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MEMORANDUM

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**TO:** ALL STATE HIGHWAY ADMINISTRATION (SHA) EMPLOYEES  
**FROM:** SHA ADMINISTRATOR WILL PINES, P.E. *Will N. Pine*  
**SUBJECT:** ETHICAL BEHAVIOR AND GIFTS  
**DATE:** DECEMBER 12, 2025  
**RESPONSE**  
**REQUESTED BY:** N/A

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**PURPOSE OF MEMORANDUM**

To provide guidance for State Highway Administration (SHA) employees on a process to seek State Ethics Commission ("Commission") approval of secondary employment.

**SUMMARY**

As State employees, we are bound by the Public Ethics Law ("Ethics Law") to comply with the requirements associated with secondary employment.

**ANALYSIS**

The State position is primary employment; all other employment is secondary. While the Ethics Law does not require a review of all secondary employment, SHA encourages employees to request a review of their secondary employment. If your secondary employment presents a potential conflict of interest with your employment with the State, then a review by the State Ethics Commission is effectively recommended to ensure compliance. Examples of potential conflicts of interest include any employment with, or ownership interest in, a company that does business with SHA as a general or sub-contractor, or as a supplier of materials or services to SHA, should seek Commission guidance. Also, State employees are prohibited from engaging in secondary employment activities while on State time or using State facilities or resources. For example, state resources include state computers, software, and telephones. Secondary employment must not negatively impact the required performance of duties for the State position.

More information on the Ethics Law can be found on their website at <https://ethics.maryland.gov>. I have also attached a recent Memorandum from the State Ethics Commission on secondary employment. In summary, the Ethics Law provides the following directions:

- Section 5-502(b)(1) prohibits an official or employee from having secondary employment with an entity that does business with, is regulated by, or is under the authority of the State department or agency with which the official or employee is affiliated. To check if your secondary employment does business with the State Highway Administration or the State of Maryland, please visit [Vendor Payments | Maryland Vendor Payments Vendor Payments](#)
- Section 5-502(b)(2) of the Ethics Law prohibits secondary employment that would impair the impartiality and independent judgment of the official or employee.
- Section 5-503(b) prohibits an official or employee who has duties relating to a contract from being employed by an entity that is a party to that contract.

Volunteering is not secondary employment for the purposes of the Ethics Law. However, employees should submit for secondary employment review any member of a board of directors or hold an executive office in an outside organization. An employee may serve as an unpaid director or board member of an organization as part of his or her official duties for SHA.

For a fuller discussion of the Ethics Law, the Commission provides helpful information on their website at <https://ethics.maryland.gov> and the attachments included here.

To request Commission approval, complete Ethics Commission Form 25 (a copy of which is attached for your convenience), obtain your immediate supervisor's approval, obtain your senior manager's approval in the Department Head section, and send Form 25 along with a current DTS-3 position description of your SHA job to Ms. Courtney Highsmith, Assistant Deputy Administrator for Administration, who is also SHA's Ethics Coordinator. Ms. Highsmith will review your request and forward it to the Commission for review. If you send a request directly to the Commission, the Commission will contact her for approval.

Thank you for complying with the Ethics Law. If you have any questions or concerns, please do not hesitate to contact the ethics team via email at [sha\\_ethics@mdot.maryland.gov](mailto:sha_ethics@mdot.maryland.gov). You may also contact the Commission at 410-260-7770, toll-free at 1-877-669-6085, or via their website at <https://ethics.maryland.gov>. You may also reach out to Ms. Courtney A. Highsmith, SHA Ethics Coordinator, at 410-545-5514, toll-free 1-800-206-0770, or via email at [chighsmith@mdot.maryland.gov](mailto:chighsmith@mdot.maryland.gov). Ms. Highsmith will be happy to assist you

#### **Attachments**

- Ethics Commission Form 25
- The State Ethics Commission's Secondary Employment Memo

cc: Ms. Courtney A. Highsmith Esq., Deputy Chief Administrative Officer/SHA Ethics Coordinator  
Ms. Laurie Goudy, Chief Administrative Officer  
Ms. Latifat Adebakin, SHA Ethics Manager