

2025

ANNUAL REPORT

OFFICE OF THE ATTORNEY GENERAL



MARYLAND ATTORNEY GENERAL
ANTHONY BROWN

January 1, 2026

Dear Marylanders,

When I took office in 2023, I made a commitment to fight for justice, defend Marylanders' rights, and keep our vulnerable neighbors safe. I am honored to share this year's Annual Report, which captures how our dedicated team of 1,000 attorneys and professional staff and the strong partnerships we've built across Maryland have fulfilled those promises and made Maryland a more just and inclusive home for all.

In 2025, we remained steadfast in our mission: protecting Marylanders, defending their rights, and advancing justice. Here are just a few examples:

Our Federal Accountability Unit defended Maryland against unlawful federal actions—filing dozens of lawsuits to protect Marylanders' lives and livelihoods, challenging federal overreach, and preserving programs that Marylanders depend on every day. From defending critical infrastructure investments to safeguarding access to essential services, our Office has been unwavering in its commitment to ensuring Maryland's voice is heard and our State's interests are protected, preserving more than \$100 million in education funding and tens of millions in funding for other essential programs and services for Marylanders.

Our Consumer Protection Division secured the largest restitution in a landlord tenant case in its history—\$11.2 million for Maryland residents who were forced to live in deplorable conditions at an apartment complex in Prince George's County that did not hold a multi-family dwelling unit license. This landmark settlement holds landlords accountable and sends a clear message: exploiting vulnerable tenants will not be tolerated. Every Marylander deserves safe housing, and our Office will continue to fight to make that right a reality.

Our newly established Civil Rights Division won a \$2.5 million judgment against an Eastern Shore landlord who sexually harassed and assaulted women facing housing instability—our first major court victory for this historic division. This case demonstrates our commitment to holding accountable those who prey on vulnerable Marylanders and sends a powerful message that discrimination in any form will not be tolerated in Maryland.

And our Office of Equity, Policy, and Engagement completed a first-of-its-kind audit of Maryland's Office of the Chief Medical Examiner, finding patterns suggesting possible pro-police and racial bias in manner of death classifications. We identified 41 cases requiring review to ensure Maryland families receive the truth, accountability, and justice they deserve.

We preserved Maryland's assault weapons ban when the U.S. Supreme Court declined to overturn the Fourth Circuit's decision upholding this critical public safety law, keeping our communities safer from gun violence. And we secured a historic \$340 million Conowingo Dam settlement that will improve water quality in the Chesapeake Bay and Susquehanna River through pollution reduction initiatives, restoration of fish passage and freshwater mussels, invasive species management, and dredging studies—protecting these critical waterways for future generations.

As we look to 2026, we remain committed to building on this progress. The recommendations included in this report reflect our ongoing efforts to keep Marylanders safe, protect vulnerable

adults and workers, strengthen civil rights protections, enhance government transparency, and ensure our laws safeguard the rights of all Marylanders.

Thank you for the privilege to serve as your Attorney General. This Office belongs to the people of Maryland, and we work every day to serve you and your families.

Sincerely,

A handwritten signature in black ink, appearing to read "AG Brown". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Anthony G. Brown
Attorney General

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ABOUT THE OFFICE OF THE ATTORNEY GENERAL

As the Chief Legal Officer for the State of Maryland, the Attorney General is elected by the citizens of Maryland to supervise and direct the legal business of the State. Under the Attorney General's leadership, the Assistant Attorneys General and professional staff who comprise the Office of the Attorney General work together to advise and represent the State, its institutions, agencies, boards, commissions, and officials. The Attorney General also enforces and upholds the rule of law, using the authority of the office to protect Marylanders and promote the public good.

MODERNIZING THE OFFICE OF THE ATTORNEY GENERAL

Organizational Restructuring and New Capabilities

Since taking office in 2023, Attorney General Brown has undertaken a comprehensive modernization of the Office of the Attorney General to ensure it can effectively serve Maryland in the 21st century. These efforts have focused on two key areas: organizational restructuring and technology integration. Significantly, these organizational improvements have been accomplished with existing resources, demonstrating efficient and strategic use of the Office's budget.

Strategic Reorganization of the Civil Division

The OAG restructured the Civil Division to create an integrated ecosystem of effective litigators capable of handling the State's most complex legal challenges. This reorganization consolidated previously separate units into a unified division with specialized expertise:

- **Correctional Litigation Unit:** Integrated into the Civil Division to provide dedicated defense of the Maryland Department of Public Safety and Correctional Services in state and federal litigation. The unit successfully defended complex cases involving correctional facilities and incarcerated individuals, achieving dismissals prior to discovery and providing considerable savings to Maryland taxpayers.
- **Contract Litigation Unit:** Consolidated within the Civil Division to handle procurement disputes and contract-related matters. The unit has saved Maryland taxpayers millions of dollars through successful defense of state agencies, including over \$5.5 million in a complex case involving termination costs under a Power Purchase Agreement.
- **Tort Litigation Unit:** Created within the Civil Division to provide specialized defense against personal injury and property damage claims filed against State agencies and employees. The unit defended the State in approximately 125 tort claims, securing favorable outcomes through motions to dismiss, defense verdicts at trial, and appellate decisions.

This structural integration allows the Civil Division to share resources, expertise, and best practices across units while maintaining specialized knowledge in distinct areas of law. The result is a more agile and effective litigation operation that can deploy the right expertise to the right case at the right time.

New Units and Enhanced Capabilities

The OAG established several new units to address emerging legal challenges and expand the Office's capacity:

- **Office of the Solicitor General:** Created to provide strategic coordination of appellate work across the OAG, the Office of Solicitor General supervises all appellate matters, advises on significant appellate issues, and ensures consistent, high-quality legal representation for the State at the appellate level. The Solicitor General also initiates strategic improvements in appellate procedures and approves amicus recommendations. In 2025, the Office handled 731 criminal appeals and habeas corpus matters, including 13 cases decided by the Supreme Court of Maryland—representing a quarter of that Court's merits docket.

- **Federal Accountability Unit:** Established in 2025, this unit has filed close to 50 lawsuits, dozens of amicus briefs, and multistate comments challenging unlawful federal actions. The unit has preserved hundreds of millions of dollars in federal funding for Maryland, including more than \$100 million in education funding and tens of millions for other essential programs and services.
- **Investigative and Prosecutorial Support Unit:** Established within the Criminal Division, this new unit is composed of analysts, investigators, and auditors providing dedicated analytical, financial, and investigative support to prosecutors across all Criminal Division units. The unit ensures cases are developed consistently using best practices through an equity lens, while leading specialized investigations, wiretaps, and prison corruption matters.

Technology and Artificial Intelligence Integration

The OAG has made strategic investments in technology to improve efficiency and service delivery:

Artificial Intelligence Protocols: The Office developed and implemented comprehensive AI protocols and policies to govern the responsible use of artificial intelligence tools across the organization. These policies establish clear guidelines for AI usage while maintaining ethical standards and protecting sensitive information. The OAG is among the first state attorney general offices in the nation to adopt formal AI governance frameworks.

Sexual Assault Evidence Kit Tracking System: Maryland launched its first-ever SAEK tracking program, providing survivors of sexual violence with real-time transparency about the status of their evidence kits. This technology-driven solution enhances accountability and supports survivors throughout the investigative process.

Professional Development and Training Infrastructure: The OAG expanded opportunities for employee growth by launching OWL (OAG Workplace Learning), the agency's new online learning management system. OWL allows staff to access training, track progress, and meet OAG's continuing education requirements. Through this launch, OAG has fostered a culture of learning and excellence by ensuring teams have the knowledge and skills needed to deliver high-quality services to our clients and the people of Maryland.

Website Modernization and Public Access: In partnership with the Maryland Department of Information Technology (DoIT), the Office also launched a newly modernized OAG website that is more accessible, easier to navigate, and responsive to the needs of Marylanders. The updated website strengthens the Office's digital presence and supports timely, accurate communication with the public.

Results and Impact

These modernization efforts have enabled the OAG to:

- Handle 731 criminal appeals and habeas corpus matters through the Office of Solicitor General;
- Establish and operationalize multiple new enforcement units within two years;

- Respond rapidly to federal challenges with close to 50 lawsuits in the first year of the Federal Accountability Unit;
- Successfully defend the State in approximately 125 tort claims;
- Create an integrated Civil Division ecosystem that shares expertise and resources across specialized units; and
- Implement cutting-edge technology solutions for survivor support and case management.

Looking Forward

The OAG's modernization is an ongoing commitment. As challenges evolve, the Office continues to adapt its structure, technology, and processes to ensure Maryland receives the highest quality legal representation and that the OAG remains a model for innovation in state government legal practice.

OAG ACTIVITIES: CENTRAL OFFICE UNITS

Antitrust Division

The Antitrust Division enforces the Maryland Antitrust Act as well as federal antitrust laws that have a significant impact on the State. The Division (1) investigates and pursues enforcement actions against potentially anticompetitive mergers and other conduct that might violate civil and criminal antitrust laws, and (2) represents the State in national and local antitrust matters that have a direct or indirect impact on Marylanders.

Significant Activities & Accomplishments

- Successfully challenged the merger between UnitedHealth Group and Amedisys, securing significant protections for Maryland home health workers and patients and protecting competition in the home health care market.
- Reached settlements with Heritage, Apotex, Bausch, and Lannett totaling over \$65 million to resolve allegations of collusion on prices and markets for generic drugs, ensuring accountability for anticompetitive conduct that harmed Maryland consumers and the State's healthcare system.
- Successfully challenged the proposed merger between Kroger and Albertsons to protect competitive grocery markets in Maryland, protecting consumers from reduced competition that could lead to higher prices and fewer choices.

Civil Division

The Civil Division represents the State, its agencies, and officials in complex civil litigation at the trial court level, including major civil cases and constitutional challenges to State laws and programs. The Division is organized into four specialized units: the Contract Litigation Unit handles procurement disputes and contract-related matters; the Correctional Litigation Unit defends the State in civil rights litigation involving correctional facilities and incarcerated individuals; the Federal Accountability Unit challenges unlawful federal actions that threaten Maryland's interests, funding, and autonomy; and the Tort Litigation Unit defends State agencies and employees against personal injury and property damage claims. In addition to litigating cases, the Division reviews and approves civil complaints filed by the OAG, approves settlements in civil cases, and serves as a resource and advisor to other OAG divisions on litigation matters.

