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Inspector General

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Office of the Inspector General

September 25, 2024

D'Andrea L. Walker
County Administrative Officer
400 Washington Avenue
Towson, Maryland 21204

Re: OIG Investigative Report - Case No. 24-006

The mission of the Office of the Inspector General (hereafter “the Office”) is to provide increased accountability and oversight in the operations of the Baltimore County Government (hereafter “the County”) by identifying fraud, waste, and abuse, while also striving to find ways to promote efficiency, accountability, and integrity.

In January 2024, the Office learned the Bureau of Solid Waste (hereafter “Solid Waste”) had made an \$864.01 payment to the Maryland Transportation Authority (MDTA) for “video toll” charges during 2022 and 2023 pertaining to vehicles assigned to Solid Waste. Of the total payment, \$700 was for civil penalties. Video tolls are tolls charged to the registered owner of a vehicle by taking a picture of their license plate and mailing them a bill called a Notice of Tolls Due (NOTD). This occurs when the registered owner of the vehicle does not have an E-ZPass account. It can also occur when the registered owner does have an E-ZPass account, but the account is either in arrears or the license plate information for the vehicle is not properly registered to the E-ZPass transponder in the E-ZPass system. The civil penalties, which are assessed at \$25 per violation, were the result of Solid Waste’s failure to pay 28 NOTDs by their specified due dates.

After some preliminary investigative steps, which included an interview of an employee within the Office of Budget and Finance’s Vehicle and Operations Maintenance (VOM) division and a limited review of toll-related data maintained by VOM, the Office initiated a full investigation, which focused on two areas – which County agencies were not taking full advantage of the discounted toll rates offered by the MDTA via its E-ZPass program and how often were these County agencies being assessed civil penalties because they were not paying NOTDs within the 30-day payment period. The investigation consisted of an examination of toll-related documents maintained by VOM for the time period January 1, 2022 through March 31, 2024. These documents were supplemented by toll-related documents maintained by certain County agencies that had more frequent video tolls or civil penalties. The Office also interviewed certain personnel within those agencies.

Based on the investigation, the Office concluded the County had wasted approximately \$17,289.13 for toll-related transactions in Maryland that occurred between January 1, 2022 and March 31, 2024.¹ The waste was due to agencies not taking advantage of discounted toll rates by either not fully participating in Maryland’s E-ZPass program or failing to resolve issues with aspects of their E-ZPass accounts in a timely manner; not paying NOTDs by their due dates, which resulted in 460 Citations; and not paying Citations on time, which resulted in additional fees related to Maryland Motor Vehicle Administration (MVA) Administrative Flags that were placed on County vehicle registrations.

I. Background on Maryland’s Electronic Toll Collection System

The E-ZPass program is an electronic toll collection system utilized for toll roads, bridges, and tunnels. The E-ZPass program is currently accepted in 19 states along the East Coast and in certain parts of the Midwest. In 2001, the MDTA joined the E-ZPass Interagency Group, which allowed Maryland’s toll facilities to participate in the E-ZPass program. Under the E-ZPass program, an individual is issued a free transponder that must be mounted on the interior of the windshield of their vehicle.² The individual is then responsible for creating an E-ZPass account, registering the transponder and their vehicle to the account, and depositing funds into the account to create a toll balance. When a vehicle passes through a toll facility, the transponder is read by an antenna at that location, and it automatically charges the E-ZPass account associated with the transponder. As the E-ZPass account is depleted, it must be replenished with additional funds to prevent the transponder from turning off. For convenience, E-ZPass allows accountholders to automatically replenish their account when the balance gets down to a specified amount. For Maryland residents, there are no monthly or annual fees to participate in the E-ZPass program.

In Maryland, toll rates vary throughout the state depending on the toll facility and the axle size of the vehicle. However, the E-ZPass system provides users with a discounted rate when passing through Maryland’s toll facilities. E-ZPass also offers various types of discount plans for its users, including offering a business account for entities that have a fleet of vehicles.

When a vehicle passes through a toll facility in Maryland without a detectable E-ZPass transponder, an image of the license plate is taken. The Maryland MVA system is then queried for that license plate information. At that time, one of two things can happen as set forth below, with the second bullet point being the focus of this report.

- If the query determines the registered owner of the vehicle has an E-ZPass account, an “image toll” or “ITOL” is levied against their E-ZPass account. The ITOL rate is more expensive than the E-ZPass rate but not as expensive as a video toll. Typically, ITOLs occur when the E-ZPass transponder’s internal battery has been

¹ The Office did not focus on any toll-related activity that occurred outside of Maryland as such activity was minimal in comparison.

² E-ZPass also offers exterior-mounted transponders for a fee.

depleted such that it is no longer effectively working; the transponder has not been properly mounted in the vehicle; or the transponder has been removed from the vehicle.

