



**COMMISSION MEMBERS:**  
CRAIG D. ROSWELL, *Chair*  
KAREN D. MORGAN  
MARIELA OLIVARES  
JAMES N. ROBEY, JR.  
GENEAU M. THAMES

## STATE ETHICS COMMISSION

45 CALVERT STREET, 3<sup>rd</sup> FLOOR  
ANNAPOLIS, MARYLAND 21401  
410-260-7770 / 1-877-669-6085  
<https://ethics.maryland.gov>

JENNIFER K. ALLGAIR  
*Executive Director*  
WILLIAM J. COLQUHOUN  
*General Counsel*  
KATHERINE P. THOMPSON  
*Staff Counsel*  
ANA L. HENRY  
*Assistant General Counsel*  
PANSY S. WATSON  
*Assistant Counsel*

March 18, 2026

### MEETING NOTICE

The next meeting of the State Ethics Commission will be held on March 26, 2026, at its office at 45 Calvert Street, 3<sup>rd</sup> Floor, Annapolis, Maryland. Reasonable accommodations will be provided for people with disabilities upon request prior to the day of the meeting.

### TENTATIVE PUBLIC AGENDA

9:00 Call to Order

9:00 General Business & Administrative Matters

Review of Agenda

Review of Minutes of November 14, 2025 Meeting - correction

Review of Minutes of January 15, 2026 Meeting

Financial Disclosure Additions and Deletions

Review and Approval of Draft 2025 Annual Report

Executive Director's Report

9:15 Update on Schedule for Amendments to Regulations

Approved for Proposal at the January 15, 2026 meeting and scheduled for Final Adoption at the June 4, 2026 meeting:

19A.06.01.02 – Blind Trusts - Applicability and Definitions

19A.06.02. – Blind Trusts - Criteria for Certification

19A.06.03 – Blind Trusts - Procedural Requirements

19A.06.04 – Blind Trusts – Governor's Requirements

Published in the Maryland Register on March 20, 2026

Public Comment Period – March 20 through April 20, 2026

9:30 Local Government

26-0082      Howard County

26-0168      City of Cumberland

26-0171      Town of Brentwood

9:45 Closed Session - Informal Matters and Pending Advice

10:30 **Closed Session** - Enforcement Matters

11:30 **Closed Session** - Discussion of Enforcement Matters

12:15 **Adjournment** - Next meeting is June 4, 2026

NOTE: The matters scheduled for 9:45, 10:30, and 11:30 are confidential and accordingly will be conducted in closed session. Some other matters may be confidential in whole or in part.

**FINANCIAL DISCLOSURE ADDITIONS & DELETIONS**

Pin #	Agency Code	Last Name	First Name	Position	Salary	Grade	Comments	Decision
<b>Department of Human Services</b>								
532115	330700000	Sawhney	Rakhi	IT Quality Assurance Specialist		20	Duties Not Applicable	Do Not Add
532114	330700000	Rahman	Fazlur	IT Quality Assurance Specialist		20	Duties Not Applicable	Do Not Add
532116	330700000	Kumar	Ashish	IT Quality Assurance Specialist		20	Duties Not Applicable	Do Not Add
532117	330700000	Muppid	Manju	IT Quality Assurance Specialist		20	Duties Not Applicable	Do Not Add
532118	330700000	Bhattari	Keshav	IT Quality Assurance Specialist		20	Duties Not Applicable	Do Not Add
092961	330700000	Larnerd	Glenn	Family Investment Spec Sup II		16	Salary & Duties	Add
077005	330700000	Ward	Warren	DHS Chief Portfolio Officer		26	Salary & Duties	Add
091640	330700000	Thompson	Jennifer	Program Manager Senior III		25	Salary & Duties	Add
<b>Department of Health</b>								
522553	320101000	Collins	Randa	Agency Grants Spec II		16	Salary & Duties	Add
497071	321701507	Winder	Jessica	Accountant Advanced		17	Salary & Duties	Add
055326	321701507	Bishwokarma	Manoj	Accountant Manager II		21	Salary & Duties	Add
060539	321201102	Woodrum	Amy	Prgm Mgr II		20	Salary & Duties	Add
082873	321201102	Davis	Deirdre	Prgm Admin III Addctn		18	Salary & Duties	Add
049487	321701507	Jalloh	Lamos	Administrator IV		19	Salary & Duties	Add
058812	320202404	Stinson	Victoria	Administrator I		16	Salary & Duties	Add
083022	321701000	Pankey	Ezekiel	Administrator III Supervisor		18	Salary & Duties	Add
025050	321101101	Adesina	Adeola	Admin Prog Mgr I		19	Salary & Duties	Add
518218	321701413	Steward	Shanitha	Administrator V		20	Salary & Duties	Add
510165	321701000	Bellamy	Kanydah	Hlth Policy Analyst Assoc		16	Duties Not Applicable	Do Not Add
082105	321701405	Nyanplu	Kalinah	Health Policy Analyst I		17	Duties Not Applicable	Do Not Add
333277	321801002	Quintanilla	Benjamin	HSCRC Chief I	\$85,321	HSCR 0003	Salary & Duties	Add
016218	321701406	Kellum	Janelle	Med Care Prgm Mgr III		20	Salary & Duties	Add
085567	321801101	Chappel	Andre	MHCC Center Director	\$210,000	MHCC 0006	Salary & Duties	Add
505427	320201004	Morton	Wendy	Hlth Occupations Invest III		16	Salary & Duties	Add
065259	321701407	Marcheskie	Rachel	Hlth Policy Analyst II		18	Salary & Duties	Add
518864	321201000	Rosenburgh	Deneka	Adminsitator I		16	Duties Not Applicable	Do Not Add
025659	321701000	Lavine	Andrea	Med Care Prgm Mgr III		20	Salary & Duties	Add
228388	321201000	Rupert	Amber	Therapy Services Mgr		20	Salary & Duties	Add
361033	321301000	Parker	Siehda	Social Worker II, Health Svcs		17	Duties Not Applicable	Do Not Add
082368	320606000	Greenbaum	Adena	Physician Program Specialist	\$226,836	PHY0005	Salary & Duties	Add

