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February 10, 2026

**TO:** The Honorable Kriselda Valderrama, Chair  
Economic Matters Committee

**FROM:** Steven M. Sakamoto-Wengel  
Executive Counsel to the Attorney General

**RE:** House Bill 77 – Consumer Protection – Sale and Resale of Event Tickets –  
Registration and Regulation  
LETTER OF CONCERN

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The Consumer Protection Division has concerns about House Bill 77, sponsored by Delegate Woods, which, among other things, would require “ticket resellers” to register annually with the Division. Ticket resellers would include not only ticket resale platforms, like StubHub or Ticketmaster, but also individuals who sell or offer to sell 50 or more event tickets per year. Based on the Division’s experience operating registration programs, such programs require both significant labor and technology resources. However, HB 77 does not authorize the Division to collect a registration fee to pay the costs of operating the registration program, nor does it provide for any other dedicated source of funding.

The responsibilities that would be required of the Division by HB 77 include:

- Identifying “ticket resellers” who sell or offer to sell 50 or more tickets per year and would thus be required to register. This would require the Division to scour ticket resale websites to identify individuals who are offering tickets for sale, in some cases using different names on different platforms, which the Division would need to be able to identify and connect;
- Ensuring that registrants and secondary ticketing platforms submit required reports every six months and reviewing those reports to ensure they comply with the requirements of the statute;

- Ensuring that registrants have obtained a surety bond of at least \$10,000;
- Publish the list of registrants on the Division's website, including information about each registrant's violations of the statute.

The Division has discussed its concerns with the sponsor. The Division respectfully requests that the Economic Matters Committee take its concerns into account when considering HB 77.

cc: The Honorable Jamila Woods  
Members, Economic Matters Committee