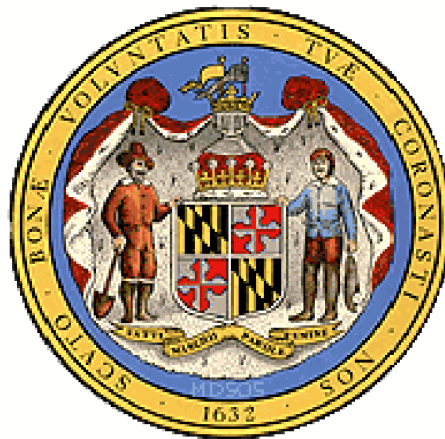


WES MOORE
GOVERNOR

ARUNA MILLER
LT. GOVERNOR

STATE PUBLIC INFORMATION ACT COMPLIANCE BOARD

TENTH ANNUAL REPORT



BOARD MEMBERS

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

SEPTEMBER 30, 2025

**TENTH ANNUAL REPORT
OF THE STATE
PUBLIC INFORMATION ACT COMPLIANCE BOARD**

The General Assembly established the State Public Information Act Compliance Board in 2015. At that time, the Board had narrow jurisdiction to review only allegations that a custodian charged an unreasonable fee higher than \$350 under § 4-206 of the Public Information Act (“PIA”). The Board received relatively few complaints under this mandate and issued even fewer decisions. In 2021, the General Assembly expanded the Board’s jurisdiction so that the Board can also review and resolve complaints about denials of inspection, failures to respond to PIA requests within certain statutory time limitations, and allegations by custodians that a PIA request or pattern of requests is “frivolous, vexatious, or in bad faith.” Md. Code Ann., Gen. Provisions (“GP”) § 4-1A-04; *see also* 2021 Md. Laws, ch. 658. The Board continues to have jurisdiction to review complaints about unreasonable fees higher than \$350. Pursuant to GP § 4-1A-04(d), the Board submits this annual report for the period July 1, 2024, through June 30, 2025 (“FY 2025”).

As detailed in this report, the Board received a comparatively high number of complaints—94—although fewer than the 114 complaints received in FY 2024. The decrease in total complaints is likely due to a decrease in the number of complaints that arose from an anomalous situation in which one person filed numerous complaints under different names. That situation is described in more detail below. This report contains a description of the Board’s activities during FY 2025, including information about the number and nature of complaints filed, and summaries of the Board’s decisions. The report also contains the Public Access Ombudsman’s annual report, attached as an appendix. Though the Ombudsman is not required to submit an annual report, the Board believes that the Ombudsman’s annual report is useful to understand the current state of alternative dispute resolution under the PIA.

**I.
ACTIVITIES OF THE BOARD**

A. Responsibilities of the Board

In FY 2025, the duties of the Board included:

- Receiving, reviewing, and resolving complaints that a custodian: (1) denied inspection of public records in violation of the PIA; (2) failed to respond to a request for public records within the time limitations prescribed in GP § 4-203(a) or (d); or (3) charged an unreasonable fee higher than \$350;

- Receiving, reviewing, and resolving complaints that a requester's PIA request or pattern of PIA requests is frivolous, vexatious, or in bad faith;
- Issuing written decisions as to whether a violation of the PIA occurred and, if so, ordering an appropriate remedy as provided by the PIA;
- Issuing written decisions as to whether a PIA request or pattern of requests is frivolous, vexatious, or in bad faith and, if so, ordering that the custodian may ignore the request(s) or respond to a less burdensome version of the request(s);
- Studying ongoing compliance with the PIA by custodians of public records; and
- Making recommendations to the General Assembly for improvements to the PIA.

The five members who served during FY 2025 are:

- Samuel G. Encarnacion – citizen member – second term expires on 6/30/2028
- Debra Lynn Gardner – non-profit / open government / news media nominee; attorney member – first term expires on 6/30/2026
- Quinton M. Herbert – PIA knowledge / custodian / Maryland Association of Counties / Maryland Municipal League nominee – first term expires on 6/30/2027
- Nivek M. Johnson – citizen member; electronic records knowledge member – second term expires on 6/30/2028
- Sareesh Rawat – Chair; citizen member; attorney member – first term expires on 6/30/2027

The Board membership did not change in FY 2025. Board members Samuel G. Encarnacion and Nivek M. Johnson were reappointed to second terms and confirmed by the Senate during the 2025 legislative session. Quinton M. Herbert resigned early in FY 2026, after leaving employment in the public sector. The Board thanks Mr. Herbert for his service and valuable contributions to the Board. Board staff is working with the Governor's Appointments Office to find a recess appointee, who will be subject to confirmation by the Senate during the 2026 legislative session.

The Public Access Unit of the Attorney General's Office provides the Board with administrative and legal support, posts the Board's decisions and other PIA-related materials on its website, and bears the incidental costs of administering the complaint and review process. *See* GP § 4-1A-03(d). Board staff currently consists of legal counsel and two administrators, all of whom also support the Ombudsman and her staff as well. The

Board appreciates the excellent service it has received from the Attorney General’s Office in the performance of these tasks, and is grateful to Attorney General Anthony Brown, who, in FY 2025, provided the Public Access Unit with a much-needed second administrator. The Board thanks Kentiara Moore and Teena Hallameyer, who serve as the Board’s administrative officers, and Assistant Attorney General Sara Klemm, who serves as counsel to the Board.

The Board also extends its thanks to the Public Access Ombudsman, Lisa Kershner, and attorney-mediator Alisa Bralove-Scherr, who joined the Ombudsman’s office in FY 2025. The Ombudsman and her staff provide indispensable dispute resolution assistance to both PIA requesters and records custodians. Through their mediation efforts, the Ombudsman and her staff are often able to resolve PIA disputes, making Board review unnecessary.

B. Processes and procedures

Before PIA requesters or custodians may file a complaint with the Board, they must attempt to resolve a PIA-related dispute through the Public Access Ombudsman. Typically, the Ombudsman and her staff work to resolve disputes in the context of voluntary, confidential mediation. The Ombudsman and her staff adhere to the Maryland Standards of Conduct for Mediators.¹ See COMAR 14.37.02.07. Because participation in mediation is voluntary, the responding party—typically the records custodian—may decline to participate. When that happens, the Ombudsman usually will issue a final determination stating that the dispute was not resolved.

When both parties consent to mediate a dispute, they have up to ninety days in which to try to resolve the dispute, although that deadline can be extended with mutual consent. See GP § 4-1B-04(b). Once a matter is closed, the Ombudsman must issue a written final determination stating whether the dispute is resolved or not resolved. See COMAR 14.37.02.11 (interpretive regulation governing final determinations). When a dispute is not resolved, and assuming the dispute is within the Board’s jurisdiction, a complainant may file a complaint within 30 days of receiving the “not resolved” or “partially resolved” final determination. As noted above, disputes about denials of inspection, failures to respond to PIA requests, unreasonable fees higher than \$350, and alleged frivolous, vexatious, or bad faith PIA requests, fall within the Board’s jurisdiction.

¹ https://www.umaryland.edu/media/umb/workplace-mediation/pdfs/mdstandardsofconductformediators_final.pdf.

Most complaints are submitted by email to the Board's dedicated inbox, piaopengov@oag.state.md.us, although the Board does receive some complaints by regular mail. When a complaint is received, it is assigned a file number. Board counsel then makes an initial determination as to whether the complaint meets the statutory filing requirements—e.g., ensuring that the complaint was timely filed and that there is a final determination stating that the dispute was not resolved or partially resolved. In addition, Board counsel also reviews the complaint to make sure that the allegations fall within the Board's jurisdiction. In close cases, the Board errs on the side of reviewing a complaint. *See, e.g.*, PIACB 23-03 (Nov. 2, 2022) (reviewing complaint but ultimately deciding that the Board lacked jurisdiction to review an allegation challenging a custodian's proposed search method).

If a complaint is timely filed and meets the other statutory requirements, the complaint and any attached material are forwarded to the relevant custodian (or, in the case of complaints about frivolous, vexatious, or bad faith PIA requests, the PIA requester) for a written response. Note that the Board cannot consider mediation communications—e.g., emails exchanged with the Ombudsman or her staff during the mediation process—so such communications are typically redacted from complaint material. *See* Md. Code Ann., Cts. & Jud. Proc. § 3-1803(b)(1) (precluding a party to a mediation from disclosing mediation communications in “any judicial, administrative, or other proceeding”). The responding party has thirty days in which to submit a written response to the complaint. Once the Board receives the response, it generally will provide the complainant an opportunity to submit a reply within fifteen days. The time for the Board to issue its decision begins to run upon receipt of the response to the complaint, not the reply. GP § 4-1A-07(a)(2).

If the written submissions provide enough information for the Board to resolve the complaint, then the Board ordinarily issues a written decision within thirty days after receiving the response. If the Board believes it would benefit from hearing from the parties, it may hold an informal conference, *see* COMAR 14.02.04 (regulations governing informal conferences), in which case the Board's written decision must issue within thirty days after the informal conference. The Board may also request additional information if it is needed to resolve the complaint, including a descriptive index of the public records that were withheld or redacted, or copies of the disputed public records themselves.² *See* COMAR 14.02.05 (regulations governing requests for additional information) and COMAR

² If the custodian's response to the PIA request indicated that inspection was denied under GP § 4-301(a)(2)(ii) (denial because inspection would be contrary to a federal statute or regulation issued under the statute that has the force of law), then the custodian may not be required to produce the public records for Board review. GP § 4-1A-06(b)(3); *see also* COMAR 14.02.05.03A(1).

14.02.06 (regulations governing the Board’s treatment and handling of confidential records or information). If the Board requests additional information, then it must issue its written decision within thirty days after receiving that additional information.

Sometimes, as happened often in FY 2025, the Board is unable to issue its decision within the time periods described above. This may happen when the Board’s caseload is particularly heavy, or when a complaint presents complex factual and legal issues and/or contains voluminous submissions. When the Board cannot issue its decision within the normal time periods, the Board issues a written Statement of Delay, in which it states the reasons for the delay. The Board must then issue the decision as soon as possible, but no later than 120 days after the complaint was filed. *See* GP § 4-1A-07(c).

Depending on the allegation(s) in the complaint, the Board has authority to order certain remedies if it finds a violation of the PIA. If the Board concludes that a custodian improperly withheld or redacted public records, it must order the custodian to produce those records or remove the redactions. In some circumstances, the Board may also direct a custodian to conduct a new search and produce any non-exempt records that are located for inspection. When the Board finds that a custodian failed to respond to a PIA request within the applicable timelines, it must order the custodian to respond “promptly.” The Board typically provides a more concrete deadline too, e.g., within three or ten business days, depending on the length of the delay and the complexity of the PIA request. In addition, the Board has discretion to order that the custodian waive all or part of the fee associated with that response, so long as the Board states the reasons why in its written decision. If the Board determines that a custodian has charged an unreasonable fee higher than \$350, it must order the custodian to reduce the fee to a reasonable amount and refund the difference, if applicable. Finally, if the Board determines that a PIA request or pattern of requests is frivolous, vexatious, or in bad faith, it must issue an order that the custodian may ignore that PIA request or any subsequent or future PIA requests that are substantially the same as that request, or respond to a less burdensome version of the PIA request.

Unless the Board’s decision states that it is unable to resolve a complaint, an “applicant” (i.e., a PIA requester) or custodian may appeal the Board’s decision to one of Maryland’s circuit courts in accordance with GP § 4-362(a)(2). An appeal automatically stays the Board’s decision pending the circuit court’s decision. In addition, “a party who is aggrieved by a final judgment of a circuit court in a judicial review proceeding . . . may appeal to the Appellate Court of Maryland in the manner that law provides for appeal of civil cases.” GP § 4-362(g).

C. Complaint and Decision Activities for FY 2025

1. Statistics

- New complaints submitted to the Board: **94** (FY 2024: 114)
- Complaints dismissed without a decision: **14** (FY 2024: 30)
 - Not within Board's jurisdiction: **4** (FY 2024: 12)
 - Complainant did not attempt to resolve the dispute through the Public Access Ombudsman first: **9** (FY 2024: 18)
 - Withdrawn by complainant: **1** (FY 2024: 0)
- Written decisions issued during FY 2025: **76** (FY 2024: 77)
 - Carryover from FY 2024 complaints: **13** (FY 2024: 6)
 - Decisions requiring conference with the parties: **1**³ (FY 2024: 2)
 - Decisions for which Board requested and reviewed confidential records or information (including descriptive index): **17**⁴ (FY 2024: 7)
- Complaints submitted in FY 2025 and still pending on July 1, 2025: **17** (FY 2024: 13)
 - **PIACB 25-73:** Custodian Town of Keedysville, wrongful denial allegation (decision issued Aug. 15, 2025)
 - **PIACB 25-75:** Custodian Montgomery County Public Schools, wrongful denial allegation (decision issued Aug. 18, 2025)

³ See PIACB 25-47 (Apr. 11, 2025).

⁴ See PIACB 24-93 (Aug. 27, 2024) (reconsideration denied Oct. 7, 2024); PIACB 24-100 (Sept. 12, 2024); PIACB 24-111 (Sept. 26, 2024); PIACB 25-12 (Jan. 23, 2025); PIACB 25-13 (Jan. 2, 2025); PIACB 25-15 (Dec. 9, 2024); PIACB 25-19 (Jan. 10, 2025); PIACB 25-20 (Jan. 22, 2025); PIACB 25-21 (Jan. 29, 2025); PIACB 25-22 (Jan. 30, 2025); PIACB 25-27 (Jan. 31, 2025); PIACB 25-33 (Feb. 14, 2025); PIACB 25-35 (Feb. 21, 2025); PIACB 25-53 (Apr. 21, 2025); PIACB 25-56 (Apr. 28, 2025); PIACB 25-64 (May 28, 2025); and PIACB 25-68 (June 30, 2025). Note that, as to PIACB 25-20 (Jan. 22, 2025), the Board asked the custodian to provide a copy of the disputed public record, but the custodian ultimately refused to do so, instead suggesting that the Board review the record *in camera* over Zoom or similar. The Board declined and issued a decision based on the submissions. That decision is currently on appeal. See *In the Matter of Harford County*, Case No. C-12-CV-25-000109 (Cir. Ct. Harford County).

- **PIACB 25-76:** Custodian State Department of Assessments and Taxation, failure to respond allegation (decision issued Aug. 20, 2025)
- **PIACB 25-80:** Custodian Washington County, wrongful denial allegation (decision issued Aug. 28, 2025)
- **PIACB 25-81:** Custodian Baltimore County Fire Department, wrongful denial allegation (decision issued Aug. 26, 2025)
- **PIACB 25-82:** Custodian Frederick County Sheriff's Office, wrongful denial allegation (decision issued Sept. 5, 2025)
- **PIACB 25-83:** Custodian Washington County Health Department, unreasonable fee allegation (decision issued Sept. 18, 2025)
- **PIACB 25-84:** Custodian Kent County Department of Planning, Housing, and Zoning, wrongful denial allegation (decision issued Sept. 22, 2025)
- **PIACB 25-85:** Custodian/complainant City of Frederick, frivolous, vexatious, and bad faith PIA request allegation (decision to issue by Oct. 1, 2025)
- **PIACB 25-87:** Custodian Maryland Transportation Authority, wrongful denial allegation (decision issued Aug. 15, 2025)
- **PIACB 25-88:** Custodian City of Annapolis, wrongful denial allegation (decision to issue by Oct. 1, 2025)
- **PIACB 25-89:** Custodian Maryland Higher Education Commission, wrongful denial allegation (decision issued Sept. 30, 2025)
- **PIACB 25-90:** Custodian Maryland Office of the Attorney General, wrongful denial allegation (decision to issue by Oct. 9, 2025)
- **PIACB 25-91:** Custodian Department of Public Safety and Correctional Services, wrongful denial allegation (decision issued Sept. 16, 2025)

- **PIACB 25-92:** Custodian City of Takoma Park, wrongful denial allegation (decision to issue by Oct. 22, 2025)
- **PIACB 25-93:** Custodian Montgomery County Office of Procurement, wrongful denial allegation (decision to issue by Oct. 23, 2025)
- **PIACB 25-94:** Custodian Baltimore County Police Department, wrongful denial allegation (decision to issue by Oct. 28, 2025)
- Breakdown of allegations in complaints:⁵
 - Denial of inspection (includes redactions and constructive denials): **67** (FY 2024: 60)
 - Failure to respond to PIA request: **20** (FY 2024: 39)
 - Unreasonable fees: **6** (FY 2024: 10)
 - Frivolous, vexatious, bad faith PIA requests: **3** (FY 2024: 3)
 - Other: **2** (FY 2024: 2)
- Outcomes of written decisions:⁶
 - No violation found: **19** (FY 2024: 26)
 - Violation found: **42** (FY 2024: 29)
 - Unable to resolve: **1** (FY 2024: 1)
 - Dismissed as moot: **14** (FY 2024: 12)

⁵ Note that some complaints raised multiple allegations.

