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Assistant General Counsel
PANSY S. WATSON
Assistant Counsel

MINUTES OF THE STATE ETHICS COMMISSION MEETING

January 15, 2026

Commission Members Present: Craig D. Roswell, Chair
Karen D. Morgan
Mariela Olivares
James N. Robey, Jr.
Geneau M. Thames

Staff Members Present: 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
Aida Canales, Paralegal
Stephen Garrett, Paralegal
Maura Pizzi, Paralegal

The meeting convened at 9:10 a.m. at 45 Calvert Street, 3rd Floor conference room. Those listed as present participated in all portions of the meeting unless otherwise noted. If other individuals participated in aspects of the meeting, they will be identified in the specific line item where their participation occurred.

ITEM 1: Tentative Agenda

Discussion: The Commission reviewed the tentative agenda.

Decision: The tentative agenda was approved as adjusted.

ITEM 2: Minutes of November 13, 2025, Meeting

Discussion: The draft minutes of November 13, 2025, meeting were reviewed and discussed.

Decision: The draft minutes were approved.

ITEM 3: Financial Disclosure Additions and Deletions

Discussion: Ms. Allgair presented a listing of the proposed additions and deletions to the financial disclosure list recommended by State agencies and reviewed by Financial Disclosure Administrator, Young Smith and Executive Director, Jennifer Allgair. The recommendations covered the Department of Information Technology, Department of Health, Attorney General's Office, Department of Commerce, Maryland Port Administration, Department of Human Services, Department of Natural Resources, University of Baltimore, University of Maryland Global Campus, Department of Education, Maryland Transportation Authority, Department of Emergency Management, Maryland Clean Energy Center, Department of Transportation, Maryland Agricultural & Resources-Based Industry Development Corporation, Election Board-Harford County, Election Board-Cecil County, Baltimore City Community College, Bowie State University, Maryland Higher Education Commission, State Highway Administration, Frostburg State University, Maryland Community Investment Corporation, University of Maryland Baltimore and the Maryland Center for School Safety.

Decision: The Commission approved Ms. Allgair's recommendations on financial disclosure position additions and deletions.

ITEM 4: Executive Unit Determinations and Financial Disclosure Exemption Requests

Discussion: Ms. Allgair briefed the Commission on whether or not the Maryland Reparations Commission and the Healthcare Ecosystem Stakeholder Cybersecurity Workgroup should be considered executive units covered by the Public Ethics Law and whether or not they would be exempt from the financial disclosure requirement.

Decision: The Commission determined the Maryland Reparations Commission and the Healthcare Ecosystem Stakeholder Cybersecurity Workgroup were executive units covered by the Public Ethics Law and granted financial disclosure exemptions.

ITEM 5: Financial Disclosure Exemption Request

Discussion: Ms. Allgair briefed the Commission on the Historical and Cultural Museum Assistance Program Review Panel's request for exemption from the financial disclosure requirement.

Decision: The Commission approved exemption for the Historical and Cultural Museum Assistance Program Review Panel.

ITEM 6: Executive Director's Report – Lobbying System Updates

Discussion: Ms. Allgair briefed the Commission on the updated MGA Committee listings in the lobbying system, proposed updates to the automated Activity Report reminders sent to lobbyists to include additional information on legislative matters/bill numbers on each report and updated oath language in both the lobbying reports and financial disclosure statements to conform with the oath language in the Maryland Rules. Updated oath language was requested by the Office of the State Prosecutor.

ITEM 7: Executive Director's Report – Candidates and Incumbents Financial Disclosures

Discussion: Ms. Allgair briefed the Commission on the 2025 financial disclosure deadlines for candidates for State office in an election year and advised that the staff will send reminders emails to executive

branch incumbents. Commission staff will assist the Maryland State Board of Election staff on the candidates' filing deadline to answer questions about financial disclosure.

ITEM 8: Executive Director's Report – Training Update

Discussion: Ms. Allgair briefed the Commission on the progress of upgrading our training platform software that is being coordinated with MPT, DoIT and EY.

ITEM 9: Update on Schedule for Proposed Amendments to the Commission's Regulations

Discussion: Ms. Allgair briefed the Commission on the status of proposed amendments to the Commission's regulations (COMAR 19A.03; 19A.04; and 19A.05). The proposed amendments reflected changes mandated by HB230/SB251 (2025) and SB 109 (2025). The changes included updates to the model laws to reflect new reporting requirements, fix errors in formatting and spelling, and update regulations related to exemptions granted to State boards and local governments. The proposed regulations were published in the Maryland Register on December 12, 2025. The Commission did not receive any public comments on the proposed regulations during the 30-day comment period. The proposed regulation amendments are ready to be considered for final adoption by the Commission.

