

# 2018 FTC Annual Report on Refunds to Consumers

Office of Claims and Refunds, Bureau of Consumer Protection

Federal Trade Commission



## Protecting America's Consumers

The Federal Trade Commission stops unfair and deceptive business practices by investigating and bringing law enforcement cases against companies that break the law. Between July 1, 2017 and June 30, 2018, the Bureau of Consumer Protection obtained 114 court orders for nearly \$563 million.<sup>1</sup>

The Bureau's Office of Claims and Refunds supports the Commission's mission by returning money to the consumers and businesses who were harmed by these illegal practices. This year, the office directed dozens of mailings to send \$122 million in refunds, and supported refund programs administered by FTC defendants or another federal agency to deliver more than \$2.3 billion in refunds.<sup>2</sup>

## Getting Money Back into People's Pockets

The goal of FTC law enforcement actions is to halt illegal practices, and when possible, get refunds to people who lost money. Once an FTC lawsuit or settlement is final and the defendants have paid the money the court orders, the Office of Claims and Refunds develops a plan for returning that money to the right people. If there is money left over at the conclusion of the refund program, or if there is not enough money to provide meaningful refund amounts, then the FTC sends the money to the U.S. Treasury, where it is deposited into the General Fund.

In total, FTC cases resulted in more than \$2.3 billion in refunds for consumers. Here is a snapshot of refund programs administered by the FTC between July 2017 and June 2018:

- Total amount FTC mailed: \$122 million<sup>3</sup>
- Number of people who received FTC checks: 2.2 million
- Check cashing rate of first round distributions: 67%
- Average percentage spent on administrative costs: 5%
- Money sent to the U.S. Treasury: \$12.5 million

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<sup>1</sup> This figure does not equal the total amount of judgments the FTC obtained within the time period because some judgments are suspended by the court when a defendant has an inability to pay it.

<sup>2</sup> This number includes self-administered programs as described on page seven of this report. Notably, it includes a landmark settlement with VW that required the company to offer a buyback program for owners of VW and Audi diesel cars fitted with illegal emissions defeat devices. The VW buyback program resulted in more than \$2.2 billion in refunds during this time period.

<sup>3</sup> During this time period, consumers cashed or deposited checks from the FTC totaling \$107.5 million.

## Mapping an FTC Refund Program

Success in getting refunds to people depends principally on whether the FTC has a reliable list of customers, including their contact information and the amount of money they spent. Usually, the FTC has this information, and it mails checks out to a list of known customers. In some cases, there is no list of known customers or there is insufficient contact information, and the agency must use a claims process to identify people who should receive a refund. There are at least six steps involved in every refund program:

1. Identify who is eligible for a refund.
2. Determine how the money will be divided.
3. Mail checks.
4. Update names and addresses as needed.
5. Consider whether an additional check mailing is feasible.
6. Send any remaining money to the U.S. Treasury.

### Identifying who is eligible for a refund

FTC court orders typically require the company to provide a list of customers, their contact information, and how much each customer paid. If the agency obtains a reliable list of eligible recipients, then the agency mails checks directly to them. This year, in cases where the FTC used company data to mail checks, an average of 67% of people on the list cashed their checks.

Without a list of customers with contact information, getting refunds out may require a claims process. In such cases, the people affected must apply for a refund. The agency might conduct a media campaign and use paid advertisements to let people know that refund money is available and encourage them to visit our website to apply. In other cases, the agency uses whatever minimal data is available, such as a consumer's email address, to tell consumers about the refund process. A claims process typically increases the administrative costs of the refund program. Generally, the FTC receives claims from 5% to 20% of potential claimants. This year, in cases where there was a claims process, the average check cashing rate was 95%.

If there is no customer list and a claims process is not feasible, the agency's Consumer Sentinel Database may be used to find eligible recipients. Consumer Sentinel contains millions of complaints from people who contacted the FTC, the Better Business Bureau, or other federal, state, and local law enforcement offices. The FTC may search for complaints related to the defendants and use the contact information in those complaints to create a list of potential refund recipients. This year, the agency used Consumer Sentinel data to send refunds in one FTC matter: A to Z Marketing. In that case, the average check cashing rate was 82%.