⁶ Includes outcomes in written decisions issued in FY 2025 for complaints filed in FY 2024. Note that, for complaints that involved multiple allegations, the Board did not necessarily find violations as to all allegations. For example, in PIACB 25-15 (Dec. 9, 2025), the Board found that the custodian improperly denied inspection of certain records, but also found that the fee was reasonable and that the custodian conducted a reasonable search and therefore did not constructively deny inspection of additional records. However, this and other such decisions have been captured as “violation found.” In addition, where the Board found that a PIA request or pattern of requests was frivolous, vexatious, or in bad faith, that decision was also captured as “violation found.”

- Dismissed at request of complainant: **0** (FY 2024: 2)
- Fee waiver ordered due to failure to respond: **4** (FY 2024: 4)
- Decision appealed to circuit court: **16** (FY 2024: 14)

2. Complaints Dismissed without a Written Decision

Of the complaints received in FY 2025, **14** complaints were dismissed without review on the merits or a written decision. For most of these complaints, the complainant did not first attempt to resolve the dispute through the Office of the Public Access Ombudsman as required by GP § 4-1A-05(a)(1), thus making the complaint ineligible for Board review. A handful of these complaints also alleged violations that are not within the Board's jurisdiction. One complainant withdrew his complaint, which was later refiled and given a different complaint number. Unless there was no PIA issue presented, all complainants who had not first attempted mediation were referred to the Ombudsman.

- **PIACB 25-06^{*7}**: Custodian was the Baltimore Police Department; issue was failure to respond to a PIA request (same request was the subject of PIACB 24-82, which was then pending appeal in the circuit court).

⁷ The asterisk on this and other complaints indicates a complaint related to an individual named James Alford who, beginning in 2022, sent many PIA requests to various agencies. The requests grew out of Mr. Alford's legal entanglements with an individual against whom he sought criminal charges. In FY 2024, the Board decided the first complaint brought under § 4-1A-04(b) of the PIA, which allows a custodian to file a complaint that a PIA request or pattern of requests is frivolous, vexatious, or in bad faith. In PIACB 24-29 (Mar. 29, 2024), the Board found that a pattern of PIA requests, either sent by Mr. Alford under different names or sent by different individuals working in concert with Mr. Alford, was vexatious and in bad faith. After that decision issued, the Board continued to receive a high number of complaints related to Mr. Alford's matters, including complaints from other custodians. As was noted in the Board's FY 2024 annual report, these complaints are responsible, to some extent, for the comparatively high number of complaints that the Board received this fiscal year. The Board's decisions for many of those complaints, including PIACB 24-29, were appealed to the Circuit Court for Baltimore City. On April 30, 2025, the circuit court dismissed thirty-three cases related to James Alford with prejudice, after finding that the litigation was vexatious and brought in bad faith. *See In the Matter of William Hernandez*, Case No. C-24-CV-24-000551 (Cir. Ct. Balt. City). An appeal of that ruling is pending in the Appellate Court of Maryland. *See In the Matter of Eric Rodriguez*, ACM-REG-0498-2025 (App. Ct. Md.) (consolidated cases).

- **PIACB 25-23*:** Custodian was the Maryland Office of the Attorney General; issue related to a PIA request that the OAG alleged was frivolous, vexatious, and in bad faith (PIA requester/complainant had not initiated mediation).
- **PIACB 25-54:** Custodian was Harford County; issue was denial of inspection of public records (final determination stated only that mediation was terminated; amended final determination later issued stating that the mediation was terminated with the dispute unresolved, which became the subject of PIACB 25-57).
- **PIACB 25-58:** Custodian was the Maryland Department of Labor; issue was failure to respond to a PIA request.
- **PIACB 25-59:** Custodian was Montgomery County; issue was denial of inspection of public records.
- **PIACB 25-60:** Custodian was the Baltimore Police Department; issue was failure to respond to a PIA request.
- **PIACB 25-65:** Custodian was the Calvert County Sheriff's Office; issue was failure to respond to a PIA request.
- **PIACB 25-66:** Custodian was Kent County; issue was denial of inspection of public records and unreasonable fees.
- **PIACB 25-72:** No custodian or PIA issue identified; complaint concerned a neighbor.
- **PIACB 25-74:** Custodian was the Baltimore Police Department; issue was format of records provided (on a disc, rather than hard copies).
- **PIACB 25-77:** Custodian was Washington County; issue was failure to respond to a PIA request and denial of inspection of public records.
- **PIACB 25-78:** Custodian was the Prince George's County Police Department; issue was failure to respond to a PIA request.
- **PIACB 25-79:** Custodian was the Frederick County Sheriff's Office; issue was denial of inspection of public records (complainant withdrew and later resubmitted complaint under PIACB 25-82)

- **PIACB 25-86:** Custodian was the Charles County Sheriff's Office; issue was denial of inspection of public records.

3. Complaints for which the Board Issued a Written Decision

When a complaint appears to be within the jurisdiction of the Board and ripe for review, the Board will issue a written decision. During FY 2025, the Board issued **63** decisions for complaints received in FY 2025. The Board also issued written decisions for the **13** complaints received, but not resolved, in FY 2024.

The Board's decisions appear on the Office of the Attorney General's website: <https://oag.maryland.gov/resources-info/Pages/piacb-decisions.aspx>. Summaries of the 63 written decisions issued for complaints filed in FY 2025, and the 13 decisions issued for complaints filed in FY 2024, appear in this report for ease of reference. The summaries are provided in order by complaint number, and not by the date that the decision issued. Where a Board decision has been appealed, information about the appeal is also included.

- **PIACB 24-87* (Aug. 27, 2024)**

Custodian: Board of Professional Counselors and Therapists ("BPCT")

Issue: The complainant alleged that the BPCT improperly denied inspection of records responsive to a PIA request for emails and documents that the BPCT received from three specific email addresses concerning one of its licensees. The BPCT denied inspection under GP § 4-333(a)(1), the PIA's exemption for information about the licensing of an individual in an occupation or profession.

Decision: While the complaint was pending, the BPCT informed the Board that it had contacted the State's Department of Information Technology ("DoIT") to assist with a search of electronic files and emails. The BPCT also provided additional information about its own search for records. The Board found that the BPCT did not violate the PIA in its application of GP § 4-333(a)(1) to the records it had already found, as the exemption was broad and those records contained information about its licensee. However, the Board also concluded that, to the extent that the BPCT's search failed to locate all responsive records, it violated the PIA. The Board determined that if the BPCT anticipated requiring the assistance of DoIT to conduct a sufficiently responsive search, it should have contacted DoIT for assistance when it initially received the complainant's PIA request. The Board ordered the BPCT to conduct another internal search for emails containing any of the three specific names, and not all three together. BPCT was required to ensure that the DoIT search was consistent with the

Board's decision. The Board also directed the BPCT to produce any non-exempt responsive records that DoIT's search may find.

- **PIACB 24-93 (Aug. 27, 2024)**

Custodian: Montgomery County Police Department ("MCPD")

Issue: The complaint concerned a PIA request for written police reports and police body worn camera footage of an incident involving a man who was behaving erratically and who was ultimately detained by police. The MCPD denied inspection of the footage on several grounds: GP § 4-301 (precluding disclosure of records that are confidential or privileged "by law"); GP § 4-307 (precluding disclosure of welfare records); GP § 4-329 (precluding disclosure medical or psychological information about an individual); and GP § 4-351(a) (allowing discretionary denial of investigatory records).

Decision: The Board requested and reviewed the responsive reports and body worn camera footage. After that review, the Board determined that the MCPD had failed to justify its application of GP §§ 4-301, 4-307, and 4-351(b)(5) (investigatory procedures and techniques) to deny inspection. The Board found that portions of the footage, e.g., footage from inside of an ambulance or hospital, contained exempt medical information and was thus subject to redaction. The Board also found that discrete references to injuries or mental health in the written reports were subject to redaction under GP § 4-329. In addition, the Board found that the identity of the individual detained by police was protected under GP § 4-351(b)(3). Thus, the Board ordered the MCPD to produce the responsive reports and footage to the complainant with redactions for the information covered by GP §§ 4-329 and 4-351(b)(3), including by blurring out the face of the detained individual.

Request for Reconsideration: After the Board issued its decision, the complainant asked that the Board reconsider language, contained in a footnote, that suggested that it would be appropriate for the complainant to bear the cost of the editing necessary to produce the body worn camera footage. While the Board ultimately determined that it has inherent authority, under certain circumstances, to reconsider its decisions, it found that those circumstances—i.e., a showing that the action was the product of fraud, surprise, mistake, or inadvertence, or that a new facts justify a different conclusion—were not present. Thus, in a written decision issued on October 7, 2024, the Board declined to reconsider its decision of August 27, 2024.

- **PIACB 24-96* (Aug. 27, 2024)**

Custodian: Board of Professional Counselors and Therapists (“BPCT”)

Issue: The complainant alleged that the BPCT violated the PIA by failing to respond to a PIA request within the required time limitations.

Decision: The Board found that the BPCT failed to respond to the PIA request “promptly, but not more than 30 days after receiving” the request. Thus, the BPCT violated GP § 4-203(a). Because the BPCT responded while the complaint was pending, the Board ordered no further relief.

- **PIACB 24-97 (Aug. 13, 2024)**

Custodian: Department of Public Safety and Correctional Services (“DPSCS”)

Issue: The complainant alleged that DPSCS violated the PIA by failing to respond to a PIA request within the required time limitations. DPSCS took the position that it had not received the complainant’s PIA request.

Decision: The Board found that DPSCS violated GP § 4-203(a) by failing to respond to the PIA request “promptly, but not more than 30 days after receiving” the request. While the Board acknowledged that DPSCS may not have received the PIA request when the complainant first sent it, it found that DPSCS nevertheless eventually received the complaint through the Ombudsman and Board process. In making its decision, the Board pointed to the fact that the complainant was in the custody of DPSCS, and had provided at least some evidence that his initial PIA request was sent when he claimed it was. The Board also noted that the DPSCS had received other PIA requests from the complainant around the same time of his initial request. Because DPSCS had done nothing to respond to the PIA request while the complaint was pending, the Board ordered DPSCS to waive the costs associated with responding and producing records.

- **PIACB 24-98* (Sept. 3, 2024)**

Custodian: Baltimore Police Department (“BPD”)

Issue: The complainant alleged that the BPD constructively denied a PIA request for records of emails and other communications concerning a specific criminal case. The BPD responded that it was unable to locate responsive records based on the language of the PIA request.

Decision: The Board concluded that the BPD constructively denied the complainant's PIA request. Although the BPD initially asked the complainant for additional information, it did not continue communicating after the complainant asked for clarification on the BPD's request or explain the BPD's limitations on its ability to search for email records (i.e., that it needed the names of the senders or recipients to do so). The Board found that the onus was on the BPD to provide this information to the complainant. The Board directed the BPD to conduct an additional search of the email accounts of the police officers identified by the complainant after his complaint was filed.

- **PIACB 24-100 (Sept. 12, 2024)**

Custodian: Anne Arundel County Office of Equity and Human Rights ("OEHR")

Issue: The complainant sent a broad PIA request for meeting minutes and agendas, as well as email, memos, correspondence, and other documents related to Anne Arundel County's development of a plan for Diversity, Equity, and Inclusion ("DEI"). OEHR denied inspection of certain records, citing GP §§ 4-301 and 4-344 (for the executive and deliberative process privileges, respectively). The complaint challenged the exemptions and also alleged that OEHR failed to produce all responsive records.

Decision: The Board concluded that OEHR properly withheld some, but not all, of the records under the deliberative process privilege as encompassed by GP § 4-344. For the records that the Board determined were improperly withheld, the Board found that they contained purely factual information and were not deliberative in nature. The Board also found that the constitutional executive privilege as encompassed by GP § 4-301(a) did not apply to the records. Finally, the Board found that OEHR conducted a good faith search for responsive records and therefore did not constructively deny the PIA request.

Appeal: The complainant appealed the Board's decision to the Circuit Court for Anne Arundel County. The court affirmed the Board's decision after a hearing. *See In the Matter of Timothy McClay*, Case No. C-02-CV-24-002495 (Cir. Ct. Anne Arundel County).

- **PIACB 24-104* (Sept. 13, 2024)**

Custodian: Board of Professional Counselors and Therapists ("BPCT")

Issue: The complainant alleged that the BPCT improperly denied inspection of records in response to a PIA request for all emails that mentioned or related to a licensee from May 2022 to December 2023. The BPCT cited GP § 4-333, the PIA’s exemption for information about the licensing of an individual in an occupation or profession.

Decision: Noting that the BPCT provided no information about its search efforts or the responsive emails it located, the Board concluded that it could not find that the BPCT conducted a search that was reasonably designed to capture all responsive records. The Board acknowledged that a majority of the responsive records were likely exempt under GP § 4-333, but nevertheless directed the BCPT to conduct another search for responsive emails, review those records, and disclose any parts of the emails or records that might fall within § 4-333(b), which lists information about a licensee that a licensing body must disclose.

- **PIACB 24-106* (Sept. 26, 2024)**

Applicant: SM et al. (aka James Alford)

Custodian/Complainant: Maryland Office of the Attorney General (“OAG”)

Issue: The OAG alleged that it had received frivolous, vexatious, and bad faith PIA requests sent from approximately a dozen different email accounts that were all connected to the same person, James Alford, and various disputes he had that arose from his legal entanglements with another individual.

Decision: After reviewing a record that included responses to the complaint sent from some of the email addresses and copies of the PIA requests as well as additional correspondence exchanged between the OAG and the requesters, the Board found that the PIA requests were frivolous, vexatious, and in bad faith. First, the Board found no reason to question its determination, made in PIACB 24-29 (Mar. 29, 2024), that there was at the very least coordination between the requesters seeking the Alford-related records. The Board also found that the pattern of PIA requests it found vexatious and in bad faith in that decision (involving the Office of the State’s Attorney for Baltimore City) was continuing, but now directed to the OAG. In addition, the Board found that the PIA requests were frivolous in that there was no basis in law for the continued pattern of harassment and abuse of process. The Board ordered that the OAG may ignore the PIA requests identified in its complaint as well as subsequent or future PIA requests for the same type of Alford-related records.

Appeal: SM et al. (aka James Alford) appealed the Board’s decision to the Circuit Court for Baltimore City. *See In the Matter of Eric Rodriguez*, Case No. C-24-CV-24-003183 (Cir. Ct. Balt. City). The matter was ultimately consolidated with approximately thirty-two other actions initiated by James Alford under his various pseudonyms. *See In the Matter of William Hernandez*, Case No. C-24-CV-24-000551 (Cir. Ct. Balt. City). The case was dismissed with prejudice after a hearing. The circuit court’s ruling is pending appeal in the Appellate Court of Maryland under case number ACM-REG-0685-2025.

- **PIACB 24-107* (Sept. 13, 2024)**

Custodian: Board of Professional Counselors and Therapists (“BPCT”)

Issue: The complainant alleged that the BPCT improperly denied inspection of records responsive to a PIA request for records involving three specific email accounts. The BPCT cited GP § 4-333, the PIA’s exemption for information about the licensing of an individual in an occupation or profession.

Decision: Noting that the BPCT provided no information about its search efforts or the responsive emails it located, the Board concluded that it could not find that the BPCT conducted a search that was reasonably designed to capture all responsive records. The Board acknowledged that a majority of the responsive records were likely exempt under GP § 4-333, but nevertheless directed the BPCT to conduct another search for responsive emails, review those records, and disclose any parts of the emails or records that might fall within § 4-333(b), which lists information about a licensee that a licensing body must disclose.

- **PIACB 24-108* (Sept. 13, 2024)**

Custodian: Maryland Office of the Attorney General (“OAG”)

Issue: The complainant alleged that the OAG violated the PIA by failing to respond to a PIA request within the required time limitations.

Decision: The Board determined that the OAG did not violate the PIA. The Board found that, before the complainant sent the PIA request, the OAG had sought dispute resolution through the Public Access Ombudsman regarding PIA requests that it alleged were frivolous, vexatious, and in bad faith, including the PIA request at issue in the complaint. Thus, under GP § 4-203(d)(2), the time for responding was extended.

