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January 8, 2020

TO: Financial Disclosure Filers

SUBJECT: Financial Disclosure of Liabilities to Persons Doing Business with or Regulated by the Filer's Agency (Schedule F of the Financial Disclosure Statement)

The State Ethics Law requires that a filer list on Schedule E of the Financial Disclosure Statement all indebtedness, excluding credit accounts, owed at any time during the reporting year to persons doing business with or regulated by the filer's agency. This is a change (as of October 1, 2017) from the previous requirement that filers list such indebtedness to entities that did business with the State. The Ethics Commission has long interpreted the Schedule E disclosure requirement as pertaining to indebtedness to financial entities (e.g. banks, credit unions, and mortgage companies) and no other types of consumer debt such as money owed to contractors, physicians' offices, etc. The Ethics Law requires each agency or governmental unit to provide a list of entities that did business with the agency during the preceding calendar year by January 15 of each year. You should contact your agency to obtain a listing of those financial institutions that did business with or were regulated by the agency during the preceding calendar year in order to complete Schedule E.

If you are unable to obtain the information required from your agency, you may review the listing below and report indebtedness to entities appearing on the list. This approach could result in "over-reporting" because an entity appearing on the list as doing business with some component(s) of State government may not have done business with your agency. Such over-reporting will allow you to satisfactorily complete your filing in the absence of the necessary information from your agency. If you need any further assistance, please do not hesitate to call our office.

*(Note: The list below, **along with** reference to a State vendor list maintained by the Department of Budget and Management which can be accessed at <https://vendorpayments.maryland.gov> and from a link on the Commission's website, will also be useful to you in completing Schedule D, which requires you to list certain gifts you received from, among other things, entities that did business with the State, and Schedule F, which requires you to report any salaried employment, office or directorship that you or any member of your immediate family (spouse or dependent child) had with an entity that did business with the State.)*

FINANCIAL INSTITUTIONS DOING BUSINESS WITH THE STATE IN 2019

1880 Bank
Bank of America
Bank of Delmarva
Bank of New York
Bank of New York Mellon
Branch Banking & Trust Co.
Calvin B. Taylor Bank
Capital Bank & Trust
Capital One
Citibank
Citizens Alliance Bank
Commercial International Bank
Community Bank of the Chesapeake
Eagle Bank
First Data Bank
First National Bank
First Peoples Community FCU
First United Bank & Trust
Frederick County Bank
Fulton Bank, National Association
Harbor Bank of Maryland
Howard Bank
JP Morgan Chase Bank
M&T Bank (Manufacturers & Traders Trust Co.)
Maryland Partners Bank
Meta Bank
Old Line Bank
Peoples Bank
PNC Bank
Provident State Bank
Sandy Spring Bank
SECU (State Employees Credit Union)
Shore United Bank
SunTrust Bank, Inc.
TD Bank
Truist Bank
U.S. Bank
UMB Bank
Wells Fargo Bank
Wex Bank
Zions Bank