### Determining how the money will be divided

In cases where the court order does not specify the parameters of the refund program, the FTC determines eligibility criteria and the formula for calculating payments to eligible recipients. In cases where the settlement fund is not large enough to provide full refunds to every customer, the FTC analyzes the data to determine how much individuals will receive. Key factors that influence these decisions include administrative costs, the size of the refund to each recipient, how much variation there is between the lowest and highest loss amounts, and other details about the case. In most FTC cases, the money is distributed on a pro rata basis, meaning that each recipient receives an equal percentage of his or her total loss.

## Mailing checks

The FTC has many mechanisms in place to verify the accuracy of the check mailing program and to confirm that only the approved recipients receive payment. First, unique identifiers are assigned to each potential claimant at the beginning of the case, which can be used to track that individual through the lifecycle of the refund program. FTC staff independently review each distribution authorization, check the proposed list of recipients against the master customer list, and investigate any discrepancies before approving a check mailing. The agency also conducts audits on closed cases to verify that only the rightful recipients received checks. In a claims process, we may ask for supporting documents or other information, and we apply analytical tools to root out false claims.

Once checks have been mailed, the FTC carefully tracks how many checks get cashed and how much money makes it into the hands of affected consumers. This year, the FTC completed 20 first-time mailings for FTC cases. Here are the highlights of each case:

## First Distributions July 1, 2017 - June 30, 2018

Case Name <sup>4</sup>	Date of First Mailing	Number of Recipients	Amount Mailed	Amount Cashed	Percent of Fund Paid to Consumers <sup>5</sup>	Median Check
<a href="#">A to Z Marketing</a>	1/24/2018	862	\$533,787	\$441,469	81%	\$526
<a href="#">Allstar Marketing</a>	3/12/2018	218,254	\$7,232,123	\$4,798,012	64%	\$27
<a href="#">American Business Builders</a>	7/25/2017	2,711	\$372,544	\$305,668	79%	\$21
<a href="#">Cardinal Health*</a>	9/18/2017	901	\$17,322,935	\$16,389,010	61%	\$8,181
<a href="#">CWB Services</a>	2/15/2018	72,836	\$2,958,108	\$1,543,373	50%	\$30
<a href="#"> DeVry University</a>	7/5/2017	173,222	\$49,122,784	\$39,277,520	80%	\$177
<a href="#">Health Formula</a>	10/10/2017	227,764	\$9,811,044	\$7,186,451	72%	\$34
<a href="#">Help Desk National</a>	1/30/2018	3,791	\$668,767	\$586,825	85%	\$168
<a href="#">Inbound Call Experts – Advanced Tech Support*</a>	3/19/2018	36,830	\$10,158,601	\$9,736,009	95%	\$240
<a href="#">Internet Teaching and Training Specialists<sup>6</sup></a>	6/12/2018	3,633	\$969,212	\$650,410	66%	\$267

<sup>4</sup> For more information about any of the FTC cases in these charts, see Appendix A: FTC Case Details.

<sup>5</sup> This number represents the percentage of the total amount collected from defendants that was returned to consumers.

<sup>6</sup> Checks for this case mailed in June 2018. As of August 31, 2018, the total amount cashed was \$805,142, or 82% of the total fund.

<a href="#">John Fowler – Tachht</a>	3/15/2018	18,301	\$437,666	\$352,345	70%	\$22
<a href="#">Lift International – Business Coaching Services</a>	1/16/2018	7,583	\$2,243,051	\$1,858,216	82%	\$296
<a href="#">MyEx.com</a>	3/21/2018	13	\$7,599	\$6,699	45%	\$500
<a href="#">Sale Slash</a>	12/6/2017	442,898	\$8,077,304	\$5,554,447	65%	\$19
<a href="#">Stratford Career Institute</a>	1/19/2018	8,043	\$216,183	\$151,367	61%	\$27
<a href="#">Sunrise Nutraceuticals – Elimidrol</a>	9/28/2017	5,379	\$210,177	\$150,498	64%	\$40
<a href="#">United Debt Counselors</a>	2/12/2018	5,745	\$484,141	\$382,299	75%	\$65
<a href="#">Universal Network Solutions</a>	5/3/2018	17	\$10,700	\$10,700	17%	\$450
<a href="#">VGC Corporation of America</a>	7/20/2017	53,240	\$532,400	\$225,120	37%	\$10
<a href="#">XXL Impressions</a>	4/2/2018	2,116	\$355,652	\$282,416	51%	\$110

\*In these cases, recipients were required to file a claim to get a refund.