- **PIACB 24-111 (Sept. 26, 2024)**

Custodian: Carroll County Public Schools (“CCPS”)

Issue: The complainant disputed redactions applied to invoices of private attorneys hired by CCPS to work on a special education case, specifically redactions to the work narratives. CCPS claimed that the narratives were protected by the attorney-client privilege and therefore exempt from disclosure under GP § 4-301(a)(1).

Decision: The Board reviewed a partially unredacted version of the attorney invoices (student information remained redacted) and found that the work narratives did not contain or constitute protected attorney-client communications, and did not disclose the specific nature of the services provided. Instead the narratives were mere descriptions of the work performed, which Maryland appellate courts have held are not subject to the attorney-client privilege. The Board directed CCPS to disclose the invoices with the redactions to the work narratives removed.

- **PIACB 24-112 (Oct. 3, 2024)**

Custodian: Alcohol, Tobacco, and Cannabis Commission (“ATCC”)

Issue: The complainant alleged that the ATCC violated the PIA by failing to produce a specific record related to employee discipline. The ATCC argued that its search was reasonable, even though it did not initially locate the specific record the complainant sought.

Decision: The Board found that the ATCC conducted a reasonable search and therefore did not violate the PIA. The Board noted that the ATCC continued to search for the record after it became apparent that it was the record the complainant most wanted, and produced it after it was found. Board Member Nivek Johnson partially disagreed with the Board’s suggestion that ATCC’s first search may have been insufficient.

- **PIACB 24-114 (Oct. 25, 2024)**

Applicant: Justin Holder

Custodian/Complainant: Maryland Department of Natural Resources (“DNR”)

Issue: DNR alleged it received more than sixty PIA requests from Justin Holder that were frivolous, vexatious, and in bad faith. Though DNR acknowledged that the initial PIA requests were not frivolous, vexatious, or in bad faith, it contended that, as Mr. Holder's requests continued and evolved, they became so. Mr. Holder denied that his PIA requests were frivolous, vexatious, or in bad faith.

Decision: A majority of the Board determined that DNR failed to meet its burden to show by a preponderance of the evidence that Mr. Holder's PIA requests were frivolous, vexatious, or in bad faith. Instead, the Board found Mr. Holder an "active" requester who was persistent in his attempts to get certain records from DNR. Noting that the PIA does not place any limits on the number of requests a requester can make, the Board found no evidence of harassment, bad faith, or mockery in Mr. Holder's requests. Board members Quinton Herbert and Nivek Johnson disagreed with the Board's decision, finding that DNR had made out a case for vexation. Board Chair Sareesh Rawat drafted a separate opinion partially disagreeing with the majority to express that the Board should be precluded from considering DNR's complaint in the first instance.

Appeal: DNR appealed the Board's decision to the Circuit Court for Washington County. *See In the Matter of Dep't of Nat'l Resources*, Case No. C-21-CV-24-000486 (Cir. Ct. Wash. County). A hearing was set for September 29, 2025, but DNR filed a notice of voluntary dismissal before that date.

- **PIACB 25-01** (Nov. 8, 2024)

Custodian: Montgomery County Public Schools ("MCPS")

Issue: The complainants disputed a \$4,250 estimated fee that MCPS charged for production of records concerning the training that health teachers receive for the high school health curriculum. MCPS maintained that the fee was reasonably related to the costs it anticipated incurring to produce the responsive records.

Decision: After requesting and receiving additional information from MCPS about the basis for the fee, including MCPS did not anticipate having to redact any of the records, the Board found that the estimated fee was unreasonable in two ways. First, the Board found it unreasonable to assign a higher-paid content specialist to perform the response work when the records did not need review. Second, the Board found that MCPS's time estimate of one minute of processing time per-page was excessive given that the work consisted of clicking on links

and converting pages to PDFs. A majority of the Board found that ten seconds per page was more reasonable and directed MCPS to reduce the estimated fee so that it reflected 14.9 hours of work by an administrative secretary. Board member Quinton Herbert disagreed that ten seconds per page was reasonable, stating his view that thirty seconds was more reasonable.

- **PIACB 25-02 (Sept. 26, 2024)**

Custodian: Maryland Department of Labor (“DOL”)

Issue: The complainant requested a list of the names of three individuals nominated to be Executive Director of the Maryland Real Estate Commission (“MREC”) and other related information. DOL responded that it had no responsive records and that, even if it did, the names of the individuals would be exempt from disclosure under GP § 4-311, the PIA’s exemption for personnel records.

Decision: The Board found no violation of the PIA. The Board determined that DOL’s search for records was reasonable, and noted that publicly-available MREC meeting minutes supported the assertion that such list did not exist when the complainant sent her PIA request.

- **PIACB 25-03 (Sept. 11, 2024)**

Custodian: Department of Public Safety and Correctional Services (“DPSCS”)

Issue: The complainant alleged that DPSCS violated the PIA by failing to respond to his PIA request within the required statutory time limitations. The complainant requested a broad range of records ranging from statistical data on incarcerated peoples’ security classifications to records related to the planned prerelease unit for women.

Decision: DPSCS did not provide a response to the complaint. The Board therefore decided the matter on the facts submitted by the complainant and found that DPSCS violated GP § 4-203(a) by failing to respond to the PIA request promptly, but in no more than thirty days after it received the request. Given the delay and DPSCS’s failure to respond to the complaint, the Board exercised its discretion and directed DPSCS to waive the fees associated with preparing the response.

- **PIACB 25-04* (Dec. 4, 2024)**

Custodian: Maryland Department of Health (“MDH”)

Issue: The complainant alleged that MDH violated the PIA by failing to respond to a PIA request for records concerning a specific licensee within the required time limitations.

Decision: MDH responded to the PIA request after the complaint was filed, thus the Board found that MDH violated GP § 4-203(a). The Board directed MDH to promptly respond to the PIA request, using additional information provided by the complainant.

Appeal: The complainant appealed the Board’s decision to the Circuit Court for Baltimore City. *See In the Matter of Eric Rodriguez*, Case No. C-24-CV-24-004526 (Cir. Ct. Balt. City). The matter was ultimately consolidated with approximately thirty-two other actions initiated by James Alford under his various pseudonyms. *See In the Matter of William Hernandez*, Case No. C-24-CV-24-000551 (Cir. Ct. Balt. City). The case was dismissed with prejudice after a hearing. The circuit court’s ruling is pending appeal in the Appellate Court of Maryland under case number ACM-REG-0685-2025. In addition, Mr. Rodriguez (aka James Alford), appealed this case individually to the Appellate Court of Maryland under case number ACM-REG-0498-2025.

- **PIACB 25-05* (Dec. 4, 2024)**

Custodian: Board of Professional Counselors and Therapists (“BPCT”)

Issue: The complainant alleged that the BPCT violated the PIA by failing to respond to a PIA request for records concerning a specific licensee within the required time limitations, and that, when it did respond, the BPCT constructively denied the PIA request by failing to provide all responsive records.

Decision: The Board found that the BPCT violated GP § 4-203(a) by failing to respond to the PIA request promptly but in no more than thirty days after it received the request. A majority of the Board also concluded that the BPCT constructively denied the PIA request by unilaterally narrowing the complainant’s broad request such that it conducted an unreasonable and inadequate search for responsive records. The Board directed the BPCT to conduct an additional search. Board members Nivek Johnson and Quinton Herbert disagreed that the BPCT constructively denied the PIA request given that the complainant had attached forms to his PIA request that he advised would be responsive to the request.

Appeal: The complainant appealed the Board’s decision to the Circuit Court for Baltimore City. *See In the Matter of Eric Rodriguez*, Case No. C-24-CV-24-004526 (Cir. Ct. Balt. City). The matter was ultimately consolidated with approximately thirty-two other actions initiated by James Alford under his various pseudonyms. *See In the Matter of William Hernandez*, Case No. C-24-CV-24-000551 (Cir. Ct. Balt. City). The case was dismissed with prejudice after a hearing. The circuit court’s ruling is pending appeal in the Appellate Court of Maryland under case number ACM-REG-0685-2025. In addition, Mr. Rodriguez (aka James Alford), appealed this case individually to the Appellate Court of Maryland under case number ACM-REG-0498-2025.

- **PIACB 25-07* (Oct. 9, 2024)**

Custodian: Baltimore Police Department (“BPD”)

Issue: The complainant alleged that the BPD violated the PIA by failing to respond to a PIA request for records related to a police complaint within the required time limitations.

Decision: The BPD conceded that it did not respond to the complainant’s PIA request within thirty days, and the Board found that the BPD violated GP § 4-203(a). Because the BPD responded and produced records while the complaint was pending, the Board ordered no further relief.

- **PIACB 25-08* (Oct. 11, 2024)**

Custodian: Maryland Office of the Attorney General (“OAG”)

Issue: The complainant alleged that the OAG constructively denied his PIA request for records concerning a specific individual whom the complainant alleged committed suicide.

Decision: The Board determined that the OAG did not violate the PIA. The Board found that, before the complainant sent the PIA request, the OAG had sought dispute resolution through the Public Access Ombudsman regarding PIA requests that it alleged were frivolous, vexatious, and in bad faith, including the PIA request at issue in the complaint. Thus, under GP § 4-203(d)(2), the time for responding was extended. In addition, the Board noted that the OAG ultimately responded to the PIA request and produced records.

- **PIACB 25-09* (Dec. 11, 2024)**

Custodian: Baltimore Police Department (“BPD”)

Issue: The complainant alleged that the BPD constructively denied a PIA request for records related to a police complaint. The complainant contacted the Public Access Ombudsman before the thirty days for responding had run.

Decision: The BPD issued a timely response and produced records while the matter was pending with the Ombudsman. After reviewing the submissions and the records the BPD produced, a majority of the Board concluded that the BPD conducted a reasonable search for records and therefore did not constructively deny the complainant’s PIA request. Board member Debra Gardner disagreed, stating her view that the BPD’s unilateral limit of the search to the complaint case file violated the PIA given that the complainant identified records that he believed existed but were not produced.

- **PIACB 25-10* (Oct. 11, 2024)**

Custodian: Office of the State’s Attorney for Baltimore City (“BCSAO”)

Issue: The complainant alleged that the BCSAO wrongfully denied inspection of public records. The BCSAO took the position that PIACB 24-29 (Mar. 29, 2024) relieved it of its obligation to respond to the PIA request.

Decision: After review of the PIA request, which sought records concerning the attorney who represented the individual with whom James Alford had legal entanglements, the Board concluded that the request was encompassed in its order of March 29, 2024, which found that the Alford-related PIA requests vexatious and in bad faith and stated that the BCSAO may ignore those requests and subsequent and future requests that were substantially the same. Thus, the Board found no violation of the PIA.

- **PIACB 25-11* (Sept. 26, 2024)**

Custodian: State Public Information Act Compliance Board (“Board”)

Issue: The complainant alleged that this Board improperly denied inspection of a PIA request for records concerning a specific individual. This Board produced some records and denied inspection of others under GP §§ 4-301(a) and 4-344 (the attorney-client and deliberative process privileges, respectively).

Decision: The Board issued a decision stating that it was unable to resolve the complaint because the Board is unable to review or resolve disputes about its own responses to PIA requests made to this Board.

- **PIACB 25-12* (Jan. 23, 2025)**

Custodian: Board of Professional Counselors and Therapists (“BPCT”)

Issue: The complainant alleged that the BPCT improperly denied a PIA request for a broad range of records of communications between the BPCT and one of its licensees or his representatives. The BPCT initially produced eight emails, some with redactions, and later produced 199 pages of emails in heavily redacted form. The BPCT claimed that the redacted information was licensing information of an individual in an occupation or profession exempt under GP § 4-333.

Decision: The Board reviewed an unredacted version of the 199 pages of email communications and determined that the BPCT properly applied GP § 4-333. However, the Board also found that, to the extent that the BPCT limited its search to email records, that search was insufficient given that the PIA request also asked for records of telephone communication. Information in the email records suggested that telephone communication took place. The Board directed the BPCT to search for records of telephone communications between the BPCT and the licensee or his representatives and disclose any non-exempt responsive records to the complainant.

- **PIACB 25-13 (Jan. 2, 2025)**

Custodian: Delegate Benjamin Barnes

Issue: Del. Benjamin Barnes denied inspection of records related to a specific legislative grant on grounds that the records were subject to the legislative privilege and therefore exempt under GP § 4-301(a). The complainant challenged Del. Barnes’s denial.

Decision: After review of a descriptive index of the records, a majority of the Board concluded that some, but not all, of the records were covered by the legislative privilege. For those records the Board determined were not subject to the legislative privilege, the Board found that the dates of generation and the parties involved suggested that the records were not part of the legislative process itself. The Board directed Del. Barnes to disclose those records to the

complainant. Board Chair Sareesh Rawat drafted a separate opinion disagreeing with the majority to state his view that all the responsive records were subject to the legislative privilege, which includes testimonial privilege afforded to State legislators. Board member Quinton Herbert joined in this view.

- **PIACB 25-14 (Oct. 31, 2024)**

Custodian: Department of Public Safety and Correctional Services (“DPSCS”)

Issue: The complainant alleged that DPSCS violated the PIA by failing to respond within the required time limitations. In addition, the complainant challenged an \$1,840 estimated fee, of which DPSCS required \$1,500 prepayment, for producing certain records related to prison suicides.

Decision: The Board found that the \$1,840 estimated fee, which was based on a vendor performing four hours of work at a rate of \$460 per hour, was unreasonable. DPSCS provided no information about why the use of that vendor in particular was necessary. In addition, the Board found that the justification for the fee, which, when initially communicated to the complainant, accounted only for reproduction costs, had shifted. The Board also found that DPSCS violated GP § 4-203(a) by failing to respond to the complainant’s PIA request (specifically a narrowed PIA request) promptly but in no longer than thirty days after receiving the request. Based on the record and the fact that DPSCS provided a written response to the complaint late and only after follow-up from the Board, the Board exercised its discretion to order DPSCS to waive the associated fees. Thus, the Board did not determine a more reasonable estimated fee as ordinarily required by GP § 4-1A-04(a)(3)(ii).

- **PIACB 25-15 (Dec. 9, 2024)**

Custodian: Department of General Services (“DGS”)

Issue: The complainant brought several allegations related to DGS’s response to a broad PIA request for a variety of records concerning the women’s pre-release facility, which had yet to be constructed or operated. First, the complainant alleged that DGS charged an unreasonable fee of \$448.38 for the records. Second, the complainant challenged redactions to the records that DGS had applied under GP § 4-344 (deliberative process privilege). Third, the complainant alleged that DGS had constructively denied the PIA request by failing to locate and produce all responsive records.

Decision: The Board requested additional information from DGS about its search efforts. The Board also asked DGS to provide unredacted copies of the records produced for the Board’s confidential review. After review of the submissions and the additional information, the Board found that the \$448.38 fee was reasonably related to the actual costs that DGS incurred in preparing the records. The Board also found that DGS’s search was reasonable and therefore DGS did not constructively deny the complainant’s PIA request. However, the Board found that DGS had not justified its discretionary application of GP § 4-344 to the redacted information because, although some of the information was pre-decision and deliberative (as required for the privilege to apply), DGS did not provide any specific justification for why denial of inspection was necessary to protect the integrity of the decision-making process, i.e., why inspection would be contrary to the public interest. Thus, the Board directed DGS to produce the responsive records to the complainant in unredacted form.

- **PIACB 25-16 (Dec. 20, 2024)**

Custodian: Maryland State Department of Education (“MSDE”)

Issue: The complainant disputed MSDE’s position that it would need to create new records to respond to his PIA requests for data about school suspensions produced and compiled according to certain demographic categories and alleged that MSDE improperly denied his requests.

Decision: After reviewing the submissions, which included an affidavit from a Senior Research and Data Specialist within MSDE, the Board agreed that MSDE would need create new records to respond to the PIA requests. Under GP § 4-205(c)(4)(iii), a custodian need not “create, compile, or program a new public record.” The Board found that the PIA requests called for more than extraction and sorting of the data, which Maryland’s Appellate Court has held is not the creation of a new record, but rather asked MSDE to put together a complex and specific compilation of information about student discipline created from the data that MSDE collects. Thus, the Board concluded that MSDE did not violate the PIA.

Appeal: The complainant appealed the Board’s decision to the Circuit Court for Baltimore City. *See In the Matter of Levi Bradford*, Case No. C-24-CV-25-000530. A hearing was held on August 7, 2025, at which the Board’s decision was affirmed.

- **PIACB 25-17 (Dec. 9, 2024)**

Custodian: Harford County (“County”)

Issue: The complainant alleged that the County improperly denied inspection of records related to an investigation conducted by the County’s Department of Inspections, Licenses, and Permits (“DILP”). The County produced records for which the complainant was a person in interest, but cited GP § 4-351(a)(2) as grounds for the denial, arguing that because the investigation was open and ongoing, disclosure would interfere with the investigation.

