

Maryland Licensing Workgroup

Meeting Summary

January 16th 2026, 10:00 a.m. (virtual)

All meetings of the Maryland Licensing Workgroup are recorded. The recording for this meeting is posted online and available to members of the public at

<https://youtu.be/4HF2dEfGYqk>.

NOTE: Under General Provisions Article, Annotated Code of Maryland §3-306, the recording constitutes the official minutes of the Maryland Licensing Workgroup meeting. This summary is prepared for ease of use by members and constitutes a public document under the Maryland Public Information Act. In the unlikely event the recording for the meeting summarized herein becomes unavailable for any reason, this summary shall constitute the official minutes for that meeting.

In Attendance

Workgroup Members

Tony Salazar, Chair (Commissioner of Financial Regulation); Matthew Calhoun; Ben Carney (Gordon, Wolf & Carney); Kevin Kesecker (SECU of Maryland); Milissa Murray (Member of the Public); Chris Rahl (Gordon Feinblatt); Emanwel Turnbull (Holland Law Firm); Nanci Weissgold (Alston & Bird); Marceline White (Economic Action Maryland)

Invited Guests

John Van Alst (National Consumer Law Center); Nora Nichols (Office of the Attorney General); Robert Enten (Gordon Feinblatt)

Staff and Counsel, Office of Financial Regulation (OFR)

Clifford Charland (Assistant Commissioner); Meredith Merchant (Operations Director); Ayanna Daugherty (Senior Analyst); Emily Hanson (Assistant Attorney General); Gretchen Reimert (Assistant Attorney General); Kenneth Krach (Assistant Attorney General)

Public Attendees

Michael Johansen; Peter Kitzmiller; Phillip Robinson; Jason Weintraub

Agenda

Welcome and Opening Remarks

Tony Salazar (Workgroup Chair), Commissioner of Financial Regulation

- Mr. Salazar welcomed the Workgroup members and public attendees and noted that the meeting is being recorded.
- Mr. Salazar reported that the Workgroup is authorized for nine members but currently has a vacancy, operating with eight members.
- Mr. Salazar mentioned that an interim report, based on consideration of comments from group members, was submitted by OFR by December 31st and is available on the Workgroup's webpage.

Collection Agency Licensing Proposals

Tony Salazar (Workgroup Chair), Commissioner of Financial Regulation

- Mr. Salazar introduced discussion on proposals regarding the Collection Agency Licensing Board, specifically: allowing the Commissioner to license collection agencies without needing Board action (with denials appealable to the Board), revising the Board's enforcement authority, and loosening consumer member requirements.
- Mr. Carney provided context after researching the Collection Agency Licensing Board's history, noting that the legislature extended the life of the Board until 2032 in 2021, suggesting its continued importance.
- After discussion, Mr. Salazar secured consensus to have staff draft language for the proposed changes to the Collection Agency Licensing Board to allow members to review and discuss further at a future meeting.

Consumer Loan and Installment Loan Lender Licensing

Clifford Charland, Assistant Commissioner, Financial Services Licensing & Supervision

- Mr. Charland continued the discussion of consumer loan and installment loan licensing from the previous meeting, focusing on statutory overlap and the need for clarity. He provided an overview, explaining that Maryland has four different laws under which non-mortgage loans to consumer borrowers can be made, with these two corresponding licenses.
- Mr. Charland also highlighted that the qualifications for both licenses are identical, and holding a consumer loan license exempts one from the installment loan license,

yet, as of a few weeks ago, 13% of consumer loan license holders also have the installment loan license, indicating potential confusion.

- Mr. Salazar emphasized that Maryland is the only state not exempting out-of-state banks, which has caused issues. Chris Rahl also agreed that Maryland is uniquely strange in requiring a license for out-of-state banks subject to federal and other state supervision.
- Mr. Carney suggested that the Commissioner could notify the duplicate license holders that they do not need both licenses. The Consumer Loan Law provides stronger consumer protections and serves as a default if a lender does not elect another regime.

Gretchen Reimert, Assistant Attorney General, Office of Financial Regulation

- Ms. Reimert provided her perspective, stating that in her experience consumers only care that an entity is licensed and properly monitored, regardless of the license type. She stressed that clarifying ambiguity in the statutory scheme makes enforcement easier against bad actors who exploit confusion.

Discussion and Q&A

Mr. Salazar facilitated discussion and Q&A between Mr. Charland, Ms. Reimert and the Workgroup members.

NOTE: Before moving to the next topic (motor vehicle financing and auto dealers), Mr. Salazar reminded the Workgroup members that if they plan on testifying before the General Assembly during the legislative session, they must follow approval protocols. A guidance memo will be emailed to the Workgroup members.

Motor Vehicle Financing and Auto Dealers

Ben Carney (Workgroup Member), Gordon Wolf & Carney

- Mr. Carney continued discussing his proposal from December's Workgroup meeting, on a potential recommendation requiring dealers engaged in transactions as a creditor to be licensed under the Financial Institutions Article.

John Van Alst, National Consumer Law Center

- Mr. Van Alst discussed that auto finance is currently the largest non-mortgage area of consumer debt in the US, with transactions occurring frequently, creating more opportunities for abuse and fraud.
- Mr. Van Alst stated that the process is extremely complex often without the consumer realizing the dealer's discretion over credit and add-on terms.

- Mr. Van Alst also noted that auto dealers act as creditors with central roles in financing, while consumers often lack the ability to vindicate their rights.

Discussion and Q&A

Mr. Salazar facilitated discussion and Q&A between Mr. Carney, Mr. Van Alst and the other Workgroup members.

Third-Party Litigation Financing

Robert Enten, Gordon Feinblatt

- Robert Enten introduced the topic of third-party litigation financing, which involves companies financing the cost of litigation in exchange for a return dependent on some recovery.
- He argued that these companies are acting as lenders, despite their claims otherwise, citing high annual rates of return, with as a median of 59%.

Recommendations, Next Steps, and Adjournment

Tony Salazar (Workgroup Chair), Commissioner of Financial Regulation

Mr. Salazar identified next steps and topics for future meetings, and responded to member questions.

- OFR staff will draft language for recommendations related to collection agency licensing for the Workgroup members to discuss at the next meeting.
- Workgroup members will cogitate on the issues of consumer loans and installment loans and send recommendations to Meredith Merchant.
- Workgroup members will consider the topic of motor vehicle financing and licensing for auto dealers, and provide comments during the next meeting regarding whether registration addresses this issue the same way that licensing would, considering resource limitations.
- Mr. Salazar will include a mortgage topic and the continued discussion of licensing for motor vehicle financing and third-party litigation financing in the next meeting's agenda.
- Workgroup members are encouraged to email staff with their proposals or recommendations, speaker suggestions, and any supporting research for inclusion in future meetings.
- The meeting adjourned at 11:56 a.m.

Next Meeting and Contact Info

Date and Time

February 13, 2026

10:00 a.m. to 12:00 p.m.

Virtual (Google Meet)

Participation Options

Join by Video: <https://meet.google.com/mco-cjpg-dqj>

Join by Phone: 1-262-885-7022 (PIN 550 367 512#)

More phone numbers: <https://tel.meet/mco-cjpg-dqj?pin=1299343031366>

Staff Coordinator

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