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OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION**

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March 10, 2026

TO: The Honorable Kriselda Valderrama, Chair
Economic Matters Committee

FROM: Hanna Abrams, Assistant Attorney General

RE: House Bill 1179 – Consumer Protection – Application Store
Accountability Act (LETTER OF INFORMATION)

The Consumer Protection Division of the Office of the Attorney General (the “Division”) submits this letter of information regarding House Bill 1179 (“HB 1179”). House Bill 1179 creates age verification obligations for app stores and app developers.

While the Division is not taking a position on the merits of HB 1179, the Division notes that the bill requires app developers and app stores to verify the age category of account holders. At the same time, the Maryland Age-Appropriate Design Code Act prohibits the “process[ing of] any personal data for the purpose of estimating the age of a child that is actively and knowingly engaged with an online product that is not reasonably necessary to provide the online product.”¹ Although the scope of each bill is slightly different, there is potential for overlap. The inconsistency between their respective requirements may create ambiguity and lead to confusion about implementation.

House Bill 1179 would also require the Division to issue regulations. The Division respectfully requests that the “shall” on page 11, line 3 be replaced with “may.”

Finally, HB 1179 permits the Attorney General to recover civil penalties of \$7,500 for each violation on top of the penalty provisions of the Consumer Protection Act (page 11, lines 12-15). While the Division believes this provision is intended to authorize it to penalize violators with an additional \$7,500 per violation beyond penalties recovered for violations of the Consumer Protection Act, the intent would be clearer if the provision instead used the following language:

¹ Md. Code Ann., Com Law § 14-4806(a)(8).

In addition to the remedies provided under Title 13 of this article, the Division may also recover civil penalties not to exceed \$7,500 for each violation under this subtitle.

The Division respectfully requests that the Economic Matters Committee consider the concerns discussed above when it considers HB 1179.

cc: Delegate LaToya Nkongolo
Delegate Steven J. Arentz
Delegate Kevin B. Hornberger
Delegate April Miller
Delegate Chris Tomlinson
Members, Economic Matters Committee