Decision: The Board requested and received an affidavit from the Director of DILP that averred that the investigation was open and ongoing at the time of the signing of the affidavit and provided certain details about how the requested records were related to the investigation. After consideration of the affidavit and the other submissions, the Board found that the County had justified its discretionary application of GP § 4-351(a)(2) to deny inspection of the records. In light of the County’s position that the complainant would be entitled to inspect the records once the investigation concluded, the Board encouraged the County to contact the complainant at that time to determine whether he still wished to inspect the records.

- **PIACB 25-18* (Jan. 23, 2025)**

Custodian: Baltimore Police Department (“BPD”)

Issue: The complainant alleged that the BPD violated the PIA by failing to respond to two PIA requests for records related to complaints filed against police officers within the required time limitations.

Decision: The Board found that the BPD violated GP § 4-203(a) by failing to respond to the complainant’s PIA requests promptly but not more than thirty days after receiving the requests. Because the BPD responded while the complaint was pending, the Board ordered no further relief.

- **PIACB 25-19 (Jan. 10, 2025)**

Custodian: Harford County (“County”)

Issue: The complainant disputed the County’s denial of inspection of handwritten notes taken by the County’s Director of Administration during a

budget work session of the Harford County Council. The County claimed that the notes were subject to the attorney-client, executive, and deliberative process privileges and thus exempt from disclosure under GP §§ 4-301(a), 4-343, and 4-344.

Decision: The Board requested and confidentially reviewed the handwritten notes. After that review, and considering the submissions, a majority of the Board concluded that the County had improperly denied inspection of the notes in their entirety, rather than redacting the limited information that the Board found exempt under GP § 4-344 (deliberative process privilege). The Board found that the attorney-client privilege did not apply because there was no attorney-client relationship between the Director of Administration and the County or its executive officials. The Board also concluded that, given its constitutional roots, the executive privilege did not apply at the local level and that, even if it did, the notes were largely factual in nature and would not qualify for protection. Finally, looking to federal case law regarding notes taken by government officials and employees, the Board found that the vast majority of the notes were “purely factual” in nature and therefore did not qualify for shielding under the deliberative process privilege, which applies to pre-decisional and deliberative material. A majority of the Board identified limited information that it determined was subject to the deliberative process privilege, however, and directed the County to produce the handwritten notes to the complainant with only that information redacted. Board members Debra Gardner and Samuel Encarnacion disagreed that any redactions were proper, finding that even if some material was pre-decisional and deliberative, the County had not demonstrated that disclosure would be contrary to the public interest.

Appeal: The County appealed the Board’s decision to the Circuit Court for Harford County. *See In the Matter of Harford County*, Case No. C-12-CV-25-000108 (Cir. Ct. Harford County). On September 8, 2025, the court issued an opinion in which it affirmed the Board’s decision and order.

- **PIACB 25-20 (Jan. 22, 2025)**

Custodian: Harford County (“County”)

Issue: The complaint concerned the County’s denial of inspection of certain text messages exchanged between the Harford County Executive and the President of the Harford County Council. The complainant alleged that the County

improperly denied inspection, while the County maintained that the text messages were subject to the attorney-client, executive, and deliberative process privileges and thus exempt from disclosure under GP §§ 4-301(a), 4-343, and 4-344.

Decision: The Board requested, under GP § 4-1A-06(b)(2)(ii)(1), a copy of the disputed text messages. The County declined to provide a copy, citing its belief that the messages were privileged, and instead suggested that the Board review the messages *in camera* over Zoom or similar. The Board declined to do so and instead resolved the complaint based on the submissions, which included a description of the text messages provided by the County. The Board concluded that the text messages were not subject to the claimed privileges and directed the County to produce them to the complainant. First, the Board determined that there was no attorney-client relationship between the County Executive and the County Council President, and therefore the attorney-client privilege could not apply. Second, the Board concluded that the constitutional executive privilege does not apply at the local level, and that, even if it did, the County had failed to demonstrate that the messages' content fell within the scope of the privilege. Finally, the Board found that the deliberative process privilege did not apply because, given the County's description of the context in which they were sent, the messages were more in the nature of a directive, and not deliberation.

Appeal: The County appealed the Board's decision to the Circuit Court for Harford County. *See In the Matter of Harford County*, Case No. C-12-CV-25-000109 (Cir. Ct. Harford County). A hearing was held on August 8, 2025.

- **PIACB 25-21 (Jan. 29, 2025)**

Custodian: Frederick County ("County")

Issue: The complainant raised several allegations of improper denial concerning three PIA requests he sent to the County for certain phone logs. The County produced phone logs for all three requests, one with redactions and two with information about calls placed to and from the Frederick County Circuit Court as well as certain other agencies excluded. The County took the position that it was not the custodian of information about phone calls to and from the court or those agencies. In addition, the County cited GP § 4-301(a)(2)(iii) to justify the redactions it applied to one of the phone logs, arguing that Maryland Rules rendered the information confidential.

Decision: After review of the submissions, and in consideration of the specific manner in which the County provides telephone services to the court and other local agencies, the Board determined that the County was the custodian of the phone records. The conclusion was also based on evidence that the Chief Deputy Clerk of the Circuit Court for Frederick County took the position (in response to a PIA request) that the County, not the court, was the proper custodian of the telephone records. To resolve the allegation regarding the redactions applied to one of the phone logs, the Board requested and received a descriptive index of the phone log that identified or described the caller/call recipient and provided an explanation of why the redacted information is exempt under the PIA. After review, the Board determined that most of the redactions were improper. The Board determined that Maryland Rule 9-205.3, which makes a custody evaluator's report confidential, did not require redaction of information about phone calls related to custody cases because the facts that a custody dispute exists and that a specific custody evaluator is assigned to the case are not confidential, and disclosure would reveal no more than this basic information. However, the Board also determined that GP § 4-305, which requires denial of inspection of records that relate to the adoption of an individual, required redaction of phone calls made in adoption cases. Thus, the Board ordered the County to produce the non-exempt information in the phone logs it had excluded on grounds that it was not the custodian, and to remove all redactions but those applied to phone calls made in adoption cases, and produce those phone logs to the complainant.

- **PIACB 25-22 (Jan. 30, 2025)**

Custodian: Maryland State Police ("MSP")

Issue: The complainant alleged that MSP improperly withheld and redacted records responsive to his PIA request for records of communications between certain members of law enforcement, including communications that mentioned a specific individual. MSP denied inspection of some records entirely under GP § 4-344 (deliberative process privilege) and redacted information in records produced under GP §§ 4-330 and 4-338, which concern sociological information and information about the security of information systems, respectively.

Decision: The Board requested and received copies of the records MSP withheld entirely and unredacted copies of the records produced in redacted for. After reviewing these confidential records, the Board determined that MSP properly applied GP §§ 4-330 and 4-338 to redact sociological information (including

personal phone numbers and marital status information) and IP addresses (which constitute information about the security of an information system). However, the Board found that MSP did not justify its application of GP § 4-344 to deny inspection of the records it withheld in their entirety. Some of those records contained purely factual, and not deliberative, information, and thus did not fall within the realm of GP § 4-344. For those records that did contain pre-decisional and deliberative material, the Board found that MSP's general argument that disclosure would stifle investigative and pretrial preparation discussions was not sufficient to show why inspection of the records—which related to a case that had been prosecuted more than ten years before—specifically would harm the public interest. The Board therefore directed MSP to disclose the records it withheld entirely to the complainant.

- **PIACB 25-24* (Mar. 20, 2025)**

Custodian: Board of Professional Counselors and Therapists (“BPCT”)

Issue: The complainant alleged that the BPCT constructively denied a PIA request for certain court records and charged an unreasonable estimated fee of \$2,088 to \$3,384 for records concerning a specific BPCT licensee.

Decision: The Board dismissed the complaint as moot after finding that the PIA request fell within the scope of the requests contemplated by the Board's order in PIACB 25-34 (Mar. 7, 2025). In that decision, the Board determined that a pattern of requests sent from numerous email accounts associated with James Alford was vexatious and in bad faith. The Board ordered that the BPCT may ignore the PIA requests identified in its complaint, as well as any subsequent or future requests that were substantially the same.

- **PIACB 25-25* (Mar. 20, 2025)**

Custodian: Board of Professional Counselors and Therapists (“BPCT”)

Issue: The complainant alleged that the BPCT improperly denied inspection of records concerning a court matter.

Decision: The Board dismissed the complaint as moot after finding that the PIA request fell within the scope of the requests contemplated by the Board's order in PIACB 25-34 (Mar. 7, 2025). In that decision, the Board determined that a pattern of requests sent from numerous email accounts associated with James Alford was vexatious and in bad faith. The Board ordered that the BPCT may

ignore the PIA requests identified in its complaint, as well as any subsequent or future requests that were substantially the same.

- **PIACB 25-26* (Feb. 11, 2025)**

Custodian: Baltimore Police Department (“BPD”)

Issue: The complainant alleged that the BPD improperly denied inspection of records related to complaints against police officers.

Decision: The Board found no violation of the PIA. The Board determined that the BPD had not violated GP § 4-203(a) because, about two weeks after it received the PIA request, the BPD requested mediation through the Ombudsman for its contention that the request (and others) was frivolous, vexatious, and in bad faith. The Board also determined that it could not conclusively resolve a factual dispute regarding the complainant’s allegation that the BPD denied the PIA request during a telephone call because the complainant declined to provide additional information requested by the Board.

Appeal: The complainant appealed the Board’s decision to the Circuit Court for Baltimore City. *See In the Matter of Cindy Benson*, Case No. C-24-CV-25-002006 (Cir. Ct. Balt. City). The matter was ultimately consolidated with approximately thirty-two other actions initiated by James Alford under his various pseudonyms. *See In the Matter of William Hernandez*, Case No. C-24-CV-24-000551 (Cir. Ct. Balt. City). The case was dismissed with prejudice after a hearing. The circuit court’s ruling is pending appeal in the Appellate Court of Maryland under case number ACM-REG-0685-2025.

- **PIACB 25-27 (Jan. 31, 2025)**

Custodian: City of Annapolis (“City”)

Issue: The dispute concerned a PIA request for records of email communications involving Annapolis Police Department (“APD”) personnel related to a specific APD investigation. The City produced redacted records in response, citing GP § 4-344 (deliberative process privilege) as authority for the redactions. The complainant alleged that the redactions were improper and that the City conducted an insufficient search that failed to locate all responsive records.

Decision: After review of the unredacted records, which the City provided in confidence to the Board, the Board concluded that the City had failed to justify

its application of GP § 4-344 and § 4-351 (related to investigative records and raised in response to the complaint). For both exemptions, the Board concluded that the City had not demonstrated that inspection of the redacted information would be contrary to the public interest under GP § 4-343, as it must to invoke a discretionary exemption. The Board directed the City to produce the records to the complainant in unredacted form. In addition to the records, the Board also requested that the City produce an affidavit describing its search efforts. After considering the information in the affidavit, the Board found that the City conducted an unreasonable and inadequate search for records because it had not searched all relevant email accounts. The Board directed the City to conduct remedial searches of specific APD email accounts and produce any additional non-exempt responsive records to the complainant.

- **PIACB 25-28 (Feb. 13, 2025)**

Custodian: Maryland Office of the Public Defender (“OPD”)

Issue: The complainant alleged that the OPD failed to produce all records responsive to a PIA request for certain records related to its representation of him in cases from 2014, and therefore improperly denied the PIA request. The OPD maintained that it conducted a thorough search and provided all responsive records it could find.

Decision: After reviewing the submissions, the Board concluded that the OPD focused its search on where responsive records were likely to be found and thus conducted a reasonable search and did not violate the PIA. The complainant sought records generated over the course of about ten years. The OPD was able to produce some responsive records by contacting various units that have been involved in the complainant’s cases, such as the post-conviction unit. The OPD also contacted the State Records Center (“SRC”), which stores closed files on the OPD’s behalf, but, according to documentation provided by the OPD, the SRC was unable to locate the complainant’s trial file.

- **PIACB 25-29 (Feb. 13, 2025)**

Custodian: Prince George’s County Public Schools (“PGCPS”)

Issue: The complainant sent PIA requests to PGCPS asking for records related to eight specific PGCPS employees, including resumes, training certifications, and information about any complaints against the employees. In addition, the complainant sent a PIA request seeking video footage from two separate

incidents involving the complainant's daughter. PGCPS denied inspection of all responsive records, taking the position that they were personnel records and thus exempt from disclosure under GP § 4-311.

Decision: The Board determined that the mandatory exemption in GP § 4-311 applied and therefore PGCPS did not violate the PIA by denying inspection of the records. As to the request for the video footage in particular, the Board found that PGCPS had used the footage in an investigation of alleged employee misconduct, thus rendering the footage part of the employees' personnel files. The Board noted that the Maryland State Department of Education maintains an online "educator license" search tool where one may verify and learn information about an educator's credentials and that, under GP § 4-333(b), licensing bodies are required to disclose certain information about occupational or professional licensees.

- **PIACB 25-30 (Feb. 20, 2025)**

Custodian: Somerset County Sheriff's Office ("SCSO")

Issue: The complainant alleged that the SCSO failed to respond to a request for records concerning a specific sheriff's deputy within the PIA's required time limitations and that the SCSO charged an unreasonable estimated fee of \$379.92 to produce responsive records.

Decision: The Board found that the SCSO did not violate the PIA's time limitations. After reviewing additional information about the basis for the estimated fee, the Board concluded that it was unreasonable in that it failed to account for one of the two free hours of labor the SCSO was required to provide under GP § 4-206(c), and that the eight-hour time estimate contemplated by the fee was excessive in light of the SCSO's description of the work anticipated. The Board directed the SCSO to reduce the estimated fee to \$142.47, which reflected four hours of anticipated work with one hour provided free of charge. The Board noted that if the actual work exceeded four hours, it could properly charge the complainant for the overage.

- **PIACB 25-31 (Feb. 20, 2025)**

Custodian: Maryland Coordination and Analysis Center / Eastern Shore Information Center ("MCAC/ESIC")

Issue: The complainant requested records about herself from MCAC/ESIC and MCAC/ESIC advised that no responsive records were found. The complainant alleged various violations, including that MCAC/ESIC were improperly withholding responsive records.

Decision: The Board found no violation of the PIA. MCAC/ESIC provided information about the searches for responsive records with its response to the complaint. The Board determined that MCAC/ESIC used sufficient search terms and focused the search on where responsive records were likely to be located. The Board also noted that it did not have jurisdiction to decide any of the allegations, including, e.g., violations of the complainant's rights under the First, Fourth, Fifth, and Fourteenth Amendments to the United States Constitution, and violations of the federal False Claims Act.

- **PIACB 25-32* (Feb. 21, 2025)**

Applicant: Cindy Benson (aka James Alford)

Custodian/Complainant: Baltimore Police Department (“BPD”)

Issue: The BPD alleged that multiple PIA requests, including one sent by applicant Cindy Benson, were frivolous, vexatious, and made in bad faith under GP § 4-1A-04(b). The requests all sought records that traced back to legal entanglements between James Alford and another individual, including records concerning police misconduct complaints against officers investigating James Alford's claims.

Decision: The Board reviewed a record that included the PIA requests, correspondence sent to the BPD from the various email accounts, and responses to the complaint from Cindy Benson, John Davis, Rachel Garcia, and Phil Garcia—including two emails signed by Cindy Benson but sent from the email account associated with John Davis. After review, the Board found that the PIA requests were vexatious and in bad faith. The Board determined that the PIA requests represented a continuation of the patterns found vexatious and in bad faith in PIACB 24-29 (Mar. 29, 2024) and PIACB 24-106 (Sept. 26, 2024), and that they all had a common thread, which was James Alford and his district court matters. The Board also found that the BPD generally approached the PIA requests in good faith, while many of the PIA requests contained evidence of bad faith, such as bald and conclusory allegations of wrongdoing. The Board ordered that the BPD may ignore the PIA requests identified in its complaint as

well as subsequent or future PIA requests for the same type of Alford-related records.

Appeal: Cindy Benson (aka James Alford) appealed the Board’s decision to the Circuit Court for Baltimore City. *See In the Matter of Cindy Benson*, Case No. C-24-CV-25-002006 (Cir. Ct. Balt. City). The matter was ultimately consolidated with approximately thirty-two other actions initiated by James Alford under his various pseudonyms. *See In the Matter of William Hernandez*, Case No. C-24-CV-24-000551 (Cir. Ct. Balt. City). The case was dismissed with prejudice after a hearing. The circuit court’s ruling is pending appeal in the Appellate Court of Maryland under case number ACM-REG-0685-2025.