Significant Activities & Accomplishments

Civil Litigation - General

- Successfully defended the Maryland Cannabis Administration before the Fourth Circuit in *Justyna Jensen v. Maryland Cannabis Administration*, defeating a Dormant Commerce Clause challenge to the cannabis dispensary license application process. The published decision, 151 F.4th 169 (4th Cir. 2025), upheld Maryland's cannabis licensing framework.
- Prevailed in a first-of-its-kind federal appellate case, *Maryland Election Integrity v. Maryland State Board of Elections*, defeating a targeted challenge to Maryland's election systems by a national advocacy group. The Fourth Circuit's published decision, 127 F.4th 534 (4th Cir. 2025),

protects the integrity of Maryland's voter registration and voting systems from misinformation campaigns.

- Successfully defended consumer protection provisions in Senate Bill 1 of 2024 in *Retail Energy Advancement League v. Anthony Brown*, defeating a motion for preliminary injunction that sought to dismantle reforms to Maryland's third-party retail energy market. The law ended commission-based compensation for salespersons and variable rate contracts that had generated numerous citizen complaints, protecting Maryland consumers from predatory practices in the retail energy marketplace.

Contract Litigation Unit

- Saved Maryland taxpayers more than \$5.5 million through successful defense of the Department of General Services in *Maryland Bio Energy, LLC*, a complex case involving termination costs under a Power Purchase Agreement.
- Achieved significant savings for Maryland taxpayers by settling a \$2 million dispute with Milani Construction, LLC before the Maryland State Board of Contract Appeals. The case involved claims for construction delays related to a dual bridge replacement on I-83 for the Maryland State Highway Administration.

Correctional Litigation Unit

- Successfully defended the Maryland Department of Public Safety and Correctional Services in complex federal civil rights litigation that fully disposed of matters prior to discovery, providing considerable savings to Maryland taxpayers and protecting state correctional operations from unmeritorious claims.
- Secured favorable decisions in *Monroe Washington v. Maryland Department of Public Safety and Correctional Services* and *Jeffrey Francis v. State of Maryland*, with both the Federal District Court and Fourth Circuit affirming dismissals of constitutional claims brought by incarcerated individuals, demonstrating effective defense of State correctional institutions while ensuring constitutional protections are properly balanced.

Federal Accountability Unit

- Established in 2025, the Federal Accountability Unit filed more than 40 lawsuits, dozens of amicus briefs, and multistate comments challenging unlawful federal actions, preserving hundreds of millions of dollars in federal funding for Maryland and protecting Marylanders' rights and benefits. The Unit led a coalition of 20 attorneys general in emergency litigation that resulted in temporary reinstatement of approximately 24,000 probationary federal employees who had been abruptly terminated in mass layoffs.
- Co-led successful litigation against the U.S. Department of Transportation's unlawful immigration enforcement conditions, obtaining preliminary and permanent injunctive relief that preserved billions of dollars in federal transportation funding for Maryland. The Unit also challenged threats to suspend Supplemental Nutrition Assistance Program benefits for 680,000 Marylanders and filed multiple actions protecting Maryland's immigrant communities from discriminatory federal funding conditions.
- Led a lawsuit on behalf of 24 plaintiffs challenging the Environment Protection Agency's cancellation of billions of dollars under the Solar for All program, including over \$60 million for

the Maryland Clean Energy Center. Filed breach-of-contract claims to recover unlawfully terminated clean energy grant funds and participated in multiple litigation matters protecting Maryland's energy efficiency programs and climate goals.

Tort Litigation Unit

- Defended the State in approximately 125 tort claims, resolving 16 through motions to dismiss, obtaining 3 defense verdicts at trial, and securing 5 favorable appellate decisions.

Civil Rights Division

The Civil Rights Division investigates, prosecutes and remediates conduct that constitute civil rights violations on behalf of the residents of the State. The mission of the Civil Rights Division is to use litigation and education to end practices and systems that create injustice, inequality, and inequity, and to help enable communities to have equal opportunities for freedom and self-determination.

Significant Activities & Accomplishments

- Resolved three major fair housing investigations addressing source of income discrimination against voucher holders and low-income tenants. The settlements with Maryland Management Company, Habitat America LLC, and American Management II, LLC resulted in over \$310,000 in civil penalties and restitution, policy reforms to accept all legal forms of income, mandatory fair housing training, and individualized tenant screening practices that reduce disparate impact on communities of color.
- Filed an amicus brief and argued before the Maryland Supreme Court in *Hare v. David S. Brown Enterprises*, challenging widespread discriminatory practices that exclude voucher holders through minimum income requirements. The case has far-reaching implications for more than 50,000 Maryland households that use federal vouchers to pay rent - the vast majority being seniors, people with disabilities, and families with children - and addresses a systemic barrier to one of the State's most effective tools for fighting homelessness and reducing concentrated poverty.
- Collaborated with various units of the OAG to publish comprehensive legal guidance protecting civil rights during federal immigration enforcement, including two guidance memoranda for Maryland law enforcement on local enforcement of federal immigration law and requirements when working with federal agencies. These materials provide clear legal framework to protect immigrant communities while ensuring law enforcement agencies understand their obligations under Maryland law.
- Conducted extensive community outreach and education, delivering more than 50 outreach sessions reaching hundreds of Marylanders across the State. Published comprehensive know-your-rights materials for the LGBTQIA+ community and, in partnership with the Maryland Commission on Civil Rights, a 37-page self-help guide to understanding and protecting civil rights under Maryland law.

Consumer Protection Division

The Consumer Protection Division investigates and takes action against unlawful consumer practices and assists the public in obtaining relief from these practices. To achieve this mandate,

the Consumer Protection Division: (1) assists individual consumers with complaints, health insurance appeals and grievances, and identity theft issues; (2) initiates investigations of potential unfair, abusive, or deceptive trade practices; (3) takes actions to stop unfair, abusive or deceptive trade practices from occurring in Maryland, obtain redress for injured consumers, and deter future illegal conduct; (4) issues administrative orders imposing injunctive relief, ordering restitution, and imposing penalties; (5) registers new home builders, new home sales representatives, health clubs, structured settlement transfer companies, and vehicle protection product warranties; and (6) educates consumers.

Significant Activities & Accomplishments

- Handled more than 12,000 consumer complaints and more than 60,000 consumer inquiries, providing direct assistance to Marylanders facing unfair or deceptive business practices.
- Entered into settlements or issued administrative orders recovering more than \$20 million in restitution, consumer recoveries, penalties, and costs, holding businesses accountable for violating consumer protection laws.
- Achieved the largest restitution order in a landlord-tenant enforcement action in the Division's history by settling with Heather Hill Property Company, LLC and Heather Hill Operating Company, LLC for operating a multi-family apartment community without required licenses. The settlement provided over \$11.2 million in restitution to current and former Heather Hill Apartments residents, prohibited negative credit reporting, and required the dismissal and shielding of hundreds of eviction actions.
- Settled an enforcement action against Darcars Honda for alleged false and misleading statements about advertised vehicle prices and unlawful fee charges. The settlement included monetary relief estimated between \$8 million and \$10 million, including approximately \$3.6 million in consumer restitution for unlawful fees and an estimated \$2 million to \$4 million for other overcharges, along with injunctive relief requiring accurate price advertising and informed consumer consent for add-on products.

Courts and Judicial Affairs Division

The Courts and Judicial Affairs Division provides advice and legal representation to the Judiciary and two executive agencies. The Division issues client-specific advice on employment, land records recording, marriage and business licensing, and taxation. It also provides representation in litigation; tort claims liability analysis; and it assists in responding to Public Information Act requests, responding to subpoenas, drafting and revising executive agency clients' regulations, drafting memoranda of understanding, and reviewing similar documents (including procurements) for legal sufficiency. Finally, it provides trainings/presentations to clients related to these topics and issues.

Significant Activities & Accomplishments

- Supported implementation of the newly enacted Judge Andrew F. Wilkinson Judicial Security Act, reinforcing Maryland's commitment to protecting judges and court personnel from threats and intimidation.

- Successfully defended against a large volume of sovereign citizen lawsuits targeting judges, clerks, and court personnel with unfounded claims. By securing prompt dismissals, the Division protected judicial officers from harassment and ensured that Maryland's courts remain accessible for individuals with legitimate legal claims.
- Successfully defended and resolved multiple employment discrimination claims, upholding fair employment practices across Maryland's judicial institutions and agencies and affirming Maryland's commitment to ensuring that public servants are treated with dignity, respect, and equity in the workplace.

Criminal Division

The Criminal Division investigates and prosecutes serious criminal cases throughout the State. The Criminal Division collaborates with local, State, and federal partners to keep Marylanders safe by combating violence, the opioid epidemic, fraud, corruption, and environmental hazards. The Criminal Division is comprised of four units: the Environmental and Natural Resources Crimes Unit (ENRCU), the Fraud and Corruption Unit (FCU), and the Organized Crime Unit (OCU), and the newly created Investigations and Prosecutions Support Unit (IPSU). Additionally, the Criminal Division houses the OAG's Victim Services, providing support and guidance to Maryland victims and victims' families.

Significant Activities & Accomplishments

- Launched the Maryland Statewide Organized Retail Crime Task Force, co-chaired by representatives from the OAG and the Frederick County State's Attorney's Office. The task force brings together prosecutors, law enforcement, and retailer representatives from across Maryland to coordinate investigation and prosecution of organized retail theft.
- Secured multiple environmental crime convictions through the Environmental and Natural Resources Crimes Unit, including convictions of three individuals for illegally dumping hazardous waste at multiple locations in Baltimore City and a defendant who abandoned thousands of scrap tires in Allegany County. These convictions protect Maryland communities from environmental hazards and hold polluters accountable.
- Obtained fraud convictions through the Fraud and Corruption Unit in cases with total financial losses exceeding \$4.2 million, of which more than \$2.9 million represented losses to the State, demonstrating strong enforcement against those who defraud state government and Maryland taxpayers.
- Charged over 80 defendants through the Organized Crime Unit for gang-related crimes, illegal firearms possession, drug trafficking, and violence throughout Maryland. Seized nearly 60 illegally possessed firearms, including "ghost guns" and Glock switches used to convert semi-automatic handguns into automatic machine guns. Secured convictions including of a violent sex trafficker in Howard County and a shooter responsible for a gang-related murder in Baltimore City.
- Established the Investigative and Prosecutorial Support Unit, a new unit composed of analysts, investigators, and auditors providing dedicated analytical, financial, and investigative support to prosecutors across all Criminal Division units. The unit ensures cases are developed

consistently using best practices through an equity lens, while leading specialized investigations, wiretaps, and prison corruption matters.