- If the query determines the registered owner does not have an E-ZPass account, a video toll is assessed. A video toll can also be assessed if the query does not recognize a license plate as being associated with an established E-ZPass account or if the E-ZPass account is in arrears. In each of these cases, an NOTD is mailed to the MVA address on file for the registered owner via the United States Postal Service. An example of an NOTD is attached as **Exhibit 1**. Video tolls are the highest toll rates in Maryland because of the cost incurred to process them. For example, the video toll rates for the two tunnels in Baltimore City and the Francis Scott Key bridge are double that of the E-ZPass rates. In addition, if the NOTD is not paid by the specified due date, a Citation Toll Violation (hereafter “Citation”) is issued that assesses an additional \$25 civil penalty. An example of a Citation is attached as **Exhibit 2**. If a Citation is not paid, an MVA Administrative Flag (hereafter “Flag”) is placed on the vehicle’s registration, which prevents the owner from being able to renew their registration until all outstanding tolls and related penalties have been paid. To remove a Flag, an additional fee of \$30 must be paid to the MVA. An example of a Flag is attached as **Exhibit 3**. Finally, the MDTA may refer the registered owner of a vehicle to Maryland’s Central Collections Unit for unpaid video tolls and associated civil penalties.

II. VOM’s Role in Processing Video Tolls and Other Related Documents

All vehicles purchased by the County are registered with the MVA to VOM’s address at 11112 Gilroy Road, Suite 102, Hunt Valley, Maryland (hereafter “the VOM address”). Therefore, all MVA-related correspondence for County vehicles, including NOTDs for video tolls, Citations for non-payment of video tolls, and Flags for non-payment of Citations, is sent to the VOM address via the United States Postal Service.

When an NOTD is received at VOM, personnel use the information on the NOTD to identify the vehicle and the agency it belongs to. The Office was told VOM handles about 25 to 30 agencies. The personnel at VOM then scan and email the NOTD to the appropriate agency as soon as feasible so the agency can begin processing it for payment. An example of such an email is attached as **Exhibit 4**. Typically, the email is sent to the agency head or someone in the agency who is responsible for managing the agency’s fleet of vehicles. If the agency fails to pay the NOTD by the specified due date, VOM typically receives a Citation in the mail notifying of the overdue toll and the assessed civil penalty of \$25. Similar to the NOTD, the Citation is emailed to the appropriate agency by VOM personnel so it can be processed for payment. If the Citation is not paid on time, a Flag is mailed to VOM assessing an additional \$30 fee. All Flags are payable upon receipt and a failure to do so could prevent, among other things, a vehicle’s registration from being renewed. The only exception to the aforementioned process pertains to the Police Department in that VOM sends the Police Department the original documents in the mail as opposed to via email.

An Office Assistant at VOM maintains binders that contain copies of the emails sent to the agencies along with the NOTDs, Citations, and Flags. The Office Assistant also uses a spreadsheet to track the toll-related data by year and by agency. A separate spreadsheet is used by the Office Assistant to track the toll-related data for the Police Department due to the large volume of toll-related transactions involving Police vehicles. Among the data included on the spreadsheets maintained by VOM are the identifying information on the vehicle, such as the five-digit equipment number and license plate; the Video Toll Transaction Number, also known as the Mailing Number, which is assigned by the MDTA and printed on the NOTD and Citation; the location where the video toll was taken; the number of video tolls incurred on a given day; the due date for the NOTD; the date VOM emailed the NOTD to the agency; and the date the NOTD was paid. The Office obtained copies of the Office Assistant's spreadsheets and reviewed them. However, the Office did not rely on these spreadsheets for its own analysis, which is described in Section III of the report.

III. Relevant Toll-Related Data Obtained and Analyzed by the Office

During the course of the investigation, the Office obtained the binders from VOM that contain the Office Assistant's correspondence with 23 different County agencies regarding NOTDs, Citations, and Flags. The binders included 27 months of video toll transactions between January 1, 2022 and March 31, 2024. The Office also obtained various toll-related records from the agencies that had a greater number of NOTDs and Citations. Using the data in the binders and what was received from the agencies, the Office compiled a detailed spreadsheet (hereafter "the Spreadsheet") for the purpose of determining: how much the County overpaid for tolls by either not utilizing E-ZPass or having unaddressed issues with an existing E-ZPass account; how often the County was assessed a civil penalty because the responsible agency did not pay the NOTD on time; and how many times a County vehicle was subject to a Flag due to non-payment of an NOTD and corresponding Citation.

The Spreadsheet, which is organized by agency, includes various information regarding the video tolls, such as when and where they occurred. It includes information about the vehicles associated with the video tolls, including the five-digit vehicle equipment numbers, the license plates assigned to those vehicles, and the names of the drivers if known. The Spreadsheet details information about the billings pertaining to the video tolls, including the amounts that were to be paid, the dates the payments were due, when the payments were actually made, and whether a late fee was assessed or a Flag was ultimately issued. Importantly, the Spreadsheet also lists how much each of the video tolls would have cost the County had the agency been taking full advantage of the discounted toll rates via Maryland's E-ZPass program. Finally, the Spreadsheet shows how much County funds were wasted due to the overpayment of tolls, the payment of Citations, and the costs incurred to remove Flags that had been placed on County vehicles.