- **PIACB 25-33 (Feb. 14, 2025)**

Custodian: Montgomery County Police Department (“MCPD”)

Issue: The complainant alleged that the MCPD improperly redacted police body worn camera footage responsive to a PIA request for records generated in connection with a police encounter at the complainant’s home. The MCPD redacted footage of the police officer’s interaction with the complainant’s father, citing GP § 4-351(b)(7) and contending that disclosure of the footage would endanger the life or physical safety of an individual.

Decision: The Board requested and received the unredacted footage from the MCPD for confidential review. After that review, the Board concluded that the MCPD had not demonstrated that § 4-351(b)(7) applied. Noting that the complainant was a person in interest, the Board found that there was insufficient evidence that disclosure to the complainant would pose a risk of danger to the complainant’s father. The police encounter had occurred eighteen months prior and MCPD provide no information about any subsequent incidents or other information that might suggest that the complainant was a danger to himself, his father, or others. Moreover, the footage that was disclosed revealed the complainant to be calm and composed when interacting with the police officer, and nothing in the redacted footage indicated that the complainant was dangerous or had a propensity for violence (in fact, the conversation suggested that the opposite was true). The Board thus directed the MCPD to disclose the unredacted video footage to the complainant.

- **PIACB 25-34* (Mar. 7, 2025)**

Applicants: James Alford et al.

Custodian/Complainant: Board of Professional Counselors and Therapists (“BPCT”)

Issue: The BPCT alleged that James Alford sent numerous frivolous, vexatious, and bad faith PIA requests from numerous different email accounts under numerous different names. The PIA requests all sought records concerning a BPCT licensee, with whom James Alford had several legal entanglements beginning in 2022.

Decision: Consistent with its findings in PIACB 24-29 (Mar. 29, 2024), PIACB 24-106 (Sept. 26, 2024), and PIACB 25-32 (Feb. 21, 2025), which all involved PIA requests that could be traced back to James Alford in some way, the Board concluded that the PIA requests identified in the BPCT’s complaint were vexatious and in bad faith. The Board found that the same deception—i.e., either one person (James Alford) masquerading as many or, at the very least, in concert with others—was present and indicative of bad faith. The Board also found that the PIA requests were similarly intended to harass or annoy the BPCT. The Board noted that it could not make conclusive determinations regarding the requesters’ primary subjective intent, but that it was hard to avoid the conclusion that the PIA requests were vexatious in nature, especially when considered alongside the BPCT’s efforts to work with the requesters, which the Board took as evidence of the BPCT’s good faith. The Board ordered that the BPCT may ignore the PIA requests identified in its complaint as well as subsequent or future PIA requests for the same type of Alford-related records.

Appeal: Steven Brown (aka James Alford) appealed the Board’s decision to the Circuit Court for Baltimore City. *See In the Matter of Steven Brown*, Case No. C-24-CV-25-003016 (Cir. Ct. Balt. City). The matter was ultimately consolidated with approximately thirty-two other actions initiated by James Alford under his various pseudonyms. *See In the Matter of William Hernandez*, Case No. C-24-CV-24-000551 (Cir. Ct. Balt. City). The case was dismissed with prejudice after a hearing. The circuit court’s ruling is pending appeal in the Appellate Court of Maryland under case number ACM-REG-0685-2025.

- **PIACB 25-35 (Feb. 21, 2025)**

Custodian: Town of Keedysville (“Town”)

Issue: The complainant alleged that the Town improperly redacted information in invoices sent to the Town by its attorney. The Town claimed that the

information was protected by the attorney-client and executive privileges, and therefore exempt under GP § 4-301(a)(1).

Decision: The Board reviewed unredacted versions of the attorney invoices, which the Town provided to the Board in confidence, and determined that some of the information was not protected by either the attorney-client or the executive privilege. As to the former, the Board found that information that constituted a “mere description” of the work performed by the attorney was not, under Maryland case law, considered a protected attorney-client communication. The Board also found that some of the redactions shielded information that was already in the public record, such as the fact that a certain attorney represented the Town in certain litigation. As to the executive privilege, the Board questioned whether the constitutional form was available at the local and municipal level, but ultimately found that, even if it was, the redacted information did not fall within its scope. The Board ordered the Town to remove certain redactions and produce those invoices to the complainant.

Appeal: The Town appealed the Board’s decision to the Circuit Court for Washington County. *See In the Matter of Town of Keedysville*, Case No. C-21-CV-25-000124 (Cir. Ct. Wash County). The court will hold a hearing on January 26, 2026.

- **PIACB 25-36* (Mar. 20, 2025)**

Custodian: Board of Professional Counselors and Therapists (“BPCT”)

Issue: The complainant alleged that the BPCT improperly denied inspection of records concerning a court matter.

Decision: The Board dismissed the complaint as moot after finding that the PIA request fell within the scope of the requests contemplated by the Board’s order in PIACB 25-34 (Mar. 7, 2025). In that decision, the Board determined that a pattern of requests sent from numerous email accounts associated with James Alford was vexatious and in bad faith. The Board ordered that the BPCT may ignore the PIA requests identified in its complaint, as well as any subsequent or future requests that were substantially the same.

- **PIACB 25-37* (Mar. 11, 2025)**

Custodian: Baltimore Police Department (“BPD”)

Issue: The complainant alleged that the BPD failed to produce all records responsive to a PIA request for records related to a police complaint.

Decision: The Board dismissed the complaint as moot after finding that the PIA request fell within the scope of the requests contemplated by the Board's order in PIACB 25-32 (Feb. 21, 2025). In that decision, the Board determined that a pattern of requests sent from numerous email accounts associated with James Alford was vexatious and in bad faith. The Board ordered that the BPD may ignore the PIA requests identified in its complaint, as well as any subsequent or future requests that were substantially the same.

- **PIACB 25-38* (Mar. 20, 2025)**

Custodian: Board of Professional Counselors and Therapists ("BPCT")

Issue: The complainant alleged that the BPCT failed to produce all records responsive to a PIA request for records about a specific licensee.

Decision: The Board dismissed the complaint as moot after finding that the PIA request fell within the scope of the requests contemplated by the Board's order in PIACB 25-34 (Mar. 7, 2025). In that decision, the Board determined that a pattern of requests sent from numerous email accounts associated with James Alford was vexatious and in bad faith. The Board ordered that the BPCT may ignore the PIA requests identified in its complaint, as well as any subsequent or future requests that were substantially the same.

- **PIACB 25-39* (Mar. 20, 2025)**

Custodian: Board of Professional Counselors and Therapists ("BPCT")

Issue: The complainant alleged that the BPCT improperly denied a PIA request for records related to a court matter.

Decision: The Board dismissed the complaint as moot after finding that the PIA request fell within the scope of the requests contemplated by the Board's order in PIACB 25-34 (Mar. 7, 2025). In that decision, the Board determined that a pattern of requests sent from numerous email accounts associated with James Alford was vexatious and in bad faith. The Board ordered that the BPCT may ignore the PIA requests identified in its complaint, as well as any subsequent or future requests that were substantially the same.

- **PIACB 25-40* (Mar. 20, 2025)**

Custodian: Board of Professional Counselors and Therapists (“BPCT”)

Issue: The complainant alleged that the BPCT failed to produce all records responsive to two PIA requests for records concerning a specific licensee.

Decision: The Board dismissed the complaint as moot after finding that the PIA requests fell within the scope of the requests contemplated by the Board’s order in PIACB 25-34 (Mar. 7, 2025). In that decision, the Board determined that a pattern of requests sent from numerous email accounts associated with James Alford was vexatious and in bad faith. The Board ordered that the BPCT may ignore the PIA requests identified in its complaint, as well as any subsequent or future requests that were substantially the same.

- **PIACB 25-41* (Apr. 4, 2025)**

Custodian: Maryland Department of Health (“MDH”)

Issue: The complainant alleged that MDH failed to respond to a PIA request for records concerning a specific licensee within the required time limitations.

Decision: The Board found no violation of the PIA, as MDH forwarded the PIA request to the licensing body, who was the custodian of the records requested. The licensing body then sent a timely ten-day letter under GP § 4-203(b), which provided an estimate of the range of fees.

- **PIACB 25-42* (Mar. 20, 2025)**

Custodian: Board of Professional Counselors and Therapists (“BPCT”)

Issue: The complainant alleged that the BPCT improperly inspection of records of email communications concerning a specific licensee.

Decision: The Board dismissed the complaint as moot after finding that the PIA request fell within the scope of the requests contemplated by the Board’s order in PIACB 25-34 (Mar. 7, 2025). In that decision, the Board determined that a pattern of requests sent from numerous email accounts associated with James Alford was vexatious and in bad faith. The Board ordered that the BPCT may ignore the PIA requests identified in its complaint, as well as any subsequent or future requests that were substantially the same.

- **PIACB 25-43* (Mar. 11, 2025)**

Custodian: Baltimore Police Department (“BPD”)

Issue: The complainant alleged that the BPD improperly denied inspection of records of email communications concerning a specific criminal complaint.

Decision: The Board dismissed the complaint as moot after finding that the PIA request fell within the scope of the requests contemplated by the Board’s order in PIACB 25-32 (Feb. 21, 2025). In that decision, the Board determined that a pattern of requests sent from numerous email accounts associated with James Alford was vexatious and in bad faith. The Board ordered that the BPD may ignore the PIA requests identified in its complaint, as well as any subsequent or future requests that were substantially the same.

- **PIACB 25-44* (Mar. 20, 2025)**

Custodian: Board of Professional Counselors and Therapists (“BPCT”)

Issue: The complainant alleged that the BPCT improperly denied inspection of records related to a complaint against a licensee.

Decision: The Board dismissed the complaint as moot after finding that the PIA request fell within the scope of the requests contemplated by the Board’s order in PIACB 25-34 (Mar. 7, 2025). In that decision, the Board determined that a pattern of requests sent from numerous email accounts associated with James Alford was vexatious and in bad faith. The Board ordered that the BPCT may ignore the PIA requests identified in its complaint, as well as any subsequent or future requests that were substantially the same.

- **PIACB 25-45 (Mar. 14, 2025)**

Custodian: Town of Eagle Harbor (“Town”)

Issue: The complainant sent two PIA requests to the Town asking for certain financial records, records of a land survey that the Town conducted, and records concerning an apparent decision to hire a Town commissioner to write grants. The Town produced some records but stated that it did not possess others, or that the records did not exist. The complainant disputed the Town’s representation regarding the non-existent records or records not in the Town’s possession.

Decision: The Board requested additional information about how the Town searched for records, as well as information about whether the Town had copies of certain specific financial records. After receiving that additional information from the Town, the Board concluded that there were responsive records that the Town did not produce, specifically additional records related to the land survey, certain invoices, and copies of checks. The Board thus directed the Town to produce those records to the complainant. The Board also determined that there were other records for which the Town was not the custodian, namely financial records for projects funded by other entities, including the State Department of Natural Resources and Prince George's County.

- **PIACB 25-46 (Mar. 26, 2025)**

Custodian: Department of Public Safety and Correctional Services ("DPSCS")

Issue: The complaint involved two PIA requests that the complainant sent to DPSCS, one asking for information about how DPSCS keeps records related to employees with alleged ties to extremist groups and the other asking for a variety of records ranging from the cost of bottled water to records concerning policies DPSCS had promoted to reduce gang recruitment. DPSCS did not respond to the first request and produced some records in response to the second. The complainant alleged that DPSCS improperly denied inspection of public records.

Decision: As to the first PIA request, the Board determined that DPSCS did not respond and directed DPSCS to conduct a search for any responsive records, noting that, if no responsive records were found, it would behoove DPSCS to explain to the complainant where it searched and how. As to the second PIA request, the Board found that DPSCS had constructively denied inspection of certain records by failing to conduct a reasonable and adequate search for those records. The Board directed DPSCS to conduct remedial searches and provided some guidance as to how those searches might be conducted.

- **PIACB 25-47 (Apr. 11, 2025)**

Custodian: Maryland State Department of Education ("MSDE")

Issue: The complainant challenged MSDE's position that it would need to create new records to respond to a PIA request for certain unduplicated data regarding school suspensions, disaggregated by race and disability status. The complainant suggested that the Board hold an informal conference and alleged that an MSDE

guidance document indicated that MSDE reports the requested data to local school systems in the manner requested.

Decision: The Board found no violation of the PIA. After reviewing the record and holding an informal conference to ask questions and receive additional information from the parties, the Board determined that the complainant's PIA request required MSDE to analyze, summarize, and perform calculations with the student discipline data and produce a very specific type of report that MSDE does not already produce.

Appeal: The complainant appealed the Board's decision to the Circuit Court for Baltimore City. *See In the Matter of Levi Bradford*, Case No. C-24-CV-25-003665. After the appeal was filed, the petitioner voluntarily dismissed the appeal.

- **PIACB 25-48* (Mar. 20, 2025)**

Custodian: Board of Professional Counselors and Therapists ("BPCT")

Issue: The complainant alleged that the BPCT improperly denied inspection of records concerning a licensee.

Decision: The Board dismissed the complaint as moot after finding that the PIA request fell within the scope of the requests contemplated by the Board's order in PIACB 25-34 (Mar. 7, 2025). In that decision, the Board determined that a pattern of requests sent from numerous email accounts associated with James Alford was vexatious and in bad faith. The Board ordered that the BPCT may ignore the PIA requests identified in its complaint, as well as any subsequent or future requests that were substantially the same.

- **PIACB 25-49* (Mar. 11, 2025)**

Custodian: Baltimore Police Department ("BPD")

Issue: The complainant alleged that the BPD failed to respond to a PIA request within the required time limitations.

Decision: The Board dismissed the complaint as moot after finding that the PIA request fell within the scope of the requests contemplated by the Board's order in PIACB 25-32 (Feb. 21, 2025). In that decision, the Board determined that a pattern of requests sent from numerous email accounts associated with James

Alford was vexatious and in bad faith. The Board ordered that the BPD may ignore the PIA requests identified in its complaint, as well as any subsequent or future requests that were substantially the same.

Appeal: The complainant appealed the Board’s decision to the Circuit Court for Baltimore City. *See In the Matter of Phil Garcia*, Case No. C-24-CV-25-001664 (Cir. Ct. Balt. City). The matter was ultimately consolidated with approximately thirty-two other actions initiated by James Alford under his various pseudonyms. *See In the Matter of William Hernandez*, Case No. C-24-CV-24-000551 (Cir. Ct. Balt. City). The case was dismissed with prejudice after a hearing. The circuit court’s ruling is pending appeal in the Appellate Court of Maryland under case number ACM-REG-0685-2025.

- **PIACB 25-50 (Mar. 26, 2025)**

Custodian: Prince George’s County Public Schools (“PGCPS”)

Issue: The complainant disputed redactions that PGCPS applied to the hourly rates in invoices for work done by a private attorney for the school system. PGCPS claimed that the hourly rate information was exempt under GP § 4-335, which requires a custodian to deny inspection of confidential commercial or financial information that is provided by or obtained from a person or governmental unit.

Decision: The Board determined that PGCPS improperly redacted the attorney’s hourly rate information and therefore violated the PIA. The Board found that the only information before it regarding whether the law firm both customarily and actually treated its rate information as private was counsel for PGCPS’s representations that the firm was unwilling to waive its right to protect that information under the PIA. The Board concluded that these representations amounted to a mere request for confidentiality, which was insufficient for PGCPS to meet its burden to show that the exemption applied.

- **PIACB 25-51 (Apr. 10, 2025)**

Custodian: Baltimore City Sheriff’s Office (“BCSO”)

Issue: The complainant alleged that the BCSO failed to respond to a PIA request within the required time limitations.

Decision: The Board found that the BCSO violated GP § 4-203(a) by failing to respond to the complainant's PIA request promptly, but in no longer than thirty days after it received the complainant's PIA request. Because the BCSO responded to the PIA request while the complaint was pending, the Board ordered no further relief.

- **PIACB 25-52* (Mar. 20, 2025)**

Custodian: Board of Professional Counselors and Therapists ("BPCT")

Issue: The complainant alleged that the BPCT improperly denied inspection of records concerning a licensee.

Decision: The Board dismissed the complaint as moot after finding that the PIA request fell within the scope of the requests contemplated by the Board's order in PIACB 25-34 (Mar. 7, 2025). In that decision, the Board determined that a pattern of requests sent from numerous email accounts associated with James Alford was vexatious and in bad faith. The Board ordered that the BPCT may ignore the PIA requests identified in its complaint, as well as any subsequent or future requests that were substantially the same.

