

RBS SB 0631 Testimony February 2025.pdf

Uploaded by: candy warden

Position: FAV

Candy Warden, President

Rosa Bonheur Society, Inc.

10240 Harvest Fields Drive

Woodstock, MD 22163

February 08, 2025

SB 0631 Testimony: FAVORABLE

Sponsor: Senator Washington,

My name is Candy Warden. I am President of the Rosa Bonheur Society, Inc. (RBS), a volunteer, nonprofit group formed in 2007 to protect and preserve the Rosa Bonheur Memorial Park, a Maryland human and pet cemetery with thousands of burials. The people with loved ones resting at our cemetery span across all the counties of Maryland.

The Rosa Bonheur Memorial Park was founded as a pet cemetery in 1935. This world renowned cemetery was operated and managed effectively and efficiently until 1979 when a developer, William Green, acquired ownership. During Mr. Green's tenure burials began to include those of human beings in addition to pets. Mr. Green made plans to develop on the cemetery grounds, but the cemetery ended up in receivership due to fiscal malfeasance. Since 1997 the cemetery has been owned by a succession of developers that all wanted to develop on the cemetery grounds. The result has been decades of severe neglect by owners of the cemetery buildings, entry wall, landscaping, burials, etc. Our volunteer group has provided maintenance for approximately 18 years without having accepted a single cash donation. If there is a project that requires an investment we pay for it ourselves as we know that those with loved ones buried at the cemetery have been taken advantage of emotionally and fiscally by the owners over the years.

In December 2023, the assault on the cemetery escalated from chronic, calculated neglect to desecration. The week before Christmas, the Rosa Bonheur Memorial Park suffered catastrophic removal and desecration of human and pet remains.

Graves were desecrated with human remains being exhumed and relocated without the permission of families and without the direction of a funeral services professional. Pet graves were also wantonly destroyed that surrounded the human graves.

The families that suffered disinterment(s) have never been notified of the location of their loved ones' remains by the desecrator(s). Are the human remains still extant? Have they been dumped in a mass grave somewhere? Have they been thrown away? Were the remains only partially exhumed or churned into the ground? Only the desecrator(s) know the answers to these questions.

Although families paid significant amounts of money for plots, caskets, vaults, memorial markers, and other services for human and pet burials and received deeds for their plots they have been victimized by their loved ones being violated.

Who is responsible for this desecration and damage? A developer that our group met with for three years in an effort to reach a mutual agreement to protect the cemetery. The developer believes that the removal of human remains will open the way for him to build on the cemetery grounds. The pet burials would just be plowed under even though the majority of the people that own the plots are still alive. The developer is hiding behind LLCs, which even the Maryland Office of Cemetery Oversight has yet to untangle. It has been over a year since these tragic events were perpetrated and the person(s) responsible have not been legally identified; just the LLCs.

How could such a tragedy occur? There is no established Commission on Abandoned and Neglected Maryland Cemeteries. The Office of Cemetery Oversight mainly regulates operating cemeteries. The Maryland Historic Trust focuses on cemeteries that meet their criteria of “historic”, which does not include all cemeteries over 50 years old. What entity is providing oversight specifically for abandoned and neglected cemeteries? None. This is unacceptable considering the significant number of abandoned and neglected cemeteries in Maryland. Families, communities, friends groups, and individuals in interest are without an expert resource to provide the guidance and support needed to address a multitude of issues.

Benefits of SB 0631 for Abandoned and Neglected Cemeteries:

- Oversight
- Ownership
- Accountability
- Preservation
- Protection

Remains interred in cemeteries must at all times be treated with honor, dignity, and respect. These beliefs are normative and widely held by constituents across Maryland. The proposed legislation is critical for the protection of all Maryland gravesites as the establishment of a Commission on Abandoned and Neglected Maryland Cemeteries would not only serve to protect the abandoned and neglected cemeteries of today, but those that will arise in the future.

