



Federal Trade Commission

Our Consumer Protection Agenda: Meeting the Challenges of a Changing Marketplace

Jessica Rich¹

Director, Bureau of Consumer Protection, FTC

National Consumers League – July 28, 2015

I'm delighted to be here. Today, I'd like to talk about some of the key priorities that Chairwoman Ramirez and I have emphasized in our 2+ year tenures at the FTC – and will continue to emphasize as we move forward.

As you know, the FTC has a broad consumer protection mission to address fraud, privacy, and deceptive advertising across virtually the entire economy. Since 2013, we've pursued this mission vigorously. And the numbers speak for themselves: we've filed over 220 actions, and obtained over 360 orders that include over \$1.7 billion in penalties and consumer redress. We've completed ten rulemakings and twelve reports; developed over 100 consumer and business education publications; and hosted almost 20 workshops and conferences. (I know it's not just about numbers, but I can't resist.)

In pursuing this work, we've placed particular emphasis on four themes that reflect key challenges consumers face today – the explosive growth of the mobile platform and new technologies; privacy and “Big Data”; deceptive claims in new media; and fraud affecting every

community. We've also engaged like never before with federal and state partners to maximize our impact and promote consistent and efficient results.

The consumer protection challenges posed by new technologies are immense. Commerce has always been a dominant force in American life, but now it's coming at us from every angle, at every minute – through the smartphones we carry with us everywhere and the many other connected devices that are all around us. Data-driven predictions about who we are and what we will do determine the information we receive and the offers we get. And, increasingly, consumers themselves are enlisted in marketing campaigns on social media, touting products and services to their friends and acquaintances. In the last two years, the FTC has made significant shifts in our privacy and advertising programs to address these trends.

Our fraud program also faces new challenges. Good old-fashioned fraudsters are still around, but they now increasingly cross international lines and find it ever easier – again driven by data – to target specific communities like the elderly, financially distressed individuals, and Spanish-speaking consumers. As a result, for the last two years, protecting every community has been a chief focus of our fraud program.

Our goal is to make clear that the fundamental principles of consumer protection still apply to today's and tomorrow's marketplace. Sure, they need to be adapted and updated. But the basic rules still apply: Tell the truth. Disclose any facts necessary to prevent a claim from being misleading. In your businesses decisions, weigh any harms you might impose on consumers very carefully. Don't help others deceive or harm consumers. These principles are eternal, and we expect businesses to abide by them across all of their business models – old and new.

I. Mobile and New Technology

New technologies benefit consumers in countless ways. In recent years, we've seen remarkable growth in the use of smartphones and connected devices, which enable consumers – from any location – to find information, contact friends, shop and pay for goods and services, update their social networks, monitor their health and fitness, and access devices in their cars and homes remotely, among many benefits and conveniences.

Clearly, the marketplace has moved to the mobile arena, and consumer protections need to move with it. Mobile technologies also raise special consumer protection challenges because they are always with you and always on; they can track your location and connect to each other; and they have a small screen, or increasingly no traditional screen, making disclosures to consumers ever more challenging.

Protecting consumers as they use and benefit from new technologies has been a chief priority of my tenure. The main goal, again, is to make clear that basic consumer protections apply to these new technologies and platforms.

Much of our work in this area deals with consumer privacy, which I'll discuss shortly. But the growth of technology raises many other important consumer issues – for example, unauthorized payments, false advertising, and basic fraud. During the past two years, the FTC has brought much-needed attention to these issues.

Notably, last year, we announced cases against Apple,² Amazon,³ and Google⁴ for allegedly failing to obtain parents' permission before letting kids run up charges in mobile gaming apps. We also took action against numerous companies – including (with all 50 states and the Federal Communications Commission) T-Mobile⁵ and AT&T⁶ – for allegedly “cramming” unauthorized third-party charges on consumers' mobile phone bills.⁷ These cases

highlight the ease with which consumers can incur unauthorized, often fraudulent charges through the mobile platform, and the need for basic safeguards to prevent them.⁸ In addition, we charged AT&T⁹ and TracFone¹⁰ with making misleading claims that they provided “unlimited data” to subscribers to their internet service.¹¹ Thus far, we’ve obtained hundreds of millions of dollars in consumer refunds from these cases collectively.