## Updating names and addresses

A consistent challenge is finding the most current contact information for eligible recipients. Because court cases sometimes take years to resolve, the FTC has several tools for updating addresses.

Before mailing checks, every distribution list is checked against the National Change of Address (NCOA) system, which records change-of-address notices submitted to the U.S. Post Office. When a check is returned as undeliverable, the agency conducts an address search to determine if there is a more recent address for the consumer, and then reissues a new check to the updated address.

## Considering whether an additional check mailing is feasible

After completing several rounds of address updates and check reissues, the FTC considers whether to use any remaining money to send a second round of checks to recipients who cashed their first check. For example, recipients might get a 50% refund with the first check and an additional 10% of their money back with the second check.

In general, if there are sufficient funds to provide a meaningful refund amount to recipients and to pay for the associated administrative costs, then the FTC sends a second round of checks. The FTC typically enforces a \$10 minimum for checks we mail, but may mail smaller checks if there are sufficient funds to distribute. This year, the FTC completed subsequent distributions in eighteen cases:

## Subsequent Distributions July 1, 2017 - June 30, 2018

Case Name	Date of Most Recent Mailing	Number of Recipients	Amount Mailed	Total Amount Cashed (including all distributions)**	Percent of Fund Paid to Consumers <sup>7**</sup>	Median Refund Amount**
<a href="#">American Business Builders</a>	5/3/2018	632	\$64,851	\$363,189	93%	\$434
<a href="#">American Tax Relief</a>	3/9/2018	10,415	\$489,637	\$16,251,981	98%	\$1,043
<a href="#">Centro Natural Corp</a>	9/5/2017	2,163	\$280,730	\$786,292	93%	\$384
<a href="#">CPU Services</a>	10/31/2017	893	\$10,537	\$47,043	78%	\$55
<a href="#">Expense Management America</a>	11/6/2017	1,191	\$489,887	\$1,774,590	94%	\$1,087
<a href="#">Fair Guide</a>	11/9/2017	738	\$117,733	\$525,893	72%	\$549
<a href="#">Goldman Schwartz</a>	12/14/2017	2,728	\$162,136	\$531,614	92%	\$168
<a href="#">Money Now Funding – Rose Marketing</a>	12/7/2017	541	\$65,014	\$427,386	95%	\$450
<a href="#">Oro Marketing</a>	9/29/2017	4,297	\$1,016,893	\$1,851,950	92%	\$277
<a href="#">Prime Legal Plans</a>	10/4/2017	4,221	\$212,881	\$3,918,656	94%	\$514
<a href="#">Regency Financial</a>	1/4/2018	201	\$23,840	\$106,708	90%	\$466
<a href="#">Rincon Debt Management</a>	4/20/2018	3,774	\$670,458	\$2,633,760	95%	\$907
<a href="#">Sensa</a>	1/16/2018	180,745	\$3,110,958	\$25,099,763	95%	\$67
<a href="#">Sunrise Nutraceuticals – Elimidrol</a>	4/25/2018	3,190	\$59,811	\$189,028	80%	\$58
<a href="#">Top Shelf Marketing</a>	7/5/2017	3,326	\$154,546	\$1,168,387	96%	\$355
<a href="#">TriVita – Nopalea</a>	8/11/2017	57,748	\$791,471	\$2,553,995	73%	\$25
<a href="#">Trudeau</a>	8/11/2017	652,678	\$2,728,194	\$5,219,993	64%	\$9
<a href="#">VGC Corporation of America</a>	5/18/2017 <sup>18</sup>	23,768	\$292,547	\$410,652	67%	\$22

\*\*These figures include previous distributions.