Thank you for your consideration of this testimony, which is greatly appreciated.

Sincerely,

Candy Warden

Rosa Bonheur Society, Inc. (founded May 2007)

2010 Periwinkle Award Winner, Coalition to Protect Maryland Burial Sites

1B Cemetery Commission written testimony.pdf

Uploaded by: Christine Simmons

Position: FAV

HB 724/SB 631 Commission on Abandoned and Neglected Maryland Cemeteries-Establishment-FAV

Christine Simmons
521 West Drive
Severna Park, MD 21146
410-978-7167

I have been working with a 15-member volunteer group of cemetery advocates. We have over 300 years combined experience dealing with cemeteries and issues surrounding them. I am on the boards of both the Anne Arundel Genealogical Society and the Coalition to Protect Maryland Burial Sites. I consult on many different types of cemetery issues.

There is no single state agency overseeing cemeteries. Usually, state agencies are not routinely involved unless there are issues with that cemetery. The Office of Cemetery Oversight deals with issues concerning operating commercial cemeteries. Maryland Historical Trust generally consults with those wishing to alter something at a cemetery such as adding fencing, removing dead trees, etc. The State Highway Administration deals with cemeteries that are located in the rights of way of current or proposed state-managed roadways. They all have different interests and abilities but none work with providing protections for all the cemeteries in Maryland.

Coordination with state and local jurisdictions would ensure that cemetery protections are in place or put in place and are appropriate. A commission would guarantee that cemeteries were included and updated into a standardized database and administered by the Abandoned and Neglected Cemeteries Fund.

The commission would be able to coordinate with Maryland's Department of Assessment and Taxation to assign tax account numbers to cemeteries, many of which are unlisted due to their tax-exempt status enabling persons with an interest to finally acquire ownership of abandoned cemeteries.

A commission could provide guidance and support to descendants and others as to how to properly maintain or improve conditions at cemeteries.

A commission would be able to identify and create management of a cemetery when necessary, purchase necessary equipment to assist with maintenance of abandoned cemeteries, and create certificate programs for pre-release incarcerated prisoners and others to obtain the necessary skills to find jobs.

I thank you for your interest in and look forward in your positive support of this much needed cemetery legislation.

Senate_Bill_631.pdf

Uploaded by: Daniel Phelan

Position: FAV

Dear Chairpersons and Members of the Finance Committee

My name is Daniel J. Phelan, and I reside in Baltimore County, Maryland. I am a member of the Board of Directors of the Baltimore County Genealogical Society.

I am writing you to ask that you help support Senate Bill 631, Commission on Abandoned and Neglected Maryland Cemeteries. As a genealogist who researches primarily in Maryland, I have come across too many abandoned cemeteries, and some cemeteries that are coming close to being abandoned.

Specific examples that immediately come to mind are (1) Western Cemetery—a large cemetery that was established in 1849 in Baltimore City; that has closed their office and has been providing only minimal maintenance in only a few newer sections, (2) St. Peter's Cemetery which began in 1851 in West Baltimore that became abandoned when the parish of St. Peters the Apostle closed around 2008. The cemetery was the burial place of both Whites and African Americans well before the Civil War, (3), the Western Star Cemetery—an African-American cemetery in Catonsville whose owner died and left the cemetery abandoned, and (4) Mount Zion Cemetery—a cemetery primarily for African American in Landover, which has been unkept for years. There too many other cemeteries in these conditions to mention in this letter.

The establishment of a commission to study and document the tragic abandonment of sacred burial grounds is absolutely necessary to uphold a civilized society that respects the rights of our deceased ancestors. Please support the establishment of the proposed commission.

Thank you for your time and considering my input.

Sincerely,

Daniel J. Phelan

MCLA.pdf

Uploaded by: David Zinner

Position: FAV



Maryland
Cemetery
Legislative
Advocates

MCLA is a new group, formed in July of 2024. We've met weekly to discuss Maryland cemetery laws and how we can bring our real world experience to proposing improvements to those laws. We drafted language for seven bills that are in the legislative process in the House and Senate.

