



To: The Honorable Kris Jordan
Chair, House Committee on Financial Institutions

Members of the House Committee on Financial Institutions

From: Luke Rollins
Director of State Government Affairs – Midwest Region
RELX (Reed Elsevier Lexis Nexis, including LexisNexis Risk Solutions)

Date: October 30, 2019

Re: Letter of Opposition to Ohio House Bill 38

Chair, Vice Chair, Ranking Member & Members of the Committee:

We respectfully submit this letter of opposition to the commercial credit regulation proposed in Ohio House Bill 38.

By way of background, RELX is the parent organization of LexisNexis that was founded in Dayton, Ohio and maintains a significant presence in Miamisburg, Ohio. LexisNexis is a recognized leader in providing authoritative legal, public records and business information. LexisNexis plays a vital role in supporting government, law enforcement and business customers who use our information services for important uses including: detecting and preventing identity theft and fraud, locating suspects, finding missing children and preventing and investigating criminal and terrorist activities. LexisNexis Risk Solutions is a provider of commercial credit reports to the US financial services industry.

LexisNexis is opposed to the commercial credit regulation proposed in HB 38 for the following reasons:

- Only one state has passed commercial credit report regulation and that is the State of California. The Ohio proposal goes considerably further than California.
- We would encourage the committee consider an amendment to HB 38 that would bring the Ohio commercial credit proposal in line with California so that businesses do not have to create a new regulatory compliance program.
- We are opposed to the private right of action provision in HB 38 and would suggest the committee consider Attorney General action as an alternative. California's commercial credit report statute is more business friendly as it does not have a private right of action.
- Businesses can work with credit reporting agencies to see their reports and correct errors already without this expansive regulatory proposal, private right of action, etc.
- The commercial credit report proposal needs to be considered on its own given this language is unprecedented in the USA and must be separate from the banker substitute amendment. We would encourage the committee strike the commercial credit proposal from HB 38 (if the substitute amendment is attached) or facilitate two separate bills.

Thank you for the opportunity to express our concerns.

Respectfully Submitted,

Luke D. Rollins