ENVIRONMENTAL AND NATURAL RESOURCES CRIMES UNIT

Annual Report
Fiscal Year 2026
July 1, 2025- June 30, 2026

Photo Credit: "Point of Attack," by William Pully, Department of Natural Resources, 2016 Photo Contest.

Dear Marylanders,

As your Attorney General, I've made it a top priority to protect Maryland's natural resources and hold accountable those who threaten them, ensuring that you and your families can breathe clean air, drink clean water, and continue to enjoy Maryland's forests, rivers and beaches for generations to come.

Created by the General Assembly in 2023, our Office's Environmental and Natural Resources Crimes Unit (ENRCU) investigates and prosecutes criminal violations of environmental and natural resources laws throughout Maryland, holding both individuals and corporations accountable. In Fiscal Year 2026, the ENRCU received 98 new inquiries and opened 57 investigations. We pursued 45 criminal counts in five cases, securing convictions on 12 counts and $154,500 in criminal fines.

These cases include charges filed against a Baltimore City lead paint inspector who pleaded guilty to falsifying lead-paint certificates for rental properties, threatening the health and safety of our children. In a separate case in Baltimore City, we secured convictions against a painting company and its president for illegally discharging toxic lead-containing paint chips during the repair and repainting of a television tower, actions that threatened children's long-term health. In Prince George's County, we convicted a man for illegally dumping and burying solid waste. Each of these cases underscore our Office's commitment to hold accountable those who harm our environmental and natural resources and threaten the health of Marylanders.

This report highlights the successes and continued goals for the ENRCU as we continue our efforts to protect Maryland's environment and natural resources. Those highlights include an update on the implementation of Supplemental Environmental Project (SEP) funds secured as part of a plea in one of the State's largest criminal prosecutions of environmental crimes. Those resources continue to fund community-based outreach, environmental action and restoration projects in Curtis Bay and surrounding neighborhoods.

When the ENRCU protects Maryland's environment, we're preserving not just the air and water we breathe and drink today, but the air and water Marylanders will breathe and drink tomorrow. This report details how we're working to protect Maryland's future, through enforcement, accountability, and environmental justice for all Marylanders.

Sincerely,

Anthony G. Brown

Annual Report of the Environmental and Natural Resources Crimes Unit Maryland Office of the Attorney General Fiscal Year 2026 July 1, 2025 – June 30, 2026

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INTRODUCTION

This is the Third Annual Report of the Environmental and Natural Resources Crimes Unit ("ENRCU" or "Unit"), provided pursuant to a statutory requirement that an annual report be submitted to the Governor and the General Assembly that includes "all the activities of the Unit during the previous fiscal year, and any actions taken by the Department of the Environment or the Department of Natural Resources in response to findings and recommendations of the Unit." SG § 6-702(d). Effective July 1, 2026, this report is due on or before October 1st each year.

To fulfill the ENRCU's annual reporting requirement and to be transparent about the work being performed, this report strives to provide as much information as possible regarding these efforts while preserving the integrity and confidentiality of past and ongoing investigations.

Photo Credit: "Calvert Cliffs," by Ranger Elena Gilroy, Maryland Park Service, Department of Natural Resources, taken on April 30, 2010.

THE ENVIRONMENTAL AND NATURAL RESOURCES CRIMES UNIT

The Environmental and Natural Resources Crimes Unit within the Maryland Office of the Attorney General ("OAG") is responsible for the coordination, investigation, and prosecution of criminal environmental and natural resources violations and other associated criminal charges throughout the State of Maryland. The Unit is an investigative and prosecutorial team under the direction of the Criminal Division of the OAG, and functions independently of the Maryland Department of the Environment ("MDE") and the Department of Natural Resources ("DNR").

The Unit complements the missions of both MDE and DNR, sharing the common goals of protecting Maryland's air, land, water, and natural resources by investigating and pursuing criminal cases throughout the State for violations of environmental, public health, and natural resources laws, regulations, and permits. Criminal enforcement against corporate and individual offenders is a necessary and effective deterrent in holding serious violators accountable for egregious environmental and natural resource violations.