- Assisted over 400 crime victims through the Victim Services program.

Independent Investigations Division

The Independent Investigations Division (IID) investigates every police-involved death in the State. The Division is independent of any local law enforcement agency and investigates each case independently, with integrity, thoroughness, and transparency.

Significant Activities & Accomplishments

- Opened 23 new investigations of officer-involved or in-custody deaths, ensuring independent review of incidents where individuals died during interactions with law enforcement or while in state custody.
- Completed investigations and issued declination reports in 26 cases, providing transparency and accountability in the Division's independent review process.
- Brought criminal charges in two cases against three officers for misconduct related to fatal incidents. One case remains pending and is scheduled for trial in April 2026, demonstrating the Division's commitment to holding law enforcement accountable when evidence supports criminal prosecution.

Medicaid Fraud and Vulnerable Victims Unit

The Medicaid Fraud and Vulnerable Victims Unit investigates and prosecutes fraud by healthcare providers in the Medicaid system as well as fraud in the administration of the Medicaid program; investigates and prosecutes crimes involving the abuse or neglect of vulnerable adults in the State; and addresses the opioid crisis by investigating the diversion of pharmaceuticals and the inappropriate dispensing of opioids by healthcare providers.

Significant Activities & Accomplishments

- Secured an \$889,000 settlement with Elkton Nursing and Rehabilitation Center to resolve claims that the facility billed Medicaid for substandard nursing care services provided to Medicaid residents. The settlement also required establishment of a \$400,679 Resident Improvement Fund to pay for appropriate care and service improvements, and implementation of a three-year Quality Improvement Agreement with oversight by a third-party consultant specializing in nursing home monitoring, ensuring ongoing accountability and improved care for vulnerable residents.
- Successfully prosecuted an individual, who misrepresented herself as a licensed registered nurse to obtain employment in multiple states including Maryland. Van Horn used the credentials of a Pennsylvania RN to secure a nursing position as an RN Supervisor at a Maryland nursing home, where she supervised staff and provided patient care before being terminated after patient narcotics under her supervision went missing.
- Prosecuted three individuals for operating a massive behavioral health fraud scheme between November 2019 and September 2024. The defendants operated two behavioral health companies that submitted fraudulent claims for Psychiatric Rehabilitation Program services, causing Maryland Medicaid to reimburse \$3.67 million for services never rendered. The

defendants falsified documentation, forged provider and patient signatures, and stole identities of healthcare professionals and Medicaid recipients.

Office of Equity, Policy, and Engagement

The Office of Equity, Policy, and Engagement identifies and helps to execute innovative strategies to advance the Office of the Attorney General's goals and priorities using a racial and social equity framework. The Office works closely with internal and external stakeholders across a broad range of issues to promote policies and other initiatives that combat systemic inequities and protect the rights, responsibilities, and privileges of all Marylanders. The Office includes the Legislative Affairs Unit, the Sexual Evidence Kit Policy and Funding Committee, and the Maryland Commission on Hate Crime Response and Prevention.

Significant Activities & Accomplishments

- Staffed and supported the Maryland Equitable Justice Collaborative in developing and approving 18 data-driven recommendations for legislative and agency reforms, program development, data collection, and other measures designed to reduce racial disparities in Maryland's prisons and jails. Drafted the Collaborative's final report presenting these recommendations to address the crisis of disproportionate incarceration of Black Marylanders, who comprise 71% of the state's incarcerated population despite representing only 30% of Maryland's general population.
- Developed and launched the Maryland Office of the Attorney General's Strategic Plan, outlining the Office's mission and the vision and values that Attorney General Brown brings to his leadership. The Strategic Plan establishes a comprehensive framework using a racial and social equity lens to guide the Office's work in combating systemic inequities and protecting the rights, responsibilities, and privileges of all Marylanders.
- Coordinated legislative strategy across the Office of the Attorney General during the 2025 General Assembly session through the Legislative Affairs Unit, advancing policy initiatives that promote equity and justice while working with internal and external stakeholders to develop innovative approaches to systemic challenges facing Maryland communities.
- Completed an audit of the Maryland's Office of the Chief Medical Examiner, finding patterns suggesting the possibility of pro-police and racial bias in manner of death classifications. The audit identified 41 cases where at least two of three independent reviewers determined the manner of death should have been classified as homicide.

Opinions and Advice Division

The Opinions & Advice Division supervises the official opinions of the Attorney General. These opinions are formal statements of the Attorney General's views on specific legal questions and are the product of an extensive process of legal research, drafting, and review. In addition to official opinions, the Opinions & Advice Division issues letters of advice to State government clients on difficult legal issues and supports units throughout the Office to render consistent advice to our client agencies. The Opinions & Advice Division is also responsible for issuing the Public Information Act Manual and the Open Meetings Act Manual, as well as for serving as a resource within the Office of the Attorney General about open government issues.

Significant Activities & Accomplishments

- Published "Immigration Guidance for Facilities that Serve the Public" as required by House Bill 1222 of 2025, providing State and local agencies and the public with information about immigration enforcement at sensitive locations and other government facilities.
- Issued official Attorney General opinions on critical State law questions, including the effect of criminal expungement on licensing records and whether the Police Accountability Act preempts local anti-discrimination policies.
- In partnership with the Civil Rights Division, updated guidance for Maryland law enforcement agencies on local immigration enforcement practices.

People's Insurance Counsel Division

The People's Insurance Counsel Division's (PICD) protects consumers in the medical professional liability insurance (MM) and homeowner's insurance (HO) markets, although it does not represent individual consumers. The Division reviews MM and HO matters before the Maryland Insurance Administration (MIA) Commissioner to determine if consumers are impacted. Additionally, PICD reviews insurance filings including rate filings with a 10% rate increase or more and files a request for rate hearing if excessive, inadequate, or unfairly discriminatory.

Significant Activities & Accomplishments

- Reviewed insurance filings that resulted in insurers withdrawing or reducing proposed rate increases, saving consumers money, and correcting coverage terms and exclusions to better protect policyholders.
- Conducted outreach events in every Maryland county and Baltimore City, reaching underserved communities including LGBTQIA+ individuals, seniors, students, and medical professionals, with a focus on ensuring rural residents and those affected by poverty or inequality can access state assistance programs.
- Participated in a home repair and maintenance program for low-income and elderly homeowners, helping prevent insurance cancellations and non-renewals due to property condition issues related to "wear, tear, and deterioration" exclusions.

Securities Division

The Securities Division administers and enforces the Maryland Securities Act, the Maryland Business Opportunities Sales Act, and the Maryland Franchise Registration and Disclosure Law. The Division functions as both an investor and consumer protection division and a regulatory agency.

Significant Activities & Accomplishments

- Secured over \$17 million for Maryland's public pension funds and local governments after investigating Wall Street fraud leading up to the 2008 financial crisis, protecting retirement security for thousands of Maryland teachers, firefighters, police officers, and public servants. The Division has recovered more than \$125 million in total for pension funds and other public moneys in cases stemming from the financial crisis.

- Resolved a case involving the largest securities transfer agent in the country, requiring Computershare and its related brokerage firm Georgeson Securities to reimburse Marylanders \$750,000 in unreasonable fees and pay a penalty of \$2.25 million. The settlement also mandates other measures including prominent disclosure that shareholder registrations can be updated for free through Computershare, verbal notification of the free option during telephone calls with shareholders, and similar disclosures in shareholder cleanup programs, protecting Maryland investors from unnecessary fees.
- Implemented a new initiative to successfully protect state records from expungement in separate arbitration matters involving financial professionals seeking to purge customer complaints alleging wrongdoing from their records. The information sought to be expunged is a required disclosure for stockbroker licensing applications and is critical to licensing decisions, employer hiring decisions, and investor decisions to entrust their financial assets to financial professionals, ensuring transparency and accountability in Maryland's securities industry.

Office of the Solicitor General

The Office of the Solicitor General handles criminal and complex civil litigation in federal and state courts, primarily at the appellate level. The Solicitor General supervises appellate work across the Office of the Attorney General, advises the Attorney General and Deputy Attorneys General on significant appellate issues, approves amicus recommendations, and initiates strategic improvements in appellate procedures to ensure effective legal representation on behalf of the State.

Significant Activities & Accomplishments

- Successfully defended Maryland's assault weapons ban before the Supreme Court of the United States in *Snope v. Brown*. After the en banc Fourth Circuit upheld the ban, the Office opposed a petition for certiorari, and in June 2025 the Supreme Court denied certiorari, preserving the Fourth Circuit's decision and Maryland's critical public safety law.
- Handled 731 criminal appeals and habeas corpus matters through the Criminal Appeals Division, including 13 cases decided by the Supreme Court of Maryland - representing a quarter of that Court's merits docket. In approximately 520 criminal appeals decided in the Appellate Court of Maryland, the Division prevailed in all but 59 cases, successfully defending the State's legal positions and ensuring accountability in Maryland's criminal justice system.
- Successfully defended the constitutionality of Maryland's prohibition on firearm possession by persons convicted of felony-equivalent crimes in *Fooks v. State* before the Supreme Court of Maryland and upheld Maryland's prohibition on possession of child pornography in *Brasse v. State* before the Appellate Court of Maryland, protecting public safety and vulnerable populations through strong legal precedent.

Tobacco Enforcement Unit

The Tobacco Enforcement Unit enforces the 1998 Master Settlement Agreement (MSA) between Maryland, over 20 cigarette manufacturers, and 51 other States and United States Territories. The Unit enforces the Tobacco Product Manufacturer Escrow Act and engages in multi-state arbitrations against Philip Morris, USA, the R.J. Reynolds Tobacco Company, and other cigarette manufacturers. The Unit also works on tobacco policy and enforcement issues with units of State

government, public-health advocates and stakeholders, other states, and the National Association of Attorneys General.

