

<b>FROM</b>	NAME & TITLE	Maggie Master, Chief of Staff
	AGENCY NAME & ADDRESS	Office of Councilman Zeke Cohen's RM 522, City Hall
	SUBJECT	Government/Charitable Solicitation Application

CITY OF BALTIMORE

**MEMO**



DATE: 07/22/2022

**TO** To Honorable Clerk of the Board  
of Board of Estimates  
Room 204, City Hall

**Re: Governmental/Charitable**

**Solicitation Application**

**ACTION REQUESTED OF THE BOARD OF ESTIMATES:**

The Board is requested to endorse a Governmental/Charitable Solicitation Application for submission to the Board of Ethics of Baltimore City to allow Councilmember Zeke Cohen and staff to solicit donations to support the creation of an Office of Aging, including support for staff headcount and programming. The period of the campaign, pending Board approval, will be effective upon Board approval to August 10, 2023.

**AMOUNT AND SOURCE OF MONEY:**

No general funds will be used.

**BACKGROUND AND EXPLANATION:**

Donations will be solicited from Baltimore businesses, civic leaders, the foundation community, and the general population. A potential donor list will be composed of individuals, organizations, businesses, and foundations that contribute to the economic, social, and cultural vitality of Baltimore City. Most of the individual and corporate entities fitting that description are not controlled donors. However, those potential donors who are controlled donors with respect to the City Council or the Board of Estimates will not be targeted or singled out in any way and will be solicited, if at all, in the same manner as the other potential donors.

The Office of Aging is a pending office within the Mayor's Office that will directly support Baltimore City residents, age 65 and older. The Office of Aging will be an independent agency including a Director of the Office and providing for the appointment, structure, and governance of a Commission on Aging. This office shall evaluate the service needs of older individuals in the city, determine the extent to which existing public and private programs meet their needs, establish priorities, coordinate, assess, evaluate and educate the public and professionals about programs and services important to the well-being of older adults, as well as other duties.

In recent years, much of the support for older adults has been based out of the Baltimore City Department of Health within the Area Agency on Aging. This agency is mandated to coordinate assistance of services to support older adults, with a mission of supporting them to remain healthy and independent. That Area Agency has had noted limitations, and so the Office of Aging will support interagency collaboration across a variety of areas including housing, public health, employment, transportation and education.

Historically, a limiting factor for the Area Agency on Aging has been limited funding for programming.

Councilmember Cohen and his staff intend to raise \$500,000 dollars or more in this campaign. These funds will pay to support the hiring of a Director of Aging and additional staff, as well as to support a variety of programming and/or grants for older adults throughout the year.

Baltimore City Code Article 8, Section 6-26, prohibits solicitation or facilitating the solicitation of a gift. An exception was enacted in 2005 to permit certain solicitations that are for the benefit of an official governmental program or activity, or a City endorsed charitable function or activity. Ethics Regulation 96.26B sets out the standards for approval, which includes the requirement that the program, function or activity to be benefited and the proposed solicitation campaign must be endorsed by the Board of Estimates or its designee.

**MBE/MWE PARTICIPATION:**

N/A

APPROVED BY BOARD OF ESTIMATES:



By Celeste.Amato at 11:36:06 AM, 8/24/2022

CLERK

DATE



**BALTIMORE CITY ETHICS BOARD**

635 City Hall  
100 N. Holliday Street  
Baltimore, Maryland 21202  
(410) 396-7986  
ethics@baltimorecity.gov

**GOVERNMENTAL/CHARITABLE SOLICITATIONS –  
APPLICATION FOR APPROVAL**

NAME OF BENEFITTED PROGRAM / CHARITY: Mayor's Office of Aging

**PART A. SPONSORING AGENCY**

Name Office of Councilmember Zeke Cohen

Address \_\_\_\_\_

Contact Person / Coordinator Maggie Master, Chief of Staff

Telephone (410) 396-4821 Email maggie.master@baltimorecity.gov

**PART B. PURPOSE OF PROPOSED SOLICITATION:**

**I. Identify the specific governmental or charitable program, function, or activity for which solicitations will be made:**

Mayor's Office of Aging  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**II. Describe the specific purposes to which contributions and other receipts will be applied:**

Donations will be used to support the creation of a Mayor's Office of Aging, including support for staff headcount and programming or grants for older adults.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**III. Select the appropriate range for the aggregate value of the contributions sought:**

- \$500,000 or more
- between \$150,000 and \$500,000
- between \$50,000 and \$150,000
- between \$5,000 and \$50,000
- less than \$5,000

**PART C. CITY ENDORSEMENT**

By: \_\_\_\_\_ Board of Estimates \_\_\_\_\_ Designee of B/E: \_\_\_\_\_  
Date and Manner of Endorsement: \_\_\_\_\_

**Attach Copy of Written Endorsement**

**PART D. WHEN AND HOW SOLICITATION TO BE CONDUCTED**

- I. Proposed starting date of solicitation efforts:** immediately upon approval
- II. Proposed ending date of solicitation efforts:** August 10, 2023

**III. Describe the categories of persons to be solicited and by whom and how those solicitations will be made:**

This campaign will target individuals, organizations, businesses, and foundations with a history of supporting the health, wellness and independence of older adults and Baltimore City residents. They will be contacted by Councilman Cohen and his staff through emails, calls, internet, and social media (Twitter, Instagram, Facebook etc)  
\_\_\_\_\_  
\_\_\_\_\_