- **PIACB 25-53 (Apr. 21, 2025)**

Custodian: Allegany County ("County")

Issue: The complainant disputed redactions applied to an incident report related to a 2015 investigation that involved alleged misconduct by law enforcement officers. In addition to redacting information about the victim and other witnesses, the County redacted information about certain suspects, citing Maryland expungement law and GP § 4-351(b)(4), which relates to disclosure of information in law enforcement investigatory records that would cause an unwarranted invasion of personal privacy.

Decision: After reviewing a partially unredacted version of the incident report (the redactions to information about the victim and witnesses remained), the Board concluded that the County failed to justify the redactions to the information about the additional suspects. First, after considering the language of § 10-103.1 of the Criminal Procedure Article, in conjunction with surrounding provisions, the Board determined that that expungement law did not apply to the incident report. Thus, the redactions were not required by GP § 4-301(a)(2), which requires a custodian to deny inspection of records or information where

inspection would be contrary to a State statute. As to the County's claim that GP § 4-351 applied, the Board concluded that, though the other suspects' privacy interests were a valid consideration, the public interest counseled in favor of disclosure of the records. In reaching that conclusion, the Board considered recent changes to the law governing disclosure of records related to alleged police misconduct, including that one purpose of those changes was to promote disclosure of information about how thoroughly and meaningfully such allegations are investigated. Thus, the Board directed the County to disclose the incident report to the complainant with redactions only to the identifying information of the victim and witnesses.

- **PIACB 25-55 (Apr. 11, 2025)**

Custodian: Department of Public Safety and Correctional Services ("DPSCS")

Issue: The complainant alleged that DPSCS improperly denied inspection of certain correspondence from an Assistant Attorney General. DPSCS responded that the correspondence did not exist.

Decision: The Board concluded that DPSCS conducted an insufficient search for responsive records and therefore constructively denied the complainant's PIA requests. Rather than search its electronic and hardcopy files, DPSCS looked for it in the complainant's base file and then asked the Assistant Attorney General whether she recalled the correspondence identified by the complainant. After the Assistant Attorney General stated that she sent no such correspondence, DPSCS stated that the records did not exist. While the Board did not doubt the Assistant Attorney General's recollection, it noted that memory is not always reliable and that DPSCS was obligated to do more to search for responsive records. The Board thus directed DPSCS to conduct a search of email records and provided guidance as to parameters. The Board ordered DPSCS to produce any non-exempt responsive records to the complainant.

- **PIACB 25-56 (Apr. 28, 2025)**

Custodian: Office of the State's Attorney for Harford County ("HCSAO")

Issue: The complainant alleged that the HCSAO improperly denied inspection of certain records related to the HCSAO's referral of illegal wiretapping allegations to the Office of the State Prosecutor ("OSP"). The HCSAO denied inspection under GP §§ 4-344 and 4-351(a)(2), which permit a custodian to deny inspection of certain pre-decisional, deliberative records and investigative

records, respectively, and GP § 4-301(a)(2), which requires a custodian to deny inspection of records if inspection would be contrary to a State statute.

Decision: The Board requested and reviewed a descriptive index of the records that the HCSAO withheld. After the HCSAO provided the index, it disclosed certain responsive records that it determined were not exempt. However, the HCSAO continued to deny inspection of the other records. The Board determined that, as to the discretionary exemptions (GP §§ 4-344 and 4-351(a)(2)), the HCSAO had failed to show that inspection would be contrary to the public interest, as it was required to do under GP § 4-343 for the exemptions to apply. The Board also concluded that GP § 4-301(a)(2) did not apply because the records were not covered by § 14-108(b) of the Criminal Procedure Article, which governs OPS reports. The Board directed the HCSAO to disclose the remaining responsive records to the complainant.

Appeal: The HCSAO appealed the Board's decision to the Circuit Court for Harford County. *See In the Matter of State's Attorney for Harford County*, Case No. C-12-CV-25-000438 (Cir. Ct. Harford County). The appeal is pending.

- **PIACB 25-57 (May 7, 2025)**

Custodian: Harford County ("County")

Issue: The complainant requested certain records concerning County property, including agreements and email correspondence. The County produced agreements but declined to search for email records unless the complainant assured the County that doing so would not result in a criminal investigation or criminal charges of wiretapping. The complainant alleged that the County improperly denied inspection of responsive email records.

Decision: The Board dismissed the complaint as moot because, while the complaint was pending, the County searched for and produced all non-privileged records, and the complainant did not dispute the County's representation to this effect. Thus, the Board could not provide any effective remedy.

- **PIACB 25-61 (Apr. 28, 2025)**

Custodian: Wicomico County Public Schools ("WCPS")

Issue: The complainant alleged that WCPS failed to respond to a PIA request for certain contract bids within the required time limitations. WCPS directed the

complainant to sent the request to a specific person and advised that it would be four to six weeks before the request could be fulfilled.

Decision: Because the complainant requested dispute resolution assistance through the Public Access Ombudsman the day after WCPS redirected his PIA request, and because, under GP § 4-203(d)(2), the time for responding to a PIA request is extended while a dispute is pending with the Ombudsman or our Board, the Board could not find that WCPS violated the time limitations in the PIA. However, the Board provided certain guidance regarding WCPS's response to the complainant, including the observation that, under Maryland case law, it may not have been appropriate for the WCPS employee who received the complainant's PIA request to redirect him to another person in the agency, rather than handle or forward the request themselves. Notably, by the time the complainant filed his complaint with the Board, WCPS had provided the responsive records.

- **PIACB 25-62 (Apr. 28, 2025)**

Custodian: Baltimore County Department of Environmental Protection & Sustainability ("DEPS")

Issue: The complainant alleged that DEPS failed to respond to a PIA request, which was for records related to the installation of an outfall point on or near his property, within the required time limitations.

Decision: DEPS acknowledged that it failed to timely respond to the PIA request, thus the Board found that DEPS violated GP § 4-203(a), which requires a custodian to respond promptly and in no more than thirty days after receiving a PIA request. Because DEPS provided a formal response while the complaint was pending, the Board ordered no further relief.

- **PIACB 25-63 (May 20, 2025)**

Custodian: Anne Arundel County Police Department ("AACPD")

Issue: The complainant challenged the AACPD's denial of inspection of certain video footage of the Francis Scott Key Bridge Collapse taken from cameras located in Fort Smallwood Park. The AACPD cited GP § 4-351(a)(2) as grounds for the denial, stating that the investigation into the bridge collapse was still open and ongoing and that disclosure of the footage would therefore be contrary to the public interest.

Decision: The Board requested an affidavit that detailed factual information regarding the status of the investigation and the video footage's part in the investigation. After receipt of the affidavit, the Board concluded that the AACPD had met its burden to justify the discretionary denial of inspection of the footage at the time, i.e., in November 2024. However, the Board noted evidence that the investigations into the bridge collapse were winding down and suggested that the AACPD may need to do more to justify discretionary denial should the complainant request the video footage in the future.

- **PIACB 25-64 (May 28, 2025)**

Custodian: Prince George's County Fire & Emergency Medical Services ("PGFEMS")

Issue: The complainant asked for contracts and other agreements concerning the provision of fire and emergency services for events at what was then called FedEx Field in Landover, Maryland. PGFEMS produced an agreement but denied inspection of a document called FedEx Field Stadium Public Safety Operations under GP §§ 4-335 and 4-352, which cover confidential commercial and financial information and information related to emergency management, respectively. The complainant disputed the application of these exemptions.

Decision: A majority of the Board found the PGFEMS properly withheld the Public Safety Operations document under GP § 4-335. Before reaching that conclusion, the Board reviewed a copy of the document, which PGFEMS provided to the Board in confidence. After review, a majority of the Board concluded that the Public Safety Operations document contained proprietary commercial information that FedEx Field held close and did not publicly disclose. Board members Samuel Encarnacion and Debra Lynn Gardner disagreed, stating their view that PGFEMS had failed to demonstrate that the Public Safety Operations document consisted of information that PGFEMS obtained from an entity outside PGFEMS, and that the record tended to support a finding that, at the least, the information was generated with PGFEMS's input. Thus, these Board members found that GP § 4-335 did not apply. Though these Board members would have directed PGFEMS to disclose the document, they would have also found that certain information fell within the scope of GP § 4-352 and was therefore subject to redaction before disclosure of the document.

- **PIACB 25-67 (June 11, 2025)**

Custodian: Prince George's County Police Department ("PGPD")

Issue: The complainant alleged that the PGPD improperly denied his PIA request for records related to a financial reward allegedly paid, through Prince George's County Crime Solvers, to a witness who testified against the complainant in a criminal trial. The PGPD stated that it had no records responsive to the request and that Crime Solvers was not subject to the PIA.

Decision: After requesting and receiving more information from the PGPD about its search for responsive records and the nature of its relationship to Crime Solvers, the Board found that the PGPD conducted an insufficient search for records and therefore constructively denied the PIA request. The Board directed the PGPD to conduct an additional search using the name of the person to whom the reward was allegedly paid as well as the indictment number connected to the alleged reward. Because it was not squarely presented by the complaint, the Board did not resolve whether Crime Solvers was subject to the PIA, but noted that it was likely a close question.

- **PIACB 25-68 (June 30, 2025)**

Custodian: Anne Arundel County Police Department ("AACPD")

Issue: The complainant requested records related to his application for a position within the AACPD, including material related to the background investigation the AACPD conducted. The AACPD initially denied inspection of all responsive records, stating that the complainant had agreed that no information about the background investigation would be disclosed to him. The AACPD later produced a redacted version of notes exchanged while his application was considered. The AACPD applied the redactions under GP §§ 4-344 and 4-351, discretionary exemptions that allow withholding of deliberative, pre-decisional material and certain investigative records, respectively, if disclosure would be contrary to the public interest. Regarding the latter in particular, the AACPD claimed that disclosure would reveal confidential sources as well as investigative techniques and procedures. The AACPD also withheld records related to the background investigation in their entireties under GP § 4-351. The complainant alleged that the AACPD improperly denied inspection of public records, including records that he alleged the AACPD failed to find and produce.

Decision: After review of the records withheld entirely and an unredacted version of the records produced in redacted form, the Board found that the

AACPD improperly applied the exemptions to some of the records. First, the Board noted that, because the complainant was a person in interest, the AACPD's burden to justify application of GP § 4-351 was heavier. Given that heavier burden, the Board found that the AACPD did not justify application of GP § 4-351(b)(4) (related to confidential sources) because it did not provide independent evidence that the sources were provide assurances of confidentiality. The Board also concluded that, though the AACPD justified application of GP § 4-351(b)(5) to some of the records and information, it improperly applied the exemption to certain records, given their source. The Board found no improper application of GP § 4-344 to redact some of the information in the notes, as that information was both pre-decisional and deliberative, and the AACPD sufficiently demonstrated that disclosure would compromise decision-making. In addition, after considering an affidavit from the AACPD's records custodian regarding the search for responsive records, the Board concluded that the AACPD conducted an unreasonable and inadequate search for records. The Board directed the AACPD to conduct additional searches of email accounts and text messages.

- **PIACB 25-69 (May 22, 2025)**

Custodian: Cecil County Department of Social Services ("CCDSS")

Issue: The complainant disputed CCDSS's denial of inspection of her own foster care records, including medical records. CCDSS cited GP §§ 4-301 and 4-307 as grounds for the denial, stating that GP § 4-301 applied because provisions in the Human Services Article made the records confidential. In addition, GP § 4-307, which requires a custodian to deny inspection of records related to welfare for an individual, applied and contained no exception for a person in interest.

Decision: The Board found no violation of the PIA. The Board determined that GP § 4-301(a)(2) applied to the records because a State statute—specifically, § 1-201 of the Human Services Article—prevents disclosure of information concerning an applicant for or recipient of child welfare services if the information is derived from the records of the State. Though that provision allows disclosure under certain circumstances, including with a court order, it makes no exception for disclosure to the welfare applicant or recipient. Similarly, GP § 4-307 broadly precludes disclosure of records related to welfare for an individual with no exception for a person in interest, which stands in contrast to other exemptions in the PIA such as GP §§ 4-311 or § 4-336, which specifically require disclosure to a person in interest. The Board noted that

CCDSS disclosed certain records to the complainant, but found that disclosure was authorized under § 5-525(j)(7) of the Family Law Article, which requires the Social Services Administration to adopt regulations that ensure that children in foster care receive certain documents upon emancipation. CCDSS thus disclosed the documents identified in the regulations adopted pursuant to that provision.

- **PIACB 25-70 (May 9, 2025)**

Custodian: University System of Maryland (“USM”)

Issue: The complainant alleged that USM violated the PIA by failing to respond to a PIA request, which asked for a variety of records involving USM’s Board of Regents that related to graduate students and labor unions, within the required time limitations.

Decision: USM did not respond to the complaint. Thus, based on the complainant’s submissions, the Board found that USM violated GP § 4-203(a) of the PIA by failing to respond to the complainant’s PIA request promptly, and in no longer than thirty days after receiving the PIA request. Considering the length of the delay and the fact that USM did not engage with the Ombudsman or Board process, the Board exercised its discretion to order that USM waive the costs associated with preparing the response to the PIA request.

- **PIACB 25-71 (June 6, 2025)**

Custodian: Maryland Department of Natural Resources (“DNR”)

Issue: The complainant alleged that DNR failed to respond to PIA requests within the required time limitations or denied inspection without a valid reason. DNR took the position, regarding one PIA request, that because circuit and appellate courts ruled that DNR performed a reasonable search for responsive records, DNR had no obligation to respond. Regarding another PIA request, DNR took the position that, because its allegation that the complainant submitted frivolous, vexatious, and bad faith PIA requests was pending judicial review, it also had no obligation to respond to that request.

Decision: After review of a recent opinion from the Appellate Court of Maryland, the Board found that that court ruled that DNR had performed a reasonable and adequate search for records responsive to a PIA request for certain specific letters and agreements. DNR had not located those specific

records, but the Appellate Court observed that production of each and every responsive records was not the standard by which a search is judged. Using the correct standard—i.e., whether the custodian’s search was sufficiently designed to locate responsive records—the Appellate Court determined that DNR’s search for those records was reasonable under the PIA. The Board concluded that it could not issue a decision that was inconsistent with the Appellate Court’s ruling and therefore found no violation of the PIA. As to the second PIA request at issue, the Board did find that DNR violated GP § 4-203(a) by failing to respond to the PIA request promptly and in no more than thirty days after receipt of the request. In doing so, the Board declined to adopt DNR’s position that its petition for judicial review of PIACB 24-114 (Oct. 25, 2024)—in which a majority of our Board found that DNR had not met its burden to prove that PIA requests sent by the complainant were frivolous, vexatious, or in bad faith—relieved it of its obligation to respond to that specific request. The Board therefore directed DNR to respond and produce any non-exempt public records promptly, and in no more than ten business days from receipt of the Board’s decision and order.

Appeal: The complainant appealed the Board’s decision to the Circuit Court for Washington County. *See In the Matter of Justin Holder*, Case No. C-21-CV-25-000339 (Cir. Ct. Wash. County). The court will hold a hearing on December 10, 2025.

II.

RECOMMENDATIONS FOR IMPROVEMENTS TO THE PIA

Section 4-1A-04(c)(3) of the General Provisions Article requires the Board to “make recommendations to the General Assembly for improvements to [the PIA].” In addition, the Board’s mandatory annual report must “recommend any improvements to [the PIA.]” GP § 4-1A-04(d)(2)(iv).

Last year, the Board voted to make three specific recommendations in its annual report for FY 2024: (1) that the General Assembly amend GP § 4-1A-04(a) of the PIA to authorize the Board to review a custodian’s denial of a request for a fee waiver; (2) that the General Assembly amend GP § 4-206(e) of the PIA to reduce a custodian’s discretion to deny a public interest fee waiver when properly requested; and (3) that the General Assembly amend GP § 4-206(e) of the PIA to create an indigency fee waiver process tied to nationally recognized standards and that generally requires that such a waiver be granted. As far as the Board is aware, no action has been taken as to any of these recommendations.

As in FY 2024, the notice for the Board's FY 2025 annual meeting asked those with ideas for improvements to the PIA to consider submitting those ideas to the Board prior to the annual meeting. The Board received twelve proposed recommendations, all from Laura Anderson Wright, Senior Associate General Counsel for University of Maryland, College Park. Though all Board members reviewed and considered Ms. Anderson Wright's recommendations individually, none of these recommendations were moved for adoption by the full Board.⁸

After discussion at its annual meeting on August 21, 2025, and a follow-up meeting on September 19, 2025,⁹ the Board voted to make three specific recommendations in its FY 2025 annual report. Those recommendations are as follows:

Recommendation 1: That the General Assembly amend GP § 4-101(k)(1) of the PIA to expand the definition of "public record" to include the original or any copy of any documentary material in any form that is made by a unit or an instrumentality of the State or of a political subdivision or received by the unit or instrumentality, *including its agents*, in connection with the transaction of public business.