We’re also tackling unsubstantiated health claims on the mobile platform. For example, the FTC recently charged two app developers with deceptively claiming that their mobile apps – Mole Detective and MelApp – could detect symptoms of melanoma, even in the early stages.¹² In fact, we alleged, the companies lacked evidence to show that their apps could detect melanoma, early or at all.

Even debt collectors are getting in on the mobile act. In the past two years, we’ve taken action against a number of collectors that sent unwanted texts to deceive and threaten consumers.¹³

In addition, we’re putting a stop to fraud involving mobile texts, new payment platforms, and virtual currencies. For example, last year, we settled a series of cases cracking down on affiliate marketers that we alleged bombarded consumers with hundreds of millions of unwanted spam text messages in an effort to steer them towards deceptive websites falsely promising “free” gift cards.¹⁴

More recently, we took action against the makers of *Prized*, a mobile gaming app that supposedly earned consumers rewards.¹⁵ The app promised it would be free from malware, but instead loaded consumers’ mobile phones with malicious software to mine virtual currencies for the developer.

And this year, we brought our first case involving the Kickstarter crowdfunding platform (*Forking Path*). We alleged that the defendant used Kickstarter to raise money to produce a board game, telling backers they would get copies of the game and other rewards.¹⁶ After raising over three times his stated goal, he cancelled the project and promised to refund backers' money. In fact, backers never got refunds because, we alleged, the defendant spent the money on personal items such as rent, home equipment, and moving to Oregon.

In addition to enforcement, education is a key component of our work to promote basic protections in the tech arena. For example, we updated our signature guidance piece, *Dot Com Disclosures*, in 2013 to provide guidance about making disclosures on mobile devices, Twitter, and other new media.¹⁷ Similarly, in 2014, we updated our guide to parents, *Net Cetera: Chatting with Kids About Being Online*,¹⁸ to address such topics as mobile apps, public Wi-Fi security, kids' privacy, and text message spam. And we've issued many reports and guides addressing privacy, which I'll discuss in moment.

Lastly, part of our focus in tech is internal to the FTC – to make sure we have the personnel and resources to meet the consumer protection challenges of the expanding tech world. A few years ago, while I was running our Division of Financial Practices, I created the Mobile Technology Unit (MTU) to help bring consumer protection into the mobile era. The MTU assisted BCP staff with law enforcement investigations and policy reports. It also developed surveys on kids' apps, mobile shopping apps, and health apps.¹⁹ This year, we announced that we would broaden the MTU's mission so it focuses not just on mobile, but on tech more broadly. We renamed it the Office of Technology Research and Investigation (OTech), and are in the process of hiring more researchers and technologists.²⁰ We expect the office to play an

important role in the agency's work on privacy, data security, connected cars, smart homes, emerging payment methods, Big Data, and the Internet of Things. Stay tuned.

II. Privacy and Big Data

Now I'll move to privacy and "Big Data." Nowhere are the effects of technology more dramatic than in privacy. Today, data is collected from consumers wherever they go – through their smartphones, wearables, and fitness devices; in their smart homes and smart cars; as they shop in stores and online; as they check and update their many social networks; as they walk down the street; everywhere. This ubiquitous data collection is also invisible in many ways. Most of the companies that collect consumers' data are behind the scenes and never interact with consumers. And as we move into the era of the Internet of Things, data collection will become even more invisible.

The use of data, and Big Data, can of course drive valuable innovation across many fields – medicine, education, transportation, and manufacturing. But it also raises privacy concerns for consumers – massive collection and storage of personal information; the risk that detailed profiles will fall into the wrong hands, enabling identity theft and other harms; the release of sensitive information consumers regard as private; and the potential use of this data by employers, insurers, creditors, and others to make important decisions about consumers.

