



VETERANS GUARDIAN
VA CLAIM CONSULTING

The Honorable Kriselda Valderrama
House Economic Matters Committee
230 Taylor House Office Building
Annapolis, Maryland 21401

March 3, 2026

Dear Chairwoman Valderrama and Members of the Committee:

Thank you for the opportunity to provide testimony in opposition to House Bill 977 – Veterans Benefits Matters – Claim Servicers – Requirements. For the reasons outlined below, we respectfully urge the Committee to issue an unfavorable report on House Bill 977.

HB 977 would significantly restrict Maryland veterans' ability to choose how they seek assistance in obtaining the disability benefits they earned through honorable service. At a time when more than 260,000 disability claims remain pending nationally, veterans need more options – not fewer.

I am a co-founder of Veterans Guardian VA Claim Consulting and a retired U.S. Army Lieutenant Colonel with 23 years of service, including six deployments. I founded Veterans Guardian to continue serving veterans navigating a complex VA system.

More than 70% of our workforce consists of veterans, military spouses, or immediate family members of veterans. We have received multiple Department of Labor HIRE Vets Medallion Awards, BBB Torch Awards for Ethics, and recognition as a Military Friendly Employer.

We are transparent about our role. We inform every veteran of free options through VSOs, state and county representatives, accredited agents, attorneys, and congressional offices. Many veterans use those options. Others choose us for responsiveness, team-based support, and experience developed across tens of thousands of claims.

We do not:

- Act as accredited agents or attorneys
- Represent veterans before the VA
- Participate in the appeals process
- Employ doctors to perform exams
- Use international call centers
- Collect fees unless a veteran receives an increase

Our fee is contingent upon success and paid one time from new benefits secured. Veterans receive lifetime increased compensation; we are paid only if they succeed.

Veterans Guardian has assisted more than 3,000 Maryland veterans, generating over \$34 million annually in additional disability compensation flowing directly into Maryland communities.

Concerns with HB 977

The central issue with HB 977 is its attempt to impose the federal backpay fee framework under 38 C.F.R. §14.636 onto entities that are not accredited agents or attorneys and do not operate in that capacity.

That federal regulation governs accredited representatives acting before the Department of Veterans Affairs. Veterans Guardian does not act in that role. Attempting to apply that federal regulatory structure beyond its intended scope creates serious legal and constitutional concerns.

To be clear: if the reference to the federal code section were removed, many of the remaining consumer protection provisions could be workable. We support:

- Contingent fee requirements
- Prohibitions on upfront fees
- Written disclosure of free options
- Restrictions on international call centers
- Prohibitions on aggressive solicitation
- Prohibitions on guaranteed outcomes

These are meaningful safeguards. The issue is not consumer protection – it is improper application of a federal accreditation framework to businesses that do not operate under it.

Litigation Update

Maine and New Jersey enacted statutes attempting to impose similar federal representative restrictions on non-accredited consulting entities. Veterans Guardian has challenged those laws in federal court on constitutional grounds. We believe those statutes improperly extend federal accreditation requirements and raise significant preemption and free speech concerns.

Separately, a False Claims Act matter initiated by a former employee was reviewed for several years by the U.S. Department of Justice. The Department declined to intervene. We remain confident in the merits of our position.

We would prefer clarity in legislation rather than litigation. However, states cannot require compliance with federal regulations that do not apply to a given business model.

The Policy Question

The question before this Committee is straightforward:

Can Maryland compel compliance with a federal regulatory framework designed for accredited VA representatives when the entity in question does not operate as one?

We respectfully believe the answer is no.

If the federal code reference is removed, this becomes a constructive consumer protection discussion. If it remains, it raises serious legal concerns that may ultimately require judicial resolution.

Veterans deserve transparency, accountability, and choice. HB 977, as drafted, risks eliminating lawful options without addressing the broader federal policy debate.

For these reasons, we respectfully urge the Committee to issue an unfavorable report on House Bill 977.

We remain committed to working with you to develop balanced solutions that protect veterans while preserving their right to choose how they pursue their claims.

Sincerely,



William C. Taylor, LTC (Ret) US Army
Co-Founder and Chief Operating Officer
Veterans Guardian VA Claim Consulting, LLC