Significant Activities & Accomplishments

- Negotiated and implemented a settlement of litigation arising from the 1998 tobacco Master Settlement Agreement with cigarette manufacturers who claimed Maryland failed to diligently enforce a statute regulating certain other cigarette manufacturers. The settlement is expected to bring in more than \$37 million in addition to Maryland's annual settlement payment due in April 2026, significantly increasing funding available for critical State programs and services.
- Successfully persuaded the General Assembly to adopt an amendment to the statute regulating the e-cigarette industry, removing a provision that authorized state-licensed e-cigarette manufacturers to sell their products directly to consumers over the internet. This amendment strengthens regulatory oversight of the e-cigarette industry and enhances protections for Maryland consumers, particularly youth, from easy access to vaping products.

OAG ACTIVITIES: AGENCY CLIENT UNITS

The Office of the Attorney General also serves as the legal adviser to the vast majority of agencies in each of the three branches of State Government, advising and representing agencies and their officials in legal matters on a broad range of topics, including, but not limited to: contracts and procurement, personnel and employee relations, equal employment opportunity, real estate, regulatory review, asset management, taxation, and grant administration. We refer to these OAG divisions as *agency client units*. Below, we have identified the activities and accomplishments for each agency client unit.

Department of Aging

Significant Activities & Accomplishments

- Assisted the Maryland Department of Aging in promulgating amended regulations governing continuing care providers, decreasing the administrative burden on continuing care at home providers and improving regulatory efficiency while maintaining protections for Maryland's aging population.
- Successfully defended the Maryland Department of Aging in a bid protest appeal concerning a procurement contract awarded for the agency's Senior Call-Check and Social Connections Program. The Maryland State Board of Contract Appeals dismissed the appeal allowing the critical program to move forward without delay and ensuring seniors across Maryland continue to receive vital wellness check and social connection services.

Department of Agriculture

Significant Activities & Accomplishments

- Assisted in the development of Maryland's new Food Processing Residuals Utilization Program, which regulates the transportation, storage, and land application of food processing residuals in the State. Drafted the implementing regulations, required permits for agricultural operations utilizing this material, and bond forms necessary to secure proper utilization.
- Successfully prosecuted a livestock operator under the State's Nutrient Management Law for failing to manage manure, prevent streambank erosion, and protect water quality and stream health. After formal charges were filed, the operator admitted guilt and agreed to pay the maximum \$5,000 penalty, demonstrating enforcement of critical environmental protections for Maryland's waterways.
- Resolved disciplinary actions against nineteen licensed veterinarians referred by the State Board of Veterinary Medical Examiners, with thirteen cases resulting in public orders finding deficiencies in professional judgment, conduct, record-keeping, and facility maintenance. The veterinarians were ordered to pay over \$10,000 in civil penalties and complete 50 hours of continuing education, protecting animal welfare and public health across Maryland.
- Supported the Maryland Agricultural Land Preservation Foundation (MALPF) in achieving a historic milestone: the program has now expended more than \$1 billion to acquire preservation easements on agricultural land in every county in Maryland, encompassing 2,881 farms covering approximately 385,000 acres - a total land area greater than 600 square miles. This

50-year program protects open-space land, combats development pressure, and ensures sources of agricultural products for Maryland citizens.

Alcohol, Tobacco, and Cannabis Commission

Significant Activities & Accomplishments

- In collaboration with the Maryland Cannabis Commission, secured significant favorable rulings in *Maryland Hemp Coalition, et al. v. Governor Wes Moore, et al.* before the Maryland Appellate Court and defeated a motion for temporary restraining order in *Charm City Hemp et al. v. Maryland Cannabis Administration* in federal court. These victories protected the State's regulatory framework for cannabis and hemp and ensured Maryland's ability to effectively oversee legal markets while preventing unauthorized sales.
- Supported ATCC's enhanced enforcement strategy regarding seizure of unregulated intoxicating hemp products, providing legal guidance that enabled the agency to remove dangerous products from the marketplace and reduce risks to public health. This work protects Maryland consumers from unregulated intoxicating substances being sold outside the State's licensed and regulated cannabis framework.

Department of Assessment and Taxation

Significant Activities & Accomplishments

- Obtained several favorable decisions in Tax Court where the Court ruled that assessed property values were higher than values asserted by taxpayers, protecting State and local tax revenues and ensuring accurate property assessments across Maryland.
- Managed and litigated approximately 1,000 cases in Tax Courts throughout Maryland, achieving favorable outcomes through settlements, withdrawals, dismissals, and favorable Tax Court decisions that protected the integrity of Maryland's property assessment system and ensured fair and accurate taxation statewide.

Board of Public Works

Significant Activities & Accomplishments

- Reviewed all agenda items that came before the Board of Public Works for legal, procurement, or funding issues, ensuring compliance with State law and protecting the State's interests in major spending and contracting decisions.
- Developed and implemented a tracking system for legal sufficiency review of miscellaneous capital grants, improving efficiency and consistency in the review process for State capital funding awards.

Department of Budget and Management and Disabilities

Significant Activities & Accomplishments

- Provided legal guidance to implement the Voluntary Separation Program for State employees, resulting in the abolishment of 502 positions and generating cost savings of \$47.2 million annually across all funding sources beginning in FY 27, with \$22 million of those savings coming from the General Fund.

- Supported and advised the Department of Budget and Management on a Request for Proposals currently underway for the State's health benefits package valued at over \$10 billion, ensuring the procurement process protects the interests of Maryland's state employees and their families while maintaining fiscal responsibility.
- Successfully resolved the Fitch case after over seven years of litigation, culminating in the United States Supreme Court's denial of plaintiffs' writ of certiorari. The case determined the scope of contractual rights to prescription drug benefits for state retirees and employees, providing legal clarity and financial certainty for the State's benefits programs.

Maryland Cannabis Administration

Significant Activities & Accomplishments

- Secured, in coordination with the Alcohol, Tobacco, and Cannabis Commission, a significant favorable ruling from the Maryland Appellate Court in *Maryland Hemp Coalition, et al. v. Governor Wes Moore, et al.*, protecting the State's regulatory framework for cannabis and hemp and ensuring Maryland's ability to effectively oversee the legal cannabis market.
- Secured a significant favorable ruling from the U.S. Court of Appeals for the Fourth Circuit in *Justyna Jensen v. Maryland Cannabis Administration*. After the Fourth Circuit affirmed the District Court's denial of plaintiff's motion for a temporary restraining order, the district court granted the MCA's motion to dismiss. The dismissal upheld Maryland's cannabis licensing process and regulations, though plaintiff has appealed and that appeal remains pending.
- Defeated a motion for temporary restraining order in federal litigation *Charm City Hemp et al. v. Maryland Cannabis Administration*, protecting the State's enforcement authority and regulatory programs.

Department of Commerce

Significant Activities & Accomplishments

- Assisted the Department of Commerce's Advantage Maryland program (MEDAAF) in closing more economic development deals in 2025 than the previous 11 years combined, dramatically accelerating business attraction and expansion efforts that create jobs and investment opportunities for Marylanders.
- Won dismissal of PEEK LLC v. Commerce, a case that had placed a two-year hold over one of Commerce's largest and most important programs. The Circuit Court dismissed the judicial review challenge to Commerce's administration of the Maryland Small Business Development Financing Authority program, allowing Commerce to move forward without impediment in supporting small businesses across Maryland.
- Assisted the Maryland Clean Energy Center in developing foundational documents, templates, guidelines, and underwriting policies for two newly established funds: the Climate Catalytic Capital Fund and Climate Tech Founder's Fund. These foundational documents enabled MCEC to approve transactions and deploy funds to clean energy projects across Maryland, advancing the state's climate goals and clean energy economy.

Office of the Comptroller

Significant Activities & Accomplishments

- Successfully defended Maryland's digital advertising gross revenues tax against constitutional challenges in extensive Tax Court litigation. Three Assistant Attorneys General defended the tax against twenty taxpayer attorneys during hearings in July 2025 featuring expert witnesses on the Internet Tax Freedom Act issues. The ongoing litigation protects critical education funding, as revenues generated by the tax fund the Blueprint for Maryland's Future, the primary source for education revenues statewide.
- Achieved a partially favorable decision from the Fourth Circuit in *Albert v. Lierman*, successfully arguing that Eleventh Amendment immunity bars claims for interest on unclaimed property that predate any future judgment, protecting the State from potentially significant retroactive liability.
- Assisted in the management of over 30 procurements for the Comptroller in 2025, including the major Financial Management Information System (FMIS) replacement procurement, significantly expanding the office's procurement capabilities.

Maryland State Department of Education

Significant Activities & Accomplishments

- Navigated the legal complexities of the challenges presented by the Somerset County Public Schools' change in leadership by advising the State Board on emergency regulatory authority, drafting an emergency regulation to stay the superintendent's termination pending appeal, and preparing memoranda for the Board's consideration of related appeals and petitions. These efforts upheld due process protections and preserved the State Board's authority in a legally novel situation.
- Successfully defended multiple childcare enforcement actions, including emergency suspensions and revocations involving serious safety violations where children were found unattended in unsafe conditions, such as a shed with no ventilation and a center that mistakenly sent a child to the wrong school. These cases protected Maryland children and reinforced the integrity of the Office of Child Care's regulatory framework.
- Achieved a favorable circuit court ruling affirming that aggregating data in MSDE's database for additional analysis constitutes the creation of a new record under the Public Information Act, establishing a precedent with statewide implications for government transparency and data management.
- Contributed to multistate litigation efforts that resulted in favorable rulings preserving \$245 million in COVID recovery funds for Maryland and blocking the dismantling of the Institute of Museum and Library Services. Additionally, drafted guidance for MSDE in response to federal policy changes affecting Title VI, FERPA, immigration enforcement, and DEI-related issues, safeguarding Maryland's education policies and legal autonomy.

Maryland Department of Emergency Management

Significant Activities & Accomplishments

- Assisted with the closure of MDEM's initial loans under the newly-established Revolving Maryland Resilient Loan Fund to support environmental resilience projects, working collaboratively with MDEM's loan team to assess creative responses given significant loss of federal funds.

