



## MONTGOMERY COUNTY ETHICS COMMISSION

**February 11, 2026**  
**Waiver 26-02-003**

Pursuant to § 19A-12(b)(1)(B) of the Public Ethics Law, a public employee must not be employed by a business that negotiates or contracts with the County agency with which the public employee is affiliated, unless the Ethics Commission grants a waiver.

Colette Anammah is a Government Assistance Eligibility Specialist II (GAES II) at the Social Services Division (SSD) of the Montgomery County Department of Health and Human Services (DHHS). She would like to engage in outside employment as a Respite Care Worker for Easter Seals, an entity that has one contract with DHHS.

As a GAES II with SSD, Ms. Anammah's responsibilities include processing supplemental nutrition assistance, medical assistance, temporary disability assistance and temporary cash assistance applications for any person or family who seeks such help in Montgomery County.

In her proposed outside employment as a Respite Care Worker for Easter Seals, she would be working to ensure the safety and well-being of children with various health challenges, providing physical care, initiating and supervising activities, and maintaining the home environment. Ms. Anammah would have no contract monitoring, procurement or execution responsibilities in her role with Easter Seals, and she has no contract monitoring responsibilities in her official capacity with SSD either.

Easter Seals has one contract with DHHS to provide adult medical day care services. Ms. Anammah's role with Easter Seals does not involve adult patients and, therefore, her proposed role with Easter Seals is in no way funded by the contract the entity has with DHHS. Therefore, there is no actual conflict of interest between her County role and her proposed role with Easter Seals.

Ms. Anammah acknowledges that there is a possibility of crossover clients between SSD and Easter Seals. However, Ms. Anammah agrees that, if presented with a crossover client, she will hand that case to a colleague in order to prevent a conflict of interest.

Pursuant to § 19A-8(b)(3) of the Public Ethics Law, the Ethics Commission may grant a waiver of the prohibition of § 19A-12(b) if the Ethics Commission concludes that the proposed employment is not likely to create an actual conflict of interest. Upon reviewing the request and the Department's concurrence in and support for the waiver request, the Commission finds that

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there is no actual conflict of interest. Pursuant to the standard of § 19A-8(b)(3), the Commission grants the waiver of the prohibition of § 19A-12(b).

The Commission notes that while 19A-12(b)'s prohibition is waived, the other provisions of the ethics law are not, including those prohibiting an employee from working on official matters relating to the outside employer. The approval of this waiver is conditioned on the facts upon which the waiver is based remaining unchanged. It is also conditioned on Ms. Anammah not making referrals as a County employee to Easter Seals. She will pass any crossover clients needing such a referral to a colleague at DHHS.

This waiver expires when the outside employment approval with which it is associated expires, unless a continuation request for outside employment is timely filed and subsequently approved by the Ethics Commission. In reaching this decision, the Commission has relied upon the facts as presented by Ms. Anammah.

For the Commission:



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Elizabeth Kellar, Chair