



March 26, 2019

Dear Congressman Perlmutter and Congressman Stivers:

We, the undersigned U.S. trade associations, write to express support for Congressman Stivers' amendment to the underlying manager's amendment-in-the-nature-of-a-substitute to H.R. 1595, the SAFE Banking Act of 2019. Collectively, we represent a majority of the companies doing business in the U.S., agents, and brokers offering property-casualty, title, and reinsurance (collectively, "insurers"). We appreciate your leadership in seeking needed clarity for transactions with cannabis-related legitimate businesses (CRLB).

Congressman Stivers' amendment would include insurers in the safe harbor provisions of H.R. 1595 and is an important recognition of the dilemma faced by our industry because of the differing legal treatment of cannabis under federal and state law and regulation at the state level. This amendment will prevent criminal prosecution of insurers engaged in the business of insurance with CRLBs. It also will prevent civil liability for agents, brokers, and insurers, their officers, directors or employees for the same. It is an important step toward legal certainty for our industry. Therefore, we also would support final passage of H.R. 1595 with the inclusion of Congressman Stivers' amendment.

We look forward to continuing to work with you and Congress to ensure our industry is not caught between additional conflicting obligations under federal and state law. Insurers must meet state statutory or regulatory requirements to protect all their customers and consumers and pay all relevant state-law based claims and not merely those of CRLBs. To do this, we will continue to seek legislative language to provide safe harbor protections for state legal cannabis-related insurance products and services that our industry provides to individuals or entities that are not CRLBs.

We are happy to work with you and your staff to address these important outstanding issues. Again, we greatly appreciate your leadership, and look forward to continuing to collaborate with you and your staff.

Sincerely,

American Land Title Association (ALTA)

American Property Casualty Insurance Association (APCIA)

The Council of Insurance Agents & Brokers (CIAB)

Independent Insurance Agents & Brokers of America (IIABA)

Reinsurance Association of America (RAA)

Wholesale & Specialty Insurance Association (WSIA)