

SPALDING COUNTY GEORGIA
ORDINANCE No. 2022-ORD-002

A RESOLUTION AMENDING THE CODE OF ORDINANCES OF SPALDING COUNTY, GEORGIA, AT DIVISION I – LAWS OF LOCAL APPLICATION, PART II – GOVERNING ADMINISTRATION – CHAPTER 12 – CODE OF ETHICS; REPEALING CONFLICTING ORDINANCES AND PARTS THEREOF; RESTATING THE CODE AS MODIFIED BY THIS ORDINANCE; AND FOR OTHER PURPOSES.

BE IT RESOLVED BY THE BOARD OF COMISSIONERS FOR SPALDING COUNTY, GEORGIA AND IT IS ESTABLISHED AS FOLLOWS:

DIVISION I – LAWS OF LOCAL APPLICATION, PART II – GOVERNING ADMINISTRATION – CHAPTER 12 – CODE OF ETHICS

Sec. 2-12001. – Purpose.

The members of the Spalding County Board of Commissioners acknowledge that holding public office is a public trust, and that the public interest must be their primary concern regardless of personal considerations. The members of the Board of Commissioners recognize that, when acting as a body, they are the governing authority of Spalding County, Georgia. As a Board, they possess the full power of local government, both legislative, executive and quasi-judicial, within the parameters established by the Constitution and laws of the State of Georgia. As individual Commissioners, however, each member acknowledges that he/she has no legal power or authority, and that official action can exist only by majority vote of the Board of Commissioners. Accordingly, it is important and in the public interest to establish a code of conduct for Commissioners that addresses conduct both during and outside of public meetings. This Ordinance is adopted to preserve the integrity of local government, to promote the efficiency with which local government services are provided, and to protect Spalding County from exposure to liability due to conduct that is unauthorized or beyond an individual Commissioner's authority.

The proper operation of local government requires that public officials be independent, impartial and responsible to the people; that the government decisions and policy be made through proper channels of the governmental structure; that public office not be used for personal gain; that the public officials be free from the appearance of impropriety; and that the public have confidence in the integrity of its government. The purpose of this policy is to establish Ethical Standards of conduct for all such officials by setting forth those acts or actions that are incompatible with the best interests of the county and by directing disclosure by such officials of private financial or other interests in matters affecting the county.

This ordinance is intended to adopt and incorporate herein for local enforcement the ethical standards of O.C.G.A. § 45-10-1 and O.C.G.A. § 45-10-3, as may be amended from time to time.

Sec. 2-12002. Definitions.

1. *Board* means the Board of Commissioners of Spalding County.

2. *Code of Ethics* means the Code of Ethics of Spalding County and may also be called the Spalding County Ethics Ordinance or Ethics Ordinance.
3. *Commissioner* means a member of the Board of Commissioners of Spalding County.
4. *Complaint* means the sworn written document alleging a violation of the Ethics Ordinance by a covered official.
5. *Complainant* means the person or persons filing the complaint.
6. *County* means Spalding County.
7. *Covered Official* means any member of the Board of Commissioners of Spalding County and any person who has been appointed to a position by the Board of Commissioners of Spalding County, including, but not limited to, the county manager, county clerk, any member of the zoning board of appeals, or any other appointed board.
8. *Ethics Panel Clerk* is an employee of Spalding County appointed by the County Manager to serve as the filing clerk for the Ethics Review Panel and publish notices of all meetings upon request of the chair of the Panel.
9. *Ethical Standards* means those principles incorporating the characteristics and values that most people associate with ethical behavior, including honesty, integrity, trustworthiness, fairness, respect for others and obedience to the law.
10. *Ethics Review Panel* means the panel selected as provided in this ordinance to review complaints filed alleging a violation of the Spalding County Ethics Ordinance by a covered official, responses to these complaints, and to hold hearings if deemed appropriate, issue opinions and make recommendations to the Board of Commissioners regarding any alleged violation and possible disciplinary action.
11. *Gift* means the transfer of anything of economic value, regardless of form, without adequate and lawful consideration, to include a subscription, membership, loan, forgiveness of debt, advance or deposit of money or anything of value, conveyed or transferred to a public official.
12. *Good Cause* means adequate or substantial grounds or reason to take or refuse to take certain action based on the facts presented.
13. *Immediate Family* means parents, spouse, siblings, children, stepchildren, mothers-in-law, fathers-in-law, sisters-in-law, brothers-in-law, grandparents and aunts or uncles by blood or marriage.
14. *Official Act or Official Duty* means acts taken in the course of a member of the Board of Commissioners of Spalding County. Any act taken in performance of the duties of such commissioner shall be deemed an official act.
15. *Panel* means the Ethics Review Panel.
16. *Panelist* means a member of the Ethics Review Panel.

