

WES MOORE
GOVERNOR

ARUNA MILLER
LT. GOVERNOR



SAREESH RAWAT, CHAIR
SAMUEL G. ENCARNACION
DEBRA LYNN GARDNER
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VACANT

STATE OF MARYLAND
PUBLIC INFORMATION ACT COMPLIANCE BOARD

PIACB 26-65

June 25, 2026

St. Mary's County Sheriff's Office, Custodian/Complainant
William Alexander, PIA Applicant

Over the course of about two and a half months in the fall of 2025, the St. Mary's County Sheriff's Office ("SMCSO") received 142 Public Information Act ("PIA") requests from an individual identified as William Alexander. The SMCSO provided fee estimates for some requests, but received payment for only two, which the SMCSO then fulfilled. In addition, for other requests, the SMCSO denied inspection of the requested records on various grounds. In this complaint, the SMCSO alleges that Mr. Alexander has sent a pattern of PIA requests intended to harass and annoy the SMCSO. Accordingly, the SMCSO seeks relief under § 4-1A-04(b)¹ of the PIA, which permits a custodian to file a complaint alleging that a PIA request or pattern of PIA requests is "frivolous, vexatious, or in bad faith." Mr. Alexander did not respond to the complaint. As discussed in more detail below, we find that the SMCSO has met its burden to demonstrate that Mr. Alexander's pattern of PIA requests is vexatious. We explain below.

Background

On July 8, 2025, the SMCSO received a PIA request asking for records related to an incident that occurred at a Walmart in Great Mills, Maryland. The individual requested records such as police body worn camera and dashcam footage, video or audio recordings of interrogations or interviews, and police reports. The PIA request was signed "William Volunteer." The SMCSO asked the requester to pay a \$161 fee and advised that redacted body worn camera footage would be produced once the SMCSO received payment.² Though the SMCSO and the requester exchanged several messages regarding the fee and

¹ Statutory citations are to the General Provisions Article of Maryland's Annotated Code unless otherwise stated.

² Based on the record of the PIA request, which consists of messages exchanged through NextRequest, it appears that the SMCSO also located responsive arrest and incident reports, as well as photographs.

the requester's request for a fee waiver,³ it appears that the SMCSO ultimately closed the request on August 8, 2025, citing non-payment of the \$161 fee.

A few days before the SMCSO closed the PIA request from "William Volunteer," it received, on August 5, 2025, another request for the same records concerning the incident at a Walmart in Great Mills, this time submitted by "Raynaldo II Volunteer." The PIA request was sent from a different email address. The SMCSO again asked for prepayment of a \$161 fee, and closed the request on August 18, 2025, after it did not receive payment. On August 26, 2025, the SMCSO received a third PIA request for records concerning the same incident in Great Mills, this time asking for "[f]ootage from the first two squads on scene, as well as any subsequent BWC video related to the arrest of the primary suspect" and "[t]he report from the primary officer or, if available, the probable cause statement." The PIA request was sent from a different email address, and signed "Tiddo Haakman." The SMCSO again asked for payment of a \$161 fee prior to production of the responsive records. On September 4, 2025, the SMCSO received yet another PIA request for the same records, this time signed by "Farshid Solook." The SMCSO asked the requester to pay the \$161 fee before records would be produced. The SMCSO eventually closed both the August 26 and September 4 PIA requests due to non-payment of fees.

On September 4, 2025, the same day that the SMCSO received the PIA request from "Farshid Solook," the SMCSO also received a PIA request from Mr. Alexander. Mr. Alexander stated that he was "researching the case" of a woman "who was arrested for a string of burglaries, thefts, and vehicle thefts," and asked for the related body-worn camera footage. Mr. Alexander provided the date and location of the incident, and the associated charges. The SMCSO denied the request the following day under § 4-351 of the PIA,⁴ advising that "the case is open in court." The next day, the SMCSO received another request from Mr. Alexander, although sent from a different email address. Mr. Alexander stated that he was "researching the case" of a man "who was arrested in Lexington Park following an alleged armed domestic assault and subsequent foot pursuit." Mr. Alexander asked for the body-worn camera footage related to the incident, and provided the date and approximate location of the incident. On September 9, 2025, the SMCSO denied the PIA request under § 4-351, advising that the "case is currently still open in the District Court for St. Mary's County."

