complies with some of the Act's requirements but not all of them." 19 *OMCB Opinions* 56, 63 (2025). For this reason, any deficiency in the written closing statements for these four sessions would not constitute a violation of the Act.

As for public disclosures *following* these four closed sessions, the Act generally does not require a public body to say anything about a session convened solely for the purpose of performing an administrative function. But when a public body "recesses an open session to carry out an administrative function in a meeting that is not open to the public," the body *does* have to disclose certain details in "the minutes for the public body's next meeting." § 3-104. Specifically, the minutes must include:

> (1) a statement of the date, time, place, and persons present at the administrative function meeting; and
>
> (2) a phrase or sentence identifying the subject matter discussed at the administrative function meeting.

Id. For each of the four administrative meetings here, the Board of Elections convened first in open session before excluding the public to carry out the administrative tasks.[5] Thus, the Board was subject to the disclosure requirements of § 3-104.

Having determined which meetings were administrative, we turn now to the question of whether the Board of Elections satisfied its disclosure obligations for each meeting.

2. Written closing statements

Because four of the six closed sessions were administrative in nature, the Board of Elections was required to prepare written closing statements only for the closed session on April 5, 2024, and possibly for the closed session on August 12, 2025 (as we cannot determine whether that meeting was administrative). As noted above, a written closing statement must contain three pieces of information: (1) the topic to be discussed; (2) a citation to the provision of the Act that permits a closed-session discussion of that topic; and (3) the public body's reason for excluding the public from its discussion." 15 *OMCB Opinions* 63, 65 (2021) (citing § 3-305(d)(2)(ii)).

The April 5, 2024, written closing statement plainly provided at least one of these elements: the citation of statutory authority. The statement invoked two provisions of the Act:

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[5] This is reflected in the minutes of these meetings, which are available at https://www.talbotcountymd.gov/election_board_contacts (last visited Jan. 12, 2025).