We are not professional lobbyists, nor are we paid for our work in Maryland's cemeteries. We have no paid staff. We don't even have a bank account. What we do have is passion and a belief that cemeteries show respect for the deceased, and that cemeteries are our history and our gift to future generations.

We are twelve Maryland citizens devoted to care, preservation, documentation and protection of all of Maryland's cemeteries. Our MCLA team represents hundreds of years of advocacy and hands-on cemetery care. We are multicultural, spanning ethnicities and religions. Our members have widespread and diverse experience and backgrounds, are bi-partisan, and come from different counties across the State.

MCLA puts a special emphasis on identification, preservation, care and when needed, restoration, of African American cemeteries. Our members are actively working with individual African American cemeteries or sections of cemeteries. We bring incarcerated citizens to learn about cemetery care, and participate in cemetery cleanups. We help identify African American cemeteries for grants.

MCLA members understand the importance of genealogy and actively work to document cemetery records and markers across the State. Our members work with statewide organizations to provide advice to Maryland's cemetery regulator and to educate Maryland citizens about the importance of cemeteries.

Maryland citizens can make a difference when they are actively involved in the legislative process. We are so grateful to our bill sponsors, three Republicans and four Democrats. And we are appreciative of the hearing process that allows us to explain the importance, need and impact of the bills that we initiated. Thank you for supporting legislation this session that will benefit all cemeteries in Maryland.

SB0631 - zinner testimony.pdf

Uploaded by: David Zinner

Position: FAV

SB631 Commission On Abandoned And Neglected Maryland Cemeteries.

I'm David Zinner, Coordinator for the Maryland Cemetery Legislative Advocates (MCLA). Our group has extensive experience with cemetery issues.

I am also a consumer representative on Maryland's Advisory Council on Cemetery Operations, but I am not representing the Council or the Office of Cemetery Oversight.

SB631 establishes a commission to address the problems of abandoned and neglected cemeteries in Maryland. We believe there are hundreds of cemeteries that are in these categories, ranging from small religious or family cemeteries, to larger cemeteries where ownership is unclear and where neglect, vandalism and trespassing has become a major community issue.

The commission will not be able to immediately solve all of the problems of abandoned and neglected cemeteries, but it can be instrumental in these areas, to name just a few:

1. Identifying where abandoned and neglected cemeteries are located
2. Consulting with local jurisdictions regarding solutions
3. Leveraging local resources including volunteers, in-kind donations of services and the development of cemetery care training programs

Establishing a commission is an important first step in recognizing the importance of care, preservation, documentation and protection of all of Maryland's cemeteries. We believe a commission can put a special emphasis on identification, preservation, care, and when needed, restoration, of African American cemeteries.

Our cemeteries show respect for the deceased. They are our history and our gift to future generations.

Please support SB631.

SB631_CPMBS_FAV

Uploaded by: Eileen McGuckian

Position: FAV



Senate Finance Committee Hearing on SB631 Hearing Date: February 20, 2025

CPMBS position: FAV

Establish Maryland Abandoned & Neglected Cemeteries Commission

The Coalition to Protect Maryland Burial Sites was organized in 1992 by Marylanders distressed by the weak protections for cemeteries existing in the Maryland Code. Some protective legislation has been enacted in past decades, and now it is time to strengthen State laws and procedures. Current State law is insufficient and infrequently enforced at local levels to protect cemeteries from desecration, vandalism, neglect, and exploitation. Stronger State laws and uniform procedures, better documentation, public awareness, widespread information, and guidance are sorely needed.