³ Any dispute over the denial of such fee waiver(s) is not before us in the context of this complaint. In any event, we would not have jurisdiction over such a dispute.

⁴ Section 4-351 is a discretionary exemption that allows a custodian to deny inspection of, among others, "records of investigations conducted by . . . a sheriff" if inspection would be "contrary to the public interest." §§ 4-343, 4-351(a)(1). This exemption is often invoked to deny inspection of records related to open and ongoing investigations or prosecutions. *See City of Frederick v. Randall Family, LLC*, 154 Md. App. 543, 566 (2004).

In September 2025, the SMCSO received a large volume of PIA requests from Mr. Alexander, each sent from one of three different email addresses. The requests followed the same pattern: Mr. Alexander advised that he was “researching the case” of a certain individual, almost always identified by name, and asked for the body-worn camera footage from the incident involving that individual. On some days, the SMCSO received only one or two such PIA requests, but on others, the number of requests was relatively high. For instance, on September 14, 2025, the SMCSO received twenty-one PIA requests from Mr. Alexander and, on September 23, 2025, twelve. The SMCSO denied inspection of records responsive to some of the PIA requests under § 4-351, citing an open investigation or prosecution related to the records. For others, the SMCSO advised that it did not have responsive records because, given the age of the underlying incident, records had been purged or destroyed according to SMCSO retention schedules. A handful of other PIA requests were denied under § 4-301(a) of the PIA,⁵ with the SMCSO citing provisions in State law governing, e.g., the disclosure of police records concerning juveniles⁶ or reports of child abuse or neglect.⁷

For approximately twenty of the PIA requests it received in September 2025, the SMCSO sent Mr. Alexander a ten-day letter⁸ advising of the potentially responsive records that it had found and asking that he pay a fee before production of those records. Mr. Alexander did not pay those fees or engage further with the SMCSO after receiving the requests for payment. In fact, with one exception for a PIA request sent on September 24, 2025,⁹ Mr. Alexander did not communicate further with the SMCSO regarding any PIA requests he sent in September.

⁵ Under § 4-301(a), a custodian must deny inspection of “a public record or any part of a public record if . . . by law, the public record is privileged or confidential” or if “the inspection would be contrary to . . . a State statute.”

⁶ See Md. Code Ann., Cts. & Jud. Proc. § 3-8A-27(a).

⁷ See Md. Code Ann., Hum. Servs. § 1-202.

⁸ See § 4-203(b)(2), which requires, when a custodian “reasonably believes that it will take more than 10 working days to produce the public record,” that the custodian send notice of this fact in writing, along with certain information, including the reason for the delay and an estimate of any fees associated with responding to the request. Though the PIA does not explicitly allow custodians to ask for payment of fees in advance, our State’s Supreme Court has suggested that it may be permissible “when the cost of processing a PIA request is likely to be substantial. *Glass v. Anne Arundel County*, 453 Md. 201, 212-13 (2017).

⁹ For this PIA request, the SMCSO responded on September 24, 2025, that, “due to the age of the incident on June 10, 2021, any Body Worn Camera video has been purged from [the] system in accordance with [the] agency policy.” The SCMSO provided a link to the SMCSO policies. That same day, Mr. Alexander sent the SMCSO a message asking the SMCSO to “clarify [the] retention period for Body Worn Camera (BWC) footage.” The following day, the SMCSO again provided the link to the SMCSO policies.

In addition to the PIA requests from Mr. Alexander, the SMCSO received three other PIA requests in September that it attributed to Mr. Alexander. One, received on September 8, 2025, was signed “Star Corner,” with the word “Volunteer” underneath the name. The second, received on September 11, 2025, was signed simply “Volunteer.” The third, received on September 24, 2025, was signed “Joseph Sapienza,” and provided an address in Charlotte, North Carolina.¹⁰ The PIA requests were all sent from email accounts not associated with Mr. Alexander, and the first two requests did not follow the same format as the requests Mr. Alexander sent under his name—e.g., they did not begin by stating that the requester was “researching” a case. Notably, however, the request sent from “Volunteer” on September 11, 2025, asked for records concerning the same case identified in the requests received from “William Volunteer” and others in July and August—i.e., records concerning an incident that occurred at a Walmart in Great Mills, Maryland. And, the PIA request from “Star Corner” sought records related to an incident that would be the subject of a subsequent request sent by Mr. Alexander at the end of October.