The ENRCU is staffed by Chief Counsel, a senior Assistant Attorney General, and two Assistant Attorneys General. Additionally, there is a Chief Investigator, an investigator, and a paralegal, all of whom support the work of the Unit. The attorneys and investigators have a diverse set of skills and backgrounds that include standard criminal prosecution and criminal law enforcement investigative techniques. The Unit combines those professional skills with specialized knowledge of environmental and natural resources laws and regulations. In addition, the ENRCU partners with both the Maryland State Police and Natural Resources Police, as well as with other local, state, and federal agencies as part of its criminal investigations.

Photo Credit: "Assateague," by Angela Baldwin, Maryland Park Service, Maryland Department of Natural Resources, uploaded on July 6, 2018.

THE ENVIRONMENTAL AND NATURAL RESOURCES CRIMES UNIT: BACKGROUND

In the early 1980's, the State created a Hazardous Waste Strike Force to investigate and prosecute cases involving the illegal disposal of hazardous waste, in response to the emerging concern over the environmental and public health risks associated with these violations. This Strike Force later became the Maryland Environmental Crimes Unit which served as a part of the Attorney General's Criminal Division. The Unit worked in cooperation with MDE and the Maryland State Police ("MSP"). In 1991, the OAG entered into an agreement with MDE and the MSP, formally establishing a Unit staffed by assistant attorneys general, MSP troopers, and MDE inspectors. The goal was to combine the prosecutorial authority and resources of the OAG with the investigative and law enforcement capabilities of the MSP, with the scientific and regulatory expertise of MDE.

In 2023, the Maryland General Assembly passed House Bill 874, codified as State Government Article ("SG") § 6-701 et seq., that expanded the existing Environmental Crimes Unit of the Office of the Attorney General's Criminal Division and renamed and codified the new unit as the "Environmental and Natural Resources Crimes Unit." The law, effective October 1, 2023, created explicit statutory authority to investigate and prosecute cases involving violations of the State's environmental and natural resources laws and any other criminal offenses discovered during the course of an investigation. Since its codification, the Unit continues to work towards enhanced collaboration with the Maryland Natural Resources Police (NRP), a public safety agency with statewide authority to enforce hunting, fishing, boating, and criminal law on all waterways and land, both public and private.

Photo Credit: "On patrol after a late-season blizzard at Greenbrier State Park," by Officer Linton, Department of Natural Resources, March 14, 2017.

THE ENVIRONMENTAL AND NATURAL RESOURCES CRIMES UNIT: AUTHORITY

The statutory function of the ENRCU is to investigate and prosecute cases against persons believed to be in violation of State criminal environmental and natural resources laws, as well as to investigate and prosecute any other criminal offense(s) discovered during the course of an investigation. SG § 6-702(a)(2). The Unit is authorized to act "with the full powers, rights, privileges, and duties of a State's Attorney," to include the use of grand juries in any county. SG § 6-702(a)(3). Additional statutory authority includes the ability to issue subpoenas to produce "telephone, business, government, or corporate records or documents," for the limited purpose of furthering ongoing criminal investigations. SG § 6-703(a)(1).

Typical ENRCU cases may involve:

- Illegal discharge of pollutants into Maryland waters;
- Illegal accumulation, storage, abandonment, or disposal of hazardous waste;
- Illegal discharge or disposal of oil;
- Illegal open dumping, accumulation, and burial of solid waste, and associated criminal litter charges;
- Illegal creation and operation of unpermitted landfills;
- Unlawful transport, storage, and disposal of scrap tires;
- Improper handling and disposal of special medical waste;
- Wetlands violations;
- Illegal discharge of septic and sewage waste;
- Illegal, unpermitted installation or modification of septic systems;
- Open burning violations;
- Frauds associated with permitting and reporting requirements and payment of excise taxes and fees;
- Falsification of required reports, forms, certificates, applications, and permits;
- Hunting, fishing, and wildlife violations; and
- Failure to comply with required natural resources licensing requirements.

The applicable statutes and regulations can be found in the Environment Article, Annotated Code of Maryland ("EN"); Natural Resources Article, Annotated Code of Maryland ("NR"); the Criminal Law Article, Annotated Code of Maryland ("CR"); and the Code of Maryland Regulations ("COMAR").