**FINANCIAL DISCLOSURE ADDITIONS & DELETIONS**

Pin #	Agency Code	Last Name	First Name	Position	Salary	Grade	Comments	Decision
016253	321701000	Vacant		Hlth Policy Analyst I		16	Salary & Duties	Add
219412	321701000	Kocherlakota	Annapurna	Hlth Policy Analyst Adv		19	Salary & Duties	Add
518223	321201000	Kastner	Allison	Coord, Spec Prgms IV, MH		16	Salary & Duties	Add
087985	321701440	Rowson	Melanie	Psychiatrist Clinical, MDH	\$428,000	PSYC 0002	Salary & Duties	Add
<b>065255</b>	<b>321701000</b>	<b>Terrell</b>	<b>Faith</b>	<b>Nursing Prgm Conslt/Admin I</b>		<b>22</b>	<b>Duties Not Applicable</b>	<b>Do Not Add</b>
073525	320201000	Dougherty	Scott	Hlth Fac Survey Coordinator I		18	Salary & Duties	Add
<b>480578</b>	<b>321301000</b>	<b>Davis</b>	<b>Ashanti</b>	<b>Coord Spec Prgms Hlth Serv IV Dev Dsbl</b>		<b>16</b>	<b>Duties Not Applicable</b>	<b>Do Not Add</b>
<b>Maryland State Library Agency</b>								
224840	999100	Biggs	Ashley	Educational Support Program Coordinator I		19	Duties Not Applicable	Delete
<b>State Highway Administration</b>								
008476	290201000	McCormack	John	OSH Compliance Officer II		16	Salary & Duties	Add
<b>Department of Juvenile Services</b>								
027579	400102000	Stinnett	Sean	Administrator III		18	Salary & Duties	Add
027684	400102000	Summerfield	Keri	Administrator II		17	Salary & Duties	Add
<b>086455</b>	<b>400102000</b>	<b>Lisbon</b>	<b>Tierra</b>	<b>Procurement Officer Trainee</b>		<b>14</b>	<b>Salary &amp; Duties Not Applicable</b>	<b>Do Not Add</b>
<b>Department of Natural Resources</b>								
522570	300105000	Tucker	Carmen	Administrator II		17	Salary & Duties	Add
<b>018382</b>	<b>300112000</b>	<b>Huebert</b>	<b>Klaus</b>	<b>Natural Resources Biologist III</b>		<b>16</b>	<b>Duties Not Applicable</b>	<b>Do Not Add</b>
427751	300105000	McGettrick	Mary	Administrator I		16	Salary & Duties	Add
053221	300105000	Wagner	Kevin	Nat Res Planner III		16	Salary & Duties	Add
005733	300105000	Vese, Jr.	Rodney	Administrator IV Sup		19	Salary & Duties	Add
013444	300101000	Smith	Emmanuel	Procurement Officer II		18	Salary & Duties	Add
<b>400406</b>	<b>300105000</b>	<b>Piccoli</b>	<b>Ashleigh</b>	<b>Nat Res Planner III</b>		<b>16</b>	<b>Duties Not Applicable</b>	<b>Do Not Add</b>
<b>522441</b>	<b>300112000</b>	<b>Branam</b>	<b>Gillian</b>	<b>Geologist II</b>		<b>16</b>	<b>Duties Not Applicable</b>	<b>Do Not Add</b>
<b>522439</b>	<b>300112000</b>	<b>Wiles</b>	<b>Jeremy</b>	<b>Geologist II</b>		<b>16</b>	<b>Duties Not Applicable</b>	<b>Do Not Add</b>
<b>522438</b>	<b>300112000</b>	<b>Cooney</b>	<b>Timothy</b>	<b>Geologist II</b>		<b>16</b>	<b>Duties Not Applicable</b>	<b>Do Not Add</b>
<b>522440</b>	<b>300112000</b>	<b>Eick</b>	<b>Ashley</b>	<b>Geologist II</b>		<b>16</b>	<b>Duties Not Applicable</b>	<b>Do Not Add</b>
<b>051736</b>	<b>300112000</b>	<b>Glasman</b>	<b>Isabel</b>	<b>Geologist III</b>		<b>17</b>	<b>Duties Not Applicable</b>	<b>Do Not Add</b>
<b>055480</b>	<b>300112000</b>	<b>Vincett</b>	<b>William</b>	<b>Geologist III</b>		<b>17</b>	<b>Duties Not Applicable</b>	<b>Do Not Add</b>
<b>014790</b>	<b>300112000</b>	<b>Higgins</b>	<b>Ryan</b>	<b>Geologist III</b>		<b>17</b>	<b>Duties Not Applicable</b>	<b>Do Not Add</b>

**FINANCIAL DISCLOSURE ADDITIONS & DELETIONS**

Pin #	Agency Code	Last Name	First Name	Position	Salary	Grade	Comments	Decision
<b>2120425</b>	<b>300112000</b>	<b>Van Ness</b>	<b>Tyler</b>	<b>Geologist III</b>		<b>17</b>	<b>Duties Not Applicable</b>	<b>Do Not Add</b>
494454	300112000	Brocks	Barbara	Power Plant Siting Assessor II		21	Salary & Duties	Add
494453	300112000	Lee	Robin	Power Plant Siting Assessor II		21	Salary & Duties	Add
014765	300112000	Mank	Mark	Power Plant Siting Assessor II		21	Salary & Duties	Add
075344	300112000	Barthel	Zachary	Power Plant Siting Assessor II		21	Salary & Duties	Add
494452	300112000	Piwkhow	Supida	Power Plant Siting Assessor II		21	Salary & Duties	Add
498445	300101000	Burks	Lynn	Fiscal Services Admin IV (Grants Director)		22	Salary & Duties	Add
075410	300117000	Lockwood	Keith	Administrator II		17	Salary & Duties	Add
013800	300101000	Eutslar	Lisa	Administrator II		17	Salary & Duties	Add
<b><u>Department of Budget &amp; Management</u></b>								
459989	250102000	Malague	Kathryn	Prg. Mgr. Sr. IV		26	Salary & Duties	Add
<b><u>College of Southern Maryland</u></b>								
	999985	Ball	Brian	Public Safety Lieutenant	\$82,000		Salary & Duties	Add
	999985	Brown	Mary	AsscVP Workforce, Innovation & Strategic Partnerships	\$141,000		Salary & Duties	Add
<b><u>State Retirement Agency</u></b>								
524072	261001000	Rose	Bonita	Procurement Mgr. I		22	Salary & Duties	Add
<b><u>Department of Commerce</u></b>								
497032	380101000	Bradsher	Charlotte	Administrator III		18	Salary & Duties	Add
076202	380101000	Hanley	Mary	Prg. Mgr. Sr. I		23	Salary & Duties	Add
494678	380601000	Verma	Kavita	Prg. Mgr. Sr. IV		26	Salary & Duties	Add
032316	380101000	Bey	Afiya	Prg. Mgr. II		20	Salary & Duties	Add
<b><u>Executive Department</u></b>								
<b>453326</b>	<b>230101000</b>	<b>Bellamy</b>	<b>Latisha</b>	<b>Executive Assistant</b>		<b>16</b>	<b>Duties Not Applicable</b>	<b>Do Not Add</b>
<b><u>Department of Housing &amp; Community Development</u></b>								
531052	370101000	Steele	Christian	HCD Project Manager III		23	Salary & Duties	Add
531668	370101000	Palmer	Steven	Prgm Mgr III		21	Salary & Duties	Add
<b><u>Department of General Services</u></b>								
056171	280101000	Woolums	John	Designated Admin Mgr III		21	Salary & Duties	Add
073410	280101000	Bhoyar	Nishant	IT Director II		24	Salary & Duties	Add
081991	280101000	Beaudouin	Tiana	Admin Prog Mgr IV		22	Salary & Duties	Add
073421	280101000	Calvert	Kate	Designated Admin Mgr II		20	Salary & Duties	Add
426703	280101000	Croft	Alexis	Administrator III		18	Salary & Duties	Add
048598	280101000	Besingrand	Sarah	IT Asst Director III		24	Salary & Duties	Add
006023	280101000	Debelius	Hannah	Prgm Mgr Senior I		23	Salary & Duties	Add
<b><u>Department of Education</u></b>								

