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OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION**

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March 3, 2026

TO: The Honorable Kriselda Valderrama, Chair
Economic Matters Committee

FROM: Steven M. Sakamoto-Wengel
Executive Counsel to the Attorney General

RE: House Bill 977 – Veterans Benefits Matters – Claims Servicers –
Requirements -- **LETTER OF CONCERN**

The Consumer Protection Division has concerns that House Bill 977, sponsored by Delegate Allen, could open the door to scam artists taking advantage of Veterans in need of assistance with pursuing claims and appeals for Veterans benefits. 38 CFR 14.636, referenced in HB 977, provides that fees for such services may only be charged by “accredited agents and attorneys”. The Division’s understanding is that Delegate Allen’s intent is to help Maryland Veterans by making it more difficult for unauthorized providers to operate in Maryland. However, the Division is concerned the bill would have the opposite effect. House Bill 977 would allow the collection of fees for those services by persons who are *not accredited* by the VA simply by entering into a written fee agreement that includes a disclosure that the business is not affiliated with the VA. The Consumer Protection Division believes that collecting or offering to collect fees without accreditation violates the Consumer Protection Act and has brought actions against individuals and businesses who collected substantial fees from Veterans offering to provide services that the Veteran could have received for free or who failed to provide any services whatsoever. The Division believes that disclosures set forth in contracts are inadequate to protect Veterans against those who would take advantage of them. The Division strongly believes that allowing fees to be charged by those who have not been accredited by the VA places Veterans at significant risk of becoming victims of fraudulent practices and has let the sponsor know about our concerns. The Division is continuing discussions with Delegate Allen and appreciate his efforts to address our concerns. Accordingly, the Consumer Protection Division respectfully

requests that the Economic Matters Committee take its concerns into account when considering House Bill 977.

cc: The Honorable Nick Allen
Members, Economic Matters Committee