<sup>7</sup> This number represents the percentage of the total amount collected from defendants that was returned to consumers.

## Feedback from the Public

Protecting American consumers from illegal business practices is a critical part of the FTC’s mission. The agency mails checks to people across the nation,<sup>8</sup> and we hear from these consumers on a regular basis. They post comments to FTC consumer blogs, send thank you notes, and call our toll-free numbers to give feedback and ask questions. We use their feedback to help improve our process, and we appreciate the kind words from people who have received refunds. Because raw numbers do not tell the complete story, we have included a sampling of consumer quotes to highlight how FTC refund programs have had a genuine effect on the lives of real people:

“Thank you for your letter, which I received yesterday with the cheque for \$227.13. I am most grateful that the FTC has thwarted the malpractice of the company involved.”

March 28, 2018

“Please pass on to your investigators and litigators my sincere appreciation for their efforts on behalf of the thousands of citizens that fall prey to criminal enterprises. The endless hours of toil that they must devote to catching these types of vipers and getting compensation for their victims must be daunting.”

March 31, 2018

“Just wanted to say Thank You! The refund was a welcome surprise, but the really big thing is knowing that you people are out there, and you’ve got our backs.”

April 5, 2018

“I’m sure that your officers will have spent many months of hard work in perusing this matter, and I would like to thank them.”

April 13, 2018

“Thanks for the refund, but most of all, thanks for the protection.”

March 28, 2018

“It is refreshing to know that the law works to help people when they have been deceived.”

August 24, 2017

“Just to say thank you for watching our back.”

August 24, 2017

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<sup>8</sup> For state level data regarding check mailings, see Appendix B.

## Refund Programs Administered by FTC Defendants and Other Federal Agencies

FTC staff also provides consultation and support for FTC cases where the court order requires the defendants—or another federal agency—to conduct a refund program. Only in rare circumstances do FTC settlements result in refund programs administered by defendants or another federal agency. When the FTC determines that this is in the best interest of the affected consumers, the Enforcement Division engages in close oversight and monitoring of the program to ensure it complies with the order. In these cases, FTC staff provides guidance about the proposed refund program to make sure eligible claimants receive plain language instructions about how to apply for a refund.

The FTC creates and maintains webpages for each FTC-related refund program, including those that are not administered by the FTC. This year, there were more than a million visits to these refund pages. A chart that links to all current FTC refund programs is available at [www.ftc.gov/refunds](http://www.ftc.gov/refunds), which is designed to help consumers verify that the check they have received is legitimate and to answer common questions. This year, the FTC assisted with five programs that are being administered by the defendant or another federal agency. Here are the details:

Case Name	Total Dollars Refunded Between July 1, 2017 and June 30, 2018	URL	Page views
Volkswagen	\$2,217,990,327	<a href="https://www.ftc.gov/vwsettlement">https://www.ftc.gov/vwsettlement</a>	32,269
NetSpend	\$7,500,000 <sup>9</sup>	<a href="https://www.ftc.gov/enforcement/cases-proceedings/refunds/netspend-refunds-0">https://www.ftc.gov/enforcement/cases-proceedings/refunds/netspend-refunds-0</a>	27,142
Amazon <sup>10</sup>	\$3,672,665	<a href="https://www.ftc.gov/amazon">https://www.ftc.gov/amazon</a>	31,589
Pact	\$948,788	<a href="https://www.ftc.gov/enforcement/cases-proceedings/152-3010/pact-inc">https://www.ftc.gov/enforcement/cases-proceedings/152-3010/pact-inc</a>	1,260
AdoreMe	\$677,243	<a href="https://www.ftc.gov/enforcement/cases-proceedings/162-3153/adoreme-inc">https://www.ftc.gov/enforcement/cases-proceedings/162-3153/adoreme-inc</a>	2,150

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<sup>9</sup> The approximate amount of refunds provided by NetSpend includes refunds distributed from April-October 2017. An additional FTC refund program for NetSpend was implemented in September 2018.

<sup>10</sup> Amazon distributed these refunds as a result of a court-ordered claims process.