Board Chair Sareesh Rawat moved this recommendation. The Chair explained that such expansion would help address certain situations in which documents that would otherwise be considered public records are unavailable to requesters under the PIA.

A majority (3-0) of the Board voted to adopt this recommendation. Chair Rawat, Ms. Gardner, and Mr. Johnson voted in favor of the recommendation; Board member Samuel Encarnacion did not attend the annual meeting and therefore did not cast a vote.

Recommendation 2: That the General Assembly amend GP § 4-1A-04(a) of the PIA to expand the Board's jurisdiction to include authority to review a custodian's denial of a request for a fee waiver under GP § 4-206(e).

Board Member Debra Gardner moved this recommendation. Ms. Gardner noted that this recommendation has been included in the Board's previous annual reports. Chair

⁸ Due to their length, the Board does not include Ms. Anderson Wright's recommendations in the annual report. A copy is available upon request to the Board. In addition, Board Chair Sareesh Rawat read those recommendations at the annual meeting, which can be viewed on the Board's website as indicated *infra*, note 9.

⁹ To view these meetings, please visit the Board's "Meetings & Minutes" page: <https://oag.maryland.gov/resources-info/Pages/piacb-meetings.aspx> (last visited Sept. 11, 2025).

Rawat observed that the Board's case load was down this fiscal year as compared to last fiscal year and that the Public Access Unit now had additional staff, and thus expressed his view that the Board could handle the additional workload that expanded jurisdiction might create.

A majority (3-0) of the Board voted to adopt this recommendation. Chair Rawat, Ms. Gardner, and Mr. Johnson voted in favor of the recommendation; Board member Samuel Encarnacion did not attend the annual meeting and therefore did not cast a vote.

Recommendation 3: That the General Assembly amend GP § 4-205(c)(5) to add the following language (in italics), "If a public record exists in a searchable and analyzable electronic format, the action of a custodian providing a portion of the public record in a searchable and analyzable electronic format does not constitute creating a new public record, *even if the request would require data compilation, extraction, querying, statistical aggregation, or any other form of data manipulation the database program is capable of performing to produce the record.*"

Board Member Debra Gardner moved this recommendation.¹⁰ Ms. Gardner noted that the provisions of the PIA that deal with electronic records appear to be lagging behind technology, at least as far as those provisions have been interpreted by the courts and in Board decisions. This amendment would clarify that, so long as a database has the capability, compiling and analyzing data does not constitute the creation of a new record.

A majority (3-0) of the Board voted to adopt this recommendation. Chair Rawat, Ms. Gardner, and Mr. Johnson voted in favor of the recommendation; Board member Samuel Encarnacion did not attend the September 19, 2025, meeting and therefore did not cast a vote.

¹⁰ This recommendation was formally moved at the Board's September 19, 2025, follow-up meeting, which can be viewed as instructed *supra*, note 9.

Appendix A.

REPORT FROM THE PUBLIC ACCESS OMBUDSMAN

APPENDIX A

Report of the Public Access Ombudsman

FY 2025

Activities of the Ombudsman

The General Assembly created the Office of the Public Access Ombudsman (“Office” or “Ombudsman”) along with the Public Information Act Compliance Board (“Board” or “PIACB”) in 2015. *See* 2015 Md. Laws, ch. 135. By statute, the Ombudsman is housed within the Office of the Attorney General (“OAG”) and is supported by the same OAG staff that support the PIACB.

The Ombudsman’s primary duty is to make reasonable attempts to resolve disputes between records custodians and applicants seeking public records under the Maryland Public Information Act (“PIA” or “Act”). Typically, this is accomplished through voluntary, non-binding, and confidential mediation. The Ombudsman has broad authority to try to resolve a wide variety of PIA disputes such as: disputes involving exemptions; the failure of a custodian to issue a timely response; fee disputes; and repetitive, overly broad, and alleged vexatious requests. *See* Md. Code Ann., Gen. Prov. (“GP”) § 4-1B-04; COMAR 14.37.02.

In addition to mediating PIA disputes, the Ombudsman also regularly provides informal assistance, resource materials, and PIA training on request. These and other activities are published in summary reports that are posted to the Ombudsman’s website, piaombuds.maryland.gov.

This report describes the Ombudsman’s activities from July 1, 2024, through June 30, 2025 (“FY 2025”). You can find additional information about Ombudsman program activities in the attachment to this report. *See* page 66 through 67.

A Year of Growth

I have served as Maryland’s Public Access Ombudsman since the program first opened its doors in 2016. Since then, the program has evolved, most notably in response to the 2022 amendments to the PIA which made mediation through the Office of the Ombudsman a prerequisite to seeking review and decision by the PIACB. This change was accompanied by new statutory requirements for the Ombudsman program at all stages of dispute resolution, from intake through conclusion.

The amendments created a 90-day period to conclude mediations and required the Ombudsman to issue a “Final Determination” summarizing the dispute and outcome of the mediation. This additional work, together with an increase in the Ombudsman’s mediation caseload, led to a steadily increasing backlog of mediation requests, longer wait periods for people seeking dispute resolution assistance, and required us to temporarily curtail discretionary activities such as PIA training until the critical need for additional staff could be met.¹

¹ We detailed these changes and impacts in more detail in our FY 2024 annual report.

We are therefore pleased to report that in FY 2025, with the support and assistance of Attorney General Anthony Brown, the program added a new administrator and new attorney-mediator.

First, Kentiara Moore joined the program as a new contractual administrator in October 2024. Although originally envisioned as additional administrative support, Kentiara soon became the sole administrator for the Ombudsman and Board when our former administrator, Spencer Dove², returned to his prior agency the same month. (Many thanks, Spencer, for your hard work and valuable contributions to our program!)

In February 2025, Alisa Bralove-Scherr joined the Office as an additional attorney-mediator, effectively doubling the Office's mediation capacity and supporting all aspects of its work.³ On October 1, 2025, the "Delegation of Powers" amendment to the PIA takes effect.⁴ This amendment, passed unanimously by both General Assembly chambers in the 2025 session, allows the Ombudsman to delegate her functions to a staff member with the appropriate training and expertise.⁵ Accordingly, Alisa will officially become the Deputy Public Access Ombudsman on October 1, 2025.

In April 2025, Teena Hallameyer joined the team as our second administrator, providing support to both the Ombudsman and the Board. Together, Kentiara and Teena bring substantial experience in State and local government and technology to the program and are valuable additions to our team.

Lastly, Assistant Attorney General Sara Klemm continues to serve as the program's counsel providing advice that has been instrumental to the program's success throughout this period of growth and transition. Again, we thank Attorney General Brown for providing consistently outstanding support to our program and for making our growth and improvement possible.

Program Operations and Metrics

Since the beginning of the program, the Office has tracked certain information about the program's operations, including caseload volume, time required to bring mediations to closure, types of disputes submitted for mediation, and types of requesters and agencies participating in mediation.

² Spencer had served as the sole administrative support since December 2021 and was instrumental in the transition when the 2022 amendments took effect.

³ Until February 2025, the Ombudsman was the only staff of the Office of the Public Access Ombudsman.

⁴ The "Delegation of Powers" amendment, also known as [HB331](#) and [SB296](#), is codified in § GP 4-1B-03(g).

⁵ Alisa brings with her 20 years of mediation experience in the Attorney General's Consumer Protection Division, where she most recently served as the Deputy Director of the Mediation Unit and the Arbitration Administrator. In addition to her mediation experience, Alisa started her career as a journalist and brings a unique combination of relevant skills and perspectives to the Office.

The program metrics during FY 2025 reflect a great deal of consistency over time in some areas, including in the make-up of agencies and requesters participating in mediations, the number and percentage of agencies that consent to dispute resolution through the Ombudsman, and types of PIA disputes received by the program.

In contrast, our data reflects changes in other metrics as compared to FY 2024, such as a decrease in the number of incoming requests for mediation and an increase in the number of “carry-over” mediations from the prior year. The lengthy carry-over queue, together with the time spent hiring, onboarding, and training several new staff members in FY 2025, has impacted wait times and the average length of time required to conclude mediations this year.

These and other trends are detailed in our discussion of program metrics below.

Figure 1: Ombudsman Caseload & Closure Rate

Time Period	Carry-Over from Prior Year	New Mediation Requests	New HD Matters	Total New Matters	Mediations Closed
FY 2025	67	252	198	450	261
FY 2024	53	299	337	636	273
FY 2023	28	275	251	526	250
FY 2022	52	215	168	383	239
Since Inception	N/A	2307	1790	4097	2238

Figure 1 presents the number of mediation requests received in FY 2025, the open mediations carried over from FY 2024, along with the number of mediations closed during this period. Figure 1 also reflects the new “Help Desk” (or “HD”) inquiries.⁶ Combined, these figures make up the Ombudsman’s total caseload for FY 2025. For context, the same data is provided for FYs 2022, 2023, and 2024, and cumulative totals since the program’s inception.

The data reflects that while the program received fewer new requests for mediation (252) and Help Desk matters (198) during FY 2025, we carried over a larger number of pending mediations from FY 2024 (67) at the start of FY 2025, reflecting a larger backlog and queue entering the fiscal year.

With the help of new staff who joined our program in FY 2025, the length of our queue has recently started to come down. This is a trend we expect will continue as the number of mediations carried over at the start of FY 2026 (46) is substantially lower than FY 2025.

⁶ Help Desk or HD matters are typically initiated by agencies seeking to troubleshoot an issue or prevent a dispute or by requestors looking for guidance on the PIA process, such as how to submit a request or who to contact. Because HD matters do not involve bilateral mediation and are generally resolved quickly, usually within a few days, we do not track the same metrics as we do for mediations.

Figure 2: Program Use – Individual & Occupational Users

Time Period	Individual	Professional Occupational User
FY 2025	77%	23%
FY 2024	72%	28%
FY 2023	64%	36%
FY 2022	81%	19%

Figure 2 reflects the types of requesters using the Ombudsman program. As has been true most years since the program’s inception, the largest group of requesters asking for assistance in resolving PIA disputes through our office are individuals who have made PIA requests for purposes unrelated to their business or occupation. Because this group encompasses such a large portion of our caseload (77% in FY 2025 and on average, 73% since 2022) we have started tracking new data points for FY 2026.

The program is now tracking whether an individual’s PIA request qualifies as a “first person request” – that is, whether the requester is seeking records about themselves or a dispute in which they are directly involved. This type of request contrasts with more general PIA requests, which reflect a broader interest in government operations rather than a personal matter.⁷ This new data point has been added to help identify whether a first person request can be correlated with other mediation metrics, such as the length of time a mediation takes and/or the outcome of mediation.

Although we continue to work with a diverse group of professional and occupational users (e.g., press and media outlets, non-profit organizations, private attorneys, and businesses), this group collectively comprises a much smaller and decreasing portion (23% in FY 2025 and on average, 26% of our total mediation caseload since 2022) of requests for mediation.

Gaining deeper insight into the nature of PIA requests, particularly those involving individuals, will be essential for future program improvements and may inform recommendations for legislative changes to the PIA.

⁷ Professor Margaret B. Kwoka studied the impact of “first person requests” on FOIA caseloads, as these requests and associated disputes have become increasingly common and significantly impact an agency’s metrics, such as backlog and wait times for requesters. See Professor Kwoka’s research in “First-Person FOIA”, published in the Yale Law Journal (https://www.yalelawjournal.org/pdf/Kwoka_2s1ppe51.pdf) where she concluded that “... while these requests may serve vital private interests for each requester, they largely do not serve the public’s interest in knowing what its government is up to.”

Figure 3: Program Use – Agency Make-Up

Time Period	State	Local*	Other**
FY 2025	36%	25%	38%
FY 2024	28%	28%	44%
FY 2023	27%	27%	45%
FY 2022	30%	24%	46%
<i>* Local includes regional, county, and municipal agencies. ** Other includes public school districts, higher education institutions, law enforcement agencies (police, fire, and state's attorneys' offices), and agency-initiated mediations with requesters.</i>			

Figure 3 reflects the type of agencies participating in mediation during FY 2025 and shows a continued high rate of consent to mediation (92%) with 116 unique agencies participating in mediations.

Our data for FY 2025 shows a modest uptick in the percentage of matters involving State agencies (36%) and a small reduction in the percentage of participating local agencies (25%). Among local agencies, 48 requests (19%) involved counties and county agencies, while 16 requests (6%) involved municipalities.

There remains strong interest in records held by public school districts, higher education institutions, and law enforcement agencies, including police, fire, and state's attorneys' offices. These entities are grouped under the "Other" category, which accounted for 38% of all agency participants in FY 2025.

Figure 4: Disputes Presented for Mediation in FY 2025

Type of Dispute	Mediation Requests	Percentage of Requests
Denial	98	39%
Failure to Respond	60	24%
Partial/Incomplete	40	16%
Excessive Fees	35	14%
Redactions	27	11%
Does Not Believe	14	6%
Request for Fee Waiver	13	5%
Other	8	3%
Frivolous, Vexatious, or Bad Faith (may include repetitive or overbroad requests) ⁸	6	2%

⁸ Though the number of requests for mediation we receive for frivolous, vexatious, or bad faith requests are infrequent and used with restraint, we recognize that the behaviors involved, when they occur, are significant for the agencies.

Figure 4 shows the numbers and percentages for each type of PIA dispute.⁹ The largest single category continues to be the “denial” of access to requested records, which came up in 98 (39%) of mediation requests. When combined with “redactions,” the denial of access to part of requested records (27 requests for mediation, or 11%), these categories comprise 50% of requests for mediation.

The next largest category involved the failure of a custodian to respond to a PIA request, with 60 requests (24%) for mediation. The Ombudsman refers to these as “MIAs,” meaning that an agency has not responded to a PIA request within the 30-day statutory deadline.

In FY 2023, we reported that we had started the practice of having our administrator first attempt to resolve a failure to respond issue before opening a mediation file. This usually meant reaching out to the agency to remind them that a response was due and to find out when it would be provided. In some cases, our administrator was able to resolve the problem very quickly, such as by supplying the PIA request when an agency had no record of receiving the request, or by asking the requester to resubmit it directly to the agency’s PIA contact.

In addition to the number reflected in Figure 4, in FY 2025, our administrators successfully resolved 35 of the 36 (about 97%) of MIA matters in this way, without the need for an actual mediation. In these instances, the resolved MIA matter is classified and logged as a HD matter. When an MIA cannot be resolved through this process, we may open a mediation file.

This case management procedure continues to maximize program efficiency by ensuring that the Ombudsman and Attorney-Mediator are not engaged in handling a matter until there is a more substantive PIA issue or dispute to be addressed.

Through training and outreach activities across the State, our Office is continuing its efforts to reduce the level of MIAs and to encourage agency representatives to communicate directly with a requester as soon as there is a problem in responding to a request. *See* page 62 through 63.

Figure 5: Length of Time to Conclude Mediations

Time Period	3 Weeks	6 Weeks	9 Weeks	12 Weeks	12+ Weeks
FY 2025	13%	10%	9%	10%	58%
FY 2024	15%	12%	17%	21%	36%
FY 2023	27%	21%	23%	16%	18%
FY 2022	18%	16%	17%	11%	38%

Figure 5 illustrates the challenges experienced in FY 2025 in concluding mediations within the statutory 90-day (*i.e.*, 12 week) deadline, which was extended with consent of the parties in approximately 58% of mediations. This reflects a significant increase over FY 2024 from the 36% of mediations where we extended the deadline. We expect the need for extensions to diminish over

⁹ Because some disputes include more than one issue, the total numbers (301) and percentage (120%) come out to be more than the number of requests received overall and the percentages add up to more than 100.

time, as the length of our queue is reduced through the contributions of the additional staff who joined the program in FY 2025.

Figure 6: Outcome of Mediations

Time Period	Resolved	Unresolved	Partially Resolved	Did Not Pursue	Terminated	Statement of Conflict
FY 2025	39%	31%	4%	9%	5%	11% ¹⁰
FY 2024	50%	28%	8%	9%	5%	Not reported
FY 2023	67%	19%	3%	8%	3%	Not reported

Figure 6 reflects the outcome of PIA mediations as recorded in the “Final Determination” that must be issued at the conclusion of each mediation. Typically, the Final Determination reflects one of the following dispute outcomes:

1. “Resolved” (*i.e.*, matter is fully resolved);
2. “Unresolved” (*i.e.*, matter is entirely unresolved);
3. “Partially Resolved” (*i.e.*, one or more but not all discrete issues presented within a dispute are resolved);
4. “Did Not Pursue” (*i.e.*, the request for mediation was withdrawn or abandoned by the party initiating the mediation);
5. “Terminated” (*i.e.*, by the Ombudsman in circumstances where one or both parties fail to engage with the process or fail to abide by the written standards of conduct applicable to the mediation); and
6. “Statement of Conflict” (*i.e.*, the Ombudsman has a conflict of interest and cannot mediate the request). These matters are closed as unresolved and were extremely rare prior to FY 2024. In these matters, the Ombudsman issues a statement advising that the Office either cannot mediate or cannot continue to mediate.