Sec. 2-12003. Ethical Considerations.

- (a) This ordinance is intended to adopt and incorporate herein for local enforcement the ethical standards of O.C.G.A. § 45-10-1 and O.C.G.A. § 45-10-3, as may be amended from time to time. Notwithstanding any provisions of law to the contrary, each member of all boards, commissions, and authorities created by general statute shall:

1. Put loyalty to the highest moral principles and to country above loyalty to persons, party, or government department.
2. Uphold the Constitution, laws, and legal regulations of the United States and the State of Georgia and of all governments therein and never be a party to their evasion.
3. Give a full day's labor for a full day's pay and give to the performance of his duties his earnest effort and best thought.
4. Seek to find and employ more efficient and economical ways of getting tasks accomplished.
5. Never discriminate unfairly by the dispensing of special favors or privileges to anyone, whether for remuneration or not, and never accept, for himself or his family, favors or benefits under circumstances which might be construed by reasonable persons as influencing the performance of his governmental duties.
6. Make no private promises of any kind binding upon the duties of office, since a government employee has no private word which can be binding on public duty.
7. Engage in no business with the government, either directly or indirectly, which is inconsistent with the conscientious performance of his governmental duties.
8. Never use any information coming to him confidentially in the performance of governmental duties as a means for making private profit.
9. Expose corruption wherever discovered.
10. Uphold these principles, ever conscious that public office is a public trust.
11. Never solicit, accept, or agree to accept gifts, loans, gratuities, discounts, favors, hospitality, or services from any person, association, or corporation under circumstances from which it could reasonably be inferred that a major purpose of the donor is to influence the performance of the member's official duties.
12. Never accept any economic opportunity under circumstances where he knows or should know that there is a substantial possibility that the opportunity is being afforded him with intent to influence his conduct in the performance of his official duties.
13. Never engage in other conduct which is unbecoming to a covered official or which constitutes a breach of public trust.
14. Never take any official action with regard to any matter under circumstances in which he/she knows or should know that he/she has a direct or indirect monetary interest in the subject matter of such matter or in the outcome of such official action.

(b) Further, each covered official shall:

1. Promptly pay when due all ad valorem taxes due to the City of Griffin, Spalding County and the Griffin Spalding County School System.
2. Promptly file any disclosure required by the State of Georgia for public officials as well as pay any fees or penalties which may be assessed by the State of Georgia within 90 days of receiving official notice from the State of Georgia of such fees or penalties.
3. Not knowingly state or withhold any information that would impair the proper decision making of the board or any of the County's boards, agencies, authorities or departments.
4. Not request or permit the unauthorized use of county-owned vehicles and equipment, including but not limited to computers, cellular telephones, materials or property for personal convenience or profit.

5. Neither cause the dismissal nor threaten the dismissal from any county position as a reward or punishment for any political activity.
 6. Not direct any person employed by the County to undertake political activity on behalf of such covered official, any other county official or employee, or any other individual, political party, group, or business organization during such time that the employee is required to conduct County business.
- (c) Social Media. The purpose of this section is to establish guidelines for covered officials who post information to and access personal web pages or social networking technology. Social Media can take many forms, including text, images, audio and video. The intent of this section is not to prohibit covered official's personal expression on the internet; however, a covered official's on-line presence reflects upon the County and as such he/she should be aware that actions captured via images, posts or comments may discredit them and/or the County or adversely affect the efficiency or integrity of the County. Covered officials should be aware that information posted on the internet is not secure or private. Even if active steps are taken to restrict access to a covered official's site. Once information has been posted on the internet, it is generally trackable, traceable and accessible indefinitely. All covered officials should be aware that due to the nature of their service in the public sector, they are held to a higher standard. It is the covered official's responsibility to ensure that the use of social media does not interfere with the County's operations. Covered officials should exercise appropriate discretion, so as not to discredit the County and should refrain from using ethnic slurs, personal insults or obscenity or using language that may be considered hateful, harassing or bullying.
- (d) Annually, each covered official shall take an oath of office and shall covenant and agree to adhere to the provisions of this ethics ordinance.