## Conclusion

As part of its mission to protect American consumers, the FTC works to get money back to people who are harmed by illegal business practices. The Bureau of Consumer Protection enforces a variety of consumer protection laws enacted by Congress, as well as trade regulation rules issued by the Commission. Its actions include individual company and industry-wide investigations and administrative and federal court litigation. In all of its activities, the Bureau works to provide consumer refunds whenever feasible, and then develops customized refund programs that are designed to get as much money back to as many injured consumers as possible.

This year, the Commission's efforts led to billions of dollars in refunds for people across the nation. The data presented in this report will be used to inform future decisions about FTC refund programs, and to continue to ensure that the agency's efforts are effective and efficient.

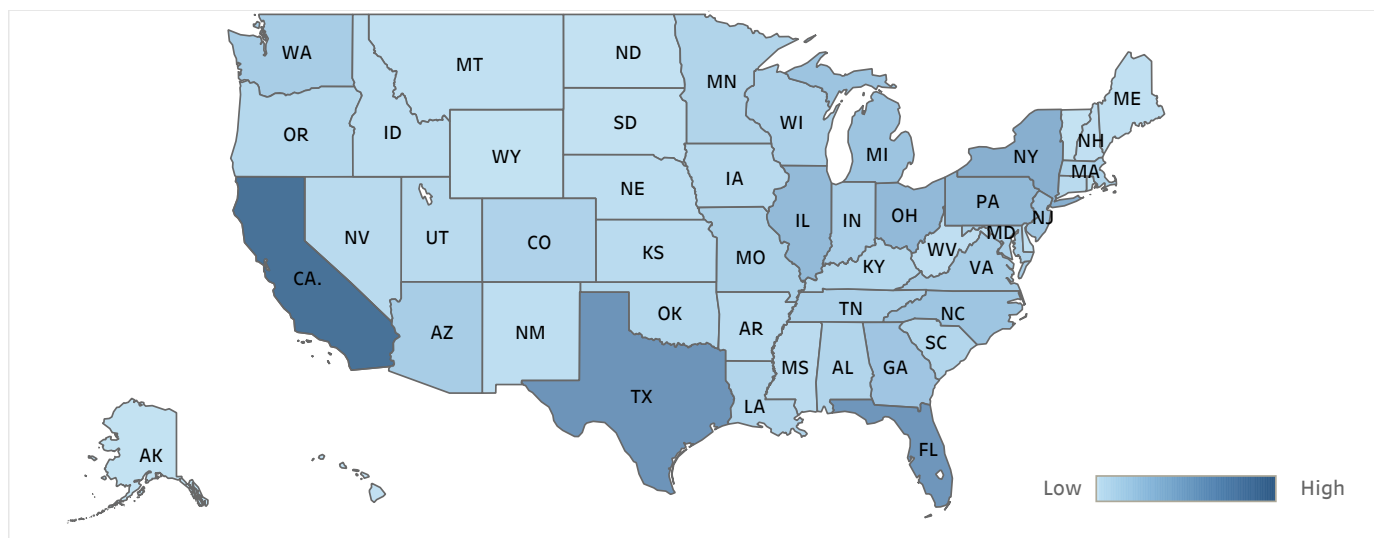
## Appendix A: FTC Case Details

Case	Product Code Or Type	Link
A to Z Marketing	Debt Management Credit Counseling	<a href="https://www.ftc.gov/enforcement/cases-proceedings/122-3074/z-marketing-inc-also-dba-client-services-apex-members-llc">https://www.ftc.gov/enforcement/cases-proceedings/122-3074/z-marketing-inc-also-dba-client-services-apex-members-llc</a>
Allstar Marketing	Shop-at-Home Catalog Sales	<a href="https://www.ftc.gov/enforcement/cases-proceedings/132-3207/allstar-marketing-group-llc">https://www.ftc.gov/enforcement/cases-proceedings/132-3207/allstar-marketing-group-llc</a>
American Business Builders	Business Opportunity Work-at-Home Plans	<a href="https://www.ftc.gov/enforcement/cases-proceedings/122-3191/american-business-builders-llc-et-al">https://www.ftc.gov/enforcement/cases-proceedings/122-3191/american-business-builders-llc-et-al</a>
American Tax Relief	Debt Management Credit Counseling	<a href="https://www.ftc.gov/enforcement/cases-proceedings/1023083/american-tax-relief-llc-et-al">https://www.ftc.gov/enforcement/cases-proceedings/1023083/american-tax-relief-llc-et-al</a>
Cardinal Health	Health Care: Other Products Supplies	<a href="https://www.ftc.gov/enforcement/cases-proceedings/101-0006/cardinal-health-inc">https://www.ftc.gov/enforcement/cases-proceedings/101-0006/cardinal-health-inc</a>
