

# **TESTIMONY IN SUPPORT OF HB 385 March 2025 (Senate**

Uploaded by: Brian Markovitz

Position: FAV

## **TESTIMONY IN SUPPORT OF HB 385**

TO: Senator Pamela Beidle, Chair, and members of the Senate Finance Committee

FROM: Brian J. Markovitz, Esq. of Joseph, Greenwald & Laake, P.A.

Chair Beidle and members of the Committee, my colleagues and I are litigation attorneys at Joseph, Greenwald & Laake, P.A. in Greenbelt, Maryland. We represent employees and consumers all over the State of Maryland in various matters. I come before the Committee in support of HB 385, respectfully seeking that the Committee take an important step towards clarifying and supporting both employee and consumer rights in Maryland.

HB 385 promises to strengthen both employee rights and consumer protection. First, HB 385 would prohibit an employer from raising the argument of good faith under a “bona fide” dispute defense in cases where employees claim that they have not received all rightful wages. Second, HB 385 would allow consumers to raise allegations of fraud in instances where employers fail to provide consumers with what they are paying for.

In terms of employee rights in cases of unpaid wages, HB 385 would provide important clarification as to what would no longer constitute a good faith, bona fide dispute. Under Section 3-507(b) of the MWPCCL, withholding wages from an employee in the absence of a good faith, bona fide dispute may result in the employee being awarded an amount up to three times their wages in addition to other fees and costs. A bona fide dispute has been defined as “a legitimate dispute over the validity of a claim or the amount that is owing where the employer has a good faith basis for refusing an employee’s claim for unpaid wages.” *Peters v. Early Healthcare Giver, Inc.*, 439 Md. 646, 657 (2014) (internal citations omitted). Simply, HB 385 would clarify to whom tips (thus, wages) are owed. Thus, employers would fail to muster a good faith basis if and when the employer pointedly refused to transmit the tips to the named workers.

In addition to protecting workers, HB 385 would enhance consumer rights by clarifying what constitutes fraud under the Maryland Consumer Protection Act. Under Maryland Code, a trade practice may be unfair, abusive, or deceptive if it includes: “(9) Deception, fraud, false pretense, false premise, misrepresentation, or knowing concealment, suppression or omission of any material fact with the intent that a consumer rely on the same...” Md. Code Com. Law § 13-301(9). A business’ promise to provide tips to certain workers and subsequent failure to do so after making such representations to consumers would fit squarely within the definition of an unfair, abusive, or deceptive trade practice. HB 385 would clarify and encourage truthful business practices by strengthening Maryland law and providing a mechanism by which consumers could ensure that their tips are put in the proper hands.

HB 385 is a simple fix to a larger problem. I, therefore, urge a favorable report for HB 385.

# **HB0385\_Automatic\_Tip\_Prompt\_Screen\_MLC\_FAV.pdf**

Uploaded by: Cecilia Plante

Position: FAV



## **TESTIMONY FOR HB0385**

### **Consumer Protection – Automatic Tip Prompt Screen - Requirements**

**Bill Sponsor:** Delegate Lehman

**Committee:** Finance

**Organization Submitting:** Maryland Legislative Coalition

**Person Submitting:** Cecilia Plante, co-chair

**Position:** FAVORABLE

I am submitting this testimony in strong support of HB0385 on behalf of the Maryland Legislative Coalition. The Maryland Legislative Coalition is an association of activists - individuals and grassroots groups in every district in the state. We are unpaid citizen lobbyists and our Coalition supports well over 30,000 members.

Automatic tipping systems are becoming a fact of life. We see them in Starbucks and at hair salons, online ordering at restaurants and many other service organizations. There are some automated tipping systems that specify who the tip goes to, but many don't. Additionally, some systems only set the tip choices to non-zero amounts, so you are required to pay extra for services.

When we order curbside pickup at restaurants, and someone runs the order to our car in the rain, are they really seeing any of the tip that was added to the order? Tips should go to the person who rendered the service, or in the case where tips are shared, the allocation should be clear to the person tipping. If a customer doesn't want to tip, a zero- tip option should be available.

We strongly support this bill and recommend a **FAVORABLE** report in committee.

**testimony2025hb385cross.pdf**

Uploaded by: Franz Schneiderman

Position: FAV



**Auto Consumer Alliance**  
13900 Laurel Lakes Avenue, Suite 100  
Laurel, MD 20707

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**Testimony to the Senate Finance Committee**  
**HB 385 – Consumer Protection – Automatic Tip Prompt Screen – Requirements Motor:**  
**Position: Favorable**

The Honorable Pam Beidle  
Senate Finance Committee  
3 East, Miller Senate Building  
Annapolis, MD 21401  
cc: Members, Senate Finance Committee

March 19, 2025

**Honorable Chair Beidle and Members of the Committee:**

I'm a consumer advocate and Executive Director of Consumer Auto, a nonprofit group that works to secure safety, transparency, and fair treatment for Maryland drivers and car buyers.