THE ENVIRONMENTAL AND NATURAL RESOURCES CRIMES UNIT: OPERATING PROCEDURES

The ENRCU receives information about possible criminal activity from various sources, including MDE, DNR, NRP, citizen complaints, other governmental and law enforcement agencies, or from the Unit's own investigation initiatives. All referrals are tracked by the ENRCU, noting the date, source, location, and nature of the alleged violations.

Information about potential criminal violations is initially reviewed by an ENRCU attorney and investigator. Matters deemed potentially suitable for prosecution are investigated. These investigations may include surveillance, subpoenas, search warrants, witness interviews, and other investigative tools. The duration of criminal investigations depends on the nature and complexity of each case.

Investigations are, at times, conducted in collaboration with various law enforcement partners. The ENRCU supports its law enforcement partners through investigation-specific collaboration and guidance, including assisting in the preparation of investigatory documents like search warrants and subpoenas. The ENRCU views its law enforcement partners as members of the prosecution team and believes that early collaboration leads to more effective criminal prosecutions.

When determining whether to pursue criminal enforcement for violations of Maryland's environmental and natural resources laws and regulations, factors the ENRCU considers include:

- Whether there is significant environmental harm and/or long-term effects on the public health;
- Whether there is evidence of intentionally deceptive, misleading, or fraudulent conduct;
- Whether the violator was operating outside the regulatory scheme;
- Whether the violation(s) were an isolated incident or a pattern of conduct;
- Whether the violator has a prior criminal record or a history of civil/regulatory enforcement action; and
- A demonstrated need for deterrence.

If the ENCRU determines criminal prosecution is appropriate, charges are filed by way of criminal information or by grand jury indictment. The Unit handles all criminal cases through trial as well as any post-trial issues that may arise, such as violations of probation.

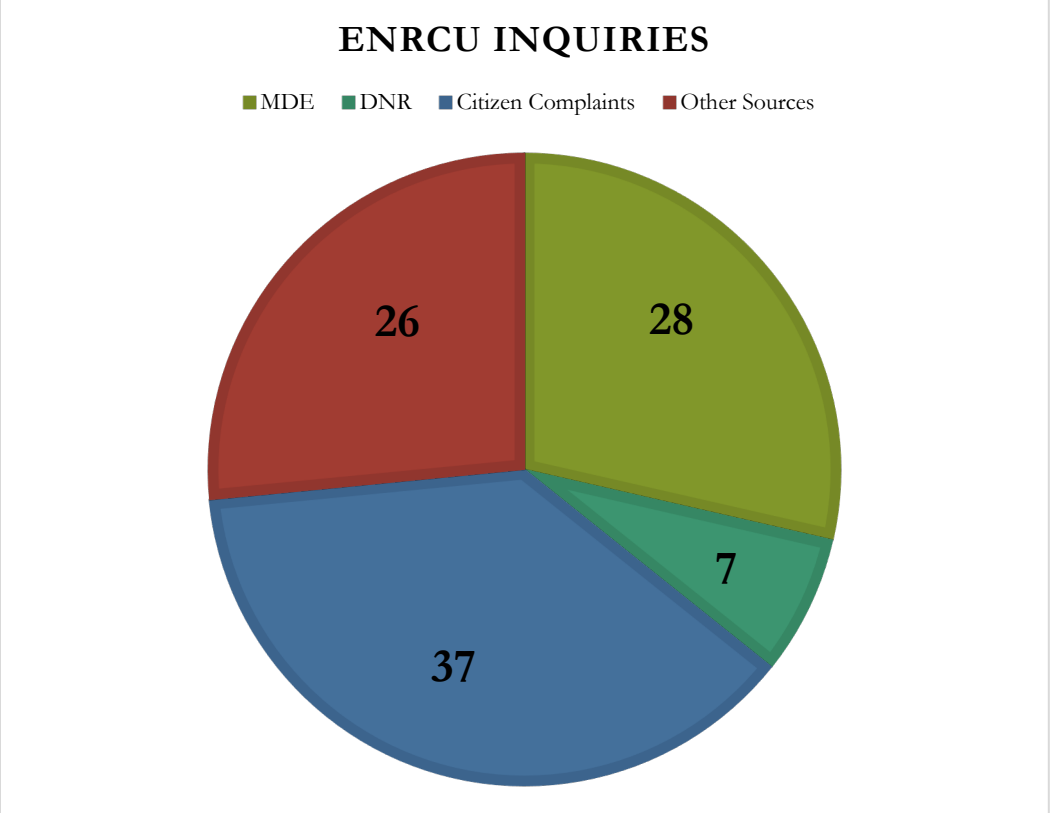
Resolution of cases can include the following:

- The imposition of jail time, either active incarceration or suspended jail sentences;
- The imposition of criminal fines, often payable to environmental funds overseen by MDE;
- Implementation of a Supplemental Environmental Project ("SEP");
- Supervised or unsupervised terms probation;
- Orders of restitution; and
- Community service hours.