In October 2025, Mr. Alexander’s pattern of PIA requests continued. The SMCSO received a high volume of requests in which Mr. Alexander stated he was “researching” certain cases, with inordinately high numbers of requests sent on October 1, 2025, (twenty PIA requests) and October 6, 2025, (twelve PIA requests). As before, the SMCSO denied inspection of records responsive to many requests on various grounds and sent ten-day letters asking for payment of fees associated with production for others. And, as before, for the majority of these requests, Mr. Alexander did not pursue them or communicate further with the SMCSO after receiving the denial or request for payment. However, on October 29, 2025, Mr. Alexander advised the SMCSO that he had sent payment for the fees associated with two PIA requests. In December, the SMCSO produced the records for both requests—thirteen body worn camera videos for one, and four such videos for the other.¹¹ In addition, after the SMCSO advised that it did not have records responsive to a PIA request received on October 6, 2025, Mr. Alexander sent a message asking the SMCSO to clarify its retention period. The SMCSO responded the same day, advising that the retention policy was on the SMCSO website.

As with the September PIA requests, the SMCSO received requests from purportedly different individuals that the SMCSO attributed to Mr. Alexander. Specifically, on October 2, 2025, the SMCSO received a PIA request signed “Ahmednoor,” with the word “Volunteer” underneath. The request did not contain the same language

¹⁰ Mr. Alexander did not always provide a mailing address, but when he did, the address was in Jacksonville, Florida.

¹¹ It appears that the SMCSO also produced records for a third PIA request. As to a PIA request received on October 20, 2025, the SMCSO noted that the same records had been requested and paid for by a different requester. Thus, on October 27, 2025, the SMCSO responded to Mr. Alexander’s PIA request and provided three redacted body worn camera videos.

about “researching cases” and asked for records beyond body worn camera footage, but, notably, the request sought records concerning the same case—i.e., the incident at the Great Mills Walmart—that prior requests from Mr. Alexander sought. The SMCSO also received another PIA request for the same records identified in the PIA request from “Star Corner,” sent in September. This PIA request, received on October 8, 2025, was signed by “Chris,” again with the word “Volunteer” underneath.

On September 24, 2025, amid receipt of the PIA requests from Mr. Alexander, the SMCSO contacted the Public Access Ombudsman to request dispute resolution assistance.¹² On January 13, 2026, the Ombudsman issued a final determination stating that the dispute was not resolved. The final determination indicates that Mr. Alexander did not respond to multiple attempts by the Ombudsman’s office to contact him. After receipt of the Ombudsman’s final determination, the SMCSO filed this complaint with our Board.

The SMCSO alleges that, between September 1 and November 4, 2025, Mr. Alexander sent 142 PIA requests to the SMCSO. According to the complaint, at the time of filing, Mr. Alexander “continues to send a large volume of PIA requests.” The SMCSO states that Mr. Alexander has “ignored [its] requests for payment” of the fees for production of records, instead sending new PIA requests. In addition, the SMCSO notes that Mr. Alexander has “sent the same requests under various pseudonyms that he uses primarily to send duplicate requests,” and that he has “in one instance sent [the SMCSO] the same request six times.” The SMCSO asserts that it has “acted in good faith” and responded to all PIA requests, while receiving payment for only two of those requests. The SMCSO states that “Mr. Alexander’s repetitive and duplicative PIA requests have caused a significant diversion of resources from valid PIA requests” and alleges that “this pattern of PIA requests is intended to harass and annoy [the SMCSO].” Under the totality of the circumstances, the SMCSO urges, a “preponderance of the evidence exists to demonstrate that these PIA requests are not made in good faith and have been submitted to divert valuable resources from legitimate PIA requests.”

On March 6, 2026, we sent the SMCSO’s complaint to Mr. Alexander by email¹³ and asked that he submit a written response to the complaint by April 6, 2026. *See* § 4-1A-06(a) and (b). When we did not receive a response by that deadline, we sent a second email to Mr. Alexander asking for a written response by April 10, 2026, noting that if he did not send a response, we would issue a decision based on the information submitted by

¹² The PIA directs the Public Access Ombudsman to “make reasonable attempts to resolve disputes between applicants and custodians relating to requests for public records.” § 4-1B-04(a). Before submitting a complaint to our Board, a complainant must attempt to resolve a dispute through the Ombudsman and receive a final determination stating that the dispute was not resolved. § 4-1A-05(a).

