps.org/departments/fiscal_services/purchasing/spend_analysis)

An individual who is required to disclose the name of a business under this section shall disclose any other names that the business is trading as or doing business as.

Finally, if you transferred the interest during the calendar year, the name of the person to whom you transferred the interest (if known), the portion of interest transferred and the amount of consideration received.

The following interests are considered to be the interests of the individual making the statement:

(1) An interest held by a member of the individual's immediate family, if the interest was, at any time during the reporting period, directly or indirectly controlled by the individual. (2) An interest held, at any time during the applicable period, by: (i) A business entity in which the individual held a (10)% or greater interest; (ii) A business entity described in section (i) of this subsection in which the business entity held a 25% or greater interest; (iii) A business entity described in section (ii) of this subsection in which the business entity held a 50% or greater interest; and (iv) A business entity in which the individual directly or indirectly, through an interest in one or a combination of other business entities, holds a 10% or greater interest. (3) An interest held by a trust or an estate in which, at any time during the reporting period: (i) The individual held a reversionary interest or was a beneficiary; or (ii) If a revocable trust, the individual was a settlor.

#### **SCHEDULE D – GIFTS**

You must report each gift in excess of \$20 in value, or a series of gifts totaling \$100 or more received during the reporting period from or on behalf of, directly or indirectly, any one person who does business with the Board of Education or from an association, or any entity acting on behalf of an association that is engaged only in representing counties or municipal corporations.

*IF YOU HAVE MORE THAN ONE GIFT TO DISCLOSE, COMPLETE A SEPARATE SCHEDULE FOR EACH GIFT RECEIVED.*

Doing business with – means

1. Having or negotiating a contract that involves the commitment, either in a single or combination of transactions, of \$5,000.00 or more of school system funds;
2. Being subject to the authority of the Board or school system;
3. Being registered as a lobbyist with the Board; or
4. Pursuing commercial financial transactions with the school system.

Please answer Schedule D, Questions 1 through 4. The Ethics Law requires you report a description and value of the gift, and the person/entity from whom the gift was received.

(Note: "Gift" does not include the solicitation, acceptance, receipt or regulation of political campaign contributions regulated under the Elections Law Article, Annotated Code of Maryland, or any other provision of State or local law regulating the conduct of elections or the receipt of political campaign contributions.)

## **SCHEDULE E – EMPLOYMENT WITH OR INTEREST IN ENTITIES DOING BUSINESS WITH THE BOARD OF EDUCATION**

You must report the name and address of the principal office of each business entity doing business with the Board of Education in which, at any time during the reporting period, you or a member of your immediate family (spouse and dependent children) held an office, directorship, salaried employment, or similar interest. If you have more than one employment/interest to disclose, complete a separate schedule for each business interest.

Also list any other similar interests (such as being a partner) held by you or a member of your immediate family during the reporting period, and not otherwise disclosed on this Schedule, in any business entity doing business with the Board of Education. For example, the presidency of a corporation or a partnership in a law firm should be reported, as should employment as an engineer in a consulting firm, if that corporation or firm does business with the Board.

Doing business with – means

1. Having or negotiating a contract that involves the commitment, either in a single or combination of transactions, of \$5,000.00 or more of school system funds;
2. Being subject to the authority of the Board or school system;
3. Being registered as a lobbyist with the Board; or
4. Pursuing commercial financial transactions with the school system.

Answer Questions 1 through 5. The Ethics Law requires for each position reported, you provide the name and address of the principal office of the business entity, the title and nature of the office held and date it commenced and identify the nature of the business relationship with the Board.

All individuals are responsible for reporting relationships with entities doing business with the Board of Education, as required in certain schedules. If you are aware of any such entity, you must report it, no matter what the amount of business with the school system. If you are not certain whether or not the entity does business with the school system, you may access the names of vendors doing business with the Board of Education or the Baltimore County Public Schools in the amount of \$5,000.00 or more by clicking “Spend Analysis” on the Purchasing Web site at: [https://businessservices.bcps.org/departments/fiscal\\_services/purchasing/spend\\_analysis](https://businessservices.bcps.org/departments/fiscal_services/purchasing/spend_analysis)

## **SCHEDULE F – DEBTS YOU OWE TO ENTITIES DOING BUSINESS WITH THE BOARD OF EDUCATION**

You are required to report all debts owed by you and by members of your immediate family (spouse and dependent children) during the reporting period to any entity doing business with the Board of Education or regulated by your school system unit or department. (Do not report retail credit accounts.) You must, however, include installment loans, mortgages, car loans, or other time-fixed liabilities owed to an entity doing business with the Board of Education. If you have more than one Debt/liability to disclose, complete a separate schedule for each.