- Supported the newly-created State Disaster Recovery Fund, a State-led recovery and relief funding program that enables individuals, households, businesses, and local governments to recover from disasters.
- Provided ongoing counsel to the MD 9-1-1 Board on a wide range of matters including recent Board leadership transition of Chair and addition of Vice Chair.
- Negotiated and executed an innovative funding agreement with a multi-billion dollar nonprofit health system to address federal grant funding administered by MDEM.

Maryland Energy Administration

Significant Activities & Accomplishments

- Worked cooperatively with OAG's Federal Accountability Unit to respond to numerous adverse federal actions impacting State energy programs, including development of offshore wind and access to Department of Energy funds for renewable energy programs.
- Led an effort to streamline MEA's grant program administration by standardizing funding opportunity announcements and terms and conditions for program grants.
- Represented MEA in numerous hearings and proceedings at the Public Service Commission, advocating for preservation and expansion of renewable and clean energy sources for Maryland.

Department of the Environment

Significant Activities & Accomplishments

- Filed a comprehensive lawsuit against W.L. Gore & Associates, Inc. in federal court on behalf of the Maryland Department of the Environment, alleging violations of state water pollution and hazardous substance statutes, as well as federal environmental laws. The complaint seeks penalties, costs for investigation and remediation of PFAS contamination, natural resource damages, and future costs to address the environmental harm caused by the company's operations.
- Successfully negotiated and issued a Revised Water Quality Certification for the Conowingo Hydroelectric Project, ending years of litigation and enabling the issuance of a new 50-year operating license. The certification secures over \$100 million in payments for mussel restoration and water quality improvement projects, requires more environmentally beneficial water flow through the dam, and mandates improvements to fish passage, invasive species management, and trash removal.
- Provided over nine years of continuous legal support to the Maryland Department of the Environment in the Conowingo relicensing process, serving as advisors, litigators, and negotiators to protect State environmental interests and ensure meaningful improvements at the dam for the Chesapeake Bay and Maryland's water quality.

Maryland Environmental Service

Significant Activities & Accomplishments

- Successfully closed the sale of MES's Midshore II Revenue Bonds, Series 2025, totaling approximately \$25.4 million. Coordinated with the agency, bond counsel, financial advisors, and the MES Board of Directors throughout the transaction, reviewing and revising key legal

documents and ensuring compliance with applicable legal requirements. Proceeds from the bonds will fund completion of Cell #5 and Cell #1 at the Midshore II Regional Landfill in Caroline County, providing critical infrastructure improvements and ensuring continued environmental compliance at the landfill serving Caroline, Kent, Queen Anne's, and Talbot Counties.

- Spearheaded the drafting and negotiation of interagency agreements with nine different state agencies to satisfy a 2020 Maryland Office of Legislative Audits recommendation. The initiative established formal written agreements for all state facilities (more than 70 facilities) operated by MES, clarifying the responsibilities of each party and providing proper contractual frameworks that replaced a 1979 Board of Public Works policy.
- Recovered \$119,000 in misappropriated funds from a former MES Director through federal asset forfeiture proceedings. After representing MES throughout legislative and criminal investigations involving the former Director's alleged fraud and embezzlement, the Office applied for remission of seized funds traced to an improperly obtained severance payment. The funds were paid to MES under the DOJ remission process, returning taxpayer dollars to the agency and demonstrating accountability for abuse of public office.

Maryland General Assembly

Significant Activities & Accomplishments

- Delivered 53 bill review letters during the 2025 legislative session, supporting agency decision-making across 878 bills passed by the General Assembly.
- Issued 475 letters of advice from October 2024 to October 2025, providing timely legal guidance to meet client needs.
- Maintained rapid response capability during the 90-day 2025 session by producing 217 letters of advice - more than two per day.

Department of General Services

Significant Activities & Accomplishments

- Successfully defended the Department of General Services in the Agile Teams 2.0 procurement and related protests, prevailing in 8 of 9 appeals filed with the Maryland State Board of Contract Appeals since December 2024. This victory protected a critical statewide IT procurement that will modernize State technology infrastructure and services.
- Completed Maryland's first-ever Health Department lease financed through Revenue Bonds issuance, enabling construction of consolidated office space and a parking garage for all Baltimore City MDH employees. The complex two-year transaction required coordination of property acquisitions, appraisal disputes, and bond financing to provide a modern, efficient workspace for state health services.
- Played a pivotal role in advancing the Procurement Reform Act of 2025 by providing comprehensive legal review that clarified statutory terms, consolidated language, and promoted a more streamlined and efficient statewide procurement process. Assisted the Office of State Procurement in drafting updated templates and agreements in preparation for the reforms, which will improve procurement efficiency across all State agencies.

Department of Health

Significant Activities & Accomplishments

- Provided legal advice and support to the Secretary of Health and the Health Services Cost Review Commission to facilitate finalization of the new Achieving Healthcare Efficiency Through Accountable Design (AHEAD) Model Agreement with the U.S. Department of Health & Human Services. AHEAD builds upon the successes of the Maryland Total Cost of Care Model in reducing healthcare cost growth and improving quality of care, with additional focus on helping all Marylanders stay healthy and get the care they need.
- Assisted in drafting and legal review of revised regulations on patient financial assistance and medical debt, which will better protect patients who need financial assistance as well as patients who benefit from income-based payment plans and significantly less aggressive collection practices. These regulations ensure Marylanders receive appropriate financial protections when accessing necessary healthcare services.
- Provided critical legal advice and support to the Maryland Office of Overdose Response to carry out the legal mandate to distribute monies from Maryland's Opioid Restitution Fund, which was established in 2019 to receive all monies awarded to the State of Maryland through prescription opioid-related legal action. This work ensures that settlement funds are properly allocated to programs and services that help abate Maryland's opioid crisis and support affected communities.

Maryland Health Benefit Exchange

Significant Activities & Accomplishments

- Litigated a complex licensure disciplinary proceeding through judicial review in Circuit Court, obtaining a favorable opinion for MHBE that created helpful precedent for the agency. This victory strengthened MHBE's enforcement authority over licensed producers and established important legal standards for future disciplinary proceedings protecting Maryland's health insurance marketplace.
- Successfully guided MHBE through significant legislative and regulatory changes necessary to ensure compliance with federal changes imposed by the current administration's HR-1 ("OBBBA") legislation ahead of 2025 Open Enrollment. This work ensured Maryland residents maintained uninterrupted access to health insurance through the Exchange despite challenging federal policy shifts that threatened program operations.

Health Occupations Prosecution and Litigation

Significant Activities & Accomplishments

- Brought over 300 enforcement actions and summarily suspended 62 practitioners when emergency action was needed to protect the health, safety, or welfare of Maryland residents. These swift interventions removed dangerous or unqualified practitioners from patient care, safeguarding vulnerable populations and maintaining the integrity of Maryland's healthcare system.
- Led enforcement action against a crematorium that improperly stored and handled human bodies and remains, working with State and local health agencies to quickly secure emergency

suspensions and the subsequent revocation of the crematory's permit and operator registrations. This urgent action protected the dignity of the deceased and their families while holding the facility accountable for egregious violations of public health standards.

- Provided training and outreach to board investigators and other stakeholders, offering guidance on thorough investigative practices, effective interviewing techniques, reviewing court records, and navigating hearing procedures. These trainings promote consistent, high-quality investigations and fair, efficient disciplinary processes across the health occupations boards, ensuring practitioners are held accountable through proper legal procedures.

Maryland Higher Education Commission

Significant Activities & Accomplishments

- Successfully represented MHEC before the Maryland Board of Contract Appeals, prevailing in two bid protests related to a major IT project designed to create a unified, secure, and flexible system for managing student data statewide. The victory protected the integrity of the procurement process and ensured students across Maryland will benefit from a modernized, efficient, and transparent system that enhances both access and accountability in higher education.
- Updated Commission Bylaws to align with current law and best practices, strengthening governance structures, clarifying procedural standards, and enhancing institutional integrity to ensure the Commission operates with transparency and accountability in today's evolving legal landscape.
- Drafted two new Repayment Appeals frameworks establishing internal guidelines for standardized and equitable treatment of individuals appealing repayment determinations, promoting fairness, consistency, and trust in the Commission's processes while balancing compliance with support for students navigating financial obligations.

Higher Education Division

The Higher Education Division provides legal advice and representation to the public higher education institutions in the State, including the University System of Maryland and its 12 constituent institutions and three regional centers, as well as to Morgan State University, St. Mary's College of Maryland, and Baltimore City Community College. The Division also advises and represents the Maryland Institute for Emergency Medical Services Systems and the Historic St. Mary's City Commission.

Significant Activities & Accomplishments

- Coordinated with the Federal Accountability Unit to advise and represent Maryland's public higher education institutions in response to federal administration actions affecting institutional operations, including cancellation of federal programs and grant funding, and policy directives with new funding conditions. Advised institutions on federal agency interpretations of antidiscrimination laws and worked with institutions to develop responses protecting their interests and autonomy.
- Defended higher education institutions in 110 cases filed in State and federal trial and appellate courts and before administrative bodies, successfully obtaining dismissal in 31

cases and summary judgment in 4 cases, protecting institutional resources and operations from unmeritorious legal challenges.

Department of Housing & Community Development

Significant Activities & Accomplishments

- Provided legal guidance for the issuance of \$1.2 billion in single family bonds, enabling approximately 3,000 low- and moderate-income households to purchase homes in Maryland and expanding access to homeownership across the state.
- Assisted with the issuance of \$589.9 million in multifamily bonds supporting 21 affordable housing projects statewide and facilitated the closing of 26 senior and subordinate loans for these projects, significantly expanding Maryland's affordable rental housing stock.
- Facilitated 597 grant agreements totaling \$139.6 million to support local governments and nonprofits with neighborhood revitalization projects, strengthening communities throughout Maryland.
- Assisted with the execution of 24 broadband grant agreements totaling \$47.7 million, helping 12,006 households and businesses achieve or improve internet connections and bridging the digital divide in underserved areas.