¹³ At that time, we sent the complaint to two of the three email addresses that Mr. Alexander used to send his PIA requests to the SMCSO.

the SMCSO. *See* § 4-1A-06(c). On April 10, 2026, still not having received a response from Mr. Alexander, and in an abundance of caution, we sent another email attaching the complaint and advised the parties that we would send the complaint to Mr. Alexander by regular mail, which we did.¹⁴ To date, we have received no response—or any other communication—from Mr. Alexander. Thus, we must “decide the case on the facts before [our] Board.” § 4-1A-06(c).

Analysis

The PIA directs us to review and resolve complaints from “any custodian alleging that an applicant’s request or pattern of requests is frivolous, vexatious, or in bad faith.” § 4-1A-04(b)(1). The General Assembly enacted this provision to provide “assistance to over-burdened custodians.” PIACB 26-30, at 6 (Feb. 20, 2026) (quoting *Hearing on H.B. 183 Before the House Health & Gov’t Operations Comm.*, 2021 Leg., Reg. Sess. (Feb. 11, 2021) (written testimony of sponsor Del. Brooke Lierman)). In reviewing a complaint under § 4-1A-04(b), we must consider “the totality of the circumstances including the number and scope of the applicant’s past requests and the custodian’s responses to past requests and efforts to cooperate with the [requester].” § 4-1A-04(b)(3). The PIA provides certain remedies when we determine that a PIA request or pattern of requests is frivolous, vexatious, or in bad faith. Specifically, we may order that the custodian may “ignore the request that is the subject of the custodian’s complaint” or that the custodian must “respond to a less burdensome version of the request within a reasonable time frame” as we determine. § 4-1A-04(b)(3). Under certain circumstances, we may also issue an order permitting a custodian to “[i]gnore any future requests that are substantially the same as the request that is the subject of the custodian’s complaint.” COMAR 14.02.07.04D(2).

In March of 2024, we issued our first decision under § 4-1A-04(b). We granted relief to a custodian after finding that it had proved, by a preponderance of the evidence, that it had received a vexatious and bad faith pattern of PIA requests.¹⁵ *See* PIACB 24-29, at 25 (Mar. 29, 2024). That case involved more than sixty PIA requests, received over a span of about three months, that were sent from multiple email accounts, all seeking records related to district court matters between two individuals. *Id.* at 1. After reviewing an extensive record, we determined that the PIA requests were all sent either by one person masquerading as many, or by multiple people all acting in concert with and at the direction of one individual. *Id.* at 15-19. In resolving the complaint, we first determined that a custodian bears the burden of proving, by a preponderance of the evidence, that a PIA request or pattern of requests is frivolous, vexatious, or in bad faith. *See id.* at 14-15

¹⁴ This email was sent to all three email addresses used by Mr. Alexander to send PIA requests to the SMCSO.

¹⁵ In September 2025, our decision was affirmed by the Appellate Court of Maryland. *See In the Matter of William Hernandez*, No. 1398, Sept. Term 2024, 2025 WL 2684358 (Sept. 19, 2025) (unreported).

(quoting *Romero v. Perez*, 463 Md. 182, 197 (2019)). We also observed that § 4-1A-04(b)(1) is disjunctively worded—a custodian must show that the PIA requests are “frivolous, vexatious, *or* in bad faith”—meaning that a custodian may be entitled to relief after showing only one of these things. *Id.* at 22 (citing *United Parcel Serv. v. Strothers*, 482 Md. 198, 221 n.11 (2022)).

The PIA does not define the terms “frivolous,” “vexatious,” or “bad faith.” For guidance as to their application, we have looked to how those terms are defined in dictionaries as well as how courts have applied them in other legal contexts. Using those sources, we have determined that a PIA request may be frivolous “when it has no basis in law and lacks in legal merit or foundation.” PIACB 24-29, at 22 (Mar. 29, 2024); *see also* PIACB 24-106, at 14 (Sept. 26, 2024) (finding frivolous a pattern of PIA requests that affected several agencies and demonstrated a “continued pattern of harassment and abuse of process” to the point that there was “no basis in law for sending PIA requests as they have been sent here”). We found that PIA requests may be vexatious when it they are intended to “harass or annoy a custodian” and contain “abusive, disparaging, or profane language.” PIACB 24-29, at 22 (Mar. 29, 2024); *see also, e.g.*, PIACB 26-59, at 12 (June 18, 2026) (finding a pattern of PIA requests vexatious where the requests and communications surrounding them had “escalate[d] to the level of repeated abuse and harassment of government workers”). In addition, a pattern of PIA requests that is “recurring, repetitive, and unrelenting” may also qualify as vexatious. PIACB 24-29, at 22 (Mar. 29, 2024). Finally, we have found that PIA requests may be made in bad faith “when there is some clear dishonesty in the requester’s motive” or when the individual sending them makes “a mockery of public access by, for example, pretending to be someone else when making the request.” *Id.* at 24 (cleaned up).

