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KAREN D. MORGAN  
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## STATE ETHICS COMMISSION

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*Staff Counsel*  
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*Assistant General Counsel*  
PANSY S. WATSON  
*Assistant Counsel*

### MINUTES OF THE STATE ETHICS COMMISSION MEETING

**March 26, 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  
Darlene Brocki Gavel, Office Manager  
Stephen Garrett, Paralegal  
Maura Pizzi, Paralegal

The meeting convened at 9:04 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: Corrected Minutes of November 13, 2025 Meeting

Discussion: The corrected minutes of November 13, 2025, meeting to include Maura Pizzi's attendance were reviewed and discussed.

Decision: The corrected minutes were approved.

ITEM 3: Minutes of January 15, 2026 Meeting

Discussion: The minutes of January 15, 2026, meeting were reviewed and discussed.

Decision: The draft minutes were approved.

ITEM 4: 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 Human Services, Department of Health, Maryland State Library Agency, State Highway Administration, Department of Juvenile Services, Department of Natural Resources, Department of Budget & Management, College of Southern Maryland, State Retirement Agency, Department of Commerce, Executive Department, Department of Housing & Community Development, Department of General Services, Department of Education, Maryland Port Administration, Food Center Authority, University of Maryland Baltimore County, University of Maryland Global Campus, St. Mary's College, University System of Maryland, Cecil County Election Board, Department of Planning, Attorney General's Office, Office of People's Counsel and the Maryland Prescription Drug Affordability Board.

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

ITEM 5: Draft 2025 Annual Report

Discussion: There was a general discussion of the Commission's draft Annual Report.

Decision: The draft Annual Report was approved.

ITEM 6: Executive Director's Report – Online Training Modules

Discussion: Ms. Allgair briefed the Commission on the status of the online training models and the need for a new server to be developed by DoIT.

ITEM 7: Executive Director's Report – New Phone System

Discussion: Ms. Allgair briefed the Commission on the switch to Microsoft Teams phone system.

ITEM 8: Executive Director's Report – Bi-County Commission Certifications

Discussion: Ms. Allgair briefed the Commission on the annual certifications filed by the bi-county commissions.

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 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. The proposed regulations were published in the Maryland Register on March 20, 2026. The proposed regulation link was added to the Commission’s website and the public comment period for the proposed regulation amendments is open until April 20, 2026.

Decision: The Commission will review any public comments received and consider the proposed amendments to the regulations for final adoption at the June 4, 2026 meeting.

ITEM 10: Local Government – Howard County (26-0082)

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

Decision: The Commission approved the proposed amendments.

ITEM 11: Local Government – City of Cumberland (26-0168)

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

Decision: The Commission approved the proposed amendments.

ITEM 12: Local Government – Town of Brentwood (26-0171)

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

Decision: The Commission approved the proposed amendments.

ITEM 13: Discussion of Local Government Survey

Discussion: The staff briefed the Commission on a survey they would like to send out to collect information from each jurisdiction.

Decision: The Commission approved reaching out to each jurisdiction.

A motion was made by Craig Roswell and seconded by Karen Morgan 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 9:21a.m.

ITEM 14: Informal Matter – Memo on Non-Participation Plans and Mitigation Agreements

Discussion: Mr. Colquhoun presented five non-participation agreements or mitigation agreements provided and approved of by the staff. The matters included 25-1297, 26-0165, 26-0164, 26-0172 and 26-0277.

ITEM 15: Informal Matters – Sheriff’s Office (26-0257)

Discussion: Ms. Henry briefed the Commission on a participation matter regarding the hiring of an individual's qualifying relative at a Sheriff's Office.

Decision: The Commission determined that the hiring was not inconsistent with the Public Ethics Law, subject to certain restrictions.

ITEM 16: Informal Matter – University of Maryland Baltimore (26-0066)

Discussion: Ms. Henry briefed the Commission on a secondary employment request regarding an employee at the University of Maryland Baltimore working at and having a financial interest in an entity at the University of Maryland College Park.

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

ITEM 17: Informal Matter – Office of the Attorney General (26-0319)

Discussion: Ms. Henry briefed the Commission on a secondary employment request regarding an employee at the Office of the Attorney General employed by an entity that has a business relationship with the Office.

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

ITEM 18: Informal Matter – Maryland General Assembly (26-0346)

Discussion: Ms. Henry briefed the Commission on a secondary employment request regarding an employee with the Maryland General Assembly seeking to work for an entity that interacts with the Maryland General Assembly.

Decision: The Commission determined that the employment did not impair the impartiality and independence of the employee.