Sec. 2-12004. Contents of a Complaint.

A complaint filed alleging a violation of the Code of Ethics by a covered official must:

1. Cite a specific behavior as established by and referring to a specific violation as set out in the Ethics Ordinance.
2. Be a written and signed sworn complaint to the Clerk of the Board of Commissioners, on a form provided by the Clerk of the Board of Commissioners of Spalding County, based on personal knowledge of the complainant.
3. Set forth such facts as would be admissible in evidence in a court of law at a hearing regarding the complaint.
4. Show that the affiant/complainant is competent to testify to the matters stated in the complaint.
5. Attach any documents referred to in the complaint.
6. The complaint must be filed within 6 months of the alleged violation of the Ethics Ordinance.
7. The complaint shall include a filing fee of \$100, which shall be refunded to the complainant if the covered official is found to have violated the Ethics Ordinance.

Sec. 2-12005. Filing a Complaint.

- (a) A complaint alleging a violation of the Ethics Ordinance shall be filed with the County Clerk who shall submit a copy of the complaint to the covered official against whom the complaint has been made and to all members of the Board of Commissioners within 10 business days of receipt of the complaint. The County Clerk shall submit a copy of the complaint to the County Attorney within 3 business days of receipt. Upon receipt, the County Attorney shall have 3 business days to review the complaint for technical deficiencies and, if and only if the complaint is against a member of the board of commissioners, to make a determination if the allegations in the complaint, if proven to be true, would be a violation of the Ethics Ordinance.
- (b) If the County Attorney determines that a complaint is technically deficient, he/she shall submit a statement of deficiencies to the complainant and provide the complainant the opportunity to cure any deficiencies within 7 days of receipt of the deficiencies. If the complaint is not corrected within 7 days, the complaint will be dismissed for technical deficiencies.
- (c) If the complaint is against a member of the board of commissioners, and the County Attorney is of the opinion that the allegations in the complaint, if proven to be true, would not be a violation of the Ethics Ordinance, he/she shall submit his opinion, together with a complete copy of the sworn complaint and any documents filed with it, to the Chief Magistrate of Spalding County, a Judge of Spalding County State Court, and one Judge of Superior Court for the Griffin Judicial Circuit. If 2 or more of the judges agree that the allegations in the complaint, if proven to be true, would not be a violation of the Ethics Ordinance, the complaint shall be dismissed, and no further action shall be required.
- (d) If a complaint is dismissed pursuant to this Section, Spalding County shall retain the filing fee to offset its cost for the above-described review.

Sec. 2-12006. Right to Respond to Complaint.

Upon receipt of a complaint, the covered official who is the subject of the complaint shall have 30 days to respond, unless the time to reply is extended by the Panel upon good cause shown. The response of the covered official must be supported by affidavits based on personal knowledge, set forth the facts that would be admissible in evidence in a court of law, and show affirmatively that the respondent is competent to testify to the matters stated therein. All documents referred to in the response should be attached.

Sec. 2-12007. Procedure for Complaints Filed Against Covered Officials Other than Member of the Board of Commissioners. Penalties for Ethical Violations. Appeal.

- (a) Consistent with the open meetings laws, the Board of Commissioners shall review all complaints against covered officials, except those complaints filed against a member of the board of commissioners. Three (3) members of the board of commissioners must agree that a sufficient basis has been given to warrant a public hearing.

- (b) The board of commissioners shall conduct the public hearing to determine whether, based upon clear and convincing evidence, the covered official has violated the Code of Ethics. Covered officials are subject to the following penalties and actions for violations of this Code of Ethics:
1. Written reprimand and/or;
 2. Public censure printed in legal organ and posted in the Spalding County Courthouse and the Spalding County Courthouse Annex and/or;
 3. Removal from office for good cause shown.
- (c) If the covered official desires to have a further hearing on the matter, a hearing shall be afforded to the covered official before the Ethics Review Panel, if requested, within 10 days of the Board of Commissioners giving the covered official notice of its intent to penalize the covered official as provided above.

Sec. 2-12008. Ethics Review Panel.