The SMCSO’s complaint presents a somewhat different set of facts and circumstances from those of previous complaints under § 4-1A-04(b). To start, many of the prior complaints we have considered involved PIA requesters who often behaved in hostile and antagonistic ways, and whose requests contained abusive and disparaging language. *See, e.g.*, PIACB 24-29, at 23 (Mar. 29, 2024); PIACB 25-85, at 9-10 (Oct. 1, 2025). Here, there is no evidence that Mr. Alexander conducted himself in such a manner. His PIA requests, though voluminous, were civil and respectful. And, although the use of different names and email accounts to submit a handful of requests arguably attributable to Mr. Alexander¹⁶ may suggest a “certain amount of deception,” PIACB 24-29, at 25 (Mar. 29, 2024), we do not see compelling evidence that any deception was used as a tool to further an impermissible campaign under the PIA—*e.g.*, to purposefully harass and

¹⁶ We tend to agree with the SMCSO’s assertion that the eight PIA requests identified in its complaint and received from individuals other than Mr. Alexander are indeed attributable to Mr. Alexander. Many of those requests asked for the same records that Mr. Alexander sought—*e.g.*, records related to the incident at the Great Mills Walmart. Many of those requests also use the term “volunteer,” either as part of the requester’s name or as a descriptor of sorts.

overwhelm a custodian, *id.* While it may be that Mr. Alexander intended such things, it is equally possible that he was in fact conducting some sort of legitimate research and did not realize the administrative burden associated with his PIA requests.

Resolving this complaint is, of course, made more difficult by the fact that Mr. Alexander has not responded to the complaint or otherwise engaged with the process. However, the PIA is clear that, in the absence of a response, we are to resolve the complaint based on the facts we have. *See* § 4-1A-06(c). The facts are that, over the course of about two and a half months, Mr. Alexander sent or caused to be sent 142 PIA requests to the SMCSO. The SMCSO denied inspection of records responsive to nearly a third of those PIA requests, denials which Mr. Alexander apparently does not challenge. The SMCSO closed all but three of the remaining PIA requests after it did not receive payment for the records. As to those three PIA requests, the SMCSO produced records after Mr. Alexander paid the fees for two of the requests and the SMCSO determined that the fee for records for the third had been previously paid by a different requester. Thus, as to these 142 PIA requests, it appears that there is no more work to be done. While the SMCSO states, in its complaint, that the PIA requests have continued, we have no evidence that this is the case. The most recent PIA request in the record before us is dated October 20, 2025. Notably, the SMCSO submitted its complaint on March 6, 2026.

We thus take each term in turn, starting with frivolous. “Frivolous” can mean “[l]acking in high purpose; trifling; trivial, and silly” or “[l]acking a legal basis or legal merit; manifestly insufficient as a matter of law.” *Black’s Law Dictionary* (12th ed. 2024). In the context of litigation, a claim may be deemed frivolous if, after an adverse decision is appealed and affirmed, a party returns to the trial court and “attempt[s] to relitigate the same issue.” *Att’y Grievance Comm’n v. Whitted*, 487 Md. 501, 531 (2024). With this understanding of the term, we cannot find Mr. Alexander’s PIA requests to the SMCSO frivolous. The requests were not “trifling” or “trivial” or “silly.” Nor were they “lacking in legal basis or merit,” or seeking records Mr. Alexander had reason to know did not exist. *Compare* PIACB 24-106, at 14 (Sept. 26, 2024). Instead, Mr. Alexander asked for records concerning actual incidents that occurred in St. Mary’s County, and provided the details of those incidents. This record does not demonstrate, by a preponderance of the evidence, that Mr. Alexander’s pattern of PIA requests was frivolous.

