



February 17, 2026

Hon. Kriselda Valderrama
Chair
House Economic Matters Committee

RE: House Bill 470 - Digital Asset and Blockchain Technology Task Force - Establishment
Position: ***Favorable with Amendments***

Chairs Valderrama, Vice-Chair Charkoudian and Committee Members:

The MD|DC Credit Union Association is a trade association representing over 65 credit unions in Maryland, along with their more than 1.9 million members. Maryland credit unions are not-for-profit, member-owned financial cooperatives that serve communities across the State.

The expansion of blockchain technology and cryptocurrency presents both significant opportunities and risks for Maryland's financial services sector, state government operations, and consumers. We commend the sponsors for recognizing the need for a comprehensive analysis of:

- The overall concepts and applications of blockchain technology and cryptocurrency;
- Associated risks, including privacy concerns, and potential benefits for public and private sector use;
- The impact on state revenues and energy consumption;
- Regulatory frameworks necessary to protect consumers while fostering innovation.

This proactive approach to understanding and potentially regulating these technologies is essential for Maryland to remain competitive while safeguarding the interests of our residents and businesses.

Requested Amendment: Enhanced Financial Institution Representation

While we support the bill's intent, we respectfully request an amendment to Section 1(b)(6)(i) to ensure adequate representation of Maryland's diverse financial services industry on the task force.

Current language:

(i) one representative of the financial services industry;

Proposed amendment:

- (i) one representative of the banking industry; and
- (ii) one representative of the credit union industry;



Rationale for Amendment

Credit unions and banks, while both serving as financial institutions, operate under fundamentally different regulatory frameworks, charter structures, and business models:

- **Different organizational structures:** Credit unions are member-owned, not-for-profit cooperatives; banks are shareholder-owned, for-profit corporations.
- **Different risk perspectives:** Credit unions' cooperative structure and field of membership requirements create unique considerations when evaluating cryptocurrency and blockchain technology adoption.
- **Different consumer bases:** Credit unions serve specific membership communities and may face distinct challenges and opportunities in implementing digital asset technologies.

Given the task force's mandate to examine risks, benefits, and regulatory frameworks for blockchain and cryptocurrency, it is essential that both banking and credit union perspectives are represented. The financial services industry is not monolithic, and the safety and soundness concerns, operational capabilities, and regulatory considerations differ significantly between these two sectors.

Including separate representation ensures that:

1. The task force receives comprehensive input from Maryland's full spectrum of financial institutions.
2. Recommendations account for the unique regulatory and operational environments of both banks and credit unions.
3. Consumer protection measures reflect the diverse ways Marylanders access financial services.
4. Any proposed regulatory framework appropriately addresses the distinct characteristics of different financial institution types.

We believe House Bill 470, with the requested amendment to ensure both credit unions and for-profit banking industry representation on the task force, will enable Maryland to conduct a thorough, balanced analysis of blockchain technology and cryptocurrency. This inclusive approach will result in more comprehensive recommendations that serve the interests of all Maryland financial institutions and the consumers they serve.

We respectfully request a **FAVORABLE WITH AMENDMENTS** report on House Bill 470.

Sincerely,

A handwritten signature in blue ink that reads "John Bratsakis". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John Bratsakis
President/CEO



MDIDC
MDIDC Credit Union Association
Credit Union Association