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Howard County Association of REALTORS®

To: Council Chair Walsh and Honorable Members of the County Council

Date: October 15, 2025

RE: Opposition to CB67-2025 | Consumer Protection updates and amendments

Good Morning Chairperson Walsh and Members of the Howard County Council,

On behalf of the Howard County Association of REALTORS®, we oppose CB67-2025. We share the goal of strong consumer protection. This bill goes too far, creates uncertainty for housing transactions, and introduces new enforcement powers without clear guardrails.

The expansion from summons to subpoena authority raises due process concerns, especially for small firms and housing providers. Broad definitions and new prohibited practices invite inconsistent interpretation and uneven enforcement. Penalty changes risk disproportionate impacts for technical errors in advertising or disclosures. The County already benefits from state and federal consumer laws, along with state licensure for real estate professionals. CB67-2025 layers new rules on top of existing frameworks and increases cost without clear evidence of improved outcomes.

Housing markets work best under clear, predictable rules. Ambiguity in the bill will slow transactions, increase compliance expenses, and encourage defensive practices that do not help consumers. Training materials, forms, and brokerage procedures would need significant revisions with little transition time. Complaint resolution will drift from education and correction toward punitive actions, which reduces cooperation and timely fixes.

If the Council proceeds, we urge targeted amendments. Align all definitions with state law to avoid conflict. Add a safe harbor for firms that adopt County-issued best practices and correct first-time violations within a set period. Require education and notice before penalties for technical issues. Limit subpoena authority to specified conduct with supervisory approval and written findings. Prioritize mediation for housing-related complaints before formal enforcement. Publish quarterly complaint data with categories and outcomes so policy stays driven by facts. Include a one-year sunset with a report on impacts, costs, and measurable benefits for consumers.



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REALTORS® support fair dealing and transparent markets. We stand ready to help craft a focused approach that targets bad actors while preserving efficient, affordable transactions for renters, buyers, sellers, and housing providers.

Sincerely,

Cory Flere, ABR, GRI, AHWD, MRP, C2EX
Chair, Legislative Committee
Howard County Association of REALTORS®