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Political Law

Compliance and Investigations Update

November 7, 2025

If you have any questions regarding the matters discussed in this memorandum, please contact the attorneys listed on the next page or call your regular Skadden contact.

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Maryland Expected to Update Contribution Reporting Portal for Pay-to-Play Filers and Lobbyist Employers on November 10, Impacting December 1 Filing

On November 10, 2025, the Maryland State Board of Elections (SBE) is expected to launch an updated version of its Business Contribution Disclosure System, where persons doing public business in Maryland (pay-to-play filers) and state lobbyist employers file semiannual contribution reports. The launch comes ahead of the December 1 deadline for the next semiannual contribution report for both types of filers.

Filers will be required to create new login credentials by the December 1 deadline. Account holders should look out for an email from SBE with login instructions. Filers will be required to complete multifactor authentication to access the updated database, likely upon each login.

While filers should be able to submit the upcoming contribution report in the existing database through November 8 (the system is expected to be down on November 9), pay-to-play filers should consider waiting until the updated database launches on November 10, as SBE FAQs note filers will be required to re-enter their beneficial ownership information in the updated database. Filers should also consider submitting their upcoming contribution report a few days before the December 1 deadline to avoid any last-minute filing issues.

SBE intends for pay-to-play filers' beneficial owners of 5% or more, as well as their resident agents in Maryland, if any, to be publicly disclosed in the updated database. Last year, Maryland adopted a requirement that pay-to-play filers provide this information (as we described in our May 24, 2024, client alert). Currently, filers have the option when disclosing this information not to make it visible to the public in the database (though the beneficial ownership information is likely available to the public upon request under the Maryland Public Information Act, while the resident agent information is already available in the Maryland business entity database). However, SBE does not intend to preserve this option in the updated version of the database.

Please contact us with any questions or for assistance with the filings.

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