State v. Michael Osei, Case No. C-01-CR-24-261, Circuit Court of Allegany County.

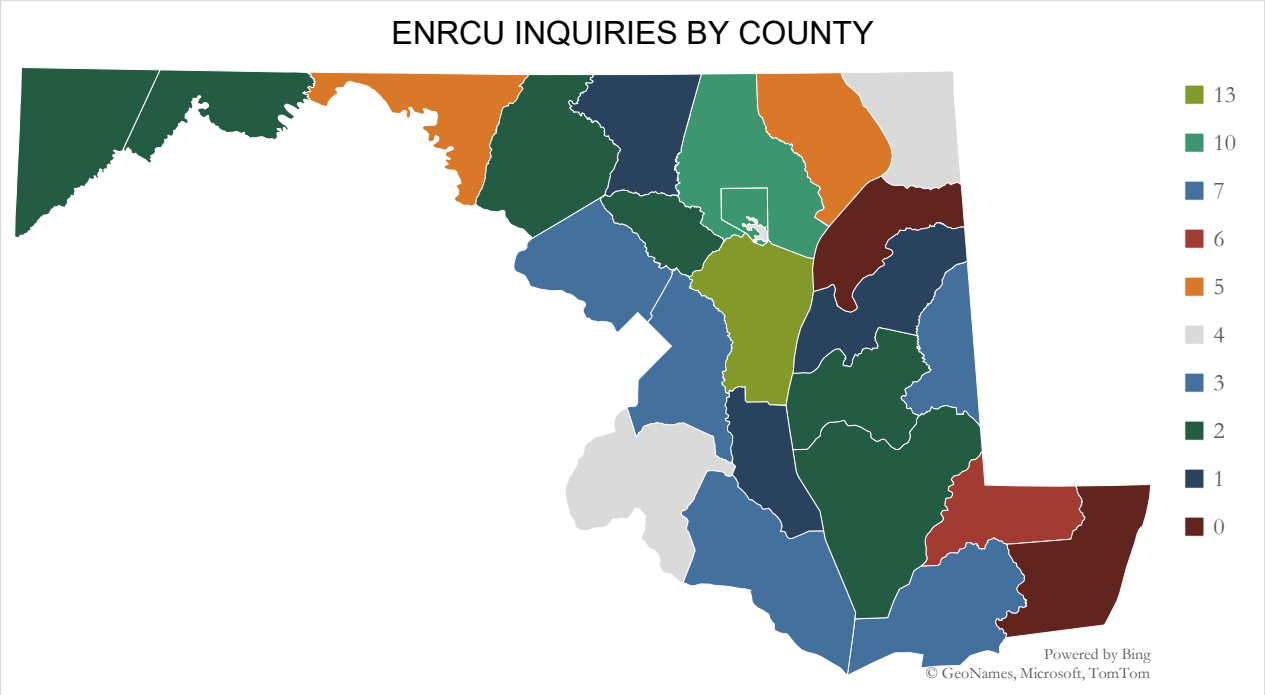
THE ENVIRONMENTAL AND NATURAL RESOURCES CRIMES UNIT: FY26 ENFORCEMENT

During the Fiscal Year 2026 reporting period, the Environmental and Natural Resources Crimes Unit received a total of ninety-eight new inquiries. Inquiries include referrals, complaints, and requests for information or records. Twenty-eight of these inquiries came from MDE, seven were from DNR, thirty-seven originated from citizen complaints, and twenty-six came from other sources.



Of the ninety-eight inquiries, the ENRCU initiated fifty-seven investigations. Some investigations were closed due to insufficient information, some were consolidated with other related matters, some were readily resolved, and others were referred to other, more appropriate, agencies to handle. Nineteen investigations remained open at the end of the reporting period. The duration of an investigation can depend on when it is received, available resources, and the complexity of the investigation.