**FINANCIAL DISCLOSURE ADDITIONS & DELETIONS**

Pin #	Agency Code	Last Name	First Name	Position	Salary	Grade	Comments	Decision
082531	360101001	Walters	Trisha	Fiscal Services Admin V		23	Salary & Duties	Add
<b><u>Maryland Port Administration</u></b>								
889811	999106	Peck	Graham	Engineering Asset Management Program Manager		22	Salary & Duties	Add
<b><u>Food Center Authority</u></b>								
	231400041	Lindner	Anja	Director of Administration	\$174,000		Salary & Duties	Add
	231400041	Cuffler	Jennifer	Market and Security Operations Coordinator	\$97,500		Salary & Duties	Add
<b><u>University of Maryland, Baltimore County</u></b>								
	<b>999954</b>	<b>Chester</b>	<b>Ashtian</b>	<b>Paralegal</b>	<b>\$88,000</b>		<b>Duties Not Applicable</b>	<b>Do Not Add</b>
<b><u>University of Maryland Global Campus</u></b>								
	999949	Sagiraju	Vidhya	VP, Platform Engineering	\$359,131		Salary & Duties	Add
	999949	Patel	Ashish	Sr. VP & Chief Information Officer	\$484,755		Salary & Duties	Add
	999949	Lagos	Jose	VP, IT Operations & Strategy	\$296,559		Salary & Duties	Add
<b><u>St. Mary's College</u></b>								
	360400000	Morris	Renea	Assistant Vice President of Integrated Marketing and Communications	\$133,500		Salary & Duties	Add
<b><u>University System of Maryland</u></b>								
	999108	Aina	Lemuel	Workday Technical Manager	\$175,000		Salary & Duties	Add
<b><u>Election Board - Cecil County</u></b>								
088258	999107	Murray	Byron	Program Manager I		19	Salary & Duties	Add
<b><u>Department of Planning</u></b>								
005545	232301000	Reitman	Carter	Administrator IV		19	Salary & Duties	Add
<b><u>Attorney General's Office</u></b>								
522795	220300000	Rees	Katherine	Administrator II		17	Salary & Duties	Add
522793	220300000	McCullough	Julianne	Administrator II		17	Salary & Duties	Add
074245	220300000	Schrader	Christopher	HR Administrator I		18	Salary & Duties	Add
079053	220300000	Pizzuro	John	Administrator II		17	Salary & Duties	Add
<b><u>Food Center Authority</u></b>								
	231400041	Torre	Margaret	Chief of Staff	\$124,000		Salary & Duties	Add
<b><u>Office of People's Counsel</u></b>								
047456	220800000	DeMaio	Sarah	Administrator III (Deputy Operations Manager)		18	Salary & Duties	Add
<b><u>Maryland Prescription Drug Affordability Board</u></b>								
	999000	York	Andrew	Executive Director	\$133,981 - \$201,576	EPP 0005	Salary & Duties	Add



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# FORTY-SEVENTH ANNUAL REPORT

JANUARY 1, 2025 – DECEMBER 31, 2025

March 26, 2026

# GENERAL STATUTORY IMPLEMENTATION

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## OVERVIEW

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The State Ethics Commission, as directed in General Provisions Article § 5-205, administers the provisions of the Public Ethics Law; creates and provides forms for each document required by the Public Ethics Law; retains as a public record each document filed with the Commission for at least four years after receipt; periodically reviews the adequacy of public ethics laws; reviews financial disclosure statements and lobbyist activity reports filed in accordance with the Public Ethics Law and notifies the filers of any identified omissions or deficiencies; and publishes information that explains the provisions of the Law.

The Commission held five meetings in 2025. During its meetings the Commission considered issues related to all areas of its statutory mandate: financial disclosure, conflict of interest, lobbyist disclosure and conduct restrictions, local government ethics laws, school board ethics regulations, advisory opinions, enforcement matters, employee training, lobbyist training and public information activities. The 2025 live stream recorded meeting videos and public meeting documents are available on the Commission's website, [ethics.maryland.gov](https://ethics.maryland.gov).

In 2025, the State Ethics Commission continued its project to create an electronic training module for elected State officials subject to the jurisdiction of the State Ethics Commission, who are now required to complete ethics training. The training project will also include updates to the State employee and lobbyist training modules. The training project will be completed in 2026. The Commission also amended its regulations to include legislative changes to local government provisions and updated exemption procedures related to financial disclosure requirements for State board and commission members and local government reviews.