Because the Spreadsheet contains a large amount of data, the Office has chosen not to attach it to this report as an exhibit. However, the Office has summarized the data on the

Spreadsheet in Table 1 below.³ As can be seen in Table 1, for the period January 1, 2022 through March 31, 2024, the County paid video tolls amounting to \$11,292.78. Had the County's various agencies been fully participating in the E-ZPass program, or if they were participating in the E-ZPass program and had addressed issues with their E-ZPass account in a timely manner, the County would have paid only \$6,253.65 for the same tolls, which would have been a savings of \$5,039.13 or approximately 45 percent. In addition, various County agencies received a total of 460 Citations due to their failure to pay NOTDs in a timely manner. At \$25 per Citation, this amounted to \$11,500.00 spent on Citations. Finally, certain County agencies failed to pay Citations on time, which resulted in 25 Flags being placed on County vehicles' registrations. At \$30 per Flag, it cost the County \$750.00 to remove the Flags so these vehicles' registrations could be renewed. The total County funds wasted equaled \$17,289.13, which is the total of the \$5,039.13 in toll overpayments plus the \$11,500.00 in Citations plus the \$750.00 in Flags. It should be noted that the Office's calculation of funds wasted does not take into account any efforts by the agencies after March 31, 2024 to recover funds from the MDTA for inaccurate or disputed charges.

Analysis of Video Tolls and Related Charges by Agency from 01/01/2022 through 03/31/2024 (Table 1)							
Agency	Total Spent on Video Tolls	Cost for the Same Tolls Under E-ZPass	No. of Citations Received	Total Spent on Citations	No. of Flags Received	Total Spent on Flags	Total County Funds Wasted
Board of Elections	\$13.47	\$7.98	0	\$0.00	0	\$0.00	\$5.49
Corrections	\$37.40	\$17.40	4	\$100.00	0	\$0.00	\$120.00
County Council	\$281.63	\$142.80	2	\$50.00	0	\$0.00	\$188.83
County Executive	\$54.00	\$27.00	3	\$75.00	0	\$0.00	\$102.00
County Sheriff	\$423.75	\$213.26	0	\$0.00	0	\$0.00	\$210.49
DPWT Bureau of Engineering & Construction	\$60.00	\$29.50	6	\$150.00	1	\$30.00	\$210.50
DPWT Bureau of Highways & EOM	\$1,040.48	\$577.95	79	\$1,975.00	12	\$360.00	\$2,797.53
DPWT Bureau of Solid Waste	\$402.00	\$209.00	45	\$1,125.00	0	\$0.00	\$1,318.00
DPWT Bureau of Transportation	\$36.00	\$18.00	3	\$75.00	0	\$0.00	\$93.00
DPWT Bureau of Utilities Construction & Repair Division	\$1,709.70	\$1,151.50	7	\$175.00	0	\$0.00	\$733.20
DPWT Bureau of Utilities Pipeline Maintenance Division	\$1,699.19	\$1,054.19	17	\$425.00	0	\$0.00	\$1,070.00

³ In Table 1, DPWT stands for the Department of Public Works and Transportation and EOM stands for Equipment Operations and Maintenance.

**Analysis of Video Tolls and Related Charges by Agency
from 01/01/2022 through 03/31/2024
(Table 1)**

Agency	Total Spent on Video Tolls	Cost for the Same Tolls Under E-ZPass	No. of Citations Received	Total Spent on Citations	No. of Flags Received	Total Spent on Flags	Total County Funds Wasted
DPWT Bureau of Utilities Pumping & Treatment Division	\$742.19	\$421.19	26	\$650.00	1	\$30.00	\$1,001.00
DPWT Metropolitan District Financing and Petitions	\$162.00	\$81.00	27	\$675.00	0	\$0.00	\$756.00
Economic and Workforce Development	\$18.00	\$9.00	1	\$25.00	0	\$0.00	\$34.00
Environmental Protection and Sustainability	\$175.29	\$87.69	4	\$100.00	0	\$0.00	\$187.60
Fire Department	\$969.31	\$464.81	15	\$375.00	0	\$0.00	\$879.50
Health and Human Services	\$414.00	\$206.50	25	\$625.00	3	\$90.00	\$922.50
Housing and Community Development	\$6.00	\$3.00	0	\$0.00	0	\$0.00	\$3.00
Libraries	\$48.39	\$23.39	0	\$0.00	0	\$0.00	\$25.00
Permits, Approvals and Inspections	\$18.00	\$9.00	0	\$0.00	0	\$0.00	\$9.00
Police Department	\$2,543.98	\$1,270.99	188	\$4,700.00	7	\$210.00	\$6,182.99
Property Management	\$282.00	\$152.00	7	\$175.00	1	\$30.00	\$335.00
Recreation and Parks	\$156.00	\$76.50	1	\$25.00	0	\$0.00	\$104.50
TOTALS:	\$11,292.78	\$6,253.65	460	\$11,500.00	25	\$750.00	\$17,289.13

IV. Interviews

For each of the nine agencies that spent the most on video tolls, Citations, and Flags, the Office interviewed the individual responsible for, or who was most knowledgeable about, the handling of toll-related charges for the time period January 1, 2022 through March 31, 2024. The interviewees provided a variety of explanations as to why their respective agencies received NOTDs for video tolls, and at times, were issued Citations and Flags for failing to pay toll-related bills on time during the relevant time period. Below is a summary of the explanations provided by the interviewees, which have been grouped into categories. Some of the explanations listed were applicable to more than one of the agencies while others were unique to an agency.