Doing business with – means

1. Having or negotiating a contract that involves the commitment, either in a single or combination of transactions, of \$5,000.00 or more of school system funds;
2. Being subject to the authority of the Board or school system;
3. Being registered as a lobbyist with the Board; or
4. Pursuing commercial financial transactions with the school system.

Answer Schedule F, Questions 1 through 7. The Ethics Law requires that you identify the person or entity to whom the debt is owed, the date the debt was incurred, the terms of payment of the debt, the amount of the debt owed as of the last day of the calendar year, terms of payment and the extent to which the principal amount of the debt increased or decreased during the calendar year, and a description of any security given for the debt. Additionally, if this transaction resulted in a debt being owed by your spouse or dependent child, you need to identify your spouse and/or child and describe the transaction.

All individuals are responsible for reporting relationships with entities doing business with the Board of Education, as required in certain schedules. If you are aware of any such entity, you must report it, no matter what the amount of business with the school system. If you are not certain whether or not the entity does business with the school system, you may access the names of vendors doing business with the Board of Education or the Baltimore County Public Schools in the amount of \$5,000.00 or more by clicking “Spend Analysis” on the Purchasing Web site at: [https://businessservices.bcps.org/departments/fiscal\\_services/purchasing/spend\\_analysis](https://businessservices.bcps.org/departments/fiscal_services/purchasing/spend_analysis)

#### **SCHEDULE G - FAMILY MEMBERS EMPLOYED BY THE BOARD OF EDUCATION**

You are required to report each member of your immediate family (spouse and dependent children) who are employed by the Board of Education. If you have more than one immediate family member to report, complete a separate schedule for each family member.

Answer Schedule G, Questions 1 through 3. The Ethics Law requires you provide the name of each member of your immediate family who was employed by the Board of Education in any capacity at any time during the reporting period. Include the title of the immediate family member’s position.

#### **SCHEDULE H – SOURCES OF EARNED INCOME**

You are required to report all sources of earned income from any business/entity from which you or a member of your immediate family received a salary or earned income as a sole or partial owner of a business. If you have more than one source of earned income to disclose, complete a separate schedule for each.

For a statement filed on or after January 1, 2019, if your spouse is a lobbyist regulated by the Board, you must disclose the entity that has engaged your spouse for lobbying purposes.

Answer Questions 1 and 2. The Ethics Law requires you disclose the name and address of all places of employment and/or of business entities wholly or partially owned by you, your spouse or a dependent child, and from which income was earned during the reporting period whether or not the entity did business with the Board of Education. For example, salaried employment, individual consulting activities, private practices, and business activities involving income-producing real property. A minor child's employment or business ownership does not need to be reported if the Board does not regulate, exercise authority over, or contract with the place of employment or business entity of the minor child.

**SCHEDULE I – RELATIONSHIP WITH THE UNIVERSITY OF MARYLAND MEDICAL SYSTEM AND OTHER STATE AND LOCAL GOVERNMENT ENTITIES/QUASI-GOVERNMENTAL ENTITIES**

You are required to report any financial or contractual relationship with: (1) the University of Maryland Medical System (2) a governmental entity of a state or a local government in the state or (3) a quasi-governmental entity of the State or a local government of the State. For each financial or contractual relationship reported, you must report (1) a description of the relationship; (2) the subject matter of the relationship and (3) the consideration you received.

**SCHEDULE J – OTHER**

You may use this Schedule for any interest or transactions you have not been required to disclose on Schedules A through I, but you wish to disclose. This schedule may also be used to further explain any prior entry.

<FOR ADDITIONAL INFORMATION, PLEASE REFER TO THE BOARD'S ETHICS CODE POLICIES>