We support **HB 385** because it will prevent the unfair and misleading practice we have seen from some service providers of asking for "tips" at the point of sale – gratuities that most consumers surely think go to help the relatively low-wage people who provide them with a service – but using that money not to compensate those workers but to defray overhead or other business expenses or simply add to their revenue.

It would also make sure that consumers see, on the same screen that discloses that the tips will go to employees, a prominent tip amount set at zero or a no-tip option. This will help see to it that the "tips" consumers pay are truly a voluntary choice on the purchaser's part to offer the employees they work with some additional compensation, not (as sometimes seems to be the case today) a confusing device some merchants may use to pad their bills.

With point of service payments now more and more commonplace across a wide range of services, consumers are more and more frequently pushed to add tips to bills for all kinds of products. This bill will provide some additional transparency to the tipping process, clarify that a tip must go to the employees who provide the service, and reinforce the idea that a tip ought to be a voluntary choice, not a prerequisite of adequate service.

**We support HB 385 and ask you to give it a FAVORABLE report.**

Sincerely,

Franz Schneiderman  
Consumer Auto

# **UFCW 400 Favorable Written Testimony for HB0385 (T**

Uploaded by: Kayla Mock

Position: FAV

## **Testimony in Support of HB 385**

### **Consumer Protection – Automatic Tip Prompt Screen - Requirement**

**March 17, 2025**

**To:** Honorable Chair Pam Beidle, Vice Chair Antonio Hayes, and Members of the Senate

Finance Committee

**From:** Kayla Mock, Political and Legislative Director

United Food and Commercial Workers Union, Local 400

Chair Beidle and members of the Senate Finance Committee, I appreciate the chance to share my testimony on behalf of our over 10,000 members in Maryland, working in grocery, retail, food distribution, law enforcement, health care, and cannabis. Through collective bargaining, our members raise the workplace standards of wages, benefits, safety, and retirement for all workers. Union members are critical to the addressing inequality and uplifting the middle class.

**We strongly support HB0385 and urge you to vote it favorably.**

Transparency in wages and tips is not only a consumer protection issue; it is also a worker issue. In March 2023, UFCW 400 joined a lawsuit with workers against a DC based company, Union Kitchen. In the lawsuit, it was alleged that Union Kitchen customers left tips for Union Kitchen's employees in its D.C. stores. Employees believed they were receiving the full amount of those tips in their paychecks, but when workers compared the tips they earned against the amounts allocated to tips in their paychecks, they learned that Union Kitchen had been withholding a portion of the tips they earned, totaling more than \$1,000 for many employees.

(More information can be found here: <https://www.ufcw400.org/2023/03/07/union-kitchen-faces-lawsuit-over-wage-theft/>)

More than a year later a settlement was reached, totaling **over \$130,000 in unlawfully withheld tips were given back to the workers**. Workers and consumers deserve transparency. Consumers deserve to be able to allocate tips and amounts with the trust that they will be the correct amount and distributed to the intended worker, and workers should get those tips with the trust that they are accurate.

**For these reasons, on behalf of our members and all Marylanders, we urge you to vote favorably on HB 385.**



# **HB385 SENATE WRITTEN TESTIMONY LEHMAN.pdf**

Uploaded by: Mary Lehman

Position: FAV



THE MARYLAND HOUSE OF DELEGATES  
ANNAPOLIS, MARYLAND 21401

**HB 385**

**Consumer Protection – Automatic Tip Prompt Screen – Requirements**

**SUPPORT WITH AMENDMENTS**

Good afternoon Chair Beidle, Vice Chair Hayes and Esteemed Members of the Finance Committee,

For the record I'm Delegate Mary Lehman and I am asking for your favorable consideration of HB 385, Automatic Tip Prompt Screen. This legislation was passed by the Economic Matters Committee (ECM) and the full House both this year and last. It was amended by ECM this year to disclose that the tip is for employees, add a "no-tip" option and require the Department of Labor and the Division of Consumer Protection of the Office of the Attorney General to describe these new requirements on the agencies' websites.

The 2024 bill was heard but not voted on in the Senate Finance Committee.

