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To: Senate Finance Committee
From: Phillip Robinson
Date: January 31, 2022
Subject: **STATEMENT IN OPPOSITION TO SB 252**

On behalf of the consumers throughout the State of Maryland who are victims of the unfair and deceptive conduct by financial service companies and the people who work for them, I oppose SB 252 because it is not clear why the Commissioner of Financial Regulation requires the purported authority sought by this legislation. The Commissioner has not communicated with Maryland's traditional consumer advocates to explain the need for the legislation.

The current Commissioner of Financial Regulation, as compared to his predecessors, also has taken a hands-off approach to enforcement of his licensees and generally not pursued meaningful enforcement activities of his licensees who harm your constituents by churning unlawful fees, violating Maryland's laws, or otherwise acting unfairly and deceptively.

The bill seems aimed to permit the Commissioner to establish different standards by regulation for "unfair, deceptive, abusive, or injurious" conduct than already exists under the Maryland Consumer Protection Act. There simply is no just explanation why the same standards under the CPA should not be referenced in the bill rather than permitting the Commissioner to side-step the standards already in place under the law.

ON BEHALF OF YOUR CONSTITUENTS AND MY CLIENTS THROUGHOUT THE STATE PLEASE VOTE UNFAVORABLE ON SB 252. The role of the Commissioner's enforcement authority and influences from political forces upon that position should be studied further to not create unintended loopholes. This is especially so when the Commissioner has not provided sufficient basis for needing this authority which is already governed by other laws.