



Maryland State Board of Elections

Beneficial Owner Frequently Asked Questions

Question 1: When amending my Business Contribution Disclosure System (BCDS) registration in the new system, why am I now required to add beneficial owners?

Answer: Since July 1, 2024, beneficial ownership has been required to be disclosed for persons doing business with the State of Maryland, Maryland counties and Maryland municipalities.

Question 2: What is beneficial ownership?

Answer: For purposes of Election Law Article, 14-105(e), Annotated Code of Maryland, a business entity shall be considered a subsidiary of the person doing public business if owned or controlled by at least 30 percent by the person doing public business of the same individuals or business entities if:

- (1) 30 percent or more of the beneficial ownership or equity of each entity is held by the same person or group of persons;
- (2) 30 percent or more of the voting shares or rights, membership, or partnership interests with voting or governing authority, control rights, trust control or other form of governance or rights authority in each entity is directly or indirectly held or controlled by the same person or group of persons.
- (3) Beneficial Ownership includes any ownership interest of 5% or more in one or more entities in a chain of parent and subsidiary entities, any one of which participates in at least 5% of the capital or profits of a business.

Question 3: What is control?

Answer: A person or group of persons is deemed to have direct or indirect control of one or more business entities if the person or group of persons is actively; Since July 1, 2024, beneficial ownership has been required to be disclosed for persons doing business with the State of Maryland, Maryland counties and Maryland municipalities.

- (1) Directing any amount of contributions, political spending, or any other activity on behalf of the business entity or entities.
- (2) Assuming responsibility for the day-to-day operation of the business entity or entities.

Question 4: Can a beneficial owner be a corporation?

Answer: Yes, it can.

Question 5: My business is a publicly traded company. Where can I find my beneficial ownership information?

Answer: You may be able to find your beneficial ownership information in your company's Annual Report or in your company's U.S. Securities and Exchange Commission (SEC) filings.



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Question 6: Beneficial ownership is sensitive information to disclose. Is there a process to prevent public disclosure of this information?

Answer: There is no waiver process to prevent disclosure of your beneficial ownership.

Question 7: I previously entered our beneficial owners in “Additional Contacts” in the old system as directed by SBE. Will I need to re-enter that information into the BCDS?

Answer: Yes, you will need to re-enter the information into BCDS.

Question 8: Where in the new BCDS will I add or update beneficial owners?

Answer: To add or update a beneficial owner in the BCDS system, follow these steps:

1. Log into the system.
2. Select “Account Overview.”
3. Click on “Amend or Correct Registration.”
4. Choose “Ownership Details.”
5. Click on “I need to add one or more beneficial owners.”
6. Click on “+ Add Beneficial Owner.”
7. Add beneficial owner type, physical address, email address, phone number, mobile number, and website address.
8. Select “Save.”
9. Click on “Review and Amend.”
10. Provide a short description.
11. Finally, select “Amend Registration.”