**BACKGROUND/WHAT THE BILL DOES**

As every consumer knows, more and more eateries and other service-related businesses ask customers when they are paying their bill for take-out food and beverages if they would like to add a tip. Prior to COVID, tips for food and beverage services were associated with sit-down restaurants and were voluntarily added to a bill by the customer for prompt service and satisfaction. Now, coffee shops, delis, ice cream stores, bakeries, and countless other venues ask customers whether they want to add a tip for take-out food and beverages.

The most common scenario for point-of-sale tipping occurs when the cashier presents to the customer a tablet or other device for the customer to pay for a purchase and then the option to tip pops up on the screen. These screens do not specify to whom the tip is going and sometimes the screen sets a default tip amount that the customer must take action to decline.

In the 2024 session, there were questions in both the Economic Matters and Finance Committees about the definition of the word "tip" and whether it is assumed to go to hourly workers or it

*must* by law go to hourly workers. It turns out that in Maryland tips may only go to workers, not management or owners. However, there is strong anecdotal evidence that online tips are not always added to workers' pay. Therefore, for consumer right-to-know and for the protection of workers the bill requires that a tip prompt screen must say some version of: Would you like to tip the staff? Or: Would you like to tip the employees?

This legislation includes last year's amendment by the ECM that preserves the ability of workers who believe they have not been receiving tips entered through prompt screens to file a complaint with the Department of Labor.

HB 385 ensures transparency for consumers about whom they are tipping and that they have a choice as to whether to tip and how much. It would still be left to the retailer what tip levels to recommend on the screen (10%, 20%, 25%, other, etc.).

## **OTHER AMENDMENTS**

I have been working with the Maryland Restaurant Association during the interim; we have had constructive discussions about amendments, and I am supportive of two.

Changes that I supported:

- Amending the bill to specify that the tip screen change does not apply to table service, or for take-out food either ordered on site or online but picked up in person.
- A written warning, if possible, for a first offense – though again, this would be up to the Attorney General's Office.

Another amendment, involving maximum financial penalties for failure to disclose, is an issue for the Attorney General's Office that I have been informed cannot be changed. The Economic Matters Committee did amend the penalty section and Attorney General's office will speak to why it opposes the change.

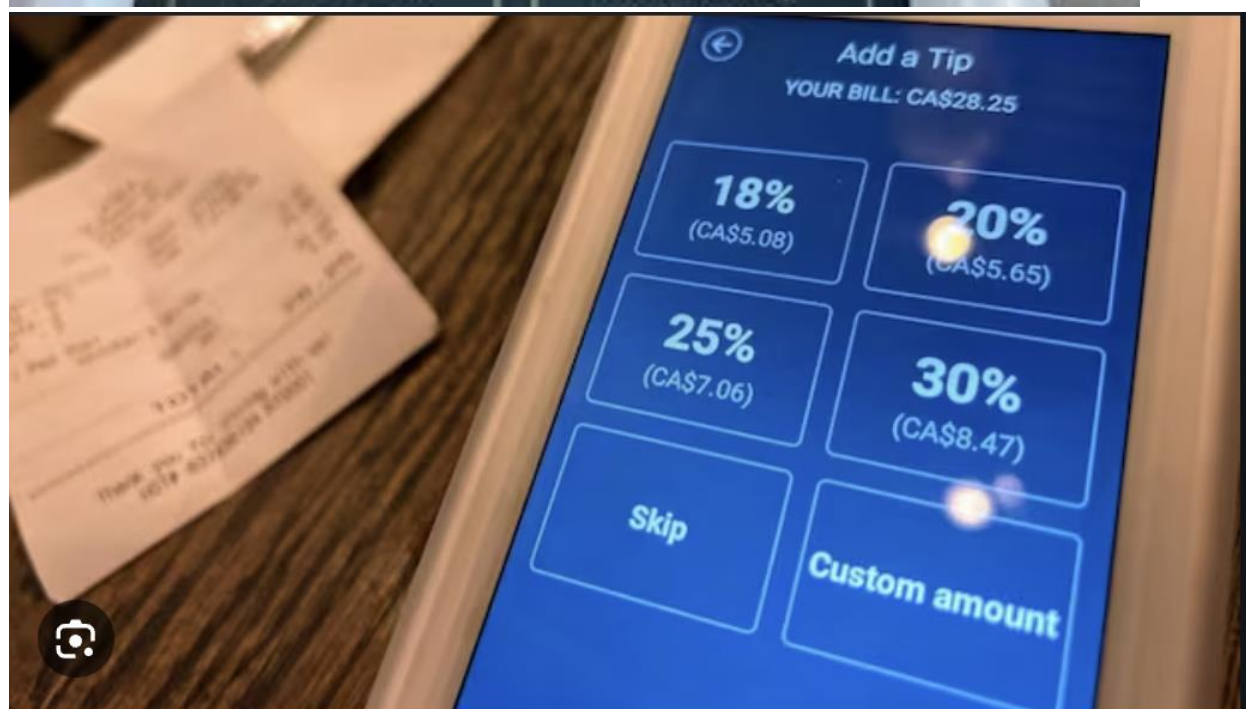
Thank you for your consideration of this pro-consumer, pro-worker legislation. I request a favorable report.

