



House Bill 0187
Criminal Procedure - Expungement - No Finding and Case Terminated Without Finding
In the Judiciary Committee
Committee Hearing on March 3, 2026
Position: FAVORABLE

Maryland Legal Aid (MLA) submits its testimony on House Bill 0187 in response to a request from Delegate Taylor.

MLA appreciates the opportunity to testify in support of HB 0187. HB 0187 closes a loophole in the law and ensures that criminal records containing a “no finding” or “case terminated without finding” disposition can be expunged. These dispositions function as convictions, but because they are not typically used in Maryland, they were never incorporated into the expungement statute. This bill *does not expand* the universe of charges that are eligible for expungement.

MLA is a private, nonprofit law firm that provides free legal services to low-income Maryland residents in civil matters, including criminal record expungement. Over the past several years, the Maryland General Assembly has increased expungement opportunities for Marylanders. Unfortunately, many individuals whose cases were adjudicated in Prince George’s County courts face a unique roadblock to expungement.

For decades, Prince George’s County defendants were asked to plead *nolo contendere* or no contest in criminal proceedings. In a no contest plea, a defendant does not admit guilt but agrees to accept a conviction and any associated sentence. Usually, in Maryland, such a plea would result in a guilty disposition, but in some cases, particularly in Prince George’s County, a no finding disposition was entered instead. Because no finding is not part of Maryland’s standard legal lexicon, it was not included during the drafting of Criminal Procedure Article 10, the statute governing expungement.

No finding dispositions were used in Prince George’s County courts from the 1980s through the mid-2010s, when opportunities for expungement were limited. At that time, it would have been difficult to contemplate any inequitable effect resulting from the use of these dispositions. Indeed, the no finding disposition was likely used so defendants could avoid association with a guilty disposition in the public record. However, when expungement law expanded to include guilty dispositions in 2017, any benefit from a special no finding designation was overshadowed. Expungement obliterates court and arrest records, opening employment and housing opportunities, whereas the no finding designation still appears in fingerprint searches and must be disclosed to potential employers. Individuals who received these specialized dispositions, whose offenses are otherwise expungement eligible, have been left behind and denied the redemptive power of expungement simply because of a misnomer.

MLA urges passage of HB 0187, to correct a fundamentally unfair limitation in the expungement statute. If you would like additional information on this bill or the underlying issues it addresses, please contact Meaghan McDermott, Maryland Legal Aid's Advocacy Director for Community Lawyering and Development, at mmcdermott@mdlaborg