We next consider whether Mr. Alexander’s PIA request, or pattern of PIA requests, is vexatious. “Vexatious” can refer to conduct that is “without reasonable or probable cause or excuse; harassing; annoying.” *Black’s Law Dictionary* (12th ed. 2024). “Vexatious” can also mean “intended to harass” or “full of disorder or stress.” *Merriam-Webster Dictionary*, <https://www.merriam-webster.com/dictionary/vexatious> (last visited June 25, 2026). When determining whether litigation is vexatious such that a litigant may be subject to a pre-filing order, courts must consider a variety of factors, including: “the litigant’s history of litigation and in particular whether it entailed vexatious, harassing or duplicative lawsuits”; (2) the litigant’s motive for the litigation, such as whether he or she

has “an objective good faith expectation of prevailing”; (3) whether the litigant has counsel; [and] (4) “whether the litigant has caused needless expense to other parties or has posed an unnecessary burden on the courts and their personnel.” *Riffin v. Circuit Court for Baltimore County*, 190 Md. App. 11, 35 (2010) (quoting *Safir v. U.S. Lines, Inc.*, 792 F.2d 19, 24 (2d Cir. 1986)).

Many of our past decisions under § 4-1A-04(b) have focused on the intent of the requester, and whether the record demonstrated, by a preponderance of the evidence, that the requester intended the PIA requests to harass or abuse agency employees. *See, e.g.*, PIACB 24-29, at 23 (Mar. 29, 2024); PIACB 25-85, at 9-10 (Oct. 1, 2025). However, it is clear that we may also consider the effect that the PIA request or pattern of PIA requests has on the agency and its employees—i.e., whether the PIA request or pattern of requests has the effect of causing vexation, regardless of whether such was the requester’s intent. *See Riffin*, 190 Md. App. at 35 (one factor in considering whether litigation is vexatious is “whether the litigant has caused needless expense to other parties or has posed an unnecessary burden on the courts and their personnel”); *see also, e.g.*, PIACB 24-106, at 13-14 (Sept. 26, 2024) (“While we cannot say for sure whether this grinding of gears is the objective of these PIA requests . . . it is certainly a result and a valid consideration here.”). It may be all the more appropriate to consider the PIA requests’ effect where, as is the case here, the requester has not engaged with the PIA’s alternative dispute resolution process.

The SMCSO asserts that Mr. Alexander’s pattern of PIA requests has had a detrimental effect on the SMCSO by causing “a significant diversion of resources from valid PIA requests.” The SMCSO states that it has “spent a tremendous amount of time and resources” responding to Mr. Alexander’s PIA requests, which the SMCSO believes were submitted to “harass and annoy [the] agency.” The work the SMCSO has put into responding to Mr. Alexander’s PIA requests is evident from the record. First, the SMCSO had to determine whether it had responsive records in its custody, which necessarily entailed at least a preliminary search for each request. For those PIA requests where inspection was denied, the SMCSO had to determine whether, e.g., cases were open or whether they involved juveniles or allegations of child abuse or neglect. For the ten-day letters that the SMCSO issued, the SMCSO had to consider the responsive records it had and determine an appropriate fee estimate for the work of preparing them. To do this sort of work, across 142 PIA requests and in the span of two and half months, no doubt required a substantial amount of time and effort. After all of this work, for 142 PIA requests, Mr. Alexander only genuinely pursued five of his requests, either by paying the requested fee or asking a follow-up questions. Viewed this way, the SMCSO’s claim that Mr. Alexander’s PIA requests had the effect of causing vexation is supported by the record. We also note that § 4-1A-04(b)(3) directs us to consider, when determining whether a PIA request or pattern of requests is vexatious, “the number and scope of the [requester’s] past requests and the custodian’s responses to past requests and efforts to cooperate with the [requester].” Considering those things—especially that the SMCSO issued responses to

all 142 PIA requests—we find that the SMCSO has demonstrated, by a preponderance of the evidence, that Mr. Alexander’s pattern of PIA requests was vexatious.