Inquiries originated from nearly all 24 Maryland municipalities, with the majority originating from Anne Arundel County, Baltimore City, and Baltimore County.



In Fiscal Year 2026, criminal charges were filed, prosecutions were pending, or prosecutions were completed by the ENRCU in five separate criminal cases, for a total of forty-five criminal counts filed throughout the State in multiple jurisdictions. Of the completed prosecutions, criminal defendants were convicted of twelve separate criminal counts. These criminal convictions included:

- Illegal Disposal of a Controlled Hazardous Substance in violation of EN § 7-265;
- Criminal Litter Over 500 pounds or 216 cubic yards, in violation of CR § 10-110;
- Discharge of a Pollutant in violation of EN § 9-322;
- Improper Handling of Solid Waste; Solid Waste Nuisance in violation of COMAR 26.04.07.03; and
- Falsification, Alteration, and Submission of Certificates in violation of EN § 1-302.

Resolution of these cases collectively resulted in suspended jail sentences totaling seven years; terms of probation of seven years; and court-imposed criminal fines totaling $154,500. Penalties also included 135 hours of court-ordered community service.

Fiscal Year 2026 *(7/1/2025- 6/30/2026)* **TOTALS**	**ENVIRONMENT ARTICLE**			**CRIMINAL LAW ARTICLE**	**COMAR Title 26 Subtitle 04**	**COMAR Title 26 Subtitle 12**	**TOTAL**
	Title 1 *Subtitle 3*	Title 7 *Subtitle 2*	Title 9 *Subtitle 3*	Title 10 *Subtitle 1*	Title 26 *Subtitle 04*	Title 26 *Subtitle 12*	
Number of Convictions Obtained***	4	1	3	1	2	1	12
Imprisonment Time Ordered (Years)	4 years		1 year	1 year		1 year	7 years
Imprisonment Time To Be Served							
Probation Ordered (Years)	2 years		2 years	3 years			7 years
Total Criminal Fines Ordered		$50,000	$50,000	$4,500	$50,000		$154,500
Criminal Fines To Be Paid		$50,000	$50,000	$4,500	$50,000		$154,500
Restitution Ordered							
Community Service Hours			60 hours	75 hours			135 hours

Environment Article (EN)	**Criminal Law Article (CR)**	**Code of Maryland Regulations (COMAR)**
Title 1 - Definitions; General Provisions; Enforcement **Title 7-** Hazardous Materials & Hazardous Substances **Title 9** - Water, Ice & Sanitary Facilities ***Note: A single case may involve charges from any number of various statutory titles*	**Title 10-** Crimes Against Public Health, Conduct and Sensibilities	**Title 26-** Department of the Environment **Subtitle 4**- Regulation of Water Supply, Sewage Disposal, Solid Waste and Recyclable Materials **Subtitle 12-** Radiation Management

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THE ENVIRONMENTAL AND NATURAL RESOURCES CRIMES UNIT: FY26 COMPLETED CASE HIGHLIGHTS

Over the course of the last fiscal year, the Unit has successfully prosecuted a range of cases to include the discharge of pollutants, the illegal falsification and submission of lead paint certificates, and the improper handling of solid and hazardous wastes. These are highlights from some of those cases.

State v. Rodney Barkey, Case No. C-24-CR-25-002915,
Circuit Court for Baltimore City

On July 9, 2025, thirty-one charges were filed against Rodney Barkley related to the falsification and submission of lead paint certificates issued to rental properties in Baltimore City. This investigation was initiated after referral from the Maryland Department of the Environment. Subsequent investigation by ENRCU revealed that Barkley, a Maryland-certified Lead Paint Inspector, issued multiple lead abatement certificates based upon falsified laboratory reports. The falsifications included changing dates, addresses, and lead content values on official lab reports to create fake certificates.

On October 3, 2025, Mr. Barkley pleaded guilty to five counts, including four counts of Falsifying a Lead Paint Reduction Certificate and one count of Operating a Radiation Machine Without Obtaining a License. The charges carried maximum penalties of up to two years of incarceration and a fine of $50,000 and one year of incarceration and a fine of $25,000, respectively.

