

**Open Meeting of the Federal Trade Commission
December 16, 2021**

Public Submissions

- 1. Aaron Cohen**
- 2. Mara Einstein**
- 3. David Grogan**
- 4. Johnson Enterprises**
- 5. Jeffrey Jones**
- 6. Christopher Irving**
- 7. Tim McGuinness, PhD**
- 8. Shannon Mitchell**
- 9. Mike Rudolph**
- 10. Jeff Vitt**

From: Federal Trade Commission via Federal Trade Commission <[REDACTED]>
Sent: Monday, December 13, 2021 7:27 PM
To: OpenMeeting <openmeetings@ftc.gov>
Subject: Form submission from: Speaker Registration and Public Comment Submission Form for December 16, 2021 Open Commission Meeting

Submitted on Monday, December 13, 2021 - 19:27 Submitted by anonymous user [REDACTED]. Submitted values are:

First Name: Aaron
Last Name: Cohen
Affiliation: eTags, Inc.
Full Email Address: [REDACTED]
Confirm Email Address: [REDACTED]
Telephone: +[REDACTED]
FTC-Related Topic: Consumer Protection
Register to speak during meeting: No
Link to web video statement:
Submit written comment:
Madam Chair, Members of the Commission:

On behalf of a small company that operates as a licensee of several government agencies, and has completed millions of transactions on behalf of satisfied consumers across the country, I would like to our express our concern, which I am sure is shared by thousands of other small, medium, and large American businesses that do business with and on behalf of state and federal governments across the nation on a daily basis.

We recognize the FTC's legitimate interest in preventing fraud and are mindful of the FTC's stated mission: "Protecting consumers and competition by preventing anticompetitive, deceptive, and unfair business practices through law enforcement, advocacy, and education without unduly burdening legitimate business activity."

We recognize that consumer fraud is a problem, not just involving individuals and entities pretending to be government representatives and agencies, but banks, finance companies and other businesses consumers regularly do business with. We are clearly in favor of regulation and enforcement to address these very real, very serious problems. We are not, however, in favor of wide-ranging regulations which will sweep up legitimate companies and prevent them from doing business despite the fact they are licensed and permitted to do so by state and federal government agencies.

The rulemaking process should seek a rule that can be enforced in a targeted and meaningful manner and should carry substantial penalties for violations thereof.

We believe that any proposed rules should,

1. very clearly distinguish legitimate, licensed individuals and businesses from illegitimate individuals and businesses whose intent is to defraud the public;
2. take into consideration that licensed individuals and businesses are already regulated by their respective licensing agencies;
3. specifically seek input from state and federal agencies that license individuals and companies to perform on behalf of in-stead of the government;
4. respect protected commercial speech such as truthful advertising that complies with existing FTC rules;
5. respect existing contracts that individuals and businesses have with government agencies;
6. address the potential adverse impact on the operations of government

agencies that depend on private individuals and businesses; We thank you for the opportunity to present this brief note to you and look forward to participating further in the rulemaking process.

The results of this submission may be viewed at:



From: Federal Trade Commission via Federal Trade Commission <[REDACTED]>

Sent: Monday, December 13, 2021 9:29 PM

To: OpenMeeting <openmeetings@ftc.gov>

Subject: Form submission from: Speaker Registration and Public Comment Submission Form for December 16, 2021 Open Commission Meeting

Submitted on Monday, December 13, 2021 - 21:29 Submitted by anonymous user: [REDACTED] Submitted values are:

First Name: Mara

Last Name: Einstein

Affiliation: Queens College (CUNY)

Full Email Address: [REDACTED] Confirm Email Address: [REDACTED]

Telephone: + [REDACTED]

FTC-Related Topic: Consumer Protection

Register to speak during meeting: No

Link to web video statement:

Submit written comment:

Social media influencers (aka creators) expanded rapidly over the last 5 years. Little has been done to ensure that paid content is noted as sponsored. This was bad enough for consumers, but increasingly influencers are being paid by political entities to promote candidates and political issues without disclosing they have been funded. Also, these are not one-off content producers, but influencer networks that coordinate messaging across dozens or hundreds of influencers. Most are micro or nano influencers, with the ability to significantly sway opinion because of their followers' connections to them.

The FEC has not done anything about this advertising. Can and will the FTC reign in this deceptive persuasion going into the midterms?