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## ADVICE ACTIVITIES

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The State Ethics Commission is responsible for interpreting the Public Ethics Law. Sections 5-301 through 5-303 of the Public Ethics Law authorize the State Ethics Commission to issue formal advisory opinions in response to requests from officials, employees, lobbyists, and others who are subject to the Public Ethics Law. Formal opinions generally follow an appearance before the Commission by the requestor, are published in the Maryland Register, and are accessible electronically through the Division of State Documents in COMAR Title 19A. Section 5-301 of the Public Ethics Law and the Commission's regulations in COMAR 19A.01.02.05 also authorize the staff and the Commission to provide informal advice. The Commission and its staff provide informal advice in many forms, including letters, emails, and phone calls.

During its forty plus years of existence, the Commission has issued 500 formal opinions. These opinions not only advise the public of the Commission's interpretation of the Public Ethics Law but also guide the Commission and its staff in providing informal advice. In light of this large body of interpretive decisions, in recent years the Commission and its staff have primarily provided advice informally. This process allows the Commission and its staff to deliver more timely advice, which

has been important considering the steady increase in advice requests. The Commission issued no formal opinions in 2025.

The Commission has also published numerous informational memoranda and other written guidance on the various topics addressed in the Law. The memoranda are available on the Commission’s website. **For officials and employees:** Agency Fundraising; Board and Commission Ethics Law Requirements; Contractual Employees; General Information for Board and Commission Members; General Information on the Public Ethics Law (an overview); Gifts; Leaving State Employment; Political Activity; Post-Employment; Secondary Employment; Participation. **For Lobbyists:** Campaign Finance Activity; Contingent Fee Restrictions; General Information for Lobbyists; Gift Reporting for Lobbyists; Lobbying Law – Frequently Asked Questions; Lobbyist Regulation and Reporting Issues; Lobbyists Serving on Boards; Procurement Lobbying. **For financial disclosure filers and agency personnel managing the agency’s program:** Frequently Asked Questions Regarding Financial Disclosure; Financial Disclosure Filer Identification Manual. **For local governments:** Prince George’s County Zoning. These memoranda and other guidance are edited as necessary to accurately reflect the current State of the Law and the Commission’s interpretation of the Law.

The Commission’s informal docket logs requests for informal advice submitted to the staff or Commission. The docket captures more complex matters (requiring research, consultation with other staff members, etc.) which come to the staff’s attention by way of letters, telephone calls, email or “walk in” requests for advice. The Commission and its staff provided informal advice in the following subject areas during calendar years 2023 through 2025:

SUBJECT MATTER OF THE ADVICE	2025	2024	2023
Lobbying Registration, Reporting and Conduct	6	6	8
Secondary Employment Advice	1005	662	556
Participation Advice	39	50	69
Post-Employment Advice	34	58	66
Gift Questions	65	108	134
Other (Financial Interest, Prestige, and Freedom of Information)	71	69	73
<b>Total</b>	<b>1220</b>	<b>953</b>	<b>906</b>

The number of informal matters addressed in 2025 exceeded those of prior years. The Commission staff has worked hard to encourage employees and officials to take a proactive approach to dealing with ethics matters, preferring to address issues before they become enforcement matters. As the above table indicates, the largest number of matters addressed dealt with State employees seeking outside or secondary employment, as is consistently the case.

The informal docket does not include routine advice on matters that the Commission’s Executive Director, General Counsel, Assistant General Counsel, Assistant Counsel, and Staff Counsel are able to immediately resolve through telephone calls, emails, and in-person discussions on a daily basis. It also does not include the Commission staff assisting individuals with electronic

financial disclosure filing or training or other general inquiries concerning the Public Ethics Law and access to public information.

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**UNIVERSITY OF MARYLAND PUBLIC-PRIVATE PARTNERSHIP  
EXEMPTIONS**

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The Public-Private Partnership Act, which is codified in § 5-525 of the Public Ethics Law, allows Maryland Educational Institutions (including University System of Maryland (USM) institutions and Morgan State University), present and former university officials or employees, and under certain circumstances specific officials (designated as a chancellor, vice chancellor, president or vice president of an educational institution) exemptions from certain conflict of interest provisions of the Public Ethics Law when engaged in research or development activities. Research or development is defined to include “the development or marketing of university-owned technology, the acquisition of services of an official or employee by an entity for research and development purposes, or participation in State economic development programs.” The exemption does not extend to the Ethics Law’s gift and prestige of office restrictions. The institution granting the exemption is required to have adopted procedures conforming to the requirements of the Ethics Law, to maintain the exemption as a public record, and to file a copy with the State Ethics Commission.

The Law requires each governing board to report quarterly to the Governor, the Legislative Policy Committee of the General Assembly, and the State Ethics Commission, the number of exemptions approved. During calendar year 2025, USM institutions and Morgan State University reported an additional 185 faculty member exemptions to the Commission. The 2025 exemptions were from the following institutions:

INSTITUTION	Number of Exemptions
Morgan State University	1
Towson University	0
University of Maryland Baltimore	70
University of Maryland Baltimore County	3
University of Maryland College Park	108
University of Maryland Global Campus (UMGC)	0
Frostburg University	1
University of Maryland Eastern Shore (UMES)	2
<b>TOTAL FACULTY EXEMPTIONS</b>	<b>185</b>

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## FINANCIAL DISCLOSURE

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The financial disclosure program continued to identify individual employees and officials required to file, provide technical assistance to filers, and monitor compliance with the Law. In accordance with Public Ethics Law § 5-103, the Commission reviewed a sizable number of requests by various agencies to add positions to or delete positions from the financial disclosure filing list. The net result was an increase in the number of filers from 19,968 in 2024 to 20,606 in 2025. Pursuant to Public Ethics Law §§ 5-103 and 5-209, the Commission also made decisions regarding whether newly created boards and commissions met the Ethics Law's definition of "executive unit." These determinations are significant because members of executive units are subject to the Public Ethics Law, including both the conflict of interest and financial disclosure filing requirements. The Commission also considered and acted upon requests by several boards and commissions for exemptions from the requirement to file financial disclosure statements. The Commission continues to see a substantial increase in the number of boards, commissions, task forces, and technical advisory groups created by the General Assembly.