Department of Human Services

Significant Activities & Accomplishments

- Prevailed in approximately 85% of Child in Need of Assistance and Termination of Parental Rights appellate proceedings handled since November 2024, helping achieve permanency for youth who have been victims of abuse or neglect and whose biological parents have been determined by courts to be either unable or unwilling to properly care for them.
- Effectively represented DHS in three ongoing systemic litigation proceedings involving the foster care system in Baltimore City, psychotropic medications for foster children, and hospital overstay for youth committed to DHS.
- Supported DHS in advancing major initiatives including legislation to prioritize kinship care for youth needing out-of-home care and responding to federal government actions adversely impacting critical public assistance programs such as the Supplemental Nutrition Assistance Program, ensuring that Maryland's most vulnerable residents continue to receive essential services despite federal challenges.

Department of Information Technology

Significant Activities & Accomplishments

- Assisted DoIT in developing and implementing its Vulnerability Disclosure Policy, establishing a framework for responsible reporting of security vulnerabilities and strengthening Maryland's cybersecurity posture by creating clear protocols for identifying and addressing potential threats to state information systems.
- Provided critical legal support to DoIT in responding to a cybersecurity incident affecting the Maryland Transit Administration, ensuring appropriate legal protocols were followed, coordinating incident response efforts, and protecting the State's interests while maintaining essential transportation services for Maryland residents.

- Assisted DoIT with the award of its digital services Request for Proposals, facilitating the procurement of critical technology services that will modernize state digital infrastructure and improve service delivery to Marylanders across multiple state agencies.

Inspector General for Education

Significant Activities & Accomplishments

- Resolved appeals recovering over \$380,000 in education funds for the State.
- Assisted the Inspector General in identifying approximately \$12 million in education funds requiring review, strengthening oversight and accountability in education spending.
- Assisted the Inspector General in the development of a policies and procedures manual for OIGH, establishing a comprehensive framework for agency operations and enhancing institutional consistency.

Maryland Insurance Administration

Significant Activities & Accomplishments

- Assisted MIA in preparing and negotiating a Market Conduct Report that found an insurer violated Maryland insurance discrimination laws by imposing stricter underwriting guidelines on Baltimore City producers. The insurer paid significant penalties, agreed to a corrective action plan, and provided restitution to producers who had commissions that were illegally reduced or terminated.
- Handled approximately 609 advice and litigation matters throughout the year.
- Successfully prosecuted numerous enforcement actions against brokers, agents, and public adjusters who acted in an unlawful manner.

Department of Juvenile Services

Significant Activities & Accomplishments

- Assisted the Department in managing a substantial statewide increase in Child in Need of Supervision petitions prompted by recent changes to the Juvenile Causes Act, ensuring the Department could effectively respond to the heightened demand for intervention services while maintaining legal compliance and protecting youth welfare.
- Managed over 1,000 lawsuits filed against the State under the 2023 Child Victims Act in collaboration with retained assistant counsel and other OAG units, coordinating the State's handling of this complex litigation involving claims of alleged historic abuse in state facilities.

Maryland Department of Labor

Significant Activities & Accomplishments

- Recovered over \$500 million in pandemic-era unemployment benefit funds that were flagged as potentially having been obtained by fraudulent means, protecting Maryland taxpayers and preserving the integrity of the unemployment insurance program through successful negotiation with a financial institution.
- Provided affidavits and critical litigation support to the Federal Accountability Unit in cases challenging the federal Administration's firing of probationary employees and termination of

grant funding for various MDOL programs, helping preserve employment protections for federal workers and secure millions of dollars in federal funding for Maryland workforce programs.

- Assisted in obtaining a statutory change to unemployment insurance law allowing the Department of Labor to obtain an administrative fee without creating a tax increase for employers, ensuring sustainable program funding while protecting Maryland businesses from additional costs.
- Provided advice and drafting assistance for the Family and Medical Leave Insurance Division's first set of proposed regulations, supporting implementation of this landmark program that will provide paid family and medical leave benefits to Maryland workers beginning in 2026.

Maryland State Lottery and Gaming Control Agency

Significant Activities & Accomplishments

- Assisted in Maryland becoming the first state to obtain a favorable decision against prediction market provider Kalshiex, LLC, establishing important precedent in regulating emerging forms of gaming and protecting Maryland consumers from unlicensed gambling operations.
- Reduced illegal gaming throughout Maryland by issuing targeted cease-and-desist letters to operators of prohibited online gaming and gray machine operations, protecting the integrity of the State's regulated gaming industry and ensuring consumer protection.
- Advised and represented the agency in legal matters relating to its nine gaming activities that provide vital funding streams for important public programs and services around the State, including traditional lottery, casinos, sports wagering, online fantasy competitions, instant ticket lottery machines to benefit veterans' organizations, electronic instant bingo machines in Anne Arundel and Calvert Counties, skills-based gaming devices, amusement gaming devices, and family amusement centers in Worcester County.
- Assisted the Maryland Stadium Authority in securing an AA rating with stable outlook for bonds backed by lottery revenue, ensuring continued access to favorable financing for critical infrastructure projects across Maryland.

Military Department and Veterans Affairs

Significant Activities & Accomplishments

- Provided advice to help facilitate the temporary closure of Freestate Challenge Academy and to assist in managing resulting media coverage. FCA is a youth program of the Maryland Military Department serving at-risk youth in Maryland.
- Successfully defended the Maryland Military Department against an EEOC claim of sexual harassment and pregnancy discrimination involving a National Guard Technician, resulting in complete dismissal of multiple serious claims and exoneration of staff.
- Negotiated and executed contracts for providers of elder medical care and other consultant services to the Charlotte Hall Veterans Home, ensuring veterans receive the services and care they deserve for serving our country.

Department of Natural Resources

Significant Activities & Accomplishments

- Represented the Department in 60 administrative, State circuit and appellate court, and federal court matters, protecting Maryland's natural resources and ensuring compliance with environmental laws across multiple legal forums.
- Assisted DNR in acquiring 3,119 acres in fee simple land acquisitions and 4,207 acres in conservation easements, as well as 465 acres in conservation easements for the Maryland Environmental Trust, preserving critical natural habitats and open space for current and future generations of Marylanders.
- Successfully defended DNR and Secretary Kurtz in *Cape Cod Charter Association v. Burgum* in federal court, defeating a multi-state challenge to striped bass conservation regulations. The U.S. District Court dismissed the case, finding plaintiffs lacked standing and state agencies were protected by sovereign immunity. This victory enables DNR to continue protecting and conserving Maryland's recreational and commercial striped bass fisheries, ensuring sustainable fisheries management for the benefit of all Marylanders.
- Achieved the first recreational hunting license suspension through a contested case proceeding, establishing an important enforcement tool that deters illegal hunting. These enforcement actions protect Maryland's native wildlife populations, support local economies that rely on wildlife tourism, prevent the spread of disease, and enhance public safety.

Department of Planning

Significant Activities & Accomplishments

- Collaborated with the Maryland Inventory of Cemeteries and Burial Sites Workgroup to develop legislative recommendations for identifying and inventorying cemeteries and burial sites statewide, including neglected, abandoned, and small family plots.
- Established and administered the MD250 Commission's grant programs, distributing \$1.5 million in federal and State funds to organizations across Maryland for local civic and celebratory events honoring the 250th anniversary of the nation's founding.

Department of State Police

Significant Activities & Accomplishments

- Successfully defended the Maryland State Police (MSP) in *Chapman v. MSP* on a significant Title VII racial discrimination case, obtaining summary judgment in U.S. District Court and prevailing on appeal before the Fourth Circuit. The Court found that the Department's disciplinary actions were based on bona fide reasons and were not discriminatory, establishing important precedent for MSP's employment practices.
- Assisted the Department with implementing the new security guard law, which significantly broadened the scope of MSP's licensing process for security guards and security guard agencies effective January 1, 2025. Provided ongoing guidance to MSP's Licensing Division on interpreting and implementing this expanded regulatory framework.
- Assisted MSP with implementing a new DNA statute that made significant changes to the collection of DNA samples during the criminal justice process, effective October 1, 2025. Provided ongoing guidance to the Department on interpreting and complying with this new law.

- Cooperated with the Federal Accountability Unit to assist MSP with submitting federal funding requests and interpreting various federal Executive Orders, protecting the Department's access to critical federal resources during a period of significant federal policy changes.

Prescription Drug Affordability Board

Significant Activities & Accomplishments

- Advised and supported the Board in implementing the cost review study process for the first time, examining four prescription drugs (Jardiance, Farxiga, Ozempic, and Trulicity) to assess their impact on healthcare affordability in Maryland.
- Advised and supported the Board in making its first preliminary determinations that the use of certain drugs created affordability challenges for the State healthcare system or high out-of-pocket costs for patients, establishing important precedent for the Board's regulatory authority.
- Advised and supported the Board in assessing non-upper payment limit policy options to address affordability challenges and determining whether to pursue development of upper payment limits for prescription drugs, providing legal guidance on the Board's full range of regulatory tools.

Office of the Public Access Ombudsman

Significant Activities & Accomplishments

- Successfully worked with the OAG Legislative Affairs Unit to pass House Bill 331 / Senate Bill 296 of 2025, which allowed the Public Access Ombudsman to delegate powers and duties to appropriate staff in the Office of the Public Access Ombudsman. This legislative change enabled the hiring of an additional mediator (now the Deputy Public Access Ombudsman), allowing the Office to address more Public Information Act disputes and resolve them faster, improving transparency and access to public records for all Marylanders.
- Provided seven Public Information Act trainings during the fiscal year, including trainings for municipalities and presentations at the Maryland Association of Counties (MACo) and Maryland Municipal League (MML) conferences. These trainings increased PIA compliance across state and local government, directly benefiting Maryland residents seeking access to public records and promoting transparency in government operations.
- Supported the PIA Compliance Board in receiving 94 complaints and issuing 76 written decisions during the fiscal year. Drafted decisions and guided the deliberation and issuing process for the all-volunteer Board, ensuring timely resolution of PIA disputes and providing clear guidance on public access rights that benefits requesters and custodians throughout Maryland.

Public Employee Relations Board

Significant Activities & Accomplishments

- Supported statewide collective bargaining stability across higher education, state agencies, and public schools by advising the Board through a high volume of complex representation matters, unfair labor practice proceedings, unit clarification petitions, and impasse requests, ensuring fair, orderly, and legally consistent processes for tens of thousands of Maryland public employees.