On February 3, 2026, Mr. Barkley was sentenced to 5 years, all suspended, and 2 years of supervised probation. In addition to criminal charges brought by the Office of the Attorney General, MDE also suspended Barkley's accreditation and invalidated approximately 1,400 lead certificates that he had issued.

State v. Christopher Mecklem, Case No. C-24-CR-25-004298; State v. Skyline Tower Painting, Inc., Case No. C-24-CR-25-004299,
Circuit Court for Baltimore City

On October 6, 2025, charges were filed against Skyline Tower Painting, Inc. (a Colorado corporation) and Christopher Mecklem, its President. These counts related to the improper handling, discharge and disposal of lead-containing paint during repair and repainting work done by Skyline Tower Painting on the candelabra television tower, located in Baltimore City and owned and operated by Television Towers, Inc. This investigation was initiated by ENRCU in June 2022 after reports that the company failed to contain chips and flakes of

removed paint, causing it to blanket the surrounding residential neighborhoods, businesses, forested areas, a community garden and playground.

The ENRCU investigation included interviews with residents and the documentation and recovery of discarded paint chips. ENRCU Investigators canvassed the area surrounding the tower, including the area adjacent to the Jones Falls River and the storm drains that discharged directly into the Jones Falls. They documented and collected paint chips from residential yards, roadways, gutters and storm drains, a community garden and throughout the surrounding wooded areas to obtain a representative sample of the waste (paint chips) discharged from the tower project. Those samples were analyzed and determined to exceed the threshold for lead content and as such were a controlled hazardous substance.

On December 10, 2025, Mr. Mecklem pleaded guilty to two counts of improperly handling solid waste and two counts of discharging a pollutant into the waters of the State of Maryland. The company pleaded guilty to one felony count of illegal disposal of a controlled hazardous substance. In the case against Mr. Mecklem, the State is seeking a one-year period of incarceration, all suspended, and a fine of $100,000, suspending all but $50,000 to be paid to the Maryland Clean Water Fund, and three years' probation. In the case against Skyline Tower Painting Inc., the State is requesting a $100,000 fine, suspending all but $50,000, with payment directed to the Maryland Hazardous Substance Control Fund, three years of probation and proof of revision of the company's Standard Operating Procedures for lead paint projects, local permitting requirements, debris containment and the lawful control and disposal of waste. The Court delayed final disposition to allow the Defendant time to pay the fines in advance of sentencing in both cases which is scheduled for December 4, 2026.

The Maryland Department of the Environment and the Office of the Attorney General also took civil enforcement action which resulted in a $2.2 million settlement and consent decree against Television Towers, Inc. and Skyline Tower Painting, Inc.

State v. Danny M. Proctor, Case No. C-16-CR-25-000769,
Circuit Court for Prince George's County

On April 3, 2025, charges were filed against Danny M. Proctor in Prince George's County Circuit Court for violations related to the unlawful dumping and burial of litter and other solid waste. This investigation was initiated after a citizen referral was received by the Unit. On September 23, 2025, Mr. Proctor pleaded guilty to criminal litter over 500 pounds and was sentenced to one year incarceration, all suspended, and three years' supervised probation. Additionally, he was ordered to pay $4,500 to the Nontidal Wetlands Compensation Fund and to perform 75 hours of community service. On July 24, 2026, the Defendant was found guilty of violating the terms of his probation following his conviction in a new, unrelated case. After a hearing, he was continued on his original probation terms.

THE ENVIRONMENTAL AND NATURAL RESOURCES CRIMES UNIT: FY26 COMMUNITY OUTREACH

The ENRCU remains committed to collaboration with both law enforcement partners and the community. This includes participating in regional task force meetings with investigative partners, and trainings with MDE inspectors and county health departments. In January 2026, the Unit participated in MDE's Enforcement and Compliance Workshop, leading a training on "Collection of Evidence: Best Practices."