Several of the initiatives filed this session were called out in a 2022 report to the Joint Chairmen on Historic African American Cemeteries in Maryland. This survey and study with recommendations provides templates for improving the situations of all cemeteries, with emphasis on sites where ownership is unknown and the site is abandoned, on creating a complete inventory of all known Maryland cemeteries, and on improving current law where experience shows it cannot protect descendants nor the physical sites.

https://africanamerican.maryland.gov/wp-content/uploads/sites/3/2022/07/2022-Historic-African-American-Cemeteries-JCR-Report_small.pdf

Sadly, as we all know, African American cemeteries are over-represented in the numbers of abandoned and unmaintained sites today, for a variety of reasons. The church may have disbanded, the congregation aged out or moved away and the cemetery neglected. Records were lost and corporate requirements were unattended to. Families sold their farms, and developers did not honor the little enclosures on the hill. Historically, many have been dismissed as less important or intentionally mistreated.

SB 631 fits neatly with SB 963. Together they define the problems and sort out the basics. All Maryland jurisdictions have sites within their borders that are abandoned or neglected. One of the most common issues is unknown ownership. Without proven, recorded ownership, it is impossible to take steps to resolve problems or to even organize a clean-up, be officially recognized, apply for a grant.

The Commission will conduct research on the experiences of other states. It will establish standard definitions, needed to dispel confusion in sections of Maryland law. It will address priorities that have long been identified in every Maryland county and municipality. This will help descendants, communities, landowners, and local governments to begin resolving issues. Creating a Commission and a dedicated fund will set the stage for understanding, defining, and envisioning a future for these needy sites and those who care about them.

Thank you for your consideration,
Eileen McGuckian, President
Coalition to Protect Maryland Burial Sites, Inc.
phileen3@verizon.net 301-468-7331

Coalition to Protect Maryland Burial Sites, Inc.

P.O. Box 1533 | Ellicott City, Maryland 21041 | www.cpmbs.org

SB0631_ FAV_ Testimony_ Jennifer Johnson.pdf

Uploaded by: Jennifer Johnson

Position: FAV

SB0631 Commission on Abandoned and Neglected Maryland Cemeteries - Establishment
Support FAV

Jennifer Elsie Johnson

Founder Friends of St. Peter's Cemetery

Cemetery Address: 1301 Moreland Ave Baltimore MD 21216

Email: friendsofstpeterscemetery1851@gmail.com

Phone: 410- 929- 2544

Dear Chair, Vice Chair and Finance Committee Members,

My name is Jennifer Johnson and I am the Founder of Friends of St. Peter's Cemetery. The cemetery was opened in 1851 and is the hallowed ground for approximately 15,000 individuals who worked and lived in West Baltimore. My cemetery work has been recognized and honored by several local organizations and has been featured multiple times in the past few years on all local news networks.

Currently there are commissions for almost everything we deem important in our state. Death is the equalizer of all Maryland residents. At some point in time we were all born and at some point in time we will all die. How we treat the dead is important and there should be a commission to ensure the needs of our state cemeteries are properly addressed.

I unfortunately, could not provide oral testimony due to other commitments. However, I ask that you please support SB0631 Commission on Abandoned and Neglected Maryland Cemeteries - Establishment.

Thanks for your time and consideration.

Sincerely,

Jennifer Elsie Johnson

Jennifer Elsie Johnson

Founder Friends of St. Peter's Cemetery

SB631 - letter to Senate Finance Committee.pdf

Uploaded by: Mark Edwards

Position: FAV



February 10, 2025

TO: Members of the Senate Finance Committee

SUBJECT: Support SB631: Commission on Abandoned and Neglected Maryland Cemeteries - Establishment

Good afternoon. My name is Mark Edwards, and I am a member of the Maryland Cemetery Legislative Advocates (MCLA) and a member of the Board of Directors of Montgomery Preservation, Inc. Before I retired 3 years ago, I worked for over 46 years in the heritage preservation and cultural resource management field, including 18 years at the Maryland Historical Trust. I reside in Silver Spring, Montgomery County, Maryland.