The basic financial disclosure statement filed by most individuals who are determined by the Commission to be public officials is referred to as Form #1. Individuals who are public officials only as the result of their participation on boards or commissions are required to file a limited financial disclosure statement (Form #2). Legislators are required to file a more extensive disclosure statement (Form #19). The Public Ethics Law requires financial disclosure statements to be submitted electronically. Filers may also electronically file amendments if required. The electronic system has many advantages, both for the filer because of its user-friendly nature and for the staff. The system permits the staff to quickly review electronically submitted statements, compare them to previously filed electronic statements, notify filers by email of any omissions or questions raised by the statements, and maintain copies of those notifications in the filers' electronic records. The emails become attached to the electronic files, and a record is therefore compiled of statements, inquiries, and responses. Communication with filers, for the most part, is through email, which also saves the Commission substantial supply and postage costs. The Commission's electronic financial disclosure system is maintained and serviced by an outside information technology vendor, with the coordination of the Maryland Department of Information Technology. Changes to financial disclosure filing requirements often require updates to the electronic system at a significant cost to the Commission.

The Commission staff conducts compliance reviews of financial disclosure statements and notifies filers of identifiable errors or omissions, and it pursues enforcement actions against those who fail to file. During 2025, the Commission was able to review 20,620 financial disclosure statements.

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## LOBBYIST DISCLOSURE AND REGULATION

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The lobbying year runs from November 1<sup>st</sup> to October 31<sup>st</sup> of the following year. The Public Ethics Law requires a regulated lobbyist to register separately for each entity that engages the regulated lobbyist for lobbying purposes. For the lobbying year that ended October 31, 2025, 4,141 lobbying registrations were filed with the Commission. Those registrations were submitted by 750 lobbyists on behalf of 1,708 employers. This represents a decrease of 166 registrations from the 4,307 filed for the period ending October 31, 2024. The Commission launched a new lobbyist registration and reporting system in September of 2019, replacing an outdated system that had been in place since 2005. This new system provides a more accurate way of reporting expenses.

The following table summarizes lobbying expenditures for 2025, 2024 and 2023:

<b>TYPE OF EXPENDITURE</b>	<b>10/31/25</b>	<b>10/31/2024</b>	<b>10/31/2023</b>
Compensation	\$80,532,934.88	\$77,053,014.24	\$70,715,566.57
Salaries to Staff	\$1,739,853.01	\$1,285,575.54	\$1,427,128.18
Office Expenses	\$1,281,128.57	\$1,133,261.39	\$1,133,386.15
Research	\$421,598.77	\$333,587.76	\$269,381.54
Publications	\$4,430,031.49	\$3,061,459.11	\$1,231,652.60
Witness Fees	\$51,292.26	\$17,092.15	\$9,157.08
Other Expenses	\$638,115.93	\$497,575.67	\$361,693.38
<b>SUBTOTAL</b>	<b>\$89,094,954.91</b>	<b>\$83,381,565.86</b>	<b>\$75,147,965.50</b>
Events	\$2,157,775.92	\$2,579,237.60	\$2,416,848.85
Tickets	\$1,125.00	\$2,748.00	\$6,175.00
Legislative Meetings	\$75,568.90	\$28,594.17	\$22,226.39
Speaking Engagements	\$21,993.25	\$8,162.47	\$1,585.74
Meals and Beverages	\$30,090.21	\$22,909.08	\$23,632.48
Gifts	\$12,078.65	\$6,918.49	\$12,787.47
<b>TOTAL OF ALL EXPENDITURES</b>	<b>\$91,393,586.84</b>	<b>\$86,030,135.67</b>	<b>\$77,631,221.43</b>

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## ENFORCEMENT ACTIVITIES

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In 2025, the Commission opened 74 A matters (Preliminary Consideration), including 42 conflict of interest matters, 20 lobbyist matters, 6 financial disclosure matters, and 6 training matters. The Commission entered into 15 Late Filing Agreements with lobbyists during 2025, resulting in payments of \$2,250 to the Fair Campaign Finance Fund. The Commission closed 43 A matters in 2025, which includes 6 from 2024. (Note that at this preliminary stage, allegations of ethics violations against multiple parties may be grouped as a single matter, e.g. late filed lobbyist reports, and many A matters transition into B matters or complaints.)

The Commission opened 27 B matters (Preliminary Inquiry Matters) in 2025. Twenty-five involved conflicts of interest and 2 were lobbying matters. In 2025, the Commission closed 19 B matters, which includes 5 matters from 2024. The Commission, through a Pre-Complaint Disposition Agreement with an employee of the Maryland State Retirement Agency, where the employee acknowledged their actions violated the prestige of office provision of § 5-506, was issued a reprimand and assessed a fee in lieu of a fine for \$250. The Commission issued a reprimand and

assessed a fee in lieu of a fine for \$100, through a Pre-Complaint Disposition Agreement, to an employee of the Maryland Department of Health for using State resources to conduct activities for the benefit of themselves or another. The employee acknowledged that their actions violated the prestige of office provision of § 5-506, which prohibits employees from using their State position for their own benefit or the benefit of another. The Commission, through a Pre-Complaint Disposition Agreement with a former employee of the University of Maryland, Baltimore, where the employee acknowledged their actions violated the prestige of office provision of § 5-506, was issued a reprimand and assessed a fee in lieu of a fine for \$250. The Commission, through a Pre-Complaint Disposition Agreement with an employee of the Maryland Department of Health, where the employee acknowledged their actions violated the post-employment provisions of § 5-504, was assessed a fee in lieu of a fine for \$500.

In calendar year 2025, the Commission issued 13 complaints and closed 8 complaints, which includes 2 matters from 2024. The Commission issued a reprimand and assessed a fee in lieu of a fine for \$5,000, through a Stipulation of Settlement Agreement with a Register of Wills where the official acknowledged their actions violated the participation provisions of § 5-501 and the prestige of office provision of § 5-506. The Commission, through a Stipulation of Settlement Agreement with an employee of the Maryland State Department of Assessments and Taxation, where the employee acknowledged their actions violated the prestige of office provision of § 5-506 and the financial disclosure provisions of § 5-607, was issued a reprimand and assessed a fee in lieu of a fine for \$100. The Commission, through a Stipulation of Settlement Agreement with an employee of the Maryland Department of Labor, where the employee acknowledged their actions violated the prestige of office provision of § 5-506, was issued a reprimand and assessed a fee in lieu of a fine for \$100. The Commission assessed a total of \$7,850 in enforcement penalties in 2025. All enforcement payments were deposited into the Fair Campaign Finance Fund and cannot be used by the Commission.