The results of this submission may be viewed at:
[REDACTED]

From: Federal Trade Commission via Federal Trade Commission <[REDACTED]>

Sent: Monday, December 13, 2021 8:59 AM

To: OpenMeeting <[REDACTED]>

Subject: Form submission from: Speaker Registration and Public Comment Submission Form for December 16, 2021 Open Commission Meeting

Submitted on Monday, December 13, 2021 - 08:59 Submitted by anonymous user [REDACTED] Submitted values are:

First Name: David

Last Name: Grogan

Affiliation: American Booksellers Association Full Email Address: [REDACTED] Confirm Email Address: [REDACTED]

Telephone: +[REDACTED]

FTC-Related Topic: Competition

Register to speak during meeting: No

Link to web video statement:

<https://drive.google.com/file/d/1RL3juS87U-vEztguhWFdfEsQHldgnls9/view?usp=sharing>

Submit written comment:

The results of this submission may be viewed at:

[REDACTED]

From: Federal Trade Commission via Federal Trade Commission <[REDACTED]>

Sent: Monday, December 13, 2021 7:38 PM

To: OpenMeeting <openmeetings@ftc.gov>

Subject: Form submission from: Speaker Registration and Public Comment Submission Form for December 16, 2021
Open Commission Meeting

Submitted on Monday, December 13, 2021 - 19:37 Submitted by anonymous user:
[REDACTED]

Submitted values are:

First Name: Scott

Last Name: Johnson

Affiliation: Johnson Enterprises

Full Email Address [REDACTED] Confirm Email Address:

Telephone: [REDACTED]

FTC-Related Topic:

- Competition
- Consumer Protection
- FTC Operations

Register to speak during meeting: No

Link to web video statement: N/A

Submit written comment: Six months ago tomorrow, June 14, 2021 the FTC announced a review of the Business Opportunity Rule and Commissioner Chopra criticized past FTC commissioners for non-action:

https://www.ftc.gov/system/files/documents/public_statements/1591046/statement_of_commissioner_rohit_chopra_regarding_the_business_opportunity_rule.pdf

Literally a decade and a half ago I submitted a comment describing Amway's Tool Scam:

<https://www.ftc.gov/policy/public-comments/2006/06/27/comment-522418-04681>

I'm STILL waiting for a response from the FTC.

The results of this submission may be viewed at:
[REDACTED]

From: Federal Trade Commission via Federal Trade Commission <[REDACTED]>

Sent: Friday, December 10, 2021 10:12 PM

To: OpenMeeting <openmeetings@ftc.gov>

Subject: Form submission from: Speaker Registration and Public Comment Submission Form for December 16, 2021 Open Commission Meeting

Submitted on Friday, December 10, 2021 - 22:12 Submitted by anonymous user: [REDACTED] Submitted values are:

First Name: Jeffrey D

Last Name: Jones

Affiliation: Palm Beach County Vendor

Full Email Address: [REDACTED] Confirm Email Address: [REDACTED]

Telephone: + [REDACTED]

FTC-Related Topic: FTC Operations

Register to speak during meeting: No

Link to web video statement:

Submit written comment: What is your ORI Numbers?

The results of this submission may be viewed at:

[REDACTED]

From: Federal Trade Commission via Federal Trade Commission <[REDACTED]>

Sent: Monday, December 13, 2021 5:47 PM

To: OpenMeeting <[REDACTED]>

Subject: Form submission from: Speaker Registration and Public Comment Submission Form for December 16, 2021 Open Commission Meeting

Submitted on Monday, December 13, 2021 - 17:46 Submitted by anonymous user: [REDACTED] Submitted values are:

First Name: Christopher

Last Name: Irving

Affiliation: Vice President, Consumer & Legal Affairs at Publishers Clearing House Full Email Address [REDACTED] Confirm Email

Address: [REDACTED]

Telephone: [REDACTED]

FTC-Related Topic: Consumer Protection

Register to speak during meeting: No

Link to web video statement:

Submit written comment:

This comment is submitted by Publishers Clearing House in response to the published request by the Federal Trade Commission that interested persons submit comments on efforts to combat Government and Business Impersonation Fraud.

Since 1953, Publishers Clearing House has been a well-known household name to consumers offering products and magazine offerings through on-line and direct mail promotions. Starting in 1967, PCH promotions have featured our famous free-by-mail sweepstakes and since that time PCH has awarded over \$535 Million in major prizes and awards to consumers from coast to coast. From the beginning, the hallmark of the Publishers Clearing House sweepstakes has been that no purchase, fee, tax or payment of any kind is ever necessary to enter, win or collect a prize.

Publishers Clearing House continues to receive reports from consumers regarding illegal and fraudulent impersonators posing as legitimate sweepstakes and seeking some form of payment to collect a non-existent prize.

These reports include scam contacts by phone, e-mail, direct mail and increasingly through social media platforms. In many cases, the Publishers Clearing House name or sound-alike name is illegally used or may be combined with other business or government names. We share these consumer contacts directly with the FTC through our monthly submission to the Consumer Sentinel Database.