Finally, we briefly address whether the evidence supports a finding that Mr. Alexander’s pattern of PIA requests was in bad faith. “Bad faith” can mean “[d]ishonesty of belief, purpose, or motive,” *Black’s Law Dictionary* (12th ed. 2024), or “lack of honesty in dealing with other people,” *Merriam-Webster’s Dictionary*, <https://www.merriam-webster.com/dictionary/bad%20faith> (last visited June 25, 2026). We have found a pattern of PIA requests in bad faith where they were sent from different email accounts by purportedly different individuals, but the evidence tended to show that one requester “either made, or, at the very least, worked with, encouraged, or assisted others to send” those requests. PIACB 24-29, at 19 (Mar. 29, 2024). We said that, although we could not “conclusively find that [the requester was] ‘pretending’ to be all of these other requesters and operating their email accounts himself,” his “implicit assertions that he [had] nothing whatsoever to do with them [were] unconvincing” such that there was a “certain amount of deception present” in the pattern. *Id.* at 24. Here, the evidence suggests that Mr. Alexander may have sent several PIA requests to the SMCSO under pseudonyms, using different email accounts. As we see it, that fact alone, without more, is insufficient to demonstrate that his PIA requests were sent to the SMCSO in bad faith. The facts here are different from those cases where we found that one requester was engaging in deceitful behavior to manipulate the PIA for improper purposes. *E.g.*, PIACB 24-29, at 24-25 (Mar. 29, 2024); PIACB 25-34, at 12 (Mar. 7, 2025).

Having found that Mr. Alexander’s pattern of PIA requests to the SMCSO was vexatious, we turn to the question of remedy. We note that the PIA provides more than one remedy when we determine that a PIA request or pattern of requests is frivolous, vexatious, or in bad faith, and those remedies may account for the severity of the underlying conduct. On the one hand, we may order that the custodian may ignore the PIA request or requests at issue, or “any future requests that are substantially the same.” § 4-1A-04(b)(3)(i); COMAR 14.02.07.04D(2). We may also order that the custodian must respond to a “less burdensome version of the request within a reasonable time frame,” § 4-1A-04(b)(3)(ii), an order which may apply to PIA requests that are “substantially the same.”

As stated above, the SMCSO has already responded in some form to all 142 PIA requests that it received from Mr. Alexander, thus there is no need to issue an order regarding those PIA requests. As to any future PIA requests that are “substantially the same”—i.e., they follow the same pattern of being submitted in rapid succession and subsequently seemingly abandoned by Mr. Alexander—we do not think the level or manner of vexation here warrants complete disregard of such PIA requests. Rather, we order that, should the SMCSO receive future PIA requests from Mr. Alexander that are “substantially the same” in the way described immediately above, it may respond to those PIA requests one at a time within the statutory time limitations provided in § 4-203. The SMCSO must respond to the PIA request it receives first in time. Should the SMCSO send

Mr. Alexander a ten-day letter requesting payment of a fee, it may advise Mr. Alexander that it will not respond to any subsequent PIA requests for the same records until he pays the fee. Should SMCSO deny any such request stating the legal basis for such denial, it may advise Mr. Alexander that it will not respond to any subsequent PIA requests for the same records if he does not timely challenge that denial by any of the remedies provided by the PIA. Our remedies are intended to ease the burden on the SMCSO in responding to a high volume of repeat PIA requests that are submitted by or on behalf of Mr. Alexander with no follow-through; while preserving Mr. Alexander's ability to obtain the public records he is truly interested in inspecting.¹⁷

Conclusion

For the reasons discussed above, we find that the SMCSO has met its burden to prove, by a preponderance of the evidence, that Mr. Alexander's pattern of PIA requests was vexatious in its impact. Therefore, pursuant to § 4-1A-04(b)(3)(ii) and COMAR 14.02.07.04D(2), we order that, should the SMCSO receive future PIA requests from Mr. Alexander that are "substantially the same," the SMCSO may respond to those PIA in the manner described immediately above.

Public Information Act Compliance Board

Sareesh Rawat, Chair
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Debra Lynn Gardner
Nivek M. Johnson

¹⁷ It appears that the SMCSO is not the only agency that has expended significant resources responding to PIA requests from Mr. Alexander. See *First Quarter IPRA Report, FY 26, Office of the City Clerk* (2026), at 004, <https://www.cabq.gov/clerk/documents/fy26-first-quarter-ipra-backlog-report-15.pdf/@/download/file/FY26%20First%20Quarter%20IPRA%20Backlog%20Report%20%2815%29.pdf> (last visited June 25, 2026). The City of Albuquerque reports that it received 294 requests for police videos sent by an individual named William Alexander. Notably, the three email addresses associated with Mr. Alexander are the same email addresses he used to send PIA requests to the SMCSO.