



**Memorandum in Opposition Unless Amended
MD HB 1471**

February 27, 2026

On behalf of PRA Group, Inc. and its wholly-owned subsidiaries (collectively, "PRA"), I am writing to express our concern with **House Bill 1198 ("HB 1471")**. While the bill proposes to provide consumer protections related to identity theft, the bill provides for a private right of action and the option to demand a jury trial which would have unintended consequences for consumers for Maryland businesses and the state.

PRA is a publicly-traded global company, headquartered in Norfolk, Virginia, that, through its subsidiaries, purchases portfolios of consumer receivables from major banks, and then partners with individuals as they repay their obligations, working toward financial recovery. We are a leader in the nonperforming loan industry and take our leadership obligations within our industry seriously. We work with consumers to resolve their obligations and typically offer a discount on the face value of the debt. In addition, we typically charge no pre-judgment interest or fees on debt we purchase domestically. PRA is also a willing participant in any action that combats unethical consumer practices and those actions in harming both consumers and legitimate businesses.

Identity theft is the unauthorized use of someone's personal information to commit fraud or other crimes. It involves someone pretending to be another person to gain money, benefits or access they are not entitled to. PRA applauds the legislature in recognizing the need for additional consumer protections around identity theft and supports additional protections for victims of identity theft. However, providing for a private right of action and the option of demanding a jury trial in the event of a violation of the provisions in HB 1471 will have unintended consequences.

A mechanism for the victims of identity theft to recover for violations under these provisions already exists under the Fair Debt Collection Practices Act and the Maryland Consumer Debt Collections Act. Moreover, jury trials introduce higher costs for the state because they require more personnel, more time and more logistical support than a judge-only trial. The state must pay for jurors, court staff, facilities and extended proceedings, all of which add up quickly. Jury trials also introduce longer timelines because scheduling around jury availability and the more elaborate trial process often means cases take significantly longer to resolve. The higher costs and the extended timeline associated with a jury trial are not necessary and do not benefit the consumer in any way or address the crime of identity theft.

The provisions also seem designed to punish the wrong entity. In the event of identity theft, the consumer whose personal information was stolen is one victim, and while it is essential to protect them, it is also



important to remember that the creditor who was deceived by the third-party and provided credit was also a victim in the transaction. Punishing the creditor or assignee of the creditor in the instance of identity theft when they are also a victim of the crime seems misguided from a public policy standpoint.

PRA therefore urges legislature to **amend HB 1471 as attached before considering any final passage.**

Best regards,

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