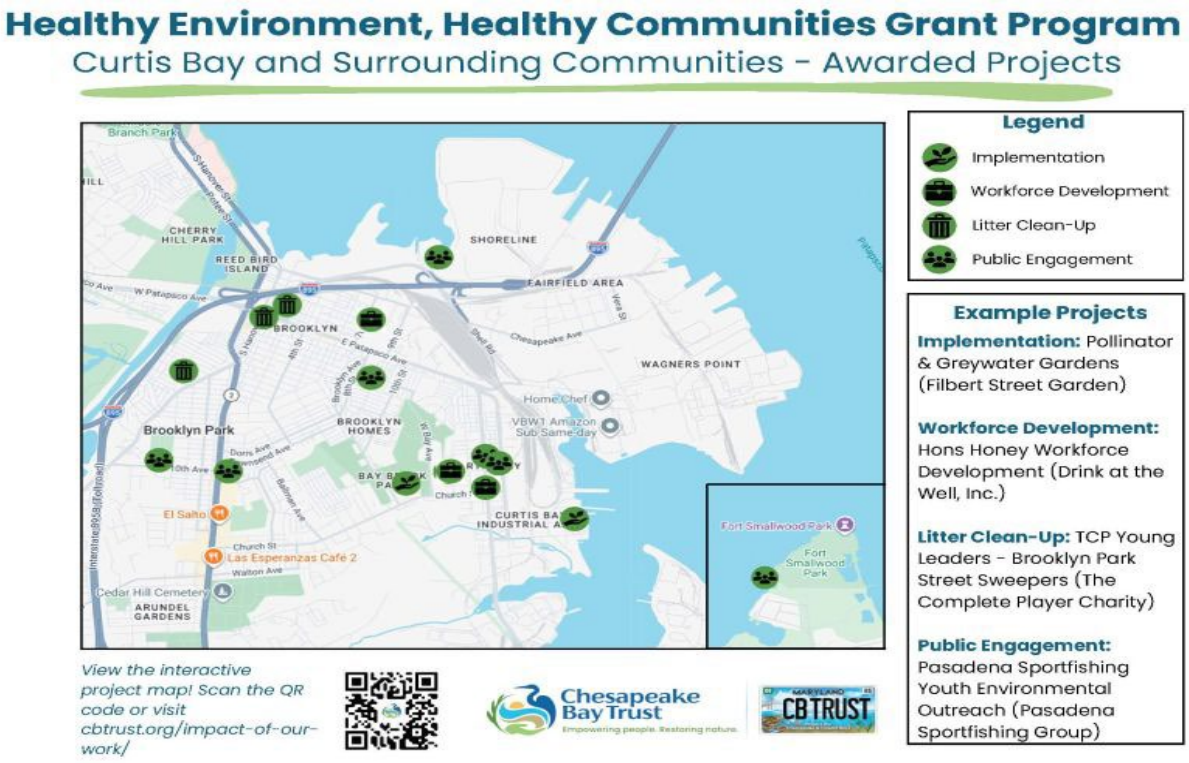
Additionally, the Unit will continue to utilize Supplemental Environmental Projects when appropriate. A Supplemental Environmental Project, or "SEP," is an environmentally beneficial project or activity that protects and improves the environment and reduces risks to public health. A requirement to complete or participate in a negotiated SEP can be part of a resolution of a case against a corporation or an individual for environmental or natural resource violations. The ENRCU believes that SEPs should support projects focused on and intended to provide direct environmental and related public benefits, especially in overburdened communities where both environmental and socio-economic stressors have contributed to persistent environmental health disparities.

For example, in August 2023, in *State v. Curtis Bay Energy, LP*, the owner and operator of a special medical waste incinerator facility located in South Baltimore, pleaded guilty in Baltimore City Circuit Court to 40 environmental violations related to the insufficient treatment and improper handling of special medical waste and concealment of an unpermitted discharge outlet. As part of the plea, the company was placed on two years' probation and ordered to pay a fine of $1,000,000 to the Maryland Clean Water Fund. A special condition of probation required Curtis Bay Energy to fund a SEP directing a total of $750,000 into communities surrounding the facility for environmental projects to protect and improve the environment and reduce risks to public health. This SEP was administered by the Chesapeake Bay Trust (the Trust), a nonprofit grant-making organization.[1] By the end of the FY26, both the $1,000,000 criminal fine and the $750,000 SEP Funds had been paid.

The Trust, in partnership with the OAG, announced a grant program aimed at supporting environmental projects led by community-based groups in Curtis Bay and its surrounding communities.[2] The "Healthy Environment, Healthy Communities Grant Program" was established to support community outreach and engagement, environmental action, and larger-scale restoration projects focused on communities within Curtis Bay and surrounding areas.