As the Commission continues to work to combat Impersonation Fraud and considers Rulemaking in this area, PCH would identify and respectfully submit the following three areas for ongoing attention:

1. International Law Enforcement Cooperation. In August 2020 the US Ambassador to Jamaica estimated that lottery and sweepstakes fraud impersonating business was responsible for well over \$500 million in fraud loss. In our own reports from consumers, we often see impersonation fraud originating from outside the United States. Ongoing efforts by law enforcement authorities within the US should continue to seek avenues to partner with international law enforcement such as has been done effectively in the past with Project Jolt (Jamaican Operations Linked to Telemarketing). Increasing penalties and enforcement in the home countries where many of the business impersonation scams originate would help put a stranglehold on many of these operations.

2. Pro-active Social Media Identification. Over the past several years, PCH has seen a significant increase in impersonation scams targeting consumers through social medial platforms including Facebook, Instagram and LinkedIn. In these scams, individuals claiming to work for our company using either fictitious names or actual names of our employees has been noted. We continue to work with each platform to report such illegal use of our name and our employees for take downs. It would

provide much added protection to consumers if additional proactive efforts could be made by each platform to increase efforts to prevent the same names that have not been verified from appearing in the first place. Consideration should be made by the FTC and law enforcement in working directly with the social media platforms for cooperative efforts to better target and prevent such impersonation postings.

3. Education Partnerships. While strong law enforcement efforts to target those behind business impersonation scams is critical, PCH would continue to urge partnerships between law enforcement and business to find increased avenues to better educate consumers against ongoing impersonation scams.

While there are many fraud tips and warnings that we provide to consumers, for those impersonating sweepstakes, the one significant education tip to underscore that would prevent all loss from the sweepstakes impersonation scams is the reminder that no payment, tax or fee of any kind is ever required to claim a legitimate sweepstakes prize. As suggested by the 2018 BBB report on sweepstakes imposter scams (authored by former FTC Regional Director Steve Baker) the following are additional education tips that can be highlighted:

- True lotteries or sweepstakes don't ask for money.
- You have to enter to win.
- Call the sweepstakes company directly to see if you won.
- Check with lottery organizations to see if you won a lottery.
- Do an internet search of the company, name, or phone number of the person who contacted you. Check BBB Scam Tracker to see if other consumers have had similar experiences.
- Law enforcement officials do not call and award prizes.
- Talk to a trusted family member or your bank.

Our thanks to the Commission for this opportunity to provide comment on the efforts to combat Government and Business Impersonation Scams.

The results of this submission may be viewed at:



From: Federal Trade Commission via Federal Trade Commission <[REDACTED]>

Sent: Monday, December 13, 2021 7:26 PM

To: OpenMeeting <[REDACTED]>

Subject: Form submission from: Speaker Registration and Public Comment Submission Form for December 16, 2021 Open Commission Meeting

Submitted on Monday, December 13, 2021 - 19:26 Submitted by anonymous user: [REDACTED]

Submitted values are:

First Name: Tim

Last Name: McGuinness PhD

Affiliation: Society of Citizens Against Relationship Scams Inc.

Full Email Address: [REDACTED] Confirm Email Address: [REDACTED]

Telephone: [REDACTED]

FTC-Related Topic: Consumer Protection

Register to speak during meeting: Yes

Link to web video statement: <https://youtu.be/NNPDOJGLkNk> Submit written comment:

We wish to bring to the commission's attention two significant concerns as relates to online social media.

1. Restraint of trade. Social media companies actively are involved in unlawful restraint of trade as practiced against the companies or enterprises that utilize their platforms as one of, or their primary communication medium with their customers. Products such as Facebook, has actively reduced our ability to reach the people that have actively asked to receive our information. It is done on a willfull and arbitrary basis, particularly for organizations that are in any way competitive or speak out about flaws or concerns about these platforms as a retaliatory action.

2. Falsifying the numbers of real active users on their platforms to both their shareholders and advertisers. In past releases by whistle blowers it has been identified that Facebook and other platforms have substantially higher numbers of non-real or fake users on their platforms and thus is fraudulently misidentifying the real shareholder values and potential advertiser reach on these platforms.

In addition, we would ask that the Commission refer these social media platforms to the Consuemr Product Safety Commission for their review of the substantial harm that these PRODUCTS create for the individual that use them.

Up to and including death resulting from suicides induced by the social engineering and manipulation created by the platform's designers and developers.

I thank the Commission for the opportunity to bring these to the attention of the Commission and hope that review of these issues will be conducted.

Tim McGuinness, Ph.D.