**IV. Identify all *public servants* who will be soliciting contributions**

Councilmember Zeke Cohen and his staff will be directly soliciting contributions.  
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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**V. Describe measures to be taken to ensure that the solicitation (i) will be directed at a broad range of donors and (ii) will not specially target *controlled donors*:**

~~Potential donors will be solicited based on their history of participating in initiatives related to supporting the health, wellness and independence of older adults and Baltimore City residents. Most potential donors fitting this description are not controlled donors. However, those potential donors who are controlled with respect to the City Council or Board of Estimates will not be targeted or singled out in any way and will be solicited, if at all, in the same manner as other potential donors.~~

**VI. Describe measures to be taken to avoid any suggestion that contributors might receive special access or favored treatment from any *agency* or *public servant* of the City:**

~~Donors will be made aware that their donation will be directed towards community conversations, events, and programming that relates directly to supporting older adults, as well as for the purposes of ramping up staff headcount. The focus of all solicitation requests and promotion of the office will focus on the potential benefits to older adults and the community. The purpose of those funds will be made clear to all those donating and donors will be informed they will not gain favors or special access with their donation.~~

**PART E. Fiscal Sponsor PERSON RESPONSIBLE FOR CUSTODY, ACCOUNTING, AND DISTRIBUTION OF DONATIONS)**

Note: This individual may not be employed by the *Sponsoring Agency*.

Name Baltimore Civic Fund

Address \_\_\_\_\_

Telephone (443) 540-6113 Email christina@baltimorecivicfund.org

**I. Disclose the person or persons within the distributing entity who will be responsible for fund distribution and accounting.**

Please see attachment for Part E  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**II. Describe how the funds will be held pending distributions, e.g., held in a trust or other dedicated account, in a general account, co-mingled with other funds, etc.**

Please see attachment for Part E  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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**III. What measures will be taken by the distributing entity to ensure that the donations will actually be used for the intended purpose?**

Please see attachment for Part E

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**IV. What measures are in place to account for the donations? In the event that donations exceed the charitable need, please state how the additional funds will be allocated or dispersed.**

Please see attachment for Part E

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**V. Please provide details about the measures that will be taken by the distributing entity to ensure to ensure that controlled donors will not receive preferential treatment.**

Please see attachment for Part E

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**PART F. SIGNATURE AND AFFIRMATION**

I affirm under the penalties of perjury that the contents of this Application and of all accompanying attachments are true to the best of my knowledge, information, and belief.

Date: 7/21/2023

FOR: Zeke Cohen, councilmember  
*{Type/Print Name of Sponsoring Agency}*

BY:   
*{Signature}*

Maggie Master, Chief of Staff  
*{Type/Print Name of Sponsoring Agency}*

Suite 522, City Hall  
*{Type/Print Office Address}*

410-396-4821  
*{Type/Print Office Telephone Number}*

maggie.master@baltimorecity.gov  
*{Type/Print Email Address}*

APPROVED BY THE BOARD OF ESTIMATES



By Celeste Amato at 11:36:31 AM, 8/24/2022

Clerk

Date

## 2022-2023 Office of Aging- Governmental/Charitable Solicitation Application

Office of Councilmember Zeke Cohen

### **Part E. Fiscal Sponsor Person Responsible for Custody, Accounting, and Distribution of Donations**

**I. Disclose the person or persons within the distributing entity who will be responsible for fund distribution and accounting.**

The Baltimore Civic Fund's Director of Finance and Operations, Tammy Grinnan, is responsible for fund distribution and accounting. The Civic Fund's President, HyeSook Chung, is responsible for reviewing and approving all disbursements. Program Manager, Christina Gatto, can provide reports and other information about program account use.

**II. Describe how the funds will be held pending distribution, e.g., held in a trust or other dedicated account, in a general account, co-mingled with other funds, etc.**

The Baltimore Civic Fund holds funds in a co-mingled account wherein every program account is segregated by a unique identifying program account code that is only accessible by the authorized contacts and uses. This project will hold funds in a program account for the Office of Aging in the Mayor's Office.

**III. What measures will be taken by the distributing entity to ensure that the donations will actually be used for the intended purpose?**

The Baltimore Civic Fund keeps records of all supporting documentation given for donations, including grants and other conditional funding. Grants are assigned transaction codes in our financial system. All disbursements from the accounts are initiated by a payment request form completed by the program, and signed by the program's authorized signatory (agency director or designated staff), all payments must align to the stated scope of the program account.

**IV. What measures are in place to account for the donations? In the event that donations exceed the charitable need, please state how the additional funds will be allocated or dispersed.**

Donations are input into our financial system with supporting documentation uploaded with the deposit. Donations are coded as contributions and grants are assigned grant codes. The Civic Fund sends donors gift acknowledgment letters. The funds remain in the program's



account to be used in accordance to the scope of the program unless otherwise directed by the donor.

V. **Please provide details about the measures that will be taken by the distributing entity to ensure that controlled donors will not receive preferential treatment.**

All disbursements need authorization by the Civic Fund program's authorized signatory, sufficient supporting documentation and are made in accordance of the IRS guidelines for nonprofits.