- Provided legal guidance critical to the continued consolidation of Maryland's three former labor boards into a unified Public Employee Relations Board, ensuring smooth integration of statutory responsibilities, legacy procedures, and administrative functions. This consolidation has improved consistency and clarity in public sector labor relations statewide.
- Oversaw the archiving and long-term preservation of case files from the predecessor labor boards, strengthening the Board's historical record and supporting continuity in Maryland's collective bargaining jurisprudence for future reference and decision-making.

Department of Public Safety & Correctional Services

Significant Activities & Accomplishments

- Successfully concluded an investigation and hearing concerning violations by a private home detention monitoring agency, resulting in the monitoring agency's license to operate in Maryland being revoked.
- Prosecuted cases and provided legal advice that led to the decertification of several police officers and correctional officers for acts of misconduct.

Maryland Public Television

Significant Activities & Accomplishments

- Completed comprehensive review of Maryland Public Television (MPT) policies and procedures applicable to its affiliated foundation (MPT Foundation, Inc.), including the MPT-MPT Foundation Affiliated Foundation Agreement, and provided recommendations for revisions to the Maryland Public Broadcasting Commission. The recommendations were adopted, strengthening governance structures and clarifying the relationship between MPT and its foundation to better support public broadcasting in Maryland.
- Participated in MPT's AI Focus Group and Working Group and assisted in drafting and adoption of MPT's Generative AI Policy. The policy establishes clear guidelines for the responsible use of artificial intelligence technology in public broadcasting, ensuring MPT remains at the forefront of media innovation while maintaining editorial integrity and public trust.
- Provided ongoing and substantial legal support and advice to MPT management in response to loss of federal funding and state budget challenges, helping the agency navigate fiscal constraints while maintaining essential public broadcasting services that educate, inform, and engage Maryland communities across the State.

State Retirement and Pension System

Significant Activities & Accomplishments

- Advised and negotiated new and additional investments in 42 private market funds and co-investment vehicles totaling approximately \$2.7 billion in assets.
- Represented the System in approximately 30 administrative appeals for disability retirement benefits and associated judicial review proceedings.

Secretary of State

Significant Activities & Accomplishments

- Secured the issuance of four Cease-and-Desist Orders against problematic charitable organizations, immediately halting harmful solicitation activities and protecting Maryland consumers, donors, and the nonprofit sector. Negotiated the resolution of longstanding registration deficiencies with five charitable organizations, ensuring ongoing compliance with annual registration and reporting requirements.
- Achieved a permanent ban against a nonprofit executive director who hid financial information from board members, misapplied charitable contributions, and failed to maintain accurate accounting records, preventing future nonprofit operation in Maryland.
- Led a multi-agency regional investigation that resulted in a Cease-and-Desist Order against a Maryland-based sham charity that exploited children by using them in door-to-door solicitations while falsely claiming donations benefitted youth programs and scholarships.
- Represented Maryland in a multistate and federal enforcement action against a professional fundraiser that deceived donors into believing car donations would fund cancer screenings when proceeds primarily benefitted the fundraisers. The action culminated in an order securing \$550,000 for distribution to a cancer charity in a manner consistent with donor intent.

Department of Service and Civic Innovation

Significant Activities & Accomplishments

- Spearheaded the development of all foundational legal documents, including contract and grant templates, essential for the newly created Maryland Department of Service and Civic Innovation (DSCI). These foundational documents established the legal framework necessary for the Department to operate effectively and advance its mission of expanding service and civic engagement opportunities across Maryland.
- Maximized operational efficiency by streamlining the processing of over 200 grant agreements and 150 contracts supporting DSCI's program and staffing expansion, enabling the new Department to rapidly scale its operations and deliver critical service programs to communities throughout Maryland.

Department of Social and Economic Mobility

Significant Activities & Accomplishments

- Provided comprehensive legal support to establish the newly created Maryland Department of Social and Economic Mobility, which became operational on October 1, 2025. Facilitated the complex organizational transition consolidating three formerly separate offices - the Governor's Office of Small, Minority, and Women's Business Affairs (GOSBA), the Office of Social Equity (formerly part of the Maryland Cannabis Administration), and the Office of Minority Business Enterprise (the MBE certification office formerly part of MDOT) - by merging distinct statutory authorities, regulatory frameworks, and operational structures while ensuring seamless continuation of critical services to Maryland's small, minority-owned, and women-owned businesses throughout the transition period.

Maryland Stadium Authority

Significant Activities & Accomplishments

- Provided legal advice, drafted transactional documents, and issued opinions for MSA's issuance of \$781.5 million in bonds, including Sports Entertainment Facilities Bonds 2025 (\$121.5 million) for financing capital projects at Minor League Baseball stadiums throughout Maryland, Baseball Stadium Bonds 2025 (\$410 million) for capital improvements to Oriole Park at Camden Yards, and Pimlico Improvements Project Series 2025 (\$250 million) for capital projects at Pimlico Race Course.
- Advised MSA on the ownership and redevelopment of Pimlico Race Course and development of a thoroughbred horse training facility after the General Assembly designated MSA as successor to the Maryland Thoroughbred Racetrack Operating Authority's real property interests. Prepared a Facilities Operations Agreement between the Maryland Economic Development Corporation, MSA, and the Maryland Jockey Club, Inc., ensuring seamless transition of operations and continued viability of Maryland's thoroughbred racing industry.

Subsequent Injury Fund

Significant Activities & Accomplishments

- Assisted the Subsequent Injury Fund in collecting assessments from employers and insurers, ensuring that qualified injured Marylanders receive the benefits to which they are entitled under the workers' compensation system.
- Assisted the Subsequent Injury Fund in recovering overpayments of benefits, protecting the Fund's resources and ensuring that benefits reach those who remain qualified to receive them.
- Represented the Subsequent Injury Fund before the Workers' Compensation Commission in a fair and equitable manner, balancing the Fund's interests with the rights of injured workers seeking benefits.

Maryland State Employees Supplemental Retirement Plans Agency

Significant Activities & Accomplishments

- Advised the Agency; reviewed documents, notices, forms, procedures, and educational materials; negotiated associated agreements; developed clarifying plan amendments for the transition to the first new contractor for plan administrator services in the Agency's history.
- Worked on and closed transactions to transition existing investment funds to three lower-fee collective investment trusts and to consolidate collective investment trusts with a single trustee. Working on a transaction to transition the remaining investment funds in the stable value fund to three building block trusts.

Maryland Technology Development Corporation (TEDCO)

Significant Activities & Accomplishments

- Closed numerous investments and grants to Maryland technology companies totaling millions of dollars in State and federal funds, including two complex Venture Capital Limited Partnership investments totaling \$6 million through Ain Ventures Fund I, LP and Collide Capital MD SSBCI Fund, LP.
- Assisted TEDCO in launching several new programs, including the Equitech Growth Fund Program, the Pava LaPere Innovation Acceleration Grant Program, and the MD SBIR-STTR Grant

Program, by drafting regulations, grant agreement templates, and related legal forms, and closing numerous grants to Maryland companies.

Maryland Department of Transportation (and Modals)

Significant Activities & Accomplishments

Maryland Aviation Administration

- Provided legal guidance to the Maryland Advanced Air Mobility Council established by Governor's executive order, researching privacy concerns, legal liability, public safety, and citizen privacy issues related to unmanned aircraft and drone operations in Maryland to support the development of policies for advanced air mobility in the State.
- Assisted in the successful procurement of a new concession management contract for BWI Marshall Airport after navigating complex negotiations and regulatory challenges, resulting in improved retail and restaurant options for the airport's passengers and customers.
- Supported the BWI Marshall Summer Youth Initiative, a partnership program providing approximately 50 middle school students with career exploration opportunities in aviation and transportation, including legal review of liability waivers and insurance coverage to protect participants while exposing Baltimore City youth to career pathways in the aviation industry.

Maryland Transportation Authority

- Coordinated legal support for the Francis Scott Key Bridge rebuild, assisting with execution of engineering, consulting, and construction management contracts while exploring financing options.
- Advised on collections initiatives to recoup \$383 million in uncollected tolls over a ten-year period, including establishing an installment plan process and drafting a Request for Proposals for out-of-state collections to improve revenue recovery.
- Assisted the Bay Crossing Tier 2 Study team in developing the study's purpose and need, reviewing engineering and environmental analyses of preferred alternatives, and advising on public engagement materials to comply with National Environmental Policy Act requirements.

Maryland Port Administration

- Assisted in securing and implementing \$147 million in EPA Clean Ports grants to accelerate decarbonization and electrification at the Port of Baltimore, including drafting and negotiating agreements with private port partners and State agencies to purchase 213 pieces of zero-emission vehicles and equipment, install charging infrastructure, and upgrade electrical grids while protecting the State's interests.
- Negotiated a five-year contract with Carnival Cruise Line (with a five-year renewal option) that keeps the world's largest cruise provider serving the Port of Baltimore. The cruise industry generates more than 400 jobs in Maryland and approximately \$1 million per cruise in economic impacts.

Maryland Transit Administration

- Finalized grant funding agreements with federal officials and Amtrak for the Frederick Douglass Tunnel and Susquehanna Bridge projects, securing critical infrastructure improvements that

will modernize the Northeast Corridor, provide a new ADA-accessible West Baltimore MARC Station, and improve travel times and reliability for the 9 million MARC and Amtrak customers who rely on these aging structures.

- Successfully defended approximately \$200 million in federal funding for MTA transportation projects through litigation coordinated with the Federal Accountability Unit, protecting formula funding for urban and rural areas, Light Rail Modernization Project funds, DHS/FEMA grants, and other critical resources for safer and expanded transportation services.
- Assisted in launching a partnership with Baltimore City to provide naloxone kits and on-demand training at Metro Subway stations throughout the city, addressing the opioid overdose crisis by empowering community members with life-saving medication and training in high-traffic public transportation locations.

Motor Vehicle Administration

- Reformed bankruptcy flag removal procedures to create a more equitable and centralized approach for Maryland residents who file bankruptcy, ensuring the MVA properly honors automatic stays, improves record-keeping technology, and reduces unnecessary litigation while protecting vehicle registration rights of bankruptcy filers.