Director

Society of Citizens Against Relationship Scams Inc. [SCARS] Miami, Florida USA contact@AgainstScams.org

The results of this submission may be viewed at:
[REDACTED]

From: Federal Trade Commission via Federal Trade Commission <[REDACTED]>

Sent: Saturday, December 11, 2021 1:22 AM

To: OpenMeeting <openmeetings@ftc.gov>

Subject: Form submission from: Speaker Registration and Public Comment Submission Form for December 16, 2021 Open Commission Meeting

Submitted on Saturday, December 11, 2021 - 01:22 Submitted by anonymous user: [REDACTED]

Submitted values are:

First Name: Shannon

Last Name: Mitchell

Affiliation: Customer

Full Email Address: [REDACTED] Confirm Email Address: [REDACTED]

Telephone: +[REDACTED]

FTC-Related Topic:

- Competition
- Consumer Protection
- FTC Operations

Register to speak during meeting: Yes

Link to web video statement: NC

Submit written comment: Anything that was taken or failed should be replaced and the companies need to secure better for these sites so this want happen ever again

The results of this submission may be viewed at:

[REDACTED]

From: Federal Trade Commission via Federal Trade Commission <[REDACTED]>

Sent: Friday, December 10, 2021 12:14 PM

To: OpenMeeting <openmeetings@ftc.gov>

Subject: Form submission from: Speaker Registration and Public Comment Submission Form for December 16, 2021 Open Commission Meeting

Submitted on Friday, December 10, 2021 - 12:13 Submitted by anonymous user: [REDACTED] Submitted values are:

First Name: Mike

Last Name: Rudolph

Affiliation: YouMail, Inc

Full Email Address: [REDACTED] Confirm Email Address: [REDACTED]

Telephone: +[REDACTED]

FTC-Related Topic: Consumer Protection

Register to speak during meeting: Yes

Link to web video statement: CA

Submit written comment: Speaking is not required unless desired by the Commission. YouMail would be willing to provide any updated data, graphs or reports on the matter of business and government impersonation through calls or SMS to the public given we have enough advance notice to produce an updated refreshed pull of this issue (i.e. our work with Marriott and the ITG eliminated Marriott imposters in the phone network, and we track imposter calls such as the Amazon imposter calls that have exceeded over half a billion calls year-to-date)

The results of this submission may be viewed at:

[REDACTED]

From: Federal Trade Commission via Federal Trade Commission <[REDACTED]>

Sent: Monday, December 13, 2021 9:58 AM

To: OpenMeeting <openmeetings@ftc.gov>

Subject: Form submission from: Speaker Registration and Public Comment Submission Form for December 16, 2021 Open Commission Meeting

Submitted on Monday, December 13, 2021 - 09:57 Submitted by anonymous user: [REDACTED] Submitted values are:

First Name: Jeff

Last Name: Vitt

Affiliation: Fear Fear Fear • Crimes Victims • Whistleblower Protections Full Email Address: [REDACTED] Confirm Email

Address: [REDACTED]

Telephone: + [REDACTED]

FTC-Related Topic:

- Competition
- Consumer Protection
- FTC Operations

Register to speak during meeting: Yes

Link to web video statement:

Submit written comment:

- Identify Theft / Impersonation
- Money, Power, Influence RICO With Civil Rights Violations • Intellectual / Proprietary/ Real Property~ Tangible / Intangible (Part Copyright)
- Monopoly Conglomerates Cartels
 - Pharmaceutical Conglomerate
 - Insurance
 - Technology
 - Data Breaches
 - Privacy
 - Data / File Hacking Breaches
 - Big Pharmaceutical Medical Industry
 - Industries Integration Overlapping
 - Attorney Failures of Self Policing
 - Every State Bar Association (i.e. Texas, Oklahoma ~ All)
 - Family Law Masquerade Massacre
 - Legal Representation Blacklisted
 - Attorney Client Privilege Ethics, Violations, Collusion
 - Local to Global, County, State, United States Police, Regulators, Federal Agencies Legal System Failure To Investigate, Regulate, Enforce
 - Injustice

I Am, Pro Se . . . Alone I Am Taking A Stand For Peacefully For Greater Good of Society In The United States of America I BELIEVE IN . . . Alone

..

Against Corruption, Perversion, Obstruction of Justice, Prosecution, Color of Law, ETC, ETC, ANDA. There Are Not Many Approaches (Including / Not Excluding Calling, Submitting Complaints Online, I've GONE TO FBI, OSBI In Person Alone. All With Follow Up Throughs

Including Voiced Out Loud, In Motions To Judges Presiding Over Multiple Courts Requesting Government Agencies Intervention DOJ, FBI, USAO, FTC, SEC, FCC

RESPECTFULLY SUBMITTED

JEFFREY A VITT, PRO SE
BAR # NOT AN ATTORNEY

The results of this submission may be viewed at:
<https://www.ftc.gov/node/1591350/submission/7>