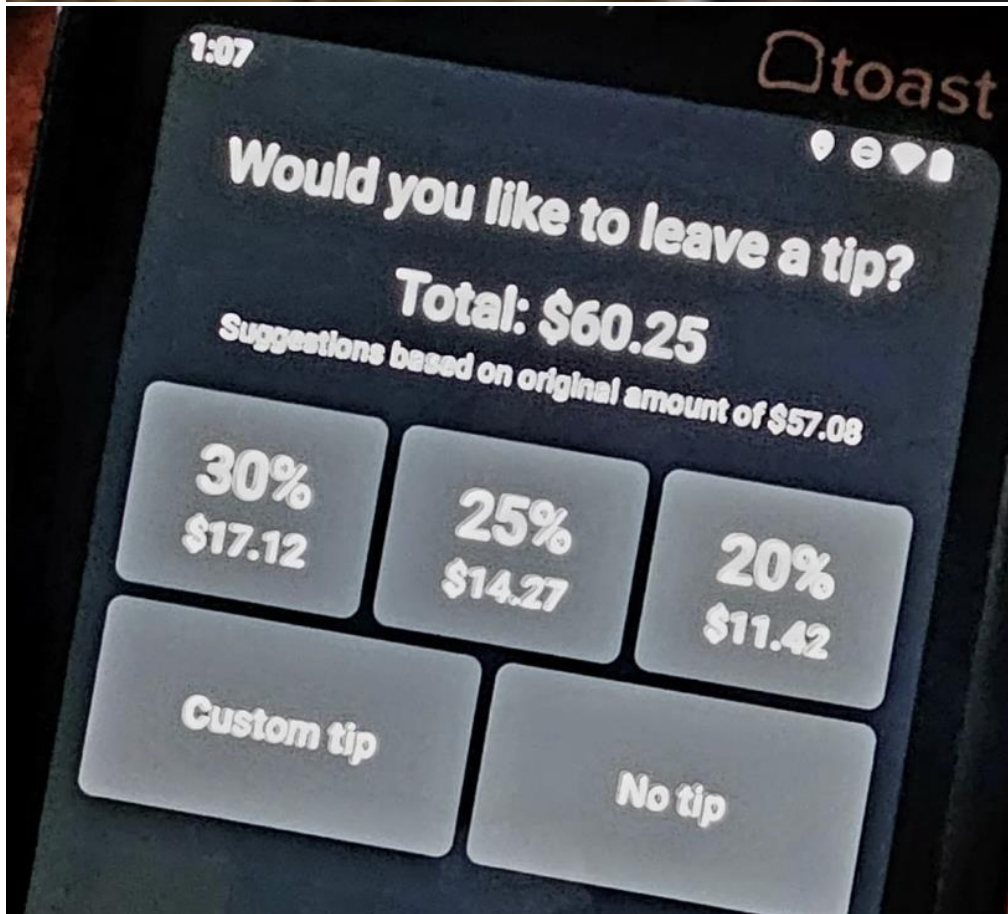
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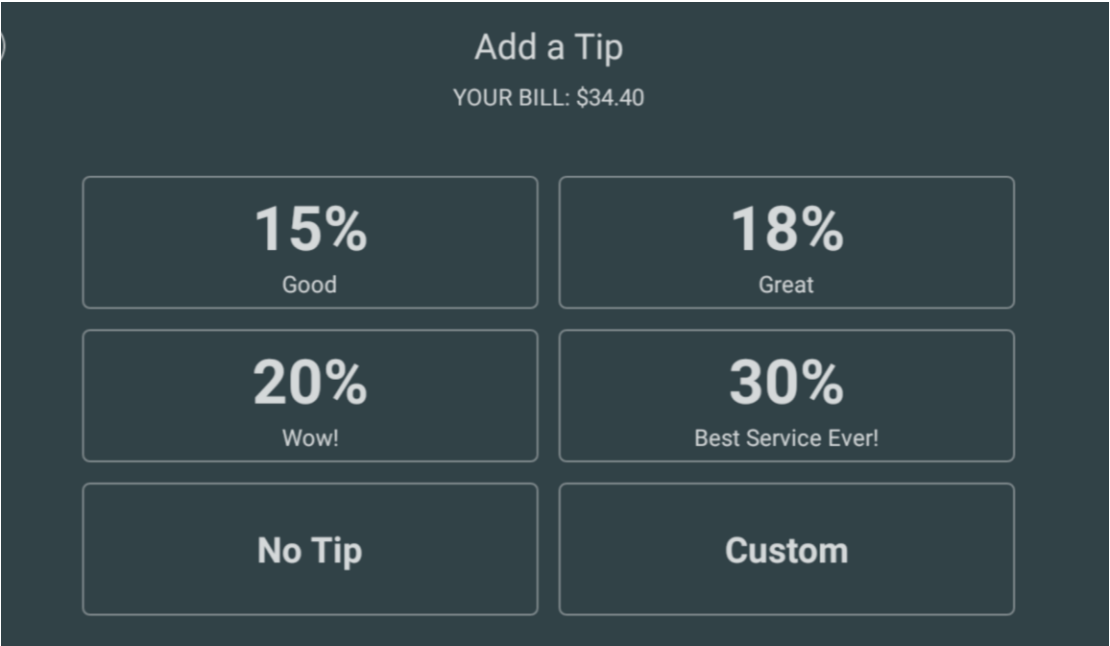
## **HB385 Tip Screen Pictures.pdf**