In fiscal year 2021, the Commission began implementing an intermediary step in the process of the issuance of complaints against State employees, public officials, and lobbyists for failing to file their Financial Disclosure Statements or failing to satisfy their mandatory training obligations. In the past, the names of the individuals who were delinquent in their filings or training requirements were presented to the Commission and complaints were authorized and issued to those individuals, during each Commission meeting. During the COVID-19 pandemic, the Commission began authorizing complaints for issuance within 14 days after the Commission meeting if the individuals failed to file or complete their training within the specified time. This authorization period has allowed staff to streamline their work and make additional efforts to contact the delinquent individuals and provide assistance. The authorization of complaints, without immediate issuance, has proven very successful in prompting individuals to file their statements and fulfill their training obligations as compared to the immediate issuance of complaints. As a direct result, there have been far fewer complaints issued than in previous years.

Following successful audits of Lobbyist Activity Reports in 2016, the Commission approved Staff Counsel's request that the audits continue annually. In 2025, 21 Activity Reports filed by lobbyists for the period of November 1, 2024 to April 30, 2025 were selected for audit. The Public Ethics Law requires that lobbyists report compensation and other expenditures by filing Activity Reports. Gen. Prov. § 5-705. The Commission is required to review each report filed with it as part of its duties under the Public Ethics Law. Gen. Prov. § 5-205(a)(5)(i). Lobbyists must retain each "...account, bill, receipt, book, paper, or other document[s] necessary to substantiate..." their Activity Reports and affiliated reports for 3 years after the reports are filed. Gen. Prov. § 5-409(a-b). Each lobbyist, with reasonable notice from the Commission, shall make those documents available to the Commission for inspection. Gen. Prov. § 5-409(c). This last section provides the Commission with the authority to audit Activity Reports and other associated reports by inspecting

supporting documentation. Lobbyists are advised that the audits will be occurring and of the documentation they will be required to provide if they are selected for an audit.

Regardless of lobbying experience levels, almost all the submissions this year (16 of the 21 selected) required amendments. Most of the amendments dealt with small calculation errors for expenses, compensation, or actual costs compared to the original estimates, but a significant amount of these amendments dealt with the specific bill disclosures that drove the audit. The audit this year was focused on the required specific bill disclosures required for legislative action lobbyists.

Each year, due to the errors discovered in the audits, instructions in the lobbyist training are updated to emphasize the issues that arise in this and other audit years. After Activity Reports for the period of November 1, 2025 to April 30, 2026 are filed, the Commission staff will randomly select no less than 20 lobbyists and meet with them to review the documentation that supports their reports. Staff Counsel will then ask the lobbyists to provide any necessary amendments. Lobbyists who fail to respond to the audit will be subject to enforcement action.<sup>1</sup>

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## **LOCAL GOVERNMENT ETHICS LAWS**

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The Public Ethics Law charges the Commission with ensuring that local governments and school boards implement laws/regulations consistent with the requirements imposed on them in the State law. The Commission, however, has no role in administering those laws/regulations once it determines compliance with the State's requirements. That responsibility belongs to the local governments and school boards.

During 2025, the Commission's Executive Director, General Counsel, Assistant Counsel, and Assistant General Counsel participated in numerous phone discussions with county and local ethics officials, as well as their representative associations. The conversations addressed questions relating to conflicts of interest, financial disclosure and lobbying, and the adoption of local laws/regulations to ensure compliance with enhanced requirements imposed on elected local officials and school board members by the General Assembly in legislation enacted in 2017 and 2021. The Commission received 23 new written requests for advice from local governments and boards of education, and Assistant Counsel, in the position created in 2023 to focus on local government matters, continued to review the ethics ordinances and policies of local governments and boards of education for compliance with the Public Ethics Law and the Commission's regulations. Local governments must submit an annual certification of compliance to the Commission. In 2025, 68 out of 74 municipalities and 22 out of 24 counties completed their annual certification, a significant increase over the prior year. In 2025 the General Assembly enacted SB 109 (CH 299), amending §5-816 of the Maryland Public Ethics Law (Md. Code Ann., General Provisions, Title 5 (Supp. 2025)) to require boards of education to provide an annual certification to the State Ethics Commission by October 1 of each year. The certification states that the board of education is in compliance with State requirements for members of the school board and if applicable, officials and employees of the local school system. Compliance requires that the school boards adopt regulations or policies that are equivalent to or exceed State law requirements regarding conflicts of interest and financial disclosure for members of the school board as set forth in Subtitle 8 of the Public Ethics Law and the COMAR 19A.05. Currently, all jurisdictions meet these requirements and may certify compliance. In 2025 23/24 Boards certified for the first time.

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<sup>1</sup> The primary purpose of the audits, which are performed on randomly selected lobbyists, is to confirm that the information reported by them is accurate and supported by the records they maintain. The random nature of the process, which is conveyed to all lobbyists in advance, encourages them to ensure accuracy in the information they provide and to maintain the proper documentation to support their reports.

As a result of the legislation referenced above, local governments and boards of education are required to make changes to their local ordinances and policies to comply with the State Law requirements. In 2025, 12 municipalities and 10 counties enacted compliant laws/regulations. Currently 23 out of 24 counties are in full compliance, 67 out of 74 municipalities are in full compliance, and all the Boards of Education are in full compliance. The primary hallmarks of noncompliance are local staff and ethics board turnover, leaving new staff unsure of their obligations. Assistant Counsel has been regularly communicating with these communities to improve this issue.

The Public Ethics Law and the Commission's regulations authorize the Commission to exempt a municipality from the requirement to adopt an ethics law, or to modify the provisions applicable to a municipality, if the Commission determines an exemption or modification to be warranted based upon the size of the municipality. Commission regulations (19A.04.03.03) that require the Commission to review the status of all municipal exemptions and modifications at the end of each decennial census to determine if those that were previously granted are still appropriate. This regulation has been updated to state that the Commission *may* review the status at the end of each *alternating* decennial census. The review for the 2010 census was undertaken at the end of 2013 and the beginning of 2014. No additional exemptions/modifications were granted in 2025.

The Commission issued no new Public Notices in 2025, but three Public Notices for noncompliance with the requirements of Subtitle 8 of the Public Ethics Law continue from previous years. Public Notices are posted on the Commission's website at <https://ethics.maryland.gov/local-government-public-notice/> and set forth the issues for each jurisdiction related to noncompliance with the State requirements. Public Notices continued for the City of Gaithersburg, the Town of Hampstead, and the Town of Mount Airy through 2025. In 2023, the Public Notice for the City of Gaithersburg was amended to include the minutes of the March 2, 2023, meeting that reflect efforts on the part of the City to make the required changes. While the City is not yet in full compliance, it continues to communicate and submit its annual certifications.