Centro Natural Corp	Third Party Debt Collection of Bogus Debt	<a href="https://www.ftc.gov/enforcement/cases-proceedings/142-3159/centro-natural-corp">https://www.ftc.gov/enforcement/cases-proceedings/142-3159/centro-natural-corp</a>
CPU Services	Internet Information Services: False Invoices	<a href="https://www.ftc.gov/enforcement/cases-proceedings/142-3070-x140045/your-yellow-book-inc">https://www.ftc.gov/enforcement/cases-proceedings/142-3070-x140045/your-yellow-book-inc</a>
CWB Services	Lending: Payday Loans	<a href="https://www.ftc.gov/enforcement/cases-proceedings/132-3184-x140065/cwb-services-llc">https://www.ftc.gov/enforcement/cases-proceedings/132-3184-x140065/cwb-services-llc</a>
DeVry University	Education: Colleges and Universities	<a href="https://www.ftc.gov/enforcement/cases-proceedings/132-3278/devry-university">https://www.ftc.gov/enforcement/cases-proceedings/132-3278/devry-university</a>
Expense Management America	Debt Management Credit Counseling	<a href="https://www.ftc.gov/enforcement/cases-proceedings/122-3069/ema-nationwide-also-dba-ema-expense-management-america-et-al">https://www.ftc.gov/enforcement/cases-proceedings/122-3069/ema-nationwide-also-dba-ema-expense-management-america-et-al</a>
Fair Guide	Office: Ad Space Directory Listings	<a href="https://www.ftc.gov/enforcement/cases-proceedings/132-3001-x130040/fair-guide-construct-data-publishers-dba-fair-guide">https://www.ftc.gov/enforcement/cases-proceedings/132-3001-x130040/fair-guide-construct-data-publishers-dba-fair-guide</a>
Goldman Schwartz	Third Party Debt Collection	<a href="https://www.ftc.gov/enforcement/cases-proceedings/122-3096-x130029/goldman-schwartz-inc">https://www.ftc.gov/enforcement/cases-proceedings/122-3096-x130029/goldman-schwartz-inc</a>
Health Formulas	Health Care: Dietary Supplements	<a href="https://www.ftc.gov/enforcement/cases-proceedings/132-3159-x150015/health-formulas-llc-doing-business-simple-pure">https://www.ftc.gov/enforcement/cases-proceedings/132-3159-x150015/health-formulas-llc-doing-business-simple-pure</a>
Help Desk National	Tech Support Scams	<a href="https://www.ftc.gov/enforcement/cases-proceedings/162-3042-x160045/help-desk-national">https://www.ftc.gov/enforcement/cases-proceedings/162-3042-x160045/help-desk-national</a>
Inbound Call Experts – Advanced Tech Support	Tech Support Scams	<a href="https://www.ftc.gov/enforcement/cases-proceedings/132-3135/inbound-call-experts-llc">https://www.ftc.gov/enforcement/cases-proceedings/132-3135/inbound-call-experts-llc</a>