Following the 2024 Maryland General Assembly session, advocates involved with cemeteries began meeting to share information about problems and challenges, review existing law, and to agree upon priorities for legislative changes to propose to the 2025 General Assembly. The working group includes individuals active in cemetery preservation, care, and maintenance as well as descendants, genealogists, and nonprofit organizations. These initiatives follow the survey and study requested by the Joint Chairmen and reported to the Maryland General Assembly on June 30, 2022. See the *Report on Historic African American Cemeteries to the Chairmen of the Senate Budget and Taxation Committee and House Appropriations Committee* submitted on June 30, 2022, by the Maryland Commission on African American History & Culture and the Maryland Historical Trust.

Currently, there are no laws in Maryland that focus on the care needed to assist and protect abandoned and neglected cemeteries. Passage of SB631 would result in a newly-established Abandoned and Neglected Cemeteries Commission to address current challenges. New duties would have a number of important benefits to our citizens:

- Foster ownership by families, persons in interest, and community groups resulting in improved maintenance of abandoned and neglected cemeteries, thereby enhancing safety by correcting and removing environmental hazards, such as collapsed vaults, sunken graves, dead trees, foliage overgrowth, etc.
- Protect our history, heritage and cultural beliefs regarding the sanctity of cemeteries and graves.
- Prevent developers from destroying and covering over abandoned and neglected cemeteries at will and without compensation.

Negative consequences of the failure to enact this proposed legislation include:

- Without oversight, these abandoned cemeteries will remain public safety hazards and eyesores.
- Unclear or disputed ownership and attendant lack of accountability will continue to result in cemeteries being unmanaged and unmaintained, leaving families, persons in interest, and communities in limbo.

- Valuable community education and engagement efforts will be thwarted because issues of ownership of abandoned and neglected cemeteries will thwart efforts to reclaim, rehabilitate, and research these vital irreplaceable places for the benefit of all Maryland citizens.
- Abandoned and neglected cemeteries will continue to be an unaddressed issue that will negatively impact families, persons of interest, members of descendant communities, and the communities in which they are situated.
- Significant lessons from our heritage and past – uniquely understood through cemeteries and burial grounds – will remain unknown or lost forever.
- The social and cultural ethical standards and beliefs of our society will continue to be violated. Simply put, our deceased to continue to be disrespected.

For these reasons, I request that you support SB631. Thank you for your consideration of my request.

Mark Edwards
1204 Edgevale Road
Silver Spring, MD 20910
Mark_edwards1@verizon.net
(301) 758-8867

SB631.pdf

Uploaded by: Thomas Kennedy

Position: FAV

TO: Members of the Senate Finance Committee

SUBJECT: Support SB631: Commission on Abandoned and Neglected Maryland Cemeteries - Establishment

My name is Thomas Kennedy and a resident of Chevy Chase, MD. I am a parishioner at St. John's Norwood Episcopal Church in Bethesda/Chevy Chase, and on their racial justice and equity committee. I am also a member of the Policy Work Group for the Maryland Poor People's Campaign. The Maryland Poor People's Campaign has been a supporter of the Bethesda African Cemetery Coalition and involved in their efforts to preserve the Moses Cemetery on River Road in Bethesda, Maryland. The BACC seeks to stop the desecration of the Macedonia Moses Cemetery and to consecrate this cemetery with a memorial and museum that would preserve the history of the African-American community that once thrived at this location after the end of slavery in Maryland. It is an example of why this legislation is so necessary at this time.

Following the 2024 Maryland General Assembly session, advocates involved with cemeteries began meeting to share information about problems and challenges, review existing law, and to agree upon priorities for legislative changes to propose to the 2025 General Assembly. The working group includes individuals active in cemetery preservation, care, and maintenance as well as descendants, genealogists, and nonprofit organizations. These initiatives follow the survey and study requested by the Joint Chairmen and reported to the Maryland General Assembly on June 30, 2022. See the Report on Historic African American Cemeteries to the Chairmen of the Senate Budget and Taxation Committee and House Appropriations Committee submitted on June 30, 2022, by the Maryland Commission on African American History & Culture and the Maryland Historical Trust.