State Highway Administration (SHA)

- Coordinated with the Federal Accountability Unit to successfully challenge unlawful federal immigration enforcement conditions on transportation funding, obtaining permanent injunctive relief that preserved millions of dollars in federal highway and transportation funds for Maryland and all its subdivisions.
- Provided critical legal advice on federal funding pass-through agreements between SHA, MDTA, and the Federal Highway Administration to maximize federal funding and obtain reimbursement for expenses related to debris removal, salvage, design, and construction of the replacement Francis Scott Key Bridge.
- Advised on implementation of expanded automated speed enforcement legislation, including new operational requirements, enhanced civil penalties for work zone enforcement, contract modifications, and new solicitations to expand enforcement beyond work zones, improving highway safety across Maryland.

MDOT Transportation Secretary's Office

- In coordination with the Department of Social and Economic Mobility, supported the completion of the statutorily required Minority Business Enterprise Disparity Study on time for delivery to the General Assembly, reviewing thousands of pages of draft reports and statistics for accuracy, completion, and constitutionality to provide legal justification for Maryland's MBE program - the largest of its kind in the country.

State Treasurer's Office

Significant Activities & Accomplishments

- In partnership with the Department of Labor, negotiated the return of over \$1 billion in unemployment funds frozen due to COVID-era fraud, including the release of more than \$500

million from Bank of America in 2023-24 and an additional \$500 million in 2024-25, restoring critical benefits to legitimate claimants.

Uninsured Employers' Fund

Significant Activities & Accomplishments

- Represented the Uninsured Employers' Fund in approximately 900 matters before the Workers' Compensation Commission and circuit courts throughout Maryland, ensuring injured workers receive benefits when their employers fail to maintain required insurance coverage.
- Identified insurance coverage in approximately 48% of claims that initially listed employers as uninsured, protecting the Fund's resources while ensuring injured workers receive benefits from the responsible parties.

Workers Compensation Commission

Significant Activities & Accomplishments

- Initiated a new enforcement program to investigate and litigate cases involving employers who failed to maintain workers' compensation insurance as required by law, strengthening compliance across the State.

RECOMMENDATIONS

The Attorney General offers the following recommendations in support of our commitment to promoting equity and justice on behalf of all Marylanders:

Procedural Requirements for State Relief in Certain Actions

Maryland should establish clear procedural requirements and options for the State in obtaining relief in certain actions involving multiple parties. Currently, the State faces procedural challenges when pursuing complex litigation with numerous responsible parties. Legislation is needed to require factfinders to make determinations of total liability and assign comparative responsibility to all parties joined in these actions. If the State does not obtain complete relief from a responsible party who has resolved their liability through settlement, the State should be able to continue pursuing actions against other responsible parties. These reforms would clarify that the Maryland Uniform Contribution Among Joint Tortfeasors Act does not apply to these claims while preserving express contractual rights and ensuring the State's authority remains limited to actions already authorized by law.

Vulnerable Adult Protections

The State should strengthen evidentiary rules to better protect vulnerable adult victims in criminal proceedings. Current law limits the admissibility of out-of-court statements made by vulnerable adults, making prosecutions more difficult when victims cannot testify. Maryland should authorize courts to admit into evidence out-of-court statements made by vulnerable adult victims or witnesses under appropriate circumstances and with specified procedural safeguards. Additionally, reforms are needed to address financial exploitation of vulnerable and senior adults by caregivers, family members, and household members. The law should prohibit those in positions of trust from knowingly and willfully exerting unauthorized control over a vulnerable adult's property with intent to deprive them of that property, eliminating the need for the State to prove additional elements of deception or undue influence when the exploitation occurs within these trusted relationships.

Transparency in Long-Term Care Facilities

To combat abuse, neglect, and exploitation of Maryland's most vulnerable residents, the State should require licensed nursing homes and assisted living programs to install, operate, and maintain video surveillance equipment in common areas of their facilities. This requirement would mandate continuous, uninterrupted video surveillance that does not capture images within private spaces and complies with federal and state privacy laws. These types of transparency measures would provide an additional layer of protection for residents while supporting accountability in long-term care settings.

Public Information Act Reforms

Maryland's Public Information Act requires targeted reforms to address emerging challenges facing custodians of public records. First, the Public Information Act Compliance Board should be authorized to receive, review, and resolve complaints from custodians alleging that requests or

patterns of requests are abusive. When the Board finds requests abusive, it should have authority to issue orders providing appropriate relief, including authorizing custodians to ignore abusive requests or not respond to future requests from certain applicants for a specified period. Second, custodians should be explicitly authorized to deny inspection of records created for purposes of pending or reasonably anticipated litigation involving the State, state agencies, political subdivisions, or their officers and employees. These reforms would balance transparency with the need to protect custodians from harassment and preserve the State's litigation interests.

Worker Protections and Fraud Prevention

Maryland must strengthen enforcement of workers' rights and expand protections against workplace fraud. The Office of the Attorney General should be granted enhanced authority to investigate and prosecute violations of workers' rights laws through a dedicated Worker Protection Unit. Reforms should expand and strengthen the Maryland False Claims Act and the Workplace Fraud Act to apply protections across all industries in the State, hold general contractors accountable for worker misclassification by subcontractors, and streamline investigation processes. Additionally, licensing authorities should be required to suspend or revoke licenses of those who violate workplace fraud laws, creating meaningful consequences that deter exploitation of Maryland's workforce.

Fair Housing and Employment Protections

Maryland's fair housing and employment discrimination laws must be strengthened to address conduct that, while facially neutral, results in discriminatory effects against protected classes. Current state law does not explicitly provide remedies for policies or practices that have disparate impacts based on race, color, religion, sex, disability, marital status, familial status, sexual orientation, gender identity, national origin, source of income, military status, or age. Explicitly prohibiting conduct with discriminatory effects - regardless of intent - in both housing and employment contexts would eliminate barriers that have historically marginalized vulnerable communities. Additionally, the Department of Housing and Community Development should be authorized to adopt regulations specifying concrete actions required to affirmatively further fair housing, accompanied by state-level enforcement mechanisms to ensure compliance and provide the clarity needed to make existing statutory obligations more impactful.

Hate Crimes Enforcement

To improve hate crime prevention and response, Maryland should modernize the definition of "sexual orientation" applicable to protected classes under hate crime statutes and establish a clear statutory definition for "hate bias incidents" applicable to law enforcement reporting requirements. The current definition of sexual orientation in Maryland Criminal Law Code § 10-301 provides only a handful of examples such as "male or female homosexuality, heterosexuality, or bisexuality," leaving out identities such as asexual, pansexual, and other orientations while ignoring the existence of intersex and nonbinary individuals. This outdated language leaves some Marylanders unprotected by hate crimes statutes if they do not fall within the current limited definition.

Additionally, while Maryland State Police have collected reports of hate bias incidents since at least 1987, there is currently no statutory definition for a hate bias incident in Maryland Public Safety Code §2-307(b). This absence of clarity leaves law enforcement and the public without an official source for defining what constitutes a hate bias incident, creating potential confusion and inconsistencies in reporting requirements. Establishing clear definitions would make these statutes easier to understand and comply with, address significant underreporting of hate-motivated conduct, ensure consistent implementation of the law statewide, and reflect the broader range of Marylanders' identities deserving protection under Maryland's hate crimes laws.

Sexual Assault Evidence Kit Processing Clarifications

Maryland should clarify when the 30-day processing period begins for Sexual Assault Evidence Kits (SAEK) submitted by law enforcement to forensic laboratories. Current statutory language creates ambiguity, allowing for two interpretations: the timeline begins either when law enforcement picks up the kit from the hospital or after law enforcement receives all associated standards and samples in addition to the primary kit. This ambiguity results in processing delays and inconsistent application of evidence processing requirements across jurisdictions.

Legislation should explicitly state that the 30-day turnaround requirement begins when law enforcement obtains the SAEK from the healthcare facility, regardless of whether all associated samples and standards have been collected at that time. This technical clarification would improve the efficiency of sexual assault evidence processing while maintaining existing quality standards, ensuring timely analysis of critical evidence in sexual assault cases and reducing trauma for survivors waiting for case resolution.

Protection Against Verbal Waivers for Sexual Assault Victims

Maryland law currently prohibits law enforcement from requiring written waivers when sexual assault victims decline to pursue criminal investigation under Criminal Procedure Article § 11-929. However, the statute's language creates a significant gap by addressing only written waivers, leaving law enforcement agencies free to use verbal waivers or verbal statements that effectively function as waivers. This loophole undermines the legislative intent to protect victims from being pressured into formal declarations that they do not wish to pursue their cases, potentially creating coercive situations and secondary trauma.

Maryland should explicitly prohibit law enforcement agencies from using any form of waiver - whether verbal, written, or otherwise documented - when sexual assault victims choose not to proceed with criminal investigation. This reform would strengthen victim protections by eliminating all forms of waivers that could be used to pressure sexual assault survivors into formal statements declining investigation, while retaining victims' right to change their minds about pursuing cases and protecting them from administrative procedures that may compound trauma or create barriers to future cooperation with law enforcement.

Police Pursuit Policies and Accountability

Maryland should establish comprehensive statewide standards for police vehicle pursuits to reduce preventable fatalities while maintaining public safety. The Independent Investigations

Division's investigations reveal that approximately one-third of police-involved fatalities result from vehicle pursuits. Nine out of ten female decedents in IID cases were killed during vehicle pursuits, highlighting the disproportionate impact on uninvolved civilians including innocent bystanders, passengers, and other motorists.

Current pursuit policies vary significantly across Maryland's law enforcement agencies, creating inconsistent standards for when pursuits should be initiated, continued, or terminated. This inconsistency has resulted in preventable deaths. Maryland should establish minimum statewide standards through legislation, administrative regulation, or both. Maryland should also consider enacting best practices such as those identified in the 2023 Police Executive Research Forum (PERF) report on vehicle pursuits, which provides evidence-based guidance for reducing preventable fatalities while maintaining effective law enforcement operations.

These reforms would ensure pursuits are conducted only when necessary and proportionate to the threat posed, reducing preventable deaths while maintaining effective law enforcement operations.

The above measures reflect the Office's commitment to upholding dignity, respect, and opportunity for all. Together, these recommendations underscore the OAG's dedication to fostering a safer and fairer community for all Marylanders. Advancing these recommendations will not only address several urgent concerns impacting our communities but will also lay the groundwork for a more equitable future for years to come.