- (a) Members of the Ethics Review Panel must be:
1. A resident of Spalding County.
 2. A registered voter.
 3. Computer literate and able to provide a valid email address.
 4. Not an employee of the County or a covered official, or any immediate family member of an employee of the County or a covered official.
 5. Not an officer or employee of any political party.
 6. Not an elected official in the County and not a candidate for office of the United States, the State of Georgia, or the County of Spalding, and has not held any elected office during the 3 months immediately preceding his/her appointment.
 7. Not a member of any board or authority appointed by the Board of Commissioners.
- (b) When the Ethics Review Panel is convened to hear a complaint, Panelists shall be paid \$50 per day for their service.
- (c) The Ethics Panel Clerk shall be an individual designated by the County Manager to serve in that capacity. The Ethics Panel Clerk shall serve as the filing clerk for the Ethics Review Panel; and shall publish notices of all meetings upon request of the chair of the Panel.
- (d) Each Ethics Review Panel shall consist of five randomly selected members from a list maintained by the Ethics Panel Clerk who shall serve for one (1) year. Members may serve successive one (1) year terms if randomly selected from the list.
- (e) The Ethics Panel Clerk shall maintain a list of not less than nine nor more than fifteen qualified individuals from which to draw members of the Ethics Panels, and shall confirm the qualifications and willingness of each to such individual to serve on an Ethics Review Panel not less than once per year.

- (f) The list may include the following persons provided they meet the qualifications for service and have no conflict of interest in providing service on the Ethics Review Panel:
 - 1. A Member of Spalding County Bar Association.
 - 2. A Member of local military organization.
 - 3. The Executive Director or board member of a Non-Profit Organization with an office in Spalding County.
 - 4. Interested citizens who have requested to be considered for service on the Panel.
 - 5. A member of the clergy with a church located in Spalding County.

All persons on the list shall have been selected by a majority vote of the Board at its first meeting in January of each year

- (g) The Ethics Review Panel shall have no regularly scheduled meetings but shall meet at least annually to select a chair and review their duties, which meeting must comply with the Open Meetings Law.
- (h) Panelists shall not be liable to any person for damages arising out of the enforcement or operation of the Code of Ethics, except in cases of willful or wanton conduct.
- (i) The Panel may be asked to render advisory opinions based on hypothetical facts or circumstances relating to conduct of a covered official or transaction of County business, when requested to do so in writing by the Board of Commissioners.
- (j) All meetings/hearings/reports/opinions of the Panel shall be subject to the Georgia Open Meetings and Open Records Act.
- (k) The Panel shall be represented by the duly appointed Human Resources Attorney for Spalding County.
- (l) A majority of the panel constitutes a quorum.
- (m) The job of the panel is to hear ethics complaints against covered officials and recommend discipline to the Board of Commissioners who shall make the final decision as to disciplinary action, if any.
- (n) The filing of a frivolous complaint as determined by the Panel after a hearing shall be a violation of the ordinances of Spalding County and such violation shall be heard by the Magistrate Court of Spalding County and the complainant may be fined up to \$1,000.

Sec. 2-12009. Hearing of Complaints by the Ethics Review Panel.

- (a) The Ethics Review Panel shall meet within 60 days of the filing of a complaint to review the complaint and determine if the complaint supports a reasonable belief that there has been a violation of the Ethics Ordinance. If the Panel determines that no violation occurred, it may dismiss the complaint without further proceedings. If a complaint is dismissed on

its merits it may not be refiled. This shall be a public meeting, and minutes should be taken. The recorder of minutes of any hearing of the Panel shall be an independent contractor and not an employee or covered official of Spalding County.

- (b) If the Panel determines that specific, substantial evidence from a credible source exists to support a reasonable belief that there has been a violation of the Ethics Ordinance it must hold a hearing after the publication of notice as to time, date and location of the hearing. A formal public hearing shall be conducted with both parties having the opportunity to be heard. The Panel is authorized to swear witnesses prior to any testimony being given. A court reporter should be present to make a record of the proceedings.
- (c) Within 30 days after the hearing the Panel shall determine if there has been clear and convincing evidence of a violation of the Ethics Ordinance and shall report its finding to the Board of Commissioners together with its recommendation for discipline, if any.

Sec. 2-12010. Right of Appeal.

