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March 3, 2026

TO: The Honorable Kriselda Valderrama, Chair
Economic Matters Committee

FROM: Hanna Abrams, Assistant Attorney General

RE: House Bill 952 – Consumer Protection – Companion Chatbots –
Regulation (LETTER OF INFORMATION)

The Consumer Protection Division of the Office of the Attorney General (the “Division”) submits this letter of information regarding House Bill 952 (“HB 952”). House Bill 952 regulates artificial intelligence chatbots.

The Division recommends replacing cross reference to the State Finance and Procurement Article¹ in the definition of “artificial intelligence” (page 2, line 13-14), with a cross reference to the Insurance Code’s definition (MD Code Ann., Ins. Law, § 15-10B-05.1). The existing definition does not clearly encompass systems whose primary function is content generation or other original outputs because it is limited to “predictions, recommendations, or decisions.” Although content generation may be, from a technical perspective, a form of prediction, that characterization is not apparent from the term’s ordinary meaning. Second, by restricting objectives to those that are “human-defined,” the definition does not clearly encompass implicit objectives—goals not explicitly coded but learned from data or inferred from behavior. The definition found in the Insurance Code addresses both of these concerns.

The Division asks the Economic Matters Committee to amend the definition of artificial intelligence as discussed when it considers HB 952.

Cc: Delegate Jason C. Buckel
Members, Economic Matters Committee

¹ Md. Code Ann., State Fin. And Proc. § 3.5–801 reads: (c) “Artificial intelligence” means a machine–based system that: (1) can, for a given set of human-defined objectives, make predictions, recommendations, or decisions influencing real or virtual environments; (2) uses machine and human–based inputs to perceive real and virtual environments and abstracts those perceptions into models through analysis in an automated manner; and (3) uses model inference to formulate options for information or action.