Uploaded by: Mary Lehman

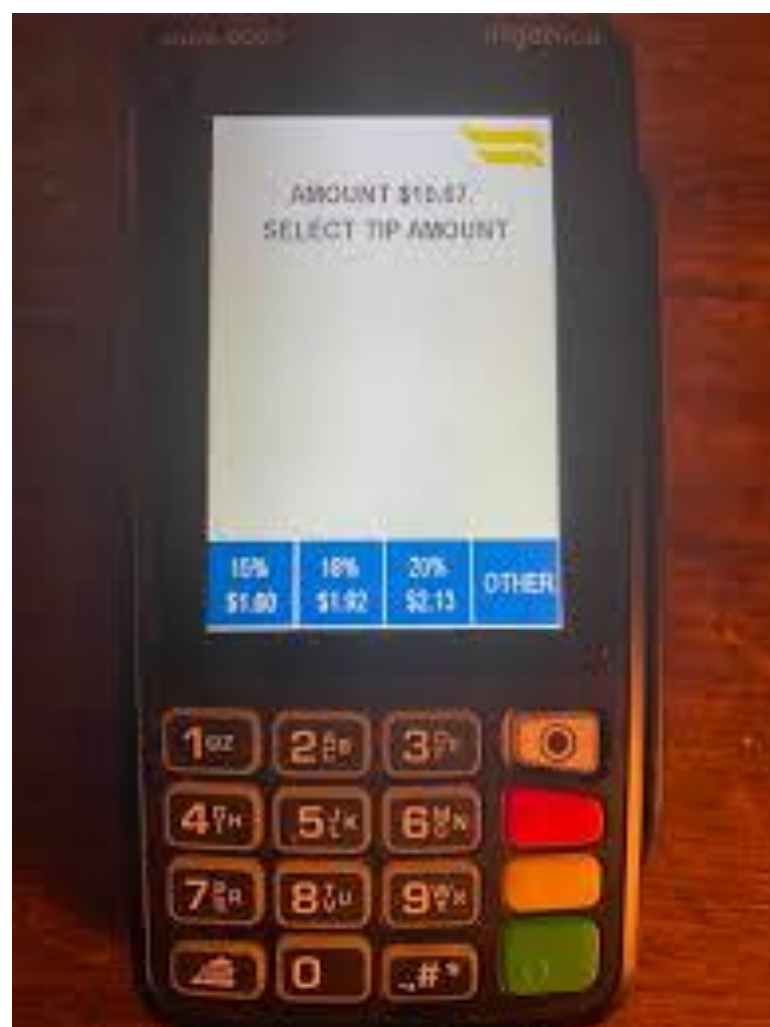
Position: FAV













# **HB385 Tipping AMENDMENT Penalties.pdf**

Uploaded by: Mary Lehman

Position: FAV



**HB0385/363829/1**

AMENDMENTS  
PREPARED  
BY THE  
DEPT. OF LEGISLATIVE  
SERVICES

17 MAR 25  
16:18:49

BY: Delegate Lehman  
(To be offered in the Finance Committee)

AMENDMENT TO HOUSE BILL 385  
(Third Reading File Bill)

On page 3, strike beginning with the comma in line 22 down through “ARTICLE” in line 23.

