



March 3, 2025

The Honorable Guy Guzzone and Members of the Committee
Senate Budget and Taxation Committee
Maryland Senate

RE: SB 904 – Data Brokers

Dear Chair Guzzone and Members of the Committee:

The National Insurance Crime Bureau (NICB) is a national, century-old, not-for-profit organization supported by approximately 1,200 property and casualty insurance companies, including many who write business in Maryland. Working hand-in-hand with our member companies and Maryland state and local law enforcement, we help to detect, prevent, and deter insurance crimes, including vehicle and catalytic converter theft.

While NICB provides value to our member companies, we also serve a significant public benefit by helping to stem the estimated billions of dollars in economic harm that insurance crime causes to individual policy holders across the country every year. Maryland recently acknowledged the benefit we serve by wholly exempting NICB from the Maryland Online Data Privacy Act of 2024. As Maryland takes up the issue of “data brokers,” we respectfully seek the same protection of our vital work to protect Marylanders from crime and fraud.

Senate Bill 904 would establish a framework for registering and taxing “data brokers” in Maryland, among other measures. NICB is concerned that, unless amended, the bill would have the unintended consequence of impeding NICB’s anti-fraud efforts—including our information sharing with law enforcement and other partners within the anti-fraud ecosystem—and our ability to fulfill the significant public benefit we provide to policyholders in Maryland. NICB is not a “data broker,” nor do we sell data. However, if NICB were unnecessarily captured by this bill’s current language (which includes the “sharing” of information), NICB’s ability to coordinate timely anti-fraud information between and among law enforcement and other partners—and the further prospect of being taxed in Maryland for our nonprofit work—would be undermined.

To ensure that our anti-fraud work can proceed unabated, **NICB respectfully seeks an amendment to SB 904 at section 7.3-101(F)(2) to exempt NICB as an entity, just as we are exempted in the Maryland Online Data Privacy Act.** Consistent with that Act, we propose the following language for consideration:

(2) “DATA BROKER” DOES NOT INCLUDE:

(III) A NONPROFIT ORGANIZATION THAT IS ORGANIZED FOR THE PURPOSES OF ASSISTING:

- 1. LAW ENFORCEMENT AGENCIES IN INVESTIGATING CRIMINAL OR FRAUDULENT ACTS RELATING TO INSURANCE; OR**
- 2. FIRST RESPONDERS IN RESPONDING TO CATASTROPHIC EVENTS.”**



We thank you for considering our views as you deliberate the merits of this bill. We strongly encourage you to utilize NICB as a resource and partner in the fight against insurance crime. If you have any questions or need additional information, please contact me at edecampos@nicb.org or 847.989.7104.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric M. DeCampos", with a long horizontal flourish extending to the right.

Eric M. DeCampos
Senior Director
Strategy, Policy and Government Affairs
National Insurance Crime Bureau