



UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

Office of Commissioner  
Rebecca Kelly Slaughter

**CONCURRING STATEMENT OF COMMISSIONER REBECCA KELLY SLAUGHTER**

*In the Matter of Shop Tutors, Inc. d/b/a LendEDU*  
*Commission File No. 1823180*  
February 3, 2020

In this matter, our dedicated staff in the Division of Financial Practices assembled a powerful complaint that underscores how pay-to-play greed and deception have corrupted the ratings and rankings on which consumers increasingly rely to make informed purchasing choices online. I am pleased to vote to accept for public comment the administrative complaint and consent agreement with Shop Tutors, Inc. d/b/a LendEDU and its principals, Nathaniel Matherson, Matthew Lenhard, and Alexander Coleman.

I write separately to highlight the importance of this case in addressing a cutting edge market practice that I fear is becoming increasingly common online: purportedly neutral rankings and recommendations that actually reflect paid product placement. The complaint's second count alleges that the respondents violated section 5 of the FTC Act by deceptively failing to "disclose adequately to consumers that financial services companies paid Respondents for website content, including rate tables, rankings, and star ratings." Compl. ¶ 45. Companies that engage in pay-to-play rankings and ratings should take heed: This conduct robs consumers of vital information, pollutes our online marketplaces, and violates the law, which will result in serious consequences.