Account Management Issues

- There was a change in the person who was responsible for managing the E-ZPass account and replenishing it with their procurement card. This change in personnel led to delays in processing payments on the account.
- The individual in charge of the E-ZPass account did not ensure all vehicles in the fleet were included on the account and allegedly mismanaged the account.
- The employee responsible for overseeing the E-ZPass account did not have a procurement card, and they had to rely on someone else in their agency to pay the E-ZPass bill. For a period of time, that procurement cardholder was detailed to another agency and was not available to make payments on the account.
- The person responsible for managing the E-ZPass account was told by a superior not to pay a series of NOTDs that were due in July 2022. The reasoning was the NOTDs included some toll-related charges pertaining to vehicles from other agencies. By the time the bills were sorted out, Citations had been issued.
- The agency only had a few vehicles utilizing E-ZPass until about the spring of 2023 at which time they began transitioning the rest of the fleet over to E-ZPass. The transition took several months. The rationale for not including all of the vehicles on the E-ZPass account prior to the spring of 2023 was that E-ZPass assessed an administrative fee. However, it should be noted that during or about 2018, all administrative fees were removed from the E-ZPass program for Maryland residents.
- The individual responsible for managing the E-ZPass account had their procurement card comprised. When the card was replaced, the same thing happened to the replacement card. It then happened a third time. Therefore, for a period of time, the employee could not replenish the E-ZPass account, which resulted in the account balance going negative and NOTDs and Citations being issued to their agency. When asked why another employee could not add money to the account using a different procurement card while the issue was being resolved, the employee explained E-ZPass only allows one individual to be in control of the account.
- The individual responsible for managing the E-ZPass account was on leave when two new vehicles, outfitted with E-ZPass transponders, were put into service. Because the individual managing the E-ZPass account was unaware that these vehicles had been placed into service, they did not register the license plates with E-ZPass. Further, they were on leave when NOTDs were received from VOM, which resulted in them not being paid on time and thus, Citations being issued. The individual described what happened as a “single-point failure” as there was no one in the agency permitted to handle these duties for them while they were on leave or if they were otherwise unavailable for an extended period of time.

- The individual who took over responsibility of the E-ZPass account for their agency could not be issued a procurement card, which was needed to make payments on the account, until they took the required procurement training. When the individual requested the training, they were told for cost reasons, they had to wait until the next group training was available, which was not until three months later. During that three-month period, the E-ZPass account went into arrears and NOTDs were issued, some of which resulted in Citations.
- There was a period of time the agency was transitioning responsibility of the E-ZPass account from one employee to another. During the transition, information about new vehicles being placed into service with E-ZPass transponders was only being sent to the former employee, who was not sharing that information with the employee who was taking over the account. Thus, the requisite information about those vehicles was not placed into the E-ZPass system.
- The agency was not utilizing the automatic replenishment function of the E-ZPass account because they were told it was not permitted under the procurement card rules. This resulted in the E-ZPass account going negative on occasions, resulting in NOTDs. This statement was contradicted by representatives from other agencies who told the Office they were able to automatically replenish their E-ZPass account using a procurement card.

Transponder-Related Issues

- The agency had E-ZPass, but the improper installation of transponders in the vehicles caused them to not work properly.
- The agency had E-ZPass, but the transponders were not functioning properly because their internal batteries had stopped working without the agency's knowledge.
- The agency had E-ZPass, but when older vehicles were exchanged for newer ones in their agency, there were times the drivers failed to transfer the transponders to the new vehicles.
- The agency had two E-ZPass accounts that were merged into one account. When that happened, the E-ZPass system marked all of the transponders in one of the accounts as "lost/stolen." Thus, those transponders stopped functioning for a period of time and had to be replaced.
- For larger vehicles in the fleet, such as dump trucks, the transponders were mounted on the outside of the vehicles on the front bumper. To avoid covering the equipment number on the bumper, the transponders were attached to the center of the front bumper or the passenger side; when in fact, the transponders needed to be on the driver's side to function properly.

- There was a delay in swapping out old transponders that were not working for new ones because employees were too busy to make the vehicle available for the exchange. At times, it may have taken several months to swap out a transponder.
- The agency was using transponders on their larger vehicles that were not being read by the system. These transponders had to be exchanged for a different style of transponder that could be mounted inside the vehicles.
- The E-ZPass transponders utilized by the agency became obsolete and were deactivated when E-ZPass transitioned to newer transponders.

Paperwork Issues

- There were delays in receiving NOTDs from VOM. Therefore, by the time the NOTDs were paid, they were past due and civil penalties had been assessed.
- The agency had toll-related paperwork from VOM emailed to someone on the administrative side of their agency, who in turn, emailed the same paperwork to the employee in the agency who was responsible for managing the E-ZPass account. Because the emails traveled through an intermediary, they were more likely to be paid after the 30-day deadline, which resulted in Citations.