# **Testimony in Support of HB 385 Automatic Tip Prompt**

Uploaded by: Tom Clark

Position: FAV



# International Brotherhood of Electrical Workers

JOSEPH F. DABBS: Business Manager • THOMAS C. MYERS: President • RICHARD D. WILKINSON: Vice President  
CHRISTOPHER M. CASH: Financial Secretary • RICHARD G. MURPHY: Recording Secretary • WILLIAM T. NG: Treasurer



## TESTIMONY IN SUPPORT OF HB 385 CONSUMER PROTECTION-AUTOMATIC TIP PROMPT SCREEN

March 19, 2025

TO: Chair Beidle, Vice Chair Hayes and members of the Senate Finance Committee FROM:  
Tom Clark, Political Director Intl. Brotherhood of Electrical Workers Local 26

Madam Chair, Mr. Vice Chair, and distinguished members of the Senate Finance Committee. I ask you to **support HB 385**, a bill that is a practical response to the world of 2025 and its use of electronic payments.

Many workers rely on tips to put food on their own table. HB 385 ensures that tips for exceptional service go to the very person that delivers that exceptional service, not to the business owners or someone not involved in the act itself. I understand that some businesses add a service charge, which is their right to do so. This smart legislation seeks to make it clear to the customer who is to receive this “service charge” or “tip”.

The “ask” of this bill is simple and has virtually no fiscal effect on the business or customer. The bill only states that on each electronic transaction, a discloser is conspicuously displayed on the screen. A disclosure that clearly states to whom the tip will be allocated. This point of sale, electronic transaction is commonplace in 2025, and I salute the sponsors of this bill for recognizing an issue that is faced by Mr. and Mrs. Marylander each day. And a bill that will put well deserved tips in the pockets of hardworking people in the food and service industry.

I respectfully ask that you join with me and those in the food and service industry and **support HB 385**. Support the clarity this bill gives to the consumer and support the proper payment that is received by the tipped worker. Thank you.



# **HB 385 - Crossover Testimony.pdf**

Uploaded by: Donna Edwards

Position: FWA



# MARYLAND STATE & D.C. AFL-CIO

AFFILIATED WITH NATIONAL AFL-CIO

7 School Street • Annapolis, Maryland 21401-2096

Balto. (410) 269-1940 • Fax (410) 280-2956

*President*

Donna S. Edwards

*Secretary-Treasurer*

Gerald W. Jackson

## HB 385 - Consumer Protection - Automatic Tip Prompt Screen - Requirements

Senate Finance Committee

March 19, 2025

### SUPPORT WITH AMENDMENTS

Donna S. Edwards

President

Maryland State and DC AFL-CIO

Madame Chair and members of the Committee, thank you for the opportunity to provide testimony in support of HB 385 if amended. My name is Donna S. Edwards, and I am the President of the Maryland State and DC AFL-CIO. On behalf of the 300,000 union members in the state of Maryland, I offer the following comments.

Consumers deserve transparency when tipping. HB 385 ensures this at the point of sale by requiring display screens at licensed businesses with tip prompts to show who will be receiving the tips. Consumers should be confident that their voluntary contributions are going to who they were intended for, while workers should not have to worry that their earned compensation is going somewhere else through misleading tip screens or service fees on point of sale systems.

While we support the substantive purpose of the bill, we propose the following amendment that recognizes collective bargaining agreements within the tip default amount:

On page, under section 14-1328, insert the following text on (B)(2):

***“A TIP AMOUNT SET AT ZERO BY DEFAULT UNLESS OTHERWISE COVERED BY A COLLECTIVE BARGAINING AGREEMENT.”***

The rise in prominence of digital point of sale systems has led to “tipflation” and confusion for consumers.<sup>1</sup> Some digital point of sale companies like Square receive a percentage of every transaction, including the tips, so the companies are incentivized to promote tips whenever possible. Workers and consumers deserve the confidence that workers receive the tip meant for them.

Tip screens have now been introduced into industries that formerly did not rely on tipped workforces.

A 2024 report done by national HR and payroll company, Paylocity, found that over 60% of people are uncomfortable with tipping, and over 70% want clearer, more transparent tipping practices to alleviate

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<sup>1</sup> Karon Warren. “Tipflation: What It Is and How It Is Changing Tipping Culture in America.” Investopedia. October 17, 2023.

that discomfort.<sup>2</sup> A lack of transparency and “tipflation” may ultimately lead to lower take home earnings and poorer working conditions for employees who depend on tips as a significant part of their income. Without policies that enforce transparency in the tipping process, we risk losing a substantial portion of workers in these fields. For these reasons, we urge the committee to issue a favorable report for HB 385 if amended.

