# Ment Law Group, P.C.

## Memorandum

To: Clients of Ment Law Group, PC
From: Regina A. Young, Senior Paralegal
Date: September 24, 2026
Re: NEW Maryland Seller of Travel Law

Our office continues to monitor Maryland's newly enacted Seller of Travel law, which governs tour operators, travel agencies, and other intermediaries that sell travel services either (i) to Maryland consumers or (ii) from physical locations within Maryland. **The law takes effect on October 1, 2026**. It will require covered sellers of travel, together with their affiliated independent agents, to register annually with the Maryland Department of Labor (MD DOL) and to file proof of professional liability and errors and omissions insurance of at least $1 million. Covered sellers must also include a list of their affiliated independent agents in each annual filing. The annual filing fee is $300. The MD DOL has not yet released the required filing forms; once available, electronic versions will be posted to the agency's website (https://labor.maryland.gov/).

With this enactment, Maryland joins four other states — California, Florida, Hawaii, and Washington — that have long maintained seller of travel registration and related financial security requirements. As with the Maryland framework, each of these states' laws applies to tour operators, travel agencies, and other intermediaries that sell travel services to consumers in, or from locations within, the respective state. In certain circumstances, a seller may qualify for an exemption from particular provisions of a state's seller of travel law. For example, a seller that holds accreditation from the Airlines Reporting Corporation (ARC) and has operated under the same ownership and control for at least three consecutive years may be eligible to apply for an exemption from Florida's seller of travel registration requirement.

## Key Takeaways

- Although the Maryland Seller of Travel law becomes effective on October 1, 2026, the MD DOL — the agency responsible for administering the law — does not expect implementation and enforcement to begin until sometime in 2027.
- By the end of this year, the MD DOL plans to publish a proposed registration rule in the Maryland Register, followed by a formal 30-day public comment period.
- The obligation to register is likely to take effect by mid-2027. No registration form is currently available.
- **Until the MD DOL provides a registration portal or publishes registration documentation, no action is required at this time**.

We will continue to keep you informed of developments regarding this new law. In the meantime, please do not hesitate to contact us with any questions at ryoung@mentlaw.com or jment@mentlaw.com.