This data reflects that the Ombudsman closed 39% of mediations as fully resolved, down from 50% in FY 2024. The Board can review matters that are closed as “unresolved” or “partially resolved” as well as those closed or never opened due to conflict, provided the issue is within the Board’s defined jurisdiction.

In FY 2025, of the 121 mediations closed that were potentially eligible for Board review 74 complaints ultimately went to the Board for review.

Outreach & Training

In addition to its core dispute resolution work, the Office resumed in-person and virtual PIA trainings and laid the groundwork for expanding outreach in FY 2026. During FY 2025, the Office conducted seven PIA trainings and presentations. The training was split between in-person and virtual, and generally involved an overview of the PIA, with emphasis on the types of issues most frequently encountered by the agency or constituency.

¹⁰ Of the 30 Statements of Conflict issued in FY 2025, 28 of them involved a single requester. The remaining two applied to a second individual.

In FY 2023, the Office launched a new training program referred to as “Brown Bag Lunch Trainings.” These training sessions were held online during the lunch hour on a quarterly basis. Each Brown Bag training focuses on PIA topics of interest, allowing the participants to take a deeper dive into topics that present recurring issues or problems. Each session was open to both requesters and custodians, thereby allowing and providing an informal and convenient forum for attendees to hear and learn from the other party’s experience and concerns. These training courses are recorded and posted on the Office’s [YouTube Channel](#).

Due to the lengthening queue for dispute resolution, the Ombudsman could not host any “Brown Bag” trainings. We hope to resume them in FY 2026. The next topic will be Technology and the PIA, which will explore how evolving digital tools impact public records access and management.

In addition to the “Brown Bag” series, the Office continues to conduct trainings upon request by specific agencies or groups. These training courses are also recorded and circulated to the individual attendees together with the written material used for that training. This approach has enabled the Office to provide engaging and in-depth information about the PIA while providing training focused on the needs, experiences, and interests of particular agencies and groups.

We also provide various resources and information about the PIA on the Ombudsman’s website. Under the guidance and direction of Sagir Kazi of the Department of Information Technology, we completed work on our new website, piaombuds.maryland.gov. Many thanks to Sagir, and to Alisa and Kentiara, whose technical skills got this project over the finish line. The revamped website contains much of the same helpful information as before but allows the public to access our services in a far more user-friendly manner.

Legislative Efforts

The Ombudsman’s Office gave testimony on two cross-filed PIA bills during the 2025 General Assembly session so that pertinent aggregate data and program information could be shared with the committees hearing these bills.

First, I offered oral and written testimony in support of the “Delegation of Powers” bills, HB331/SB296, which as highlighted earlier, passed without opposition and allow the Ombudsman to delegate any of her duties and functions to a staff member with the appropriate training and experience. The ability to delegate tasks and duties as needed is vital to the efficiency, ongoing stability, and continuity of the Ombudsman program. We thank the Attorney General, legislators, non-profit organizations, and members of the public for their support of this bill. As noted, this amendment to the PIA goes into effect on October 1, 2025, at which time, Alisa Bralove-Scherr will officially become the Deputy Public Access Ombudsman.

Second, I submitted written testimony in support of HB806/SB554, which would have enabled agencies to pursue a judicial remedy without first attempting to mediate or seek Board

review to obtain relief from PIA requests believed to be frivolous, vexatious, or made in bad faith. The bills did not make it out of committee.

My testimony provided the committees hearing the bill with program data concerning the relatively small number of times our program has received and attempted to mediate such disputes since the provision became effective on July 1, 2022, and detailed the challenges we face in trying to resolve this type of dispute via mediation. While our office has received comparatively few requests for mediation of disputes with this issue, it remains an important source of concern for State and local agencies and staff when their work or operations are disrupted by the need to respond to such requests.

The concerns are not limited to any one requestor or any particular part of the State and are an issue well beyond Maryland's borders. This type of problem has been studied by scholars and other experts under FOIA and open records laws of the United Kingdom, with preliminary findings recently presented by four researchers¹¹ at the FOIA Advisory Committee's meeting on September 11, 2025. The presentation previewed their upcoming report – "A Request Too Far: A study in mitigating the burden of unduly burdensome public record requests without restricting the flow of civic information" – which is due to be published this winter.¹²

The researchers used data from the 2024 Elections & Voting Information Center (EVIC) Local Election Official Survey¹³ which asked custodians questions about their experiences with public records requests. The authors discussed the data and what options could reduce the impact that these requests carry in the 2025 article "Effects of election-related unduly burdensome public records requests on the emotional labor of street-level bureaucrats".¹⁴

According to the survey, 64% of respondents "agreed that public records requests are taking more time than they did four years ago" while 72% "strongly agreed" or "agreed" that "a few requests disproportionately consumed a significant amount of time."

Looking Forward: FY 2026

As the Office enters FY 2026, our top priority is to reduce the waiting time for dispute resolution and assistance. With the addition of new staff members in FY 2025, we are now better positioned to address the needs of our program users. To support this effort, we are developing written Standard Operating Procedures ("SOPs") to streamline internal processes, ensure consistency, and facilitate the onboarding and training of new staff. These SOPs will also help us maintain high-quality service delivery as the program continues to evolve.

¹¹ David Cuillier, University of Florida; Shelley Kimball, Johns Hopkins University; Ben Worthy, University of London; and Suzanne Piotrowski, Rutgers University.

¹² See <https://www.archives.gov/ogis/foia-advisory-committee/2024-2026-term/meetings/foiaac-09-11-2025>

¹³ See <https://evic.reed.edu/2024-evic-leo-survey-report/>

¹⁴ See <https://drive.google.com/file/d/136NCe6ZFUAf6ZApAatvsoogus2IqLzoo/view?usp=drivesdk>

We are also focused on expanding our outreach and training initiatives. After resuming in-person and virtual training sessions in FY 2025, we aim to conduct at least 10 training sessions in FY 2026. With two already completed and more scheduled, we are on track to meet this goal. We also plan to relaunch our “Brown Bag” training series, beginning with a session on “Technology and the PIA” and another to focus on recent Board decisions.

In addition, we are working to enhance our case management strategies to better triage incoming requests and to allocate resources efficiently. This includes exploring options for a database that can automate some of our tasks.

Looking ahead, we remain committed to supporting both requesters and custodians through fair, timely, and effective dispute resolution.

Conclusion

With a stronger team, clearer procedures, and a renewed focus on outreach, the Office is well-equipped to meet the challenges of the coming year and to continue advancing the goals of transparency in Maryland government.

I again want to thank Attorney General Brown and the OAG for their support of the Ombudsman program and the consistently outstanding staff support the OAG has provided to the program. In addition, I also extend my thanks to the Board for providing this forum for sharing information about the Ombudsman program. Finally, I again want to thank Sara Klemm, Kentiara Moore, and Teena Hallameyer who tirelessly support the Office of the Public Access Ombudsman. I also want to thank Alisa Bralove-Scherr for her assistance in compiling this report.

You can find additional program information, including statistical reports, helpful tips, and PIA-related news and developments, on the Ombudsman’s website at piaombuds.maryland.gov.

Respectfully submitted,
Lisa Kershner
Public Access Ombudsman
September 2025



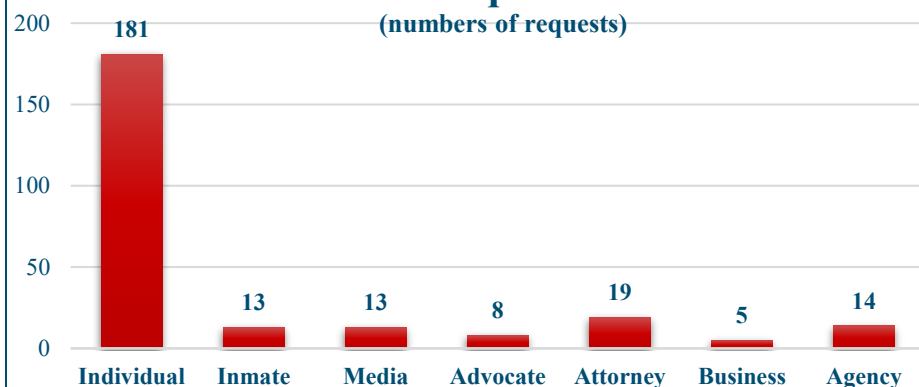
Public Access Ombudsman Mediation Metrics Report

July 1, 2024 to June 30, 2025

Annual
Report
FY2025

The data presented in this report summarizes the requests for mediation received in FY 2025.

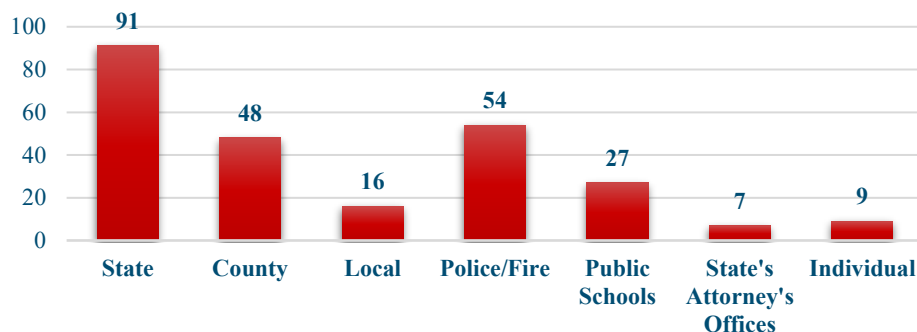
The Requesters
(numbers of requests)



Quick Facts

- 252 new requests for mediation
- 261 mediations closed
- 198 “Help Desk” requests

The Agencies
(numbers of requests)



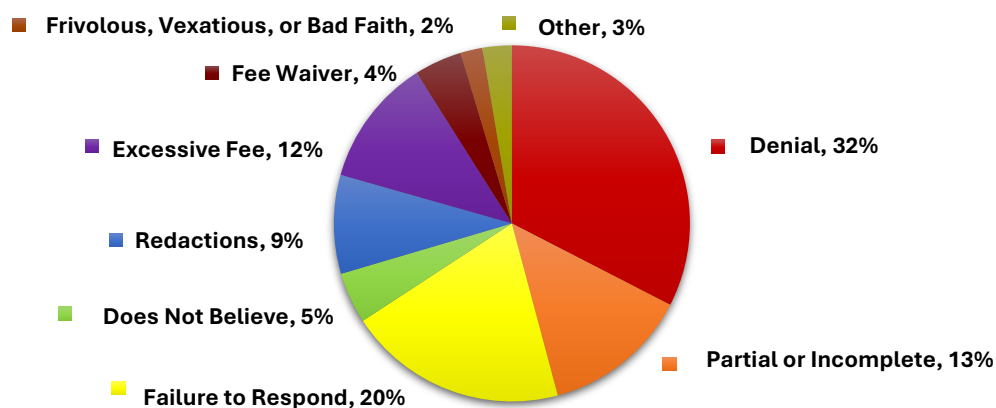
There were 116 unique agencies participating in mediation matters with the PIA Ombudsman in FY 2025.

“Individual” refers to agency-initiated mediations with PIA requesters.

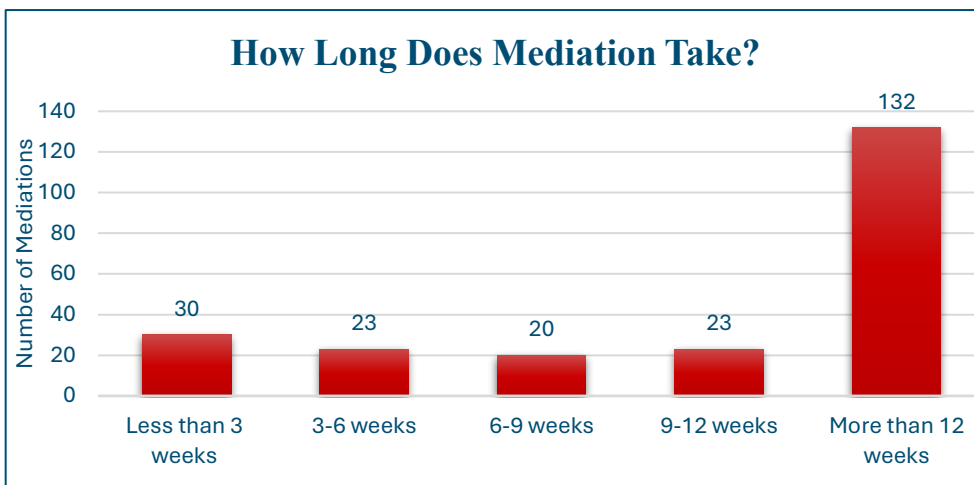
The types of PIA disputes listed are based on how the requester framed the dispute. They may include more than one issue.

These are not findings.

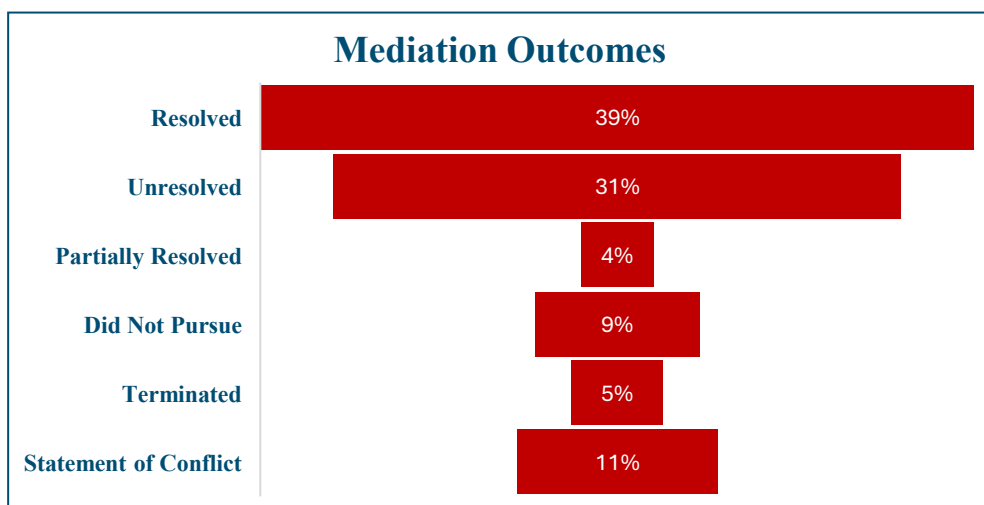
What are the PIA Disputes?



There is a 90-day statutory deadline for concluding mediations, but the time can be extended with the consent of both sides. The Ombudsman closed 37% of files within that time period. The remaining files had extensions agreed to by the parties.



The below data shows why mediation matters. The Ombudsman resolved 39% of matters and partially resolved another 4%. Early resolution of disputes saves time and resources. Mediation is voluntary, confidential, and in many cases doesn't require an attorney.



In FY 2025, the Ombudsman brought on an attorney-mediator who, as of October 1, 2025 will serve as the Deputy Ombudsman. The Ombudsman also added a contractual administrator to support the program and hired a new administrator as a replacement for the one who left in October 2024. The new staff, once fully trained, will be a large help to the program. The Ombudsman thanks the Attorney General for allocating the two new positions.

Presentations, Workshops, Trainings, and Other Outreach

The Office of the Public Access Ombudsman conducted the following in-person and virtual trainings in FY 2025:

- Carroll County Sheriff's Office, *MPIA: A Comprehensive Overview* – August 21, 2024
- MACO Winter Conference, *MPIA: A Comprehensive Overview* – December 11, 2024
- Anne Arundel County Public Schools General Counsel, *MPIA: A Comprehensive Overview* – December 17, 2024
- Town of Easton, *MPIA: A Comprehensive Overview* – April 10, 2025
- City of Rockville, *MPIA: A Comprehensive Overview* – April 29, 2025
- City of Greenbelt, *MPIA: A Comprehensive Overview* – April 30, 2025
- MML Summer Conference, *MPIA: A Comprehensive Overview* – June 23, 2025

To request a PIA training, please visit the Ombudsman's website at <https://piaombuds.maryland.gov/Pages/trainingrequest.aspx>

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