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<sup>2</sup> “Employee Benefits and Tipping Study Report.” Paylocity. September 10, 2024

# **hb 385 Crossover Support Letter.pdf**

Uploaded by: Karen Straughn

Position: FWA



**CAROLYN A. QUATTROCKI**  
*Chief Deputy Attorney General*

**LEONARD J. HOWIE III**  
*Deputy Attorney General*

**CARRIE J. WILLIAMS**  
*Deputy Attorney General*

**SHARON S. MERRIWEATHER**  
*Deputy Attorney General*

**ZENITA WICKHAM HURLEY**  
*Chief, Equity, Policy, and Engagement*



**STATE OF MARYLAND  
OFFICE OF THE ATTORNEY GENERAL  
CONSUMER PROTECTION DIVISION  
MEDIATION UNIT**

**ANTHONY G. BROWN**  
*Attorney General*

**WILLIAM D. GRUHN**  
*Division Chief*

**KAREN S. STRAUGHN**  
*Unit Director*

**PETER V. BERNIS**  
*General Counsel*

**CHRISTIAN E. BARRERA**  
*Chief Operating Officer*

410-576-7942  
[kstraughn@oag.state.md.us](mailto:kstraughn@oag.state.md.us)  
Fax: 410-576-7942

March 19, 2025

To: The Honorable Pamela Beidle  
Chair, Finance Committee

From: Karen S. Straughn  
Consumer Protection Division

Re: House Bill 385 – Consumer Protection – Automatic Tip Prompt Screen - Requirements (SUPPORT WITH AMENDMENT)

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The Consumer Protection Division of the Office of the Attorney General submits the following written testimony in support of House Bill 385 submitted by Delegates Mary A. Lehman, *et al*, as amended. This bill requires each licensed business that uses a point-of-sale system at the time of checkout that displays a screen prompting a customer to select an amount for a tip to conspicuously display a disclosure that the tip will be paid to employees and a tip amount set to \$0 or a “No Tip” option. The Consumer Protection Division seeks an amendment to restore the enforcement provisions under the Consumer Protection Act, including a private right of action for deceived consumers.

Consumers are increasingly asked to provide a tip when purchasing everyday items. This can range from restaurants, to retail stores, to auto mechanics and more. The business determines the tip suggestions, but they typically range from 10% to 30% of the total bill. The Federal Trade Commission has taken action against businesses that misled consumers about the purpose of their tips by diverting them from their employees and, instead, using consumer tips to defray overhead.<sup>1</sup> Although the Division believes that failure to disclose that tips are not being allocated to employees already violates the Consumer Protection Act, this bill would expressly require a disclosure that the tips are being allocated to

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<sup>1</sup> See e.g. FTC Press Release – Amazon Flex (“Amazon will pay more than \$61.7 million to settle Federal Trade Commission charges that it failed to pay Amazon Flex drivers the full amount of tips they received from Amazon customers over a two and a half year period.”) at <https://www.ftc.gov/legal-library/browse/cases-proceedings/1923123-amazon-flex>.

employees and make failure to make the disclosure or deviation from such allocation a violation of the Act.

While most businesses that use a point-of-sale system distribute tips to the employees who helped the customer, some may distribute the tips more generally among employees, and still others may be failing to distribute all of the tips to the employees, thereby deceiving consumers about the use of the surcharge. Consumers should not be misled into leaving a tip thinking it is for a helpful employee when it is not. Consumers should also not be told that their payments are “tips” when, in fact, they are collected by the business for its overhead.

This bill does not require that a tip be provided, only that the point-of-sale system identify that the tip is being provided to employees. This will allow consumers to make an educated decision about whether and how much to tip. Additionally, by setting a tip amount to \$0 or providing a “No Tip” option, it lessens the pressure on consumers to leave a tip or, if the consumer chooses to tip, give the suggested amount.

The bill was amended in the House to remove §§ 13-408 and 13-411 from the enforcement provisions. However, consumers who are deceived as to where their tips are going should have the right to bring an action to recover the money taken from them through deception. The Consumer Protection Division seeks the attached amendment which will restore those sections and will permit a private right of action by consumers harmed by a violation of this law.