Data Entry Issues

- License plate numbers were entered into the E-ZPass system incorrectly, so the system was not recognizing them as belonging to an E-ZPass account.

V. Conclusion

During the investigation, the Office learned that while it is not a County policy, the majority of the agencies in the County that operate vehicles were utilizing E-ZPass, to varying degrees, by the end of the time period covered by the investigation. Thus, it appears that many agencies, on their own initiative over the past several years, sought out E-ZPass for some or all of their respective vehicles as a way to save the County money on tolls and to attempt to streamline the payment process for such expenses.

However, during the course of the investigation, the Office identified various issues concerning the management and operation of the E-ZPass program within the various County agencies that were examined by the Office. As can be seen by the groupings in Section IV, the overwhelming majority of the issues pertained to either a breakdown in some aspect of the management of the E-ZPass account within a given agency or the malfunctioning of a transponder or group of transponders that went unnoticed for a period of time. Collectively, these issues resulted in \$17,289.13 (see Table 1) in County funds being wasted during the relevant time period. The waste was in the form of the County paying higher tolls, in the form of video tolls, than what it should have paid under the E-ZPass program; hundreds of Citations being issued to the County

for not paying video tolls in a timely manner; and in some instances, Flags being placed on a County vehicles' registrations for not complying with Citations. Fortunately, the Office did not come across any situations where the County's delinquency in paying a video toll or a related penalty resulted in a referral to Maryland's Central Collections Unit.

Based on the findings set forth in the report, the Office recommends the County consider transitioning what is now a voluntary, decentralized E-ZPass account management system to a mandatory, centralized system that is operated out of VOM. Under such a system, all new vehicles put into service through VOM would be required to have an E-ZPass transponder installed and registered by VOM personnel prior to the vehicle being leased out to a County agency. One or more individuals at VOM, who have procurement cards, would then be responsible for managing the E-ZPass account on a regular basis for all County vehicles. As part of their management of the account, VOM should inquire as to whether the County, with its large fleet of vehicles, could qualify for an E-ZPass business account, which may offer even larger discounts on tolls and other benefits compared to standard E-ZPass accounts.

There would be several benefits to centralizing the E-ZPass functions under VOM, an entity within the County that is already structured to handle vehicle-related services as its primary mission. Below is a list of some of those anticipated benefits.

- It would help to ensure that every vehicle that goes into service for the County has the appropriate E-ZPass transponder, based on the nature and size of the vehicle, and that the transponder is properly installed on the vehicle and registered with E-ZPass.
- It would provide for better tracking of when the transponders are put into service such that the lifespan of the transponders can be better managed and replacement transponders can be ordered and installed before they reach their maximum lifespan.
- It would help to ensure that new E-ZPass technologies are uniformly implemented throughout the County's fleet of vehicles.
- Toll-related bills received by VOM could be directly paid by VOM upon receipt as opposed to having VOM email them to the agencies to be paid. By eliminating this step, it should increase the probability that the bill will be paid on time, which would reduce the number of toll-related Citations and Flags incurred by the County.
- Because the management of the E-ZPass account would be a primary duty within VOM, as opposed to an ancillary duty within the agencies, it would eliminate many of the issues noted in the report that were the result of access to a procurement card, personnel turnover, or personnel unavailability due to extended absences.
- Instead of having multiple employees throughout the County contacting E-ZPass to resolve various issues with transponders and toll-related bills, it would ensure that a very limited number of individuals, who are already experienced in dealing with state motor vehicle agencies, are using their contacts at those agencies and their expertise to resolve issues favorably for the County.

Should the County decide to keep a decentralized system in place for the management of toll-related expenses, it should consider implementing the measures listed below.

- Each agency that possesses a County-issued vehicle should apply for an E-ZPass account and obtain transponders for all of their current vehicles.
- If an agency has a fleet of vehicles, it should explore whether it makes sense to apply for a business E-ZPass account.
- Each agency should have a main point of contact for management of its E-ZPass account and a backup employee in the event that the main employee is unavailable for an extended period of time. The main point of contact must have a procurement card that is tied to the E-ZPass account.
- Procurement cards should be authorized to make payments on E-ZPass accounts, and auto-replenishment should be approved to avoid having accounts reach negative balances.
- If the employee in charge of managing the E-ZPass account leaves the County, procurement card training should be available for the new employee within a reasonable amount of time.
- Each agency should maintain a list of when transponders were first received and activated to ensure that transponders are replaced before they reach their maximum lifespan.
- When a new vehicle is added to an E-ZPass account, it is essential for the managing employee to enter the license plate number of the vehicle correctly into the E-ZPass system.
- Each agency should develop a checklist of the items to be removed from a vehicle prior to it being taken out of service and returned to VOM. The checklist should include removal of the E-ZPass transponder. A similar checklist should exist when a new vehicle goes into service within an agency.
- There should be no intermediary between VOM and the person responsible for the E-ZPass account within an agency so as to reduce the likelihood that a toll-related bill will become delinquent.
- If an agency listed in Table 1 is still experiencing video tolls for vehicles in its fleet that are assigned to E-ZPass transponders, the agency should inspect those vehicles to ensure the transponders are in them, they are properly mounted, and they have not reached their maximum lifespan.

