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12 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

13 **IN AND FOR THE COUNTY OF MARICOPA**

14 STATE OF ARIZONA, *ex rel.* MARK
15 BRNOVICH, Attorney General,

16 Plaintiff,

17 v.

18
19 TICKETMASTER, L.L.C., a Virginia limited
20 liability company,

21 Defendant.

Case No. CV2020-013425

COMPLAINT

22
23 Plaintiff, State of Arizona *ex rel.* Mark Brnovich, the Attorney General (the “State”),
24 alleges the following for its Civil Complaint (the “Complaint”) against Defendant Ticketmaster
25 L.L.C. (“Ticketmaster”).
26
27
28

1 **JURISDICTION AND VENUE**

2 1. The State brings this action pursuant to Arizona Revised Statutes (“A.R.S.”) §§ 44-
3 1521 to -1534.

4 2. This Court has subject-matter jurisdiction.

5 3. This Court may issue appropriate orders pursuant to A.R.S. § 44-1528.

6 4. Events occurred in this state which are the subject of this Complaint.

7 5. Venue is proper in Maricopa County pursuant to A.R.S. § 12-401(17).

8 **PARTIES**

9 6. Plaintiff is the State of Arizona *ex rel.* Mark Brnovich, the Attorney General of
10 Arizona, who is authorized to bring this action under the Arizona Consumer Fraud Act (the
11 “CFA”), A.R.S. §§ 44-1521 to -1534.

12 7. Defendant Ticketmaster is a Virginia limited liability company, incorporated on
13 January 14, 1999, with a principal place of business at 9348 Civic Center Drive, Beverly Hills,
14 CA 90210.

15 **ALLEGATIONS**

16 8. Ticketmaster sold tickets for events in Arizona to consumers.

17 9. Ticketmaster sold tickets to Arizona events as an agent of Event Organizers (also
18 known as Event Providers), such as artists, venues and promoters.

19 10. In 2020, many of these events did not take place as scheduled and were canceled,
20 rescheduled or postponed because of public health concerns related to COVID-19.

21 11. At the time of sale, Ticketmaster’s purchase policy provided that Ticketmaster
22 would automatically issue refunds for canceled events. Ticketmaster’s purchase policy further
23 provided that Event Providers may set refund limitations on moved or rescheduled events and
24 instructed consumers to contact Ticketmaster for more information or to request a refund if a
25 consumer could not attend the rescheduled event.

26 12. Consumers were presented with the purchase policy when setting up an account
27 with Ticketmaster and upon completing any ticket purchase.

28 13. Up to and until March 13, 2020, Ticketmaster’s website on a webpage entitled

1 “Refunds” in Ticketmaster’s FAQs provided that “Refunds are available if your event is
2 postponed, rescheduled or canceled,” and further provided that “Ticket refunds should be received
3 within 7-10 business days.”

4 14. As of March 14, 2020, visitors to the same “Refunds” page were redirected to a new
5 page that stated refunds were available for cancellations, and made no mention of refunds for
6 postponed or rescheduled events.

7 15. Ticketmaster has provided an automatic refund to ticket purchasers for canceled
8 Arizona events.

9 16. Ticketmaster did not make refunds available for Arizona events that were postponed
10 or rescheduled unless refunds had been authorized by the Event Organizer.

11 17. Consumers, some of whom had expended hundreds or even thousands of dollars on
12 ticket purchases, were left in limbo for months, many without a rescheduled event date or the
13 ability to obtain a refund. Although they had purchased their tickets through Ticketmaster, their
14 ticket purchase monies were held by Event Organizers who had not authorized refunds.

15 18. Ticket sales for the events at issue totaled \$71,030,000.

16 **FIRST CLAIM FOR RELIEF**

17 19. The State realleges all prior allegations of this Complaint as though fully set forth
18 herein.

19 20. The conduct described in the preceding paragraphs of this Complaint constitutes
20 violations of A.R.S. §§ 44-1521 to -1534.

21 **PRAYER FOR RELIEF**

22 WHEREFORE, the State respectfully requests that the Court:

23 21. Pursuant to A.R.S. § 44-1528(A)(1), issue a permanent injunction, enjoining and
24 restraining (a) Defendant, (b) its officers, agents, servants, employees, attorneys, and (c) all
25 persons in active concert or participation with anyone described in part (a) or (b) of this
26 paragraph, directly or indirectly, from engaging in violations of A.R.S. § 44-1522(A);