Any party against whom a decision of the Ethics Review Panel is rendered may obtain judicial review of the decision by writ of certiorari to the Superior Court of Spalding County within 30 days from submission of the Panel's written report to the Board of Commissioners. Judicial review shall be based solely on the record (i.e., the Complaint, the response, and the minutes from the hearing). No party shall be entitled to a de novo appeal. Failure to appeal within 30 days constitutes acquiescence to the report of the Panel.

Sec. 2-12011. Penalties for Ethical Violation by Commissioner.

The Board of Commissioners, not to include the member who has been determined to have violated the Ethics Ordinance, shall review the findings and recommendations of the Ethics Review Panel, and shall be authorized to issue the following disciplinary action:

1. Written reprimand and/or;
2. Public censure printed in legal organ and posted in the Spalding County Courthouse and the Spalding County Courthouse Annex and/or;
3. Fine not to exceed \$1,000.

Sec. 2-12012. Conduct During Meetings.

Generally, during the public portions of Public Meetings and Public Hearings members of the Spalding County Board of Commissioners, employees, presenters, citizens, and other covered officials, shall not, without good cause:

1. Speak without first being recognized by the Chair;
2. Interrupt anyone who has the floor;
3. Use profanity during the public portion of any meeting;
4. Refuse to yield the floor or argue with the Chair, if he/she is ruled out of order by the Chair;

5. Make disparaging remarks about any persons' character during the public portion of any meeting;
6. Confront anyone about a prior statement in an accusatory manner during the public portion of any meeting. The purpose of the public portion of a meeting of the Board of Commissioners is to allow the Commissioners, County representatives, and members of the public to state their position in an orderly fashion. It is not a trial where persons are cross-examined, interrogated, belittled or held out for public ridicule or embarrassment;
7. State during the public portion of any meeting that a county employee has not done his/her job properly, or challenge the integrity or competency of any county employee;
8. Represent his/her personal position or belief as being the position or belief of the Board of Commissioners as a whole. No single Commissioner can speak on behalf of the Board unless specifically authorized by a majority vote to do so;
9. Refuse to recognize the validity of any action approved by a majority vote of the Board of Commissioners; or
10. Divulge the subject matter of any confidential information, legal advice, or strategy discussions revealed during an executive session called for the purpose of discussing potential litigation against the County or any county employee.

The content of this Section shall be construed as guidelines for members of the Spalding County Board of Commissioners. Failure to adhere to these guidelines shall not be the sole basis for a Complaint pursuant to the Ethics Ordinance.

Sec. 2-12013 – Conduct Outside of Meetings.

A member of the Spalding County Board of Commissioners shall not:

1. Direct any county employee to do a job or perform a task. All such requests should be made to the County Manager. After such a request is made the Commissioners shall follow-up with the County Manager and not with the county employee expected to perform the task;
2. Publicly state that he/she intends to terminate the employment of or discipline any county employee;
3. Reprimand any county employee;
4. Use profanity, insulting or demeaning words about a county employee in the presence of that or any other county employee;
5. Call into question the qualifications or competency of a county employee in the presence of that or any other county employee;
6. Demand that the County Manager or any other county employee stop what he or she is doing to immediately attend to the business of the Commissioner;
7. Promise on behalf of the County or the Board of Commissioners to undertake any act, or to pass any ordinance, resolution, contract, or agreement;
8. Agree to buy or sell anything of value on behalf of the County without prior approval by majority vote of the Board of Commissioners;
9. Attempt to negotiate County business with any private party or any representative of another governmental entity without the advance approval of a majority of the Board of Commissioners;

10. Speak to any representative of the news media on behalf of the County or the Board of Commissioners without advance approval by majority vote of the Board of Commissioners.

The content of this Section shall be construed as guidelines for members of the Spalding County Board of Commissioners. Failure to adhere to these guidelines shall not be the sole basis for a Complaint pursuant to the Ethics Ordinance.

Chapter 12A – Conflicts of Interest

Sec. 2-12001A. Conflicts of Interest.

