



Matt Brittin, President of EMEA Business & Operations
Ronan Harris, Managing Director UK and Ireland
Google,
1-13 St Giles High St,
London,
WC2H 8AG

Friday 7th September 2018

Dear Matt and Ronan,

This year has seen major progress in tackling online ticket touting.

Google has played an important part in this change. In February 2018, Google launched a new certification system for ticket resellers, with the aim of providing clearer information for consumers. However, Viagogo's use of Google paid-for search to achieve prominence to consumers continues to concern all signatories to this letter, now more than ever.

On Friday August 31st, the Competition & Markets Authority (CMA) issued court proceedings against Viagogo for potential breaches of consumer protection law.

Last Wednesday (September 5th), Viagogo failed for the second time to appear before the Digital, Culture, Media and Sport Select Committee in an evidence session on secondary ticketing. The Committee's Chair, Damian Collins MP, described this as a *"pattern of evasion, disrespectful to the House and disrespectful to consumers."*

"If you've got nothing to hide, the truth will do you no harm," he added. *"If you want to be safe, do not buy tickets from Viagogo."*

Repeated research by FanFair Alliance has highlighted how Viagogo systematically tops Google results for tickets, even when primary inventory is still widely available or, most worryingly, when the tickets listed will be invalid for entry at the event.

This results in confusion, and risks your users clicking through to Viagogo unaware they are being transferred to a ticket reseller.

Working with the campaign group Victim of Viagogo, FanFair has helped many individuals who believe they were mis-sold tickets to claim back hundreds of thousands of pounds. The vast majority of these customers tell us they were led to Viagogo through Google search and unaware they were buying a resold ticket.

It is an untenable situation.

In effect, one of the world's most trusted brands - Google - is being paid to actively promote one of the least trusted.

Viagogo's search advertising is also, we believe, breaking Google's own AdWords guidelines. These state clearly that advertisers are expected *"to comply with the local laws for any area that their ads target"* and that Google will *"generally err on the side of caution in applying this policy because we don't want to allow content of questionable legality."*

We understand that Viagogo is a valuable client to Google, spending considerable sums each year on paid search advertising.

However, we urge you to protect consumers who daily put their trust in Google, and act now to restrict Viagogo's ability to pay for prominence.

We look forward to working with you to achieve these goals,

Sharon Hodgson MP, Chair of the All-Party Parliamentary Group on Ticket Abuse

Adam Webb, Campaign Manager, FanFair Alliance

Jonathan Brown, Chief Executive, Society of Ticket Agents & Retailers (STAR)

Countersigned by:

- Nigel Adams MP
- Pete Wishart MP
- Lord Tim Clement-Jones CBE

- Annabella Coldrick, Chief Executive, Music Managers Forum
- Claire Turnham, Founder, Victim of Viagogo
- Lucie Caswell, Chief Executive, Featured Artists Coalition
- Martin Ingham, Chair, National Arenas Association
- Michael Dugher, Chief Executive, UK Music
- Neil Tomlinson, President, The Entertainment Agents' Association
- Paul Reed, Association of Independent Festivals
- Phil Bowdery, Chair, Concert Promoters Association

- STAR - Full member list at <https://www.star.org.uk/all-members/>
- Julian Bird, CEO, Society of London Theatre & UK Theatre
- David Allfrey, Chief Executive & Producer, The Royal Edinburgh Military Tattoo
- Edward Snape, Chair, League of Independent Producers

- England and Wales Cricket Board (ECB)
- Sport and Recreation Alliance (SRA)
- Lawn Tennis Association (LTA)
- All England Lawn Tennis and Croquet Club (AELTC)
- Rugby Football Union (RFU)
- The Football Association (FA)