In the 2022 legislative session, HB 1059(CH 284) was passed and enacted. This legislation required the three bicounty commissions, which are the Washington Suburban Sanitation Commission ("WSSC"), the Maryland-National Capital Parks and Planning Commission ("M-NCPPC") and the Washington Suburban Transit Commission ("WSTC"), to file an annual certification of compliance with the State Ethics Commission beginning in 2023. The annual filing is required to certify that each bicounty commission's respective ethics regulations for their employees and lobbying provisions meet the requirements of Subtitle 8 of the Public Ethics Law. The State Ethics Commission does not have any jurisdiction over the bicounty commissions, as entities, or over their respective employees and lobbying programs. Members of the three bicounty commission boards, however, are subject to the Public Ethics Law and file an annual financial disclosure statement with the State Ethics Commission. The State Ethics Commission does assist the bicounty commissions, if asked, with reviewing their respective ethics policies and keeps copies of the bicounty commission annual reports provided. In response to this legislative change, the Commission developed a new Bicounty Commission Certification Form, which is available on its website. The certification must be filed annually by April 30<sup>th</sup> each year. Any annual certification forms filed with the State Ethics Commission will be placed in the bicounty binders in the lobby of the Commission's office. All bicounty commissions filed certification forms with the State Ethics Commission by April 30, 2025.

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## EDUCATIONAL AND INFORMATIONAL ACTIVITIES

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The Commission staff has been active in providing formal training to State employees, lobbyists, and local jurisdictions. The training involved advising and assisting employees, officials, candidates and lobbyists on completion of forms, and providing training related to the conflict of interest provisions of the Public Ethics Law. The Commission staff has assisted local government and school board officials in drafting their ethics laws and regulations and provided technical advice to local government ethics commissions.

The Public Ethics Law requires new financial disclosure filers (i.e. public officials) to receive 2 hours of Ethics Law training (§ 5-205(d)) within 6 months of becoming filers. In 2025, approximately 1,888 filers took this training. After January 19, 2023, State officials who are subject to the State Ethics Commission's jurisdiction are also required to complete mandatory ethics training. All State officials required to take this ethics training were in compliance during 2025.

In addition to the basic training provided to new financial disclosure filers, the staff regularly responds to requests from various State entities for general ethics training and other, specifically focused training. The staff conducted 9 virtual and 1 in-person general ethics training programs for agencies, boards and commissions, attended by 239 State employees and public officials, addressing conflicts of interest and the financial disclosure requirements. The Commission staff also conducted 21 virtual and 9 in-person training sessions addressing conflict of interest issues attended by an additional 521 State employees, public officials, members of the public and special interest groups. The total number of individuals who attended virtual and in-person general ethics and conflict of interest training was 760.

In accordance with § 5-205(e) of the Public Ethics Law, which requires the State Ethics Commission to provide a training course for regulated lobbyists and prospective regulated lobbyists at least twice each year, the Commission staff conducted 3 virtual lobbying training programs attended by 21 regulated lobbyists. In total, 406 regulated lobbyists took the mandated training online or in person during calendar year 2025. The lobbying training focuses on electronic filing, the general lobbying conduct prohibitions in the Law, and reporting requirements.

The State Ethics Commission relies heavily on its website to make information available to officials, employees, lobbyists, and members of the general public. The Commission's home page allows users to access the Commission's Annual Reports, special explanatory memoranda, and other information. The Commission's electronic filing for lobbyists and financial disclosure filers may be accessed from the website, and all Commission forms may be downloaded from the home page.

## 2025 LEGISLATION REPORT & RECOMMENDATIONS

The State Ethics Commission proposed two departmental bills during the 2025 legislative session.

1. HB230/SB251(CH 73) – Maryland Public Ethics Law – Training and Financial Disclosure Requirements – Revisions

[https://mgaleg.maryland.gov/2025RS/chapters\\_noln/Ch\\_73\\_hb0230T.pdf](https://mgaleg.maryland.gov/2025RS/chapters_noln/Ch_73_hb0230T.pdf)

This legislation removes the two-hour language from the employees' ethics training requirements. This bill also adds online training as a mechanism for providing mandatory employee, official or lobbyist training. An amendment to this bill offered on the Senate side also included specific topics to be included in the employee and official training. This amendment was also included in the House version of the bill when it passed. Commission staff testified in favor of this bill before the House and the Senate. Governor Moore signed this bill into law on April 8, 2025.

2. HB166/SB185 – Maryland Public Ethics Law – State Officials of and Candidates to be State Officials of the Judicial Branch – Conflicts of Interest and Financial Disclosure Statements

<https://mgaleg.maryland.gov/mgawebwebsite/Legislation/Details/sb0185>

This legislation clarifies that the Supreme Court of Maryland and the Administrative Office of the Courts (AOC) administer all provisions of the Public Ethics Law, including public records inspection, for judicial officials and candidates to be judicial officials. This bill also removes the requirement that the AOC transfer copies of judicial officials' financial disclosure statements to the State Ethics Commission. Commission staff testified in favor of this bill before the House and the Senate. This bill passed the House of Delegates unanimously but did not receive a vote from the assigned Senate committee. The Commission will consider proposing this bill as departmental legislation again for the 2026 legislative session.

Two other bills passed during the 2025 legislative session included changes to the Maryland Public Ethics Law.

1. SB109 CH 299) – Maryland Public Ethics Law – School Boards – Compliance Certification  
[https://mgaleg.maryland.gov/2025RS/chapters\\_noln/Ch\\_299\\_sb0109T.pdf](https://mgaleg.maryland.gov/2025RS/chapters_noln/Ch_299_sb0109T.pdf)

This legislation requires each school board to annually certify to the State Ethics Commission compliance with the Subtitle 8 requirements for conflict of interest, financial disclosure and lobbying provisions in the local ethics policy. This is similar to the certification requirements that already exist for bicounty commissions, counties and municipalities. The Commission staff provided written informational testimony on the current compliance certification requirements.