This matter is being referred to you for an official response. Please respond in writing by October 25, 2024. In the response, please indicate what actions have been taken or what actions you intend to take regarding this matter. Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,



Kelly Madigan
Inspector General
Office of the Inspector General

cc: John A. Olszewski, Jr., County Executive
Sean Naron, Chief of Staff
James R. Benjamin, Jr., County Attorney
Kevin Reed, Director, Office of Budget and Finance



Mailing Number: B1531133615230
Mailing Date: 02/16/2024

EQ# 31657

NOTICE OF TOLL DUE

BALTIMORE COUNTY GOVERNMENT
11112 GILROY RD STE 102
HUNT VALLEY MD 21031-1328

\$ NOTD Amount Due \$6.00
By: 03/18/2024

View full image and pay online at www.DriveEzMD.com



This Notice of Toll Due (NOTD) contains information about this vehicle that was recorded on a video monitoring system at a Maryland toll facility without payment of toll, resulting in a Video Toll transaction. As the registered owner of this vehicle or the person alleged to be liable, you are responsible for paying the Video Toll.

Pay today to avoid additional charges*

NOW	Toll Amount Due	\$6.00
AFTER: 03/18/2024	Toll Amount Due + Civil Penalty	\$31.00

HAVING AN E-ZPASS MARYLAND ACCOUNT CAN SAVE YOU MONEY!
Sign up and start saving now!
Visit www.DriveEzMD.com
**Some restrictions may apply*



Video Toll Transaction Number	B1531133615230-00003
State/License Plate Number	MD/11240LG
Location of Video Toll Transaction	Baltimore County I-695 Francis Scott Key Bridge
Exit Date and Time of Transaction	01/29/2024 01:02:10 PM

MDTA Maryland Transportation Authority
*In accordance with the Annotated Code of Maryland, Transportation Article § 21-1414 and COMAR 11.07.07, the MDTA must receive payment by the Payment Due Date or a Citation will be issued and a Civil Penalty will be assessed on each unpaid toll transaction.

9E_M-NOTD_Toll_Violation_MDTA_V4_2023-04-29 - 185659288

See below for 4 easy ways to pay or see further instructions on the back of this notice.

Mailing Number: B1531133615230	Transaction Number: 00003	Payment Due: 03/18/2024	Amount Due: \$6.00	Amount Enclosed: \$ _____
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TO REQUEST A TRANSFER OF LIABILITY (see instructions on reverse side of this notice)

TO PAY THIS NOTD (Invoice):

- Online: www.DriveEzMD.com
- Visit: Customer Service Center (www.DriveEzMD.com for a list of locations and hours)
- Phone: Customer Information Center 1-866-320-9995
- Mail: Send the bottom portion of this notice along with your check or money order, payable to: **MARYLAND TRANSPORTATION AUTHORITY**, P.O. Box 12853, Philadelphia, PA 19176-0853 (Do not send cash)

BALTIMORE COUNTY GOVERNMENT
11112 GILROY RD STE 102
HUNT VALLEY MD 21031-1328

Exhibit 1



CITATION TOLL VIOLATION

Mailing Date: 04/10/2024

Mailing #: B1531133615230

View full images and pay online at: www.DriveEzMD.com

BALTIMORE COUNTY GOVERNMENT
1112 GILROY RD STE 102
HUNT VALLEY MD 21031-1328

EQ# 31657



This vehicle has been recorded on a video monitoring system while traveling through a Maryland toll collection facility without payment of the toll, resulting in a video toll transaction and you have failed to pay the Notice of Toll Due (NOTD) before the civil penalty was assessed. These actions constitute a violation of Maryland Law, Transportation Article § 21-1414 and COMAR 11.07.07. You are liable for the Toll Violation, which includes the video toll and a \$25.00 civil penalty. One citation is issued for each Toll Violation.

If you do not contest liability, you may pay the amount due within thirty (30) days using the remittance coupon below.

If you contest your liability and wish to appear at a District Court hearing, the Maryland Transportation Authority (MDTA) must receive your request for a court hearing by the payment due date shown below. Detach the Request for a Court Hearing form (see reverse) and mail to the address on the form. (If you request a hearing, court costs may be assessed in addition to the amounts listed below.)

Video Toll Transaction #	B1531133615230-00008
License Plate State/#	MD/11240LG
Location of Video Toll Transaction	Baltimore County I-695 Francis Scott Key Bridge
Exit Date and Time of Transaction	02/01/2024 06:41:32 AM
Date and Time of Transaction	02/01/2024 06:41:32 AM
Video Toll Amount	\$6.00
NOTD Payment Due Date	03/18/2024
Toll Violation Date	03/19/2024
Civil Penalty Assessment Date	04/03/2024
Civil Penalty Amount	\$25.00
Citation Amount (includes toll charge)	\$31.00
Due Date	05/10/2024

PAYMENT OF THE AMOUNT DUE FOR THE TOLL VIOLATION WILL NOT RESULT IN POINTS AND CANNOT BE USED TO INCREASE YOUR INSURANCE RATES.