Decision: The Commission approved the proposed regulations for final adoption on January 27th, as long as no changes were made by the final review committee.

ITEM 10: Review of New Proposed Amendments to the Commission's Regulations

Discussion: Ms. Allgair briefed the Commission on the proposed amendments to the Commission's regulations to amend the subtitle on Blind Trusts (COMAR 19A.06) and add a new chapter to the subtitle concerning the Governor's blind trust requirements which include: 19A.06.01.02 – Blind Trusts - Applicability and Definitions, 19A.06.02. – Blind Trusts - Criteria for Certification, 19A.06.03 – Blind Trusts - Procedural Requirements, and 9A.06.04 – Blind Trusts – Governor's Requirements.

Decision: The Commission approved the proposed draft amendments to the regulations and directed staff to begin the submission process with the Division of State Documents for publication and public comment.

ITEM 11: Local Government – Allegany County (25-1188)

Discussion: Ms. Watson briefed the Commission on the proposed amendments to the local ethics ordinance for Allegany County.

Decision: The Commission approved the proposed amendments.

ITEM 12: Local Government – City of Greenbelt (25-1173)

Discussion: Ms. Watson briefed the Commission on the proposed amendments to the local ethics ordinance for the City of Greenbelt.

Decision: The Commission approved the proposed amendments.

ITEM 13: Local Government – Town of Oakland (25-1018)

Discussion: Ms. Watson briefed the Commission on the proposed amendments to the local ethics ordinance for the Town of Oakland.

Decision: The Commission approved the proposed amendments.

ITEM 14: Local Government – Town of Elkton (25-1219)

Discussion: Ms. Watson briefed the Commission on the proposed amendments to the local ethics ordinance for the Town of Elkton.

Decision: The Commission approved the proposed amendments.

A motion was made by Ms. Olivares and seconded by Ms. Thames to close the meeting to the public pursuant to §3-305(b)(13) of the Open Meetings Act to consider confidential advice matters and enforcement matters per §5-303 and §5-407 of the Public Ethics Law, and to receive the advice of counsel pursuant to §3-305(b)(7) of the Open Meetings Act. The Commission voted unanimously in favor of closing the meeting at 9:30 a.m.

ITEM 15: Informal Matter – Memo on Non-Participation Plans and Mitigation Agreements

Discussion: Mr. Colquhoun presented two non-participation agreements or mitigation agreements provided and approved of by the staff. The matters included 25-1269 and 25-1302.

ITEM 16: Informal Matters – Department of Housing & Community Development (25-1065)

Discussion: Ms. Henry briefed the Commission on this matter regarding an employee in the Department of Housing and Community Development whose relative works for a financial institution that does business with the Department.

Decision: The Commission granted the employee a participation exception.

ITEM 17: Informal Matter – University of Maryland Baltimore County (25-1174)

Discussion: Mr. Colquhoun briefed the Commission on whether or not two contractual employees at the University of Maryland Baltimore County are subject to the Ethics Law restrictions if they have not been identified as a financial disclosure filer.

Decision: The Commission determined that the contractual employees are not subject to the Public Ethics Law.

ITEM 18: Informal Matter – University of Maryland Board of Regents (25-1107)

Discussion: Mr. Colquhoun briefed the Commission on a secondary employment request regarding a University of Maryland Board of Regents member who wants to work for a company that lobbies Congress.

Decision: The Commission determined that the activity was not inconsistent with the Public Ethics Law.

ITEM 19: Informal Matter – Secondary Employment Requests

Discussion: Mr. Colquhoun briefed the Commission on secondary employment requests regarding employees in the Department of Health working at an entity that is regulated by the Department or has a business relationship with the Department. The matters included: 25-1118, 25-1120, 25-1124, 25-1125, 25-1133, 25-1135, 25-1136, 25-1146, 25-1147, 25-1148, 25-1154, 25-1155, 25-1166, 25-1185, 25-1191, 25-1195, 26-1196, 25-1211, 25-1247, 25-1251, 25-1264, 25-1266, 25-1281, 25-1281, 25-1284, 26-0002, 26-0005, 26-0007, 26-0008, 26-0009, 26-0020, 26-0054 and 26-0055.

Decision: The Commission granted exceptions to allow secondary employment for all matters.

ITEM 20: Informal Matter – Maryland General Assembly (25-1297)

Discussion: Mr. Colquhoun briefed the Commission on a secondary employment request regarding an employee in the Maryland General Assembly working for a non-profit entity.

Decision: The Commission determined that the employment was not inconsistent with the Public Ethics Law.

ITEM 21: Informal Matter – Department of Human Services (25-1291)

Discussion: Ms. Henry briefed the Commission on a secondary employment request regarding an employee in the Department of Human Services working for an entity that is regulated by the Department.