For these reasons, the Consumer Protection Division asks that the Finance Committee return a favorable report on this bill with the amendments described.

cc:     The Honorable Mary A. Lehman  
          The Honorable Gabriel Acevero  
          The Honorable Nick Allen  
          The Honorable Heather Bagnall  
          The Honorable Linda Foley  
          The Honorable Michele Guyton  
          The Honorable Kevin M. Harris  
          The Honorable Julian Ivey  
          The Honorable Dana Jones  
          The Honorable Aaron M. Kaufman  
          The Honorable Robbyn Lewis  
          The Honorable Jeffrie E. Long, Jr  
          The Honorable Joseline A. Pena-Melnyk  
          The Honorable N. Scott Phillips  
          The Honorable Andrew C. Pruski  
          The Honorable Stuart Michael Schmidt, Jr.  
          The Honorable Vaughn Stewart  
          The Honorable Deni Taveras  
          The Honorable Kym Taylor  
          The Honorable Nicole A. Williams  
          The Honorable Jamila J. Woods  
          The Honorable Chao Wu  
          The Honorable Natalie Ziegler  
          Members, Finance Committee

AMENDMENT TO HB 385 (2025)

Amendment 1

On Page 3, Strike beginning with “except” in line 22, down through “Article” in line 23.

# **HB385\_FIN\_RestaurantAssoc\_Thompson\_UNF.pdf**

Uploaded by: Melvin Thompson

Position: UNF

## **House Bill 385**

### *Consumer Protection - Automatic Tip Prompt Screen - Requirements*

March 19, 2025

Position: **Oppose unless amended**

Madame Chair and Members of the Senate Finance Committee:

The Restaurant Association of Maryland has been working with the bill sponsor on amendments to address our concerns. And we sincerely appreciate that the sponsor accepted many of our amendments in the House. However, we remain opposed to House Bill 385 unless our concern about the potential penalties is also addressed.

We worked with the sponsor on amendment language to address our concerns regarding the compliance challenges of including the required disclosure on point-of-sale (POS) system equipment with small display screens. We also worked on the appropriate language for such a disclosure and tip options, and to narrow the scope to exclude payment transactions by customers seated at a table or bar.

We also support the House amendment that exempts these violations from §§13-408 and 13-411 of the enforcement and penalty provisions contained in Title 13. Section 13-408 would have allowed a private right of action, which would not be appropriate for these types of violations.

We still have significant concern about the potential penalties for violations. Under the bill, penalties could be up to \$10,000 for a first offense and up to \$25,000 for subsequent offenses under §13-410 of Title 13. These are stiff penalties for a mere disclosure violation. A business's failure to provide the required disclosure as specified in the bill would be "*an unfair, abusive, or deceptive trade practice within the meaning of Title 13.*" And the business would be subject to penalties despite distributing all POS tips to employees as customers intended and as labor laws already require.

We respectfully request that the Senate Finance Committee adopt an amendment to require a written notice of violation with 90 days to comply for a first violation (see amendment on page 2). Such a warning with time to comply is reasonable and is more appropriate for such a disclosure violation. Moreover, we have heard that it may be challenging for some POS system providers to make the required software changes, and some merchant businesses may require new hardware. A violation notice with time to comply is warranted for such a requirement that involves technology upgrades.

*(more)*

Thank you for your consideration of our concerns.

Sincerely,



Melvin R. Thompson  
Senior Vice President  
Government Affairs and Public Policy

#### **Amendment**

On page 3, in line 18, strike “A VIOLATION OF THIS SECTION IS:” and substitute:

**“FOR A FIRST VIOLATION OF THIS SECTION, THE DIVISION OF CONSUMER PROTECTION SHALL ISSUE A WRITTEN NOTICE OF VIOLATION TO THE BUSINESS AND ALLOW AT LEAST 90 DAYS FOR THE BUSINESS TO COMPLY.**

**(G) A FAILURE TO COMPLY UNDER SUBSECTION (F) OF THIS SECTION OR A SUBSEQUENT VIOLATION OF THIS SECTION BY THE SAME BUSINESS IS:”**

#### **Important Background Note on Title 13 Penalties**

*In 2018, Maryland enacted HB 1634 ([CH0731](#)), Financial Consumer Protection Act of 2018. Among other things, this law increased the penalties under Maryland’s Consumer Protection Act from \$1,000 to \$10,000 and to \$25,000 for subsequent violations. That legislation primarily addressed abusive, unfair and deceptive trade practices by the financial services and lending sectors. In explaining the rationale for the increased penalties, former Maryland Attorney General Brian Frosh commented in his testimony during the 2/9/2018 [HB 1634 House Economic Matters Committee hearing](#), that “...a thousand bucks ain’t much of a deterrent.” [referring to financial institutions/large corporations and their lawyers who try to drag out Maryland consumer protection cases]. These higher Title 13 penalties in effect today were not envisioned to apply to violations for merely failing to provide a POS screen disclosure as required by this year’s HB 385.*