- (a) No covered official shall acquire or maintain an interest in any contract or transaction if a reasonable basis exists that such an interest will be affected directly by his/her official act or action or by official acts of the County, which the covered official or employee has a reasonable opportunity to influence, except consistent with the disclosure and abstention provisions set forth herein.
- (b) Spalding County shall not enter into any contract involving services or property with a covered official or with a business entity in which the covered official has a substantial interest. This section shall not apply in the case of:
 - 1. Contracts for goods or services with a business that employs a covered official or employee, or family member of a covered official or employee where:
 - a. The contract is competitively procured; and
 - b. The covered official or employee does not participate in any aspect of the procurement or performance of the contract;
 - 2. The designation of a bank or trust company as depository for county funds;
 - 3. The borrowing of funds from any bank or lending institution which offers the lowest available rate of interest for such loan;
 - 4. Contracts for services entered into with a business which is the only available source for such goods or services; and
 - 5. Contracts entered into under circumstances which constitute an emergency situation, provided that a record explaining the emergency is prepared by the county manager and submitted to the board at its next regular meeting,

Sec. 2-12002A. Zoning Application Disclosures.

Zoning Application Disclosures shall be governed solely by the conflict of interest in zoning actions provisions provided in O.C.G.A. §§ 36-67A-1 *et seq.*, as it may be amended from time to time.

Sec. 2-12003A. Bids and Proposals.

Disclosures related to submission of bids or proposals for county work or contract: Persons submitting bids for county work who have contributed \$250 or more to a covered official must disclose on their bid or proposal the name of the covered official(s) to whom the contribution was made, and the amount contributed. Such a disclosure must also be made prior to a request for any change order or extension of any contract awarded to the person who submitted the successful bid or proposal.

Sec. 2-12004A. Incompatible Services.

Incompatible Service: No covered official or employee shall engage in or accept private or public employment or render service for any private or public entity, when such employment or service is incompatible with the proper discharge of his/her official duties or would tend to impair his/her independence of judgment or action in the performance of his/her official duties, unless otherwise permitted by law and unless public disclosure is made.

Sec. 2-12005A. Gifts.

Solicitation or acceptance of gifts:

1. Covered officials shall not accept gifts, gratuities or loans from organizations, business concerns or individuals with whom he/she has official relationships concerning business of the County. These limitations are not intended to prohibit the acceptance of articles of a negligible value which are distributed generally, nor to prohibit covered officials from accepting social courtesies which promote good public relations, nor to prohibit covered officials from obtaining loans from regular lending institutions. Covered officials should refrain from relationships which could be construed as evidence of favoritism, coercion, unfair advantage or collusion.
2. There shall be no violation of this article in the following circumstances:
 - a. Meals and beverages given in the usual course of entertaining associated with normal and customary business or social functions;
 - b. An occasional gift from a single source of \$101 or less in any calendar year;
 - c. Ceremonial gifts or awards;
 - d. Gifts of advertising value only or promotional items generally distributed to public officials;
 - e. Awards presented in recognition of service;
 - f. Reasonable expenses of food, travel, lodging and scheduled entertainment for a meeting that is given in return for participation in or speaking engagement at the meeting;
 - g. Courtesy tickets or free admission extended for an event as a courtesy or for ceremonial purposes, given on an occasional basis, not to include season tickets of any kind;
 - h. Gifts from relatives or member of the covered officials' household;
 - i. Honorariums or awards of professional achievement;
 - j. Courtesy tickets or free admission to educational seminars, educational or other conventions, or other similar events.

Sec. 2-12006A. Disclosure of Interest.

Disclosure of interest. Any covered official who has a financial or personal interest in any proposed action before the Board shall immediately disclose publicly the nature and extent of such interest.

Sec. 2-12007A. Abstention to Avoid Conflicts of Interest.

Abstention to avoid conflicts of interest.

1. Except as otherwise provided by law, no covered official shall participate in the discussion, debate, deliberation, vote or otherwise take part in the decision-making process on any item before him/her in which the covered official has a conflict of interest.
2. To avoid the appearance of impropriety, if any covered official has a conflict of interest or has an interest that he/she has a reason to believe either violates this article or may affect his/her official acts or actions in any matter, the covered official shall immediately leave the meeting room, except that if the matter is being considered at a public meeting, the covered official may remain in the meeting room.
3. In the event of a conflict of interest, the covered official shall announce his/her intent to abstain prior to the beginning of the discussion, debate, deliberation, or vote on the item, shall not participate in any way, and shall abstain from casting a vote.

Approved on first reading June 20, 2022.

Approved on second reading July 18, 2022.