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STATE ETHICS COMMISSION

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September 11, 2025

CONFIDENTIAL

Sent via email to: amanda.laforge@maryland.gov

Amanda S. La Forge
Chief Counsel
Executive Office of the Governor
100 State Circle
Annapolis, Maryland 21401

Re: Governor Wes Moore's Non-Participation Agreement

Dear Ms. La Forge:

This letter is in response to your request for review of the proposed Non-Participation Agreement for Governor Wes Moore. Earlier this year, Governor Moore signed House Bill 932, Laws of Maryland 2025, Ch. 300, "Public Ethics – Conflict of Interest Blind Trust – Governor" into law. The law will become effective on October 1, 2025. The Commission, at its regular meeting on today's date, approved of the proposed Non-Participation Agreement.

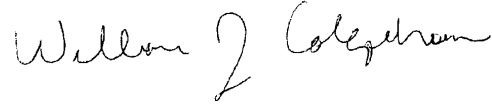
Section 5-501.1 of the Public Ethics Law will require a Governor to place certain interests into a certified blind trust or divest certain interests within 6 months after taking office and enter into a non-participation agreement with the State Ethics Commission for any remaining financial interests not placed in the blind trust. Governor Moore has an approved blind trust and financial interests that could not be placed into the blind trust. The Non-Participation Agreement references these as Non-Eligible Interests and they are the financial interests disclosed on Schedules B and C of Governor Moore's 2024 Annual Financial Disclosure Statement. The Non-Participation Agreement prohibits the Governor from participating in any matter that involves any interests not included in his blind trust, including matters that come before the Board of Public Works. The Non-Participation Agreement Work Plan requires that all interactions that ordinarily involve the Governor involving his Non-Eligible interests will be handled by the Governor's Chief of Staff. The Commission approved the proposed draft Non-Participation Agreement as being consistent with the Public Ethics Law.

Once executed by Governor Moore and provided to the Commission, the Commission will share the Non-Participation Agreement with: 1) the Presiding Officers of the General Assembly; 2) the Joint Ethics Committee; and 3) the Executive Secretary and General Counsel of the Board of Public Works. The Commission is also required to post a copy of the Non-Participation Agreement

on its website.

I look forward to receiving a signed copy of the Non-Participation Agreement, so that the Commission may complete other statutory duties related to sharing and posting the document. Please do not hesitate to contact me if you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "William J. Colquhoun". The signature is fluid and cursive, with a large, stylized "W" and "C".

William J. Colquhoun
General Counsel



WES MOORE
GOVERNOR

To: Governor Wes Moore
From: Amanda La Forge, Chief Counsel
Date: September 29, 2025
Re: Non-Participation Agreement

This Non-Participation Agreement (“NPA”), required by newly enacted provisions of the Maryland Public Ethics Law (the “Ethics Law”), is effective October 1, 2025.

Background

On May 6, 2025, you signed House Bill 932, Laws of Maryland 2025, Ch. 300, “Public Ethics – Conflict of Interest Blind Trust – Governor” into law. Section 501.1(D)(2) of the law requires the Governor to enter into an NPA with the Maryland State Ethics Commission (the “Ethics Commission”) for any interest not included in his or her blind trust, including interests exempted from the blind trust by the Ethics Commission under its regulations. The NPA prohibits the Governor from participating in any matter that involves any interests not included in the blind trust, including any matters that come before the Board of Public Works.

Your blind trust was certified by the Ethics Commission on April 27, 2023. Pursuant to the Ethics Commission’s regulations, certain interests are not eligible for inclusion in a blind trust (See, Code of Maryland Regulations 19A.06.02.02B(2), requiring blind trust assets to be “readily marketable”). The interests listed on Schedules B and C of your 2024 Annual Financial Disclosure Statement (hereinafter “*Non-Eligible Interests*”) were determined by the Ethics Commission not to be eligible for inclusion in your blind trust. The Ethics Law prohibits you from participating in matters involving these *Non-Eligible Interests*.

To ensure compliance with the Ethics Law, we are implementing the measures outlined below to avoid any conflict of interest or appearance of a conflict of interest regarding those *Non-Eligible Interests*.

Non-Participation Agreement

The participation restrictions under §5-501 of the Ethics Law are broad, prohibiting your participation in advising, discussions, meetings, supervision, as well as all decision making in any matters in which your *Non-Eligible Interests* have a specific interest. All interactions with your *Non-Eligible Interests* will be handled by your Chief of Staff. In addition, any employee who is usually supervised by you will be instructed to report to your Chief of Staff on any matter or

question involving your *Non-Eligible Interests*. This plan will be communicated to key staff so when matters arise in the office involving your *Non-Eligible Interests*, you and your staff can ensure that appropriate restrictions are in place.

You should also be aware of additional restrictions under the Ethics Law. Section 5-506 of the Ethics Law prohibits a State official from intentionally using the prestige of public position for private gain or for the private gain of another. Additionally, Section 5-507 of the Ethics Law prohibits a State official from disclosing or using confidential information acquired by reason of the employee or official's public position, which is not available to the public, for personal economic benefit or the economic benefit of another.

If you have any questions or concerns, please do not hesitate to contact me.

By signing below, you acknowledge receipt of this Memorandum and the Non-Participation Agreement outlined herein.



Wes Moore, Governor

9/30/25

Date

Copies to: Maryland State Ethics Commission
Jennifer Allgair, Executive Director
William Colquhoun, General Counsel
Joint Committee on Legislative Ethics, Maryland General Assembly
Dea Daly, Counsel
Board of Public Works
John Gontrum, Executive Secretary
Rachel Hersey, General Counsel