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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. Pines*

**SUBJECT:** ETHICAL BEHAVIOR AND GIFTS

**DATE:** NOVEMBER 19, 2025

**RESPONSE  
REQUESTED BY:** N/A

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**PURPOSE OF MEMORANDUM**

To summarize the State Highway Administration (SHA) guidance on gifts, which mirrors the Maryland Public Ethics Law ("Ethics Law") policy on gifts.

**SUMMARY**

At any time, and especially during the holiday season, persons or companies doing, or hoping to do business with SHA may offer you gifts. The SHA's policy on gifts is consistent with the Ethics Law. Examples of gifts and activities that should be avoided include cash, gift cards, and free tickets to a social, sporting, or cultural event. The Ethics Law sets standards of ethical conduct and every employee must adhere to these standards.

**ANALYSIS**

The Ethics Law addresses ethical behavior and gifts. We ask all SHA employees to be aware of the restrictions on soliciting and accepting gifts. 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. In summary, the Ethics Law provides the following directions:

- Employees may not solicit gifts for themselves or another. This prohibition against an employee soliciting gifts applies without regard to value and without regard to the relationship of potential donors to the State or the employee's agency.
- Employees may not accept a gift from individuals or entities that do business with or seek to do business with the employee's agency, are regulated by the employee's agency, have private interests that can be impacted by an employee's performance of his/her duties, or are regulated lobbyists with respect to matters within the jurisdiction of the employee.
- Employees should pay particular attention to avoid acceptance of unsolicited gifts from individuals or businesses that do business with or seek to do business with the employee's agency, are regulated by an employee's agency, have private interests that can be impacted by an employee's performance of his/her duties or are regulated lobbyists with respect to matters within the jurisdiction of the employee.

The Ethics Law provides that an unsolicited gift that does not fall within its restriction may be accepted and in certain situations, a gift from one of the parties noted above may be accepted if the gift does not impair the impartiality or independent judgment of the employee or give the appearance of impairing the impartiality or independent judgment of the employee. The Ethics Law states that some gifts under \$20 or attendance at a social event may be accepted and are permissible under the Ethics Law. Note that gifts over \$20 may have a requirement to be reported on the recipient's financial disclosure statement. Please see the State Ethics Commission's Memorandum on The Gift Law for a more detailed discussion, located on their website at <https://ethics.maryland.gov>.

The following gifts are some exceptions to the Ethics Law's gift prohibitions and may be accepted:

- Meals and beverages consumed in the presence of the donor or sponsoring entity may be accepted; the donor/sponsor of the meal must be in attendance. A meal where the donor/sponsor does not participate is not covered by this exception.
- Reasonable expenses for food, travel, lodging, and scheduled entertainment may be accepted to attend a meeting or conference by an official or employee if the official/employee is a scheduled speaker or scheduled panel member. In the case of an Executive Branch official, if the anticipated value of the expense exceeds \$500, and is being paid by a regulated lobbyist (including an entity that employs a lobbyist), the official must notify the Ethics Commission by letter before attending the meeting.
- Ceremonial gifts, such as a plaque, that are purely ceremonial may be accepted without regard to its value provided the gift would not impair or appear to impair an official's or employee's impartiality or independence of judgment. Consumer items are not covered under this provision.
- Gifts of nominal value, such as miscellaneous unsolicited gifts (e.g., coffee mugs, baseball caps) not exceeding \$20 in cost, may be accepted. This exception does not cover meals, alcoholic beverages, or tickets to sporting events.

An official or employee should always be aware that refusing a gift that is offered is always appropriate under the Ethics Law and may be the best way to handle a situation when questions arise about the acceptability of a gift. When in doubt, contact the State Ethics Commission for advice and guidance at 410-260-7770, toll-free 1-877-669-6085, or via email at <https://ethics.maryland.gov>.

Thank you for your cooperation. 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 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.

Please make sure this memorandum is printed out for those employees who do not have access to email.

#### **Attachments**

- State Ethics Commission (SEC) Memo on Gifts

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