Our central message is that, even in the face of rapidly changing technology and business models, companies still need to follow the basic privacy principles. Don't collect or retain more data than you reasonably need. Protect data from unauthorized access. Give consumers accurate information and meaningful choices about their privacy. As new business models and technologies develop, these principles remain as important as ever, although they do need to be

adjusted and adapted. We've emphasized these principles through enforcement, policy initiatives, and education.

Not surprisingly, many of our recent privacy cases involve mobile and connected devices. For example, last year, we announced a case against mobile messaging app Snapchat for, among other things, promising that the photos and videos sent through its app would disappear at a time set by the sender.²¹ In fact, we alleged that recipients could use easy workarounds to keep the messages forever. We also took action against the maker of a popular flashlight app (Goldenshores Technology) for promising that it would only collect data from users' devices for certain internal housekeeping purposes when, in fact, it collected – and transmitted to third party ad networks – the device's location and device ID.²²

And in our first case involving the Internet of Things, we alleged that video monitoring company *TRENDnet* failed to provide reasonable security for IP cameras used for home security and baby monitoring, resulting in hackers posting private video feeds of people's bedrooms and children's rooms on the Internet.²³

More recently, we addressed the growing practice by retailers of using mobile technologies to track the movements of their customers in stores. We alleged that Nomi Technologies, the analytics firm that performed these services, told consumers they would be notified when stores were using its tracking services and would be able to opt out then and there.²⁴ In fact, consumers weren't told and thus wouldn't know to opt out.

We've also brought a number of cases involving mobile security – including against mobile device manufacturer HTC for failing to secure its mobile devices,²⁵ and against mobile apps Credit Karma²⁶ and Fandango²⁷ for disabling a critical default process necessary to ensure that apps' communications were secure.

Health data is another important FTC concern because it's sensitive and often regarded as private and because, contrary to popular belief, much of it falls outside of HIPAA. Indeed, HIPAA doesn't cover most health apps and consumer generated health data, but the FTC Act does. In December, we charged Payments MD, a health billing company, with using a deceptive registration process to trick thousands of consumers who signed up for its online billing portal into also consenting to collection of their detailed medical information from pharmacies, medical labs, and insurance companies.²⁸

Then there are extortion websites that harvest sensitive data, post it online, and seek payment to take it down. We took action against two of those this year. In one, the defendant Craig Brittain solicited sexually explicit photos from women's ex-boyfriends and others – in many cases through deception – to post on his website, isanybodydown.com.²⁹ He then used another site to pose as an attorney and charge \$250 for removing the information. The Commission also issued a unanimous summary decision finding law violations by Jerk.com.³⁰ That case involved photos of kids and teens being labeled a “jerk,” supposedly by their peers.

Data security is also a significant part of our work to protect sensitive data. Over the past 15 years, we've brought over 50 cases against companies that failed to implement reasonable security protections.³¹ During the last two years, we've continued our pace of work in this area, taking action against – in addition to those already mentioned – healthcare company Accretive Health,³² supplement companies Genelink³³ and Genewize,³⁴ medical transcriber GMR Transcription Services,³⁵ and debt brokers Bayview³⁶ and Cornerstone³⁷ for failure to protect sensitive health and financial account data. And we have ongoing litigation against Wyndham Hotels³⁸ and LabMD³⁹ – and just last week a new contempt action against Lifelock⁴⁰ – for alleged failures to protect sensitive financial and health data. I should also mention that a

unanimous Commission also supports a law to give us civil penalty and breach notification authority in this important area.

This year, we are emphasizing our data security educational tools and taking our message on the road, gearing up for a campaign called *Start with Security*, in which we will host events around on the country on security topics and best practices.⁴¹ We also continue to put out new and current business guidance, including our latest piece on lessons learned from FTC cases.⁴²

Additionally, we are vigorously enforcing the laws protecting the privacy and accuracy of sensitive consumer report data⁴³ and kids' privacy,⁴⁴ as well as the U.S.-EU Safe Harbor Framework.⁴⁵

One theme I am stressing in our privacy program is the connection between the sale of sensitive data and fraud. In fact, we often discover in our fraud cases that the scammers used highly sensitive data bought from another company – including Social Security and bank account numbers – to trick or steal from consumers.⁴⁶ This data goes well beyond the usual lead lists we've been seeing for years.