Currently, there are no laws in Maryland that focus on the care needed to assist and protect abandoned and neglected cemeteries. Passage of SB631 would result in a newly-established Abandoned and Neglected Cemeteries Commission to address current challenges. New duties would have a number of important benefits to our citizens:

- Foster ownership by families, persons in interest, and community groups resulting in improved maintenance of abandoned and neglected cemeteries, thereby enhancing safety by correcting and removing environmental hazards, such as collapsed vaults, sunken graves, dead trees, foliage overgrowth, etc.
- Protect our history, heritage and cultural beliefs regarding the sanctity of cemeteries and graves.
- Prevent developers from destroying and covering over abandoned and neglected cemeteries at will and without compensation.
Negative consequences of the failure to enact this proposed legislation include:
 - Without oversight, these abandoned cemeteries will remain public safety hazards and eyesores.
 - Unclear or disputed ownership and attendant lack of accountability will continue to result in cemeteries being unmanaged and unmaintained, leaving families, persons in interest, and communities in limbo.
 - Valuable community education and engagement efforts will be thwarted because issues of ownership of abandoned and neglected cemeteries will thwart efforts to reclaim, rehabilitate, and research these vital irreplaceable places for the benefit of all Maryland citizens.
 - Abandoned and neglected cemeteries will continue to be an unaddressed issue that will negatively impact families, persons of interest, members of descendant communities, and the communities in which they are situated.

- Significant lessons from our heritage and past - uniquely understood through cemeteries and burial grounds - will remain unknown or lost forever.

The social and cultural ethical standards and beliefs of our society will continue to be violated. Simply put, our deceased to continue to be disrespected.

For these reasons, I request that you support SB631.

Thank you for your consideration of my request.

Sincerely,

Thomas Kennedy

4002 Laird Place

Chevy Chase, MD 20815

240-601-8041

kennedymedia@gmail.com

SB 631 02-20-2025_MCCA_FWA.pdf

Uploaded by: John Stierhoff

Position: FWA

John R. Stierhoff, Esquire
(410) 244-7833
jrstierhoff@venable.com

February 20, 2025

The Honorable Pamela Beidle, Chair
Senate Finance Committee
3 East Miller Senate Office Building
11 Bladen Street
Annapolis, Maryland 21401

Re: Senate Bill 631 – Commission on Abandoned and Neglected Maryland Cemeteries –
Establishment

Dear Chair Beidle:

I am writing on behalf of the Maryland Cemetery and Cremation Association (“MCCA”) in Support with Amendments of Senate Bill 631.

Senate Bill 631 establishes the Commission on Abandoned and Neglected Maryland Cemeteries within the Office of Cemetery Oversight. The Commission’s voting membership includes a wide range of individuals representing interests throughout the state. However, it does not include any person specifically representing the cemetery industry.

The Maryland Cemetery and Cremation Association respectfully requests to be included as a voting member of the Commission. The MCCA was founded in 1916 and represents the shared interests and concerns of professionals across the spectrum of Maryland’s “death care” industries.

Thank you for your consideration of the Amendment to Senate Bill 631.

Sincerely,

John R. Stierhoff

cc: Members, Senate Finance Committee

SB 631-Commission on Abandoned and Neglected Maryl

Uploaded by: John Dove

Position: INFO

MARYLAND DEPARTMENT OF LABOR LETTER OF INFORMATION ON SB631.