Decision: The Commission granted an exception to allow this secondary employment.

ITEM 22: Informal Matters – Department of Human Services (25-1177)

Discussion: Ms. Henry briefed the Commission on a secondary employment request regarding an employee in the Department of Human Services working for an entity that accepts benefits from the Department.

Decision: The Commission granted an exception to allow this secondary employment.

ITEM 23: Informal Matter – Department of Human Services (25-1288)

Discussion: Ms. Henry briefed the Commission on a secondary employment request regarding an employee in the Department of Human Services working for an entity that accepts benefits from the Department.

Decision: The Commission granted an exception to allow this secondary employment.

ITEM 24: Informal Matter – Department of Health (26-0054)

Discussion: Ms. Henry briefed the Commission on a secondary employment request regarding an employee in the Department of Health employee working for an entity that does business with and is regulated by the Department.

Decision: The Commission granted an exception to allow this secondary employment.

ITEM 25: Informal Matter – Department of Health (26-0055)

Discussion: Ms. Henry briefed the Commission on a secondary employment request regarding an

employee in the Department of Health employee working for an entity that does business with and is regulated by the Department.

Decision: The Commission granted an exception to allow this secondary employment.

ITEM 26: Informal Matter – Maryland Environmental Service (25-1064)

Discussion: Ms. Henry briefed the Commission on a post-employment request regarding an employee who previously worked at Maryland Environmental Service.

Decision: The Commission granted the post-employment request.

ITEM 27: 2026 Legislation and Lobbying Compliance Report

Discussion: Ms. Allgair briefed the Commission on the status of the Commission’s proposed departmental bill for the 2026 legislative session, SB80/HB269. Ms. Allgair briefed the Commission on other legislation that either impacts the Maryland Public Ethics Law or the State Ethics Commission received a fiscal note request from the Department of Legislative Services. The bills included HB 136, HB 166, HB 226/SB22, HB 268, SB 86, SB 121 and SB 144. Ms. Allgair also provided the Commission with a copy of a letter and compliance report received from F Minus related to lobbying reporting matters.

ITEM 28: A-63-25

Discussion: Ms. Thompson briefed the Commission on this matter.

Decision: This matter will be placed on the Preliminary Inquiry Docket. (B-1-26)

ITEM 29: A-64-25

Discussion: Ms. Thompson briefed the Commission on this matter.

Decision: This matter will be placed on the Preliminary Inquiry Docket. (B-2-26)

ITEM 30: A-65-25

Discussion: Ms. Thompson briefed the Commission on this matter.

Decision: This matter will be placed on the Preliminary Inquiry Docket. (B-3-26)

ITEM 31: A-67-25

Discussion: Ms. Thompson briefed the Commission on this matter.

Decision: The Commission declined to issue the complaint and the matter will be closed.

ITEM 32: A-69-25

Discussion: Ms. Thompson briefed the Commission on this matter.

Decision: This matter will be placed on the Preliminary Inquiry Docket. (B-4-26)

ITEM 33: A-70-25

Discussion: Ms. Thompson briefed the Commission on this matter.

Decision: This matter will be closed.

ITEM 34: A-71-25

Discussion: Ms. Thompson briefed the Commission on this matter.

Decision: This matter will be placed on the Preliminary Inquiry Docket. (B-5-26)

ITEM 35: B-21-25

Discussion: Ms. Thompson briefed the Commission on this matter.

Decision: This matter will be closed with a Non-Participation Plan.

ITEM 36: B-27-25

Discussion: Ms. Thompson briefed the Commission on this matter.

Decision: The Commission declined to issue the complaint and the matter will be closed.

ITEM 37: C-7-25

Discussion: Ms. Thompson briefed the Commission on this matter.

Decision: This matter will be closed with a letter.

ITEM 38: C-8-25

Discussion: Ms. Thompson requested the matter be removed from the agenda.

Decision: This matter will be reviewed at a future meeting.

ITEM 39: A-66-25

Discussion: Ms. Thompson briefed the Commission on this matter.

Decision: The Commission accepted the Lobbyist Filing Agreement.

ITEM 40: A-73-25

Discussion: Ms. Thompson briefed the Commission on these matters.

Decision: The Commission authorized complaints in these matters.

ITEM 41: A-74-25

Discussion: Ms. Thompson briefed the Commission on these matters.

Decision: The Commission authorized complaints in these matters.

ITEM 42: C-9-25

Discussion: Ms. Thompson briefed the Commission on this matter.

Decision: The Commission accepted the late filing as a cure.

(Ms. Thompson, Ms. Allgair, Ms. Watson, Ms. Pizzi, and Mr. Garrett participated in the briefings to the Commission, but did not participate in the decisions regarding Items 28 through 42.)

The meeting was adjourned at 11:15 a.m.