



March 6, 2025

My name is Albert Bloomfield and I own several death care businesses in Maryland including funeral homes. Below are my arguments against the bill. In addition, I have included copies of the following:

1. A copy of the formal complaint we made to the State Board of Morticians and Funeral Directors.
2. A copy of the survey I did of 20 Jewish funeral homes, including 5 not-for-profit.
3. A saved image of the Jewish Funeral Practices Committee of Greater Washington (JFPCGW) website from 2015 with highlighted portions
4. A saved image of the JFPCGW listed in Jewish community publication under the section with funeral homes and cemeteries. Note their statement about financial exploitation.

Argument Against House Bill 1051

House Bill 1051, which seeks to facilitate the establishment of not-for-profit funeral homes, presents several concerns that must be carefully examined before considering its approval. While the bill is presented as a means to support religious and community-based funeral services, it ultimately risks disrupting the existing funeral marketplace, creating unfair advantages for select organizations, and reducing essential regulatory oversight.

1. Unfair Market Disruption

The Jewish Funeral Practices Committee of Greater Washington (JFPCGW), which has spearheaded this legislation has successfully operated within the current system for 48 years by contracting with licensed funeral homes to provide low-cost Jewish funerals. The agreement offers families a basic Jewish funeral at a drastically reduced price set by JFPCGW while funeral homes shoulder the operational costs and regulatory burdens. However, JFPCGW now seeks to change state law to allow for a not-for-profit funeral home under its direct control. This shift would give them a significant and unfair advantage over traditional funeral homes, which are required to comply with stringent licensing, operational, and financial obligations. By eliminating market competition under the guise of religious exemption, HB 1051 would allow an entity like JFPCGW to operate without the same financial and legal responsibilities that all other funeral providers must bear. This preferential treatment would distort the marketplace and undermine consumer choice by creating an uneven playing field.

www.SagelBloomfield.com

170 Rollins Avenue | Rockville, MD 20852 | P. 301.340.1400 | F. 301.340.6087



2. Lack of Operational Experience

JFPCGW has no experience owning or operating a funeral home. For nearly five decades, their role has been limited to negotiating funeral contracts, leaving the complex operations of a funeral home to licensed professionals. Funeral home operations require substantial financial, physical, emotional, and logistical commitments, including regulatory compliance, facility maintenance, and staff training. JFPCGW's insistence that volunteers alone can handle funeral arrangements raises serious concerns about their ability to provide consistent, high-quality services. Funeral directors exist for a reason—they ensure that grieving families receive professional, compassionate, and legally compliant services. JFPCGW's past statements, including those by Vice President David Zinner made directly to me where he said “funeral directors have no relevance and should not exist”, indicate a fundamental disregard for the funeral director profession, raising further doubts about their ability to responsibly manage a funeral home.

3. Regulatory Oversight and Consumer Protection Risks

All licensed funeral homes in Maryland must adhere to strict regulations, including Federal Trade Commission (FTC) guidelines and Maryland state laws under COMAR. These regulations protect consumers from fraud, mismanagement, and unethical practices. However, JFPCGW has a history of disregarding these legal requirements. In 2015, a formal complaint was filed against them for violating FTC and Maryland COMAR laws, yet no action was taken due to their religious affiliation. If HB 1051 passes, JFPCGW and other religious organizations could operate funeral homes with reduced oversight, using religious exemptions to circumvent state and federal regulations. This lack of accountability could expose consumers to increased risks, including potential mismanagement of funds, inconsistent service quality, and legal ambiguities regarding liability. Maryland legislators must ensure that all funeral service providers—whether for-profit or not-for-profit—are held to the same legal and ethical standards to protect public interest.

4. The Real Motivation Behind HB 1051

JFPCGW has successfully maintained its low-cost funeral contract for decades. Given this success, the question arises: Why is there a need for a legislative change now? One possibility is that JFPCGW has been advised that their long-standing contract with funeral homes, such as Hines-Rinaldi Funeral Home in Silver Spring, MD, may not be renewed. Instead of adapting by renegotiating a fair market price, they are attempting to create an alternative arrangement that circumvents industry standards and regulations.

Additionally, the financial feasibility of their proposed not-for-profit funeral home is questionable. The current contract price of \$3,330 for a graveside service is significantly lower



than 5 Jewish not-for-profit funeral homes average for the same services, which ranges from \$5,000 to \$7,400 and averaged \$5,800. In contrast, a survey of 15 for-profit funeral homes from across the country for the same services is \$7,679. JFPCGW has been able to maintain this price because it does not bear the full costs of operating a funeral home. If they were to run their own facility, they would either have to dramatically increase prices or seek external funding sources, ultimately undermining the very affordability they claim to protect.

5. A Solution Without Legislation

JFPCGW already has a functional model that works within the established framework. Rather than pushing for a bill that introduces unnecessary risks and market disruptions, they should focus on negotiating fair contracts with funeral homes. If their pricing model is unsustainable under current conditions, they should adjust it accordingly rather than seeking special legislative treatment. They can also recognize that the Jewish funeral homes in the marketplace offer fair and competitive pricing and don't exploit the Jewish community. Their insistence of having an unjustifiably low contract price has distorted the Jewish funeral market in Maryland. JFPCGW appears to be the only organization seeking this legislative change, where is the outpouring of support for the bill? Mr. van Emdon said in his Senate testimony stated "other faith leaders are afraid to speak out in support of the bill in fear of retaliation from funeral directors". This statement is highly offensive to the funeral directors of Maryland as the vast majority of us have strong long-term relationships with religious leaders. This bill should not be considered for the benefit of one organization who contracts for 150-175 funerals per year in a state with 50,000 death a year.

Conclusion

HB 1051 is not about improving funeral services for Maryland residents—it is about granting an unregulated advantage to a single organization at the expense of consumer protection, industry fairness, and regulatory oversight. At the Senate Finance committee meeting there were no other organizations there in support of this bill, only two people connected to JFPCGW. If passed, this bill would create a competitive imbalance, compromise service quality, and set a dangerous precedent for reduced accountability in the funeral industry. Legislators must recognize the risks associated with HB 1051 and reject this bill in favor of preserving an industry that operates under consistent, fair, and necessary regulations. The Maryland funeral marketplace should remain a competitive and transparent environment where all providers, regardless of their status, are held to the same legal and ethical standards.

Respectfully submitted,

A handwritten signature in black ink that reads "Albert Bloomfield". The signature is written in a cursive style and is positioned above a horizontal line.

Albert Bloomfield
Owner

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