[1] *State v. Curtis Bay Energy, LP*, Case No. 623160001, Circuit Court for Baltimore City.

[2] Funding sources originated from both the criminal case against Curtis Bay Energy, L.P., and a civil settlement involving the Patapsco and Back River Wastewater Treatment Plants. The funds from the criminal case directly supported projects in Curtis Bay and surrounding communities. *See*, https://cbtrust.org/grants/healthy-environment-healthy-communities/



On May 28, 2026, The Chesapeake Bay Trust held a community meeting to bring grantees together with the goals of sharing their projects with each other and other community members, to build transparency, and to celebrate the good work being done in the community.[3] The successes highlighted by the Trust during the most recent community meeting demonstrate the long-term positive impacts on communities and the environment that can be achieved with engaged and directed implementation and oversight of SEP funds.

[3] The "Awarded Projects" map and updates on the ""Healthy Environment, Healthy Communities Grant Program" were provided by the Restoration Program Manager with the Chesapeake Bay Trust.

THE ENVIRONMENTAL AND NATURAL RESOURCES CRIMES UNIT: BUDGET

Though a part of the Office of the Attorney General's Criminal Division, the Unit receives funding from MDE and DNR. Figures for the past three fiscal years show total appropriations by MDE:

FY25	FY26	FY27
$674,226	$854,322	$988,614
FY25 Actuals	FY26 Actuals	FY27 Actuals
$953,761.36	$ 1,053,526.21	

The total budget appropriated for the Unit by MDE for FY 2026 was $854,322. This included the conversion of both an Assistant Attorney General and criminal investigator position from contractual to PINS.

Additionally, DNR provides funding supporting an Assistant Attorney General position. This resulted in a total contribution by DNR to the Unit of $179,273.18 for FY26. The total anticipated DNR contribution for FY27 is $183, 254.10.

Photo Credit: "Waterfowl" photo by Larry Hindman, retired waterfowl program manager. Department of Natural Resources, taken on January 16, 2010.

CONCLUSION

In January 2025, the Office of the Attorney General introduced its Strategic Plan, detailing the OAG's mission, vision, values and strategic priorities. The mission of the Office includes vigorous enforcement of laws that "safeguard the rights of the people and promotes justice and equity for all Marylanders," and includes as one of the OAG's priorities, "safeguarding good stewardship of our public and natural resources." In furtherance of this goal, the OAG prioritizes the protection of natural resources through the enforcement of natural resource and environmental laws and holding violators accountable, while bringing equity to environmental policy and protections with a focus on environmental justice.

During this reporting period, the Environmental and Natural Resources Crimes Unit obtained convictions in five separate cases on twelve separate criminal counts. This resulted in suspended jail sentences totaling seven years. Defendants were ordered to complete 135 hours of community service, were placed on a collective seven years of probation and were ordered to pay criminal fines totaling $154,000. With dozens of ongoing investigations and pending cases at the time of this report, the Unit continues its proactive and committed efforts to protect Maryland's environment and natural resources by holding accountable those persons and companies that threaten those resources.

State v. Anthony Simmons Case No. C-24-CR-24-001278, Circuit Court for Baltimore City.

THE ENVIRONMENTAL AND NATURAL RESOURCES CRIMES UNIT: CONTACT INFORMATION

A continuing objective of the ENRCU is to expand and increase awareness of the Unit with the goal of becoming a better-known resource for those witnessing or experiencing potential environmental or natural resource crimes. The ENRCU encourages anyone with such information to reach out via the contacts provided below or through the OAG website.

Office Main Line…….	(410) 537-3333
General Email Address……	ENRCU.OAG@maryland.gov
Mailing Address……	1800 Washington Boulevard Suite # 6115 Baltimore, Maryland 21230
OAG webpage…….	https://oag.maryland.gov/i-need-to/Pages/Environmental-&-Natural-Resources-Crimes.aspx

Photo Credit: "Upper Potomac River," by Secretary Mark Belton, Maryland Department of Natural Resources, Wolf Den Run State Park, taken in August 2018.

MARYLAND
OFFICE OF THE ATTORNEY GENERAL