WARNING: FAILURE TO PAY THE VIDEO TOLL AND CIVIL PENALTY, CONTEST LIABILITY AS DESCRIBED ABOVE, OR TO APPEAR AT A REQUESTED HEARING, IS AN ADMISSION OF LIABILITY AND A WAIVER OF AVAILABLE DEFENSES AND MAY RESULT IN THE REFUSAL OR SUSPENSION OF YOUR MOTOR VEHICLE REGISTRATION AND REFERRAL FOR COLLECTION OF THE CITATION AMOUNT AND ASSOCIATED CIVIL PENALTIES.

(Rev. 07/01/2020)

1E M-Citation Toll Violation MDTA V2 2021-09-29 - 191870681

Retain top portion for your records. Detach and mail with payment or request a court hearing.

Note: You must detach and include a remittance coupon for each citation you wish to pay or dispute.



Video Toll Transaction #: B1531133615230-00008

Payment Due Date:
05/10/2024

Amount Due:
\$31.00

Payment is considered an **ADMISSION OF LIABILITY** and waives your right to a hearing. Payment must be received on or before the due date.

BALTIMORE COUNTY GOVERNMENT
11112 GILROY RD STE 102
HUNT VALLEY MD 21031-1328

CERTIFICATE

I am a duly authorized agent of the MDTA and based upon inspection of the recorded image(s) shown above and electronic toll collection records produced by an electronic toll collection video monitoring system evidencing that a Toll Violation occurred in violation of Transportation Article § 21-1414 and COMAR 11.07.07 and the video toll payment was not received before the civil penalty was assessed. Sworn to or Affirmed By:

Signature: *Althea Hughes* ID#: 176651

- IF YOU WANT TO PAY THIS CITATION:
(Do not send cash)
- Online: www.DriveEzMD.com (Use the Mailing # which appears at the top of this document)
- Mail: Send your check or money order, payable to: **MARYLAND TRANSPORTATION AUTHORITY**
P.O. Box 12853
Philadelphia, PA 19176-0853 (Do not send cash)
- Phone: E-ZPass Maryland Customer Service Center
1-866-320-9995
- Visit: E-ZPass Maryland Customer Service Center
(www.DriveEzMD.com for a list of locations and hours)
- IF YOU WANT TO REQUEST A COURT HEARING:
Follow the instructions on the reverse side of this notice.

Exhibit 2

00030108202322671998623051020240000031001



MVA
 MARYLAND DEPARTMENT
 OF TRANSPORTATION
 MOTOR VEHICLE
 ADMINISTRATION

Wes Moore
 Governor
 Aruna Miller
 Lieutenant Governor
 Paul J. Wiedefeld
 Secretary
 Christine Nizer
 Administrator

MVA 104FL
 BALTIMORE COUNTY GOVERNMENT
 11112 GILROY RD STE 102
 HUNT VALLEY MD 21031

ID: 10970LG
Letter Id: L0059549704
Issued: 10-Nov-2023

Tag/Title 10970LG 50153604 **Model/Year/Make** 7000 / 2018 / INTL
Registration Renewal Date **Vin #** 3HAWDTAR4JL714694

Flag Date **Jurisdiction Code & Name**
 2023-11-08 4000 - MD TRANSPORTATION AUTHORITY

EQ# 38870

**PLEASE NOTE: ADDITIONAL ADMIN RECORDS & FEES WILL BE INDICATED WITH
 *****MORE ADMIN FLAGS ON FILE*****
 CONTACT MVA FOR MORE INFORMATION 1-800-950-1MVA (1682)**

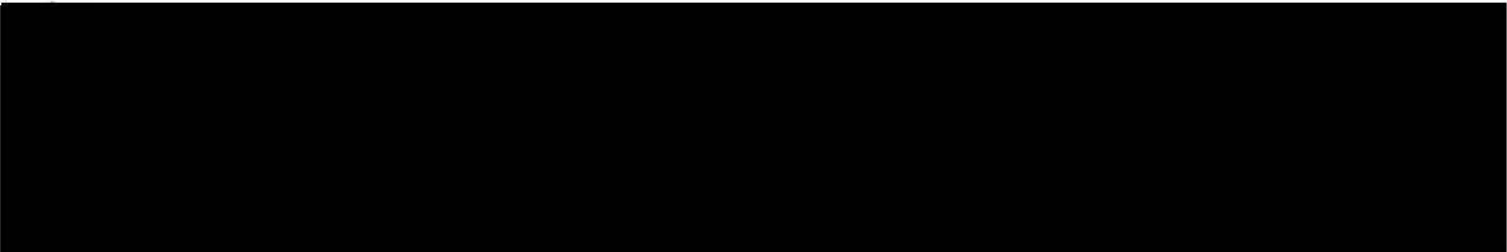
TOTAL AMOUNT DUE: \$30.00 PAYMENT IN FULL UPON RECEIPT
 PLEASE CUT STATEMENT BELOW & RETURN WITH CHECK PAYABLE TO MVA OR PROCESS
 THROUGH WEBSITE WITH CREDIT CARD www.mva.maryland.gov