2. HB 932 (CH300) – Public Ethics – Conflicts of Interest and Blind Trust – Governor  
[https://mgaleg.maryland.gov/2025RS/chapters\\_noln/Ch\\_300\\_hb0932T.pdf](https://mgaleg.maryland.gov/2025RS/chapters_noln/Ch_300_hb0932T.pdf)

This legislation will require a Governor-elect to consult with the State Ethics Commission and begin the blind trust process during transition. This legislation requires the Governor to place certain interests into a certified blind trust or divest certain interests within 6 months after taking office and enter into a nonparticipation agreement with the State Ethics Commission for any remaining financial interests not placed in the blind trust. This bill adds many of the Commission regulatory requirements for blind trusts to the Public Ethics Law. Both the blind trust documents and the nonparticipation agreement must be public documents available on the State Ethics Commission's website. This bill also adds a new disclosure requirement in §5-501.1(E) of the Public Ethics Law. The State Ethics Commission must also create a public disclosure form submitted by any business entity that seeks any sort of State funds, grants or contracts if that business entity is partially owned by the Governor or certain restricted individuals that have a defined relationship with the Governor. Submitted disclosure forms must be posted on the Commission's website. DGS must also revise all State procurement documents to include required disclosure of interests held by the Governor of the restricted individuals in a business entity seeking State funds or contracts. The legislation includes fining authority for the State Ethics Commission to

directly fine the Governor for failure to comply with the blind trust requirements. Additionally, any person who knowingly and willfully violates the business entity disclosure requirements of §5-501.1(E) is guilty of a misdemeanor and subject to a \$10,000 fine or imprisonment of one year, or both. The State Ethics Commission submitted a \$50,000 fiscal note estimate for required changes to agency training modules, programming costs and staff training to complete all necessary operational changes from this legislation. Commission staff appeared at the legislative hearings, at the request of each sponsor, to be available for questions. The Commission submitted informational written testimony on this bill in both the House and the Senate.

The State Ethics Commission recommends that the proposed changes listed below be considered as possible departmental legislation in the future.

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### **PROPOSED CHANGES TO CONFLICT OF INTEREST PROVISIONS**

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No current recommendations.

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### **PROPOSED CHANGES TO LOBBYING PROVISIONS**

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No current recommendations.

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### **PROPOSED CHANGES TO FINANCIAL DISCLOSURE PROVISIONS**

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Amend Subtitle 6 of the Public Ethics Law to clarify that the Supreme Court of Maryland or another body designated by that court shall maintain the financial disclosure statements of State officials of the Judicial Branch and candidates to be State officials of the Judicial Branch and make the statements available for public inspection. Also amend Subtitle 6 of the Public Ethics Law to remove the requirement that the Supreme Court of Maryland forward copies of financial disclosure statements of State officials of the Judicial Branch and candidates to be State officials of the Judicial Branch to the State Ethics Commission.

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### **PROPOSED CHANGES TO ENFORCEMENT PROVISIONS**

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No current recommendations.

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### **PROPOSED CHANGES TO ADMINISTRATIVE PROVISIONS**

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No current recommendations.

**STATE ETHICS COMMISSION MEMBERS –  
1979 TO PRESENT**

* Herbert J. Belgrad	1979 to 1986
William B. Calvert	1979 to 1980
Jervis S. Finney	1979 to 1983
Reverend John Wesley Holland	1979 to 1987
* Barbara M. Steckel	1979 to 1990
Betty B. Nelson	1981 to 1988
* Thomas D. Washburne	1984 to 1986
* M. Peter Moser	1987 to 1989
* William J. Evans	1987 to 1993
Reverend C. Anthony Muse	1988 to 1990
Robert C. Rice, Ph.D.	1989 to 1993
* Mark C. Medairy, Jr.	1990 to 1999
Mary M. Thompson	1990 to 1994
Shirley P. Hill	1992 to 1994
* Michael L. May	1993 to 2003
Robert J. Romadka	1994 to 1997
April E. Sepulveda	1994 to 2003
* Charles O. Monk, II	1995 to 2003
* Dorothy R. Fait	1999 to 2005
D. Bruce Poole	2000 to 2004
* Julian L. Lapidés	2002 to 2014
Ava S. Feiner, Ph.D.	2003 to 2005
* Robert F. Scholz	2003 to 2012
Daryl D. Jones	2005 to 2006
* Janet E. McHugh	2005 to 2011 & 2015 to 2023
* Paul M. Vettori	2006 to 2016
H. Richard Duden, III	2006 to 2008
Jacob Yosef Miliman	2008 to 2019
Andrea M. Leahy	2011 to 2013
Robert G. Blue	2012 to 2015
Martin G. Madden	2014 to 2014
Rachel T. McGuckian	2014 to 2015
Kim L. Coble	2015 to 2019
Thomas B. Smyth, M.D.	2015 to 2016
James R. Benjamin, Jr.	2016 to 2018
* Craig D. Roswell	2016 to present
Aruna Miller	2019 to 2020
Geneau M. Thames	2019 to present
James N. Robey, Jr.	2019 to present
Bonnie A. Kirkland	2021 to 2024
Mariela Olivares	2023 to present
Karen D. Morgan	2024 to present

*\*Person served as Chair during some part of his/her term on the Commission.*

## **Blind Trust Regulations: Summary of Changes**

19A.06.01.01 Purpose and Scope. Adds that the scope of the law now includes additional requirements for the governor and governor-elect, as well as disclosure requirements for the State Ethics Commission.

19A.06.01.02 Applicability and Definitions. Clarifies that there are new requirements applicable to the Governor and Governor-elect.

19A.06.02.01 Substantive Requirements for Certification. Clarifies that there are additional requirements for the Governor and Governor-elect.

19A.06.03.01 Compliance with Procedural Requirements for Certified Blind Trusts. Again, added language specifies that there are additional requirements for the Governor and Governor-elect.

19A.06.04 NEW CHAPTER: Governor's Blind Trust. Details the new Governor's Blind trust requirements legislated by HB 932 (2025). Sections are: Applicability, Consultation with State Ethics Commission, Governor's Blind Trust Obligations, Governor's Trustee, Exemptions, Nonparticipation plans, Disclosure requirements, Sanctions.

These proposed amendments have been reviewed by the AELR Committee and will be published in the Maryland Register on March 20, 2026 for the 30-day public comment period. The proposed amendment information and Md. Register link will be posted on the Commission's website with information on how to submit comments. If any comments are received, they will be provided to the Commission. If no comments are received, the proposed regulation amendments will be presented to the Commission for a final adoption vote on June 4, 2026.