TO: Senate Finance Committee
FROM: Deborah Rappazzo, Executive Director, Office of Cemetery Oversight
DATE: February 20, 2025
BILL: SB 631-Commission on Abandoned and Neglected Maryland
Cemeteries - Establishment

Senate Bill 631 establishes a new Commission on Abandoned and Neglected Maryland Cemeteries within the Office of Cemetery Oversight (“OCO”). The Commission will consist of 15 members, each with specialties surrounding deathcare, preservation planning, industry development, knowledge of cemetery history, architecture, archaeology, and a consumer. All members of the Commission will be appointed by the Director of OCO. The Commission will be charged with establishing standard definitions for neglected and abandoned cemeteries, support the development of a statewide inventory of cemeteries and burial sites in Maryland, as well as develop recommendations relating to historical cemeteries. Furthermore, this new Commission will be required to submit an annual report to the Governor and the General Assembly by December 1st each year.

The OCO is a small, self-funded unit. When fully staffed, the OCO consists of a total of three full-time employees and one part-time employee. Currently, the OCO is advised by a 12-member advisory council with decades of deathcare experience. Due to OCO’s limited staffing, the OCO will have to increase staff to handle the new duties created by Senate Bill 631. Furthermore, since the OCO is a self-funded unit, it will be challenging for the OCO to absorb the additional staffing and legal expenses that will be necessary to fulfill the goals of this new Commission.

For questions, please contact Andrew Fulginiti, at **Andrew.Fulginiti@maryland.gov**

www.labor.maryland.gov

FINAL_ SENATE Position Statement SB 0631_HB 0724 C

Uploaded by: Jordan BaucumColbert

Position: INFO



POSITION STATEMENT

Bill: SB 0631/ HB 0724 Commission on Abandoned and Neglected Maryland Cemeteries - Establishment

Position: Informational

Date: February 20, 2025

Contact: Debra Borden, General Counsel

Jordan Baucum Colbert, Government Affairs Liaison

Dear: Chair Pamela Beidle,

The Maryland-National Capital Park and Planning Commission (“M-NCPPC” or the “Commission”) has not taken a position on this bill. However, staff have prepared informational comments for clarification purposes.

What this Bill Does. This bill establishes the Commission on Abandoned and Neglected Maryland Cemeteries within the Office of Cemetery Oversight; and generally, relates to the Commission on Abandoned and Neglected Maryland Cemeteries.

Voting Committee Members. The Maryland Historical Trust (MHT) is known for assisting the people of Maryland in understanding historical and cultural heritage and has access to valuable data. Therefore, the sponsor may want to consider adding MHT as a voting member on the Committee.

Further Clarification on Neglected and Abandon Property.

- “Neglected” Cemetery is not defined in this legislation and appears to be at the discretion of the Commission to define.
- Using the terms “neglected” and “abandoned” interchangeably may lead to confusion. We recommend clear definitions and usage in the bill to differentiate between the two words. “Neglect” could be seen as anything from 'my neighbor doesn't mow the grass often enough' to completely abandoned with no maintenance at all.

- 'Abandoned and Neglected' are always combined in the bill. Some clarity is needed in the language to determine if the intent is only cemeteries that are both abandoned and neglected or if it means either abandoned or neglected.

Inventory and Data Clarification.

- There is unclear language in item (4) on Page 4, lines 13-19. Item (4) says: "*Support the development and establishment of a statewide inventory of cemeteries and burial sites in the state that includes: (I) Information related to abandoned and neglected Maryland cemeteries; and (II) A searchable database of information from each cemetery identified by the Commission as abandoned and neglected;*" It is unclear if the proposed commission will create and maintain the database or support another entity, (like MHT) in doing so.
- It is also unclear if the database intends to include all Maryland cemeteries or just Abandoned and Neglected cemeteries.

Interest in security at cemetery sites and enforcement.

- Abandoned and neglected cemeteries are particularly vulnerable to vandalism, theft, and other criminal activity. The legislation should clarify how any locational information that is gathered and made available, including in the statewide inventory and searchable database, will be restricted to only those parties who demonstrate a legitimate interest.
- There is no mention of enforcement or penalties.