Internet Teaching and Training Specialists	Business Opportunity Work-at-Home Plans	<a href="https://www.ftc.gov/enforcement/cases-proceedings/172-3077/internet-teaching-training-specialists-llc">https://www.ftc.gov/enforcement/cases-proceedings/172-3077/internet-teaching-training-specialists-llc</a>
John Fowler – Tachht	Health Care: Diet Products Centers Plans	<a href="https://www.ftc.gov/enforcement/cases-proceedings/152-3080/john-fowler">https://www.ftc.gov/enforcement/cases-proceedings/152-3080/john-fowler</a>
Lift International – Business Coaching Services	Business Opportunity Work-at-Home Plans	<a href="https://www.ftc.gov/enforcement/cases-proceedings/152-3233/lift-international-llc">https://www.ftc.gov/enforcement/cases-proceedings/152-3233/lift-international-llc</a>
Money Now Funding – Rose Marketing	Business Opportunity Work-at-Home Plans	<a href="https://www.ftc.gov/enforcement/cases-proceedings/122-3216-x130063/money-now-funding-llc">https://www.ftc.gov/enforcement/cases-proceedings/122-3216-x130063/money-now-funding-llc</a>
MyEx.com	Internet Information Services: Revenge Porn	<a href="https://www.ftc.gov/enforcement/cases-proceedings/162-3052/emp-media-inc-myexcom">https://www.ftc.gov/enforcement/cases-proceedings/162-3052/emp-media-inc-myexcom</a>
Oro Marketing	Business Opportunity Work-at-Home Plans	<a href="https://www.ftc.gov/enforcement/cases-proceedings/132-3047-x140010/oro-marketing-inc-et-al">https://www.ftc.gov/enforcement/cases-proceedings/132-3047-x140010/oro-marketing-inc-et-al</a>
Prime Legal Plans	Debt Management Credit Counseling	<a href="https://www.ftc.gov/enforcement/cases-proceedings/refunds/prime-legal-plans-llc">https://www.ftc.gov/enforcement/cases-proceedings/refunds/prime-legal-plans-llc</a>
Regency Financial	Debt Management Credit Counseling	<a href="https://www.ftc.gov/enforcement/cases-proceedings/142-3059/regency-financial-services-llc">https://www.ftc.gov/enforcement/cases-proceedings/142-3059/regency-financial-services-llc</a>
Rincon Debt Management	Third Party Debt Collection	<a href="https://www.ftc.gov/enforcement/cases-proceedings/112-3142/rincon-management-services-llc">https://www.ftc.gov/enforcement/cases-proceedings/112-3142/rincon-management-services-llc</a>
Sale Slash	Health Care: Diet Products Centers Plans	<a href="https://www.ftc.gov/enforcement/cases-proceedings/142-3247/sale-slash-llc">https://www.ftc.gov/enforcement/cases-proceedings/142-3247/sale-slash-llc</a>
Sensa	Health Care: Diet Products Centers Plans	<a href="https://www.ftc.gov/enforcement/cases-proceedings/112-3102/sensa-products-llc-et-al">https://www.ftc.gov/enforcement/cases-proceedings/112-3102/sensa-products-llc-et-al</a>
Stratford Career Institute	Education: Trade Vocational Schools	<a href="https://www.ftc.gov/enforcement/cases-proceedings/132-3146-x160028/stratford-career-institute-inc">https://www.ftc.gov/enforcement/cases-proceedings/132-3146-x160028/stratford-career-institute-inc</a>
Sunrise Nutraceuticals – Elimidrol	Health Care: Dietary Supplements Herbal Remedies	<a href="https://www.ftc.gov/enforcement/cases-proceedings/152-3208-x160006/sunrise-nutraceuticals-llc">https://www.ftc.gov/enforcement/cases-proceedings/152-3208-x160006/sunrise-nutraceuticals-llc</a>
Top Shelf Marketing	Business Opportunity Work-at-Home Plans	<a href="https://www.ftc.gov/enforcement/cases-proceedings/142-3228/top-shelf-marketing-corp">https://www.ftc.gov/enforcement/cases-proceedings/142-3228/top-shelf-marketing-corp</a>
TriVita – Nopalea	Health Care: Dietary Supplements Herbal Remedies	<a href="https://www.ftc.gov/enforcement/cases-proceedings/122-3185/trivita-inc">https://www.ftc.gov/enforcement/cases-proceedings/122-3185/trivita-inc</a>