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: 26-091, 26-0092, 26-0093, 25-1237, 26-0098, 26-0102, 26-0120, 26-0121, 26-0125, 26-0129, 26-0135, 26-0140, 26-0144, 26-0146, 26-0149, 26-0156, 26-0174, 26-0175, 26-0176, 26-0179, 26-0183, 26-0196, 26-0228, 26-0233, 26-0234, 26-0237, 26-0260, 26-0263, 26-0274, 26-0278, 26-0297, 26-0300, 26-0322, 26-0326, 26-0328, 26-0330, 26-0331, 26-0333, 26-0334, 26-0336, 26-0337, 26-0338, 26-0339, 26-0131, 26-0366, 26-0371, 26-0375 and 26-0382.

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

ITEM 20: Informal Matter – Towson University (26-0062)

Discussion: Ms. Henry briefed the Commission on a secondary employment request regarding an employee at Towson University working for an entity that has a business relationship with the University.

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

ITEM 21: Informal Matter – Towson University (26-0072)

Discussion: Ms. Henry briefed the Commission on a secondary employment request regarding an employee at Towson University working for an entity that has a business relationship with the University.

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

ITEM 22: Informal Matters – Department of Human Services (26-0088)

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 (26-0158)

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 Human Services (26-0161)

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

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

ITEM 25: Informal Matter – Department of Human Services (26-0187)

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

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

ITEM 26: Informal Matter – Department of Human Services (26-0225)

Discussion: Mr. Colquhoun briefed the Commission on a request from the Department of Human Services asking for review of its proposed changes to their foster and other care policy.

Decision: The Commission approved the proposed changes to the policy.

ITEM 27: Informal Matter – Elected Official (22-0861)

Discussion: Mr. Colquhoun briefed the Commission on the status of this matter.

ITEM 28: Informal Matter – Elected Official (26-0345)

Discussion: Mr. Colquhoun briefed the Commission on this matter regarding

Decision: The Commission determined the activity is allowable subject to certain restrictions.

ITEM 29: Legislative Update

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.

ITEM 30: A-53-24

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

Decision: This matter will be closed.

ITEM 31: A-4-26

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

Decision: This matter will be closed with a letter.

ITEM 32: A-5-26

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

Decision: The Commission closed the matter.

ITEM 33: A-6-26

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

Decision: This matter will be placed on the Preliminary Inquiry Docket. (B-6-26)

ITEM 34: A-7-26

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

Decision: This matter will be placed on the Preliminary Inquiry Docket. (B-8-26)

ITEM 35: A-8-26

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

Decision: The Commission will hold the Complaint for further consideration.

ITEM 36: A-10-26

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

Decision: This matter will be placed on the Preliminary Inquiry Docket. (B-9-26)

ITEM 37: A-12-26

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

Decision: This matter will be placed on the Preliminary Inquiry Docket. (B-7-26)

ITEM 38: B-24-25

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

Decision: This matter will remain on the Preliminary Inquiry Docket.

ITEM 39: B-25-25

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

Decision: This matter will be closed with a letter.

ITEM 40: B-4-26

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

Decision: This matter will be closed.

ITEM 41: C-12-25

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

Decision: The Commission declined to close the matter, and it will be continued at a later meeting.

ITEM 42: A-72-25

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

Decision: The Commission accepted the Lobbyist Filing Agreement.

ITEM 43: A-1-26

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

Decision: The Commission accepted the Lobbyist Filing Agreement.

ITEM 44: A-2-26

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

Decision: The Commission accepted the Lobbyist Filing Agreement.

ITEM 45: A-3-26

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

Decision: The Commission accepted the Lobbyist Filing Agreement.

ITEM 46: A-11-26

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

Decision: The Commission accepted the Lobbyist Filing Agreement.

ITEM 47: F Minus Organization's Report Update

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

ITEM 48: A-73-25

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

Decision: The Commission will issue a complaint in this matter. (C-1-26)

ITEM 49: A-13-26

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

Decision: The Commission authorized complaints in these matters.

ITEM 50: A-15-26

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

Decision: This matter will be closed with a letter.

ITEM 51: Informal Matter – Health Services Cost Review Commission (26-0226)

Discussion: Ms. Allgair briefed the Commission on this matter. The Commission reviewed prior guidance provided to the agency related to separating various agenda items to accommodate required member recusals and participation restrictions. The Commission affirmed the prior guidance.

Decision: The Commission directed staff to confirm the prior guidance provided to the agency and provide additional guidance related to the nonparticipation restrictions of the Public Ethics Law and contemporaneous disclosures necessary under the statute in instances where a board member participates in a matter notwithstanding a conflict in order to preserve quorum to allow the board to take action on a matter.

(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 30 through 51.)

The meeting was adjourned at 11:22 a.m.