Invoice Date	Tag Number	Title Number	Driver License Number
10-Nov-2023	10970LG	50153604	
BALTIMORE COUNTY GOVERNMENT 11112 GILROY RD STE 102 HUNT VALLEY MD 21031			Number of Admin Flags: 1
			Total Amount Due: \$30.00
PAYMENT IN FULL UPON RECEIPT			

DO NOT WRITE BELOW THIS LINE MVA ADMIN FLAG FEE INVOICE (FS-141) 04/13 DO NOT WRITE BELOW THIS LINE

0 T AF 50153604XXXXX00010000300050153604XXXXX000100003000

Exhibit 3



Subject: EQ#32105, EQ#32302, EQ#32348 BUREAU OF UTILITIES DriveEzMD TOLL VIOLATIONS
Attachments: EQ#32105, EQ#32302, EQ#32348 BUREAU OF UTILITIES DriveEzMD TOLL VIOLATIONS (4).pdf

Hello,

This is the last of the emails for Toll violations for today. I wanted to send them with only a few equipment numbers to assure you received all of them.

Attached is a Notice of Toll Due for DriveEzMD Violation that was issued on a vehicle that is currently assigned to your department. The costs of fines, late fees, etc. are the responsibility of the assigned operator.

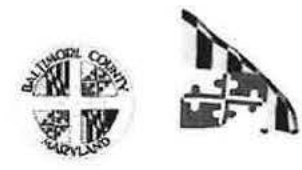
Please reference the Tag Number when making payment, since there are multiple transactions with the same Mailing #.

After the fine is paid, a copy of the receipt should be forwarded to Vehicle Operations and Maintenance – Mailbox #1104B.

PLEASE BE SURE THAT YOU HAVE AN EZ PASS TRANSPONDER AND THAT THE TRANSPONDER IS PLACED IN THE APPROPRIATE POSITION SO THE CAMERA IS ABLE TO DETECT. IF YOU DON'T HAVE A TRANSPONDER IN THE VEHICLE PLEASE CHECK TO SEE HOW YOU CAN OBTAIN ONE.

THANK YOU FOR YOUR COOPERATION


Office Assistant
 Vehicle Operations & Maintenance
 HUNT VALLEY MD





JOHN A. OLSZEWSKI, JR.
County Executive

D'ANDREA L. WALKER
County Administrative Officer

November 8, 2024

Kelly Madigan
Inspector General
Office of the Inspector General
400 Washington Ave.
Towson, MD 21204

Re: OIG Investigative Report – Case No. 24-006

Dear Ms. Madigan:

We would like to thank the OIG's Office for its diligence and work evidenced in its report dated September 25, 2024 regarding toll charges from the Maryland Transportation Authority and the County's E-ZPass deployment and operations. It is a priority for this Administration and the Office of Budget and Finance to be good stewards of County funding, and to that end, design and implement processes that act as these safe guards.

The report offered two recommendations:

Recommendation: Based on the findings set forth in the report, the Office recommends transitioning what is now a voluntary, decentralized E-ZPass account management system to a mandatory, centralized system that is operated out of VOM.

Response: At this time there are no plans to centralized the vehicle fleet operators of Vehicle & Operations Maintenance (VOM) and Equipment & Operations Maintenance (EOM). We will however do benchmarking for best practices for fleet management. OBF will also review and update policies to include timelines and steps required by agencies and employees to be more efficient in addressing EZ pass notices.

Recommendation: Should the County decide to keep a decentralized system in place for the management of toll-related expenses it should consider implementing the measures listed below. The report included a list of ten measures that are aimed at addressing the cited instances where the OIG concludes "... the overwhelming majority of the issues pertained to either a breakdown in some aspect of the management of the E-ZPass account within a given agency or the malfunctioning of a transponder or group of transponders that went unnoticed for a period of time."

Response: Thank you for the list of recommendations. We will review each one and take them into consideration as we are updating the policies to improve the efficiency around our fleet. It's important to note that our larger agencies have started the process of installing transponders in the vehicles. We will work with all agencies to assess the efficiency of installing transponders.

An update policy with clear directions on how to handle EZ pass violations will be issue within the next 90 days. More specifically the goal of the update policy will be to provide consistency on how matters related to EZPass and video tolls are addressed and minimize issues that result in the "breakdown" cited in the report. The policy will also detail tracking of transponders.

Lastly, the Office of Budget & Finance is committed to providing an increased frequency of P-Card trainings and availability as necessary to help make the implementation at all agencies successful and result in use of the maximum beneficial usage of these systems for the County.

We want to reiterate our unwavering commitment to accountability and integrity as foundational principles guiding our operations. We strive to uphold the highest standards of ethical conduct, foster transparency and continuously improve our practices. We appreciate the recommendations provided by your office and remain dedicated to addressing any findings that may arise.

Sincerely,



D'Andrea L. Walker
County Administrative Officer