<b>Trudeau</b>	<b>Health Care: Diet Products Centers Plans</b>	<a href="https://www.ftc.gov/enforcement/cases-proceedings/032-3064/trudeau-kevin-et-al">https://www.ftc.gov/enforcement/cases-proceedings/032-3064/trudeau-kevin-et-al</a>
United Debt Counselors	Debt Management Credit Counseling	<a href="https://www.ftc.gov/enforcement/cases-proceedings/142-3184/united-debt-counselors-llc">https://www.ftc.gov/enforcement/cases-proceedings/142-3184/united-debt-counselors-llc</a>
Universal Network Solutions	Tech Support Scams	<a href="https://www.ftc.gov/enforcement/cases-proceedings/172-3034/universal-network-solutions-0">https://www.ftc.gov/enforcement/cases-proceedings/172-3034/universal-network-solutions-0</a>
VGC Corporation of America	Prizes Sweepstakes Lotteries	<a href="https://www.ftc.gov/enforcement/cases-proceedings/102-3210/vgc-corporation-america-et-al">https://www.ftc.gov/enforcement/cases-proceedings/102-3210/vgc-corporation-america-et-al</a>
XXL Impressions	Health Care: Dietary Supplements Herbal Remedies	<a href="https://www.ftc.gov/enforcement/cases-proceedings/152-3024-162-3033-162-3036/xxl-impressions-llc-j2-response-llp">https://www.ftc.gov/enforcement/cases-proceedings/152-3024-162-3033-162-3036/xxl-impressions-llc-j2-response-llp</a>

## Appendix B: Refunds Issued by the FTC by State July 1, 2017- June 30, 2018



State	# of checks	Total Redress	State	# of checks	Total Redress
Alabama	32,628	\$1,312,705.20	Montana	8,642	\$369,786.89
Alaska	5,229	\$238,747.57	Nebraska	12,823	\$1,783,324.91
Arizona	48,748	\$2,871,671.56	Nevada	22,068	\$1,087,083.74
Arkansas	19,673	\$2,220,076.31	New Hampshire	9,210	\$313,035.52
California	237,729	\$13,187,389.92	New Jersey	62,001	\$3,778,320.78
Colorado	38,190	\$2,917,532.29	New Mexico	13,021	\$505,735.67
Connecticut	22,017	\$693,093.76	New York	113,236	\$5,462,114.50
Delaware	7,304	\$302,978.40	North Carolina	66,166	\$5,320,774.85
Dist. of Columbia	3,469	\$167,817.86	North Dakota	6,168	\$226,326.97
Florida	167,004	\$8,153,102.78	Ohio	90,101	\$4,890,788.30
Georgia	63,545	\$4,253,297.92	Oklahoma	26,824	\$1,089,440.37
Hawaii	8,869	\$333,162.50	Oregon	27,074	\$988,836.52
Idaho	13,081	\$663,644.75	Pennsylvania	91,986	\$4,308,661.61
Illinois	88,926	\$7,369,658.35	Puerto Rico	2,599	\$62,899.28
Indiana	44,889	\$3,258,074.28	Rhode Island	5,445	\$174,775.24
Iowa	21,719	\$927,455.97	South Carolina	30,620	\$1,471,191.15
Kansas	19,700	\$1,520,444.54	South Dakota	5,829	\$199,945.02
Kentucky	26,614	\$2,126,467.80	Tennessee	42,139	\$3,177,302.99
Louisiana	32,724	\$1,163,780.34	Texas	173,506	\$9,579,594.31
Maine	8,664	\$260,884.90	Utah	20,942	\$711,781.75
Maryland	41,723	\$1,852,350.29	Vermont	3,998	\$145,184.93
Massachusetts	37,321	\$1,276,730.97	Virginia	47,740	\$3,862,900.59
Michigan	67,986	\$2,276,256.87	Washington	47,703	\$2,583,763.11
Minnesota	34,843	\$1,246,157.09	West Virginia	11,588	\$793,657.17
Mississippi	18,479	\$1,248,308.90	Wisconsin	39,773	\$1,544,214.78
Missouri	42,322	\$2,577,833.83	Wyoming	5,108	\$203,099.78

For some consumers, no state is available because they live on a military base, they live in a territory not listed, or their address is international. In these cases, the consumer's check is not counted in these numbers, but are calculated as part of our total numbers.