For example, in December, we brought action against data broker LeapLab.⁴⁷ We alleged that LeapLab bought the payday loan applications of financially strapped consumers – which included names, addresses, phone numbers, employers, SSNs, and bank account numbers – and then sold it to marketers whom it knew had no legitimate need for it. These marketers included scam artists that used the data to withdraw millions of dollars from consumers' accounts. These types of cases are hard to investigate and prove but we have more in the pipeline. They reveal a very troubling trend and help to answer the question we so often hear in privacy – “where's the harm?”

But we also know that many lead generators and data brokers don't engage in these practices and, indeed, follow codes of conduct and protocols to ensure that their data doesn't fall into the wrong hands. To explore these issues in greater detail, we recently announced that we will host a workshop in the fall on the growing use of online lead generation in various industries.⁴⁸

Finally, in the last two years, the FTC has hosted workshops and released influential reports about trends and privacy concerns in today's marketplace. For example, last year, we hosted a three-part "Spring Privacy Series" to examine the privacy implications of new uses of technology that have garnered attention and concern – mobile device tracking in retail stores (also addressed in the *Nomi* case);⁴⁹ the use of predictive scoring to help companies predict consumer behavior;⁵⁰ and health apps and devices that consumers increasingly use to manage and analyze their health data.⁵¹ In May 2014, we also issued a report on data brokers, showing the enormous number of data points they collect on each consumer, the profiles and categories they use to characterize individuals, and their many sources of data and clients.⁵²

In addition, last fall, we hosted a workshop entitled *Big Data: A Tool for Inclusion or Exclusion?*⁵³ The workshop explored how the categorization of consumers may be both creating and limiting opportunities for consumers, with a focus on low income and underserved consumers. We plan to issue a report on this topic in the coming months. And in January, we issued a staff report setting forth a number of recommended best practices for the Internet of Things.⁵⁴

More policy work is in the pipeline, notably our upcoming workshop on cross-device tracking to examine the various ways that companies now track consumers across multiple devices, and not just within one device.⁵⁵

III. Deception in New Media

As you know, one of the FTC's signature programs is to stop false and unsubstantiated advertising. In the past two years, the FTC has done an enormous amount of work in this area, with particular focus on health claims,⁵⁶ green claims,⁵⁷ and auto advertising⁵⁸ – all areas where we see significant deception in today's marketplace.

I want to focus today on how the FTC has addressed the dramatic changes we've seen in recent years to how consumers *receive* advertising. Today, everyone's a salesman – the doctor on TV, the blogger you thought was just expressing his own opinion, your friends on Facebook, and even that six-year old unwrapping gifts on his own YouTube channel, EvanTube. And the article you just read about the latest medical breakthrough was actually paid for by the person *selling* the medical breakthrough.

Indeed, we're seeing the increased blurring of purportedly objective content and advertising – through misleading formats and deceptive endorsements. In the last two years, we've shifted our program priorities to provide greater focus on these concerns.

These problems are particularly pronounced in the area of deceptive health and weight loss claims. Over the past year, we've brought a number of cases against companies touting the slimming effects of various supplements, many of which involved deceptive formats and endorsements. In one, defendant Lindsey Duncan made TV appearances on *The Dr. Oz Show* touting pure green coffee bean extract (GCBE).⁵⁹ According to our complaint, Duncan purported to be an independent expert when he was actually selling the supplement – deceptively – through websites set up just beforehand. In another (*NPB Advertising*), we alleged that the defendants set up fake news sites that made false claims about the effectiveness of GCBE and channeled people to another site where they could buy it.⁶⁰ And in April, working with the state of Connecticut,

we obtained an \$11.9 million dollar judgment against an affiliate marketing network, LeadClick Media, for using fake news sites to convince people that acai berry and colon cleansing weight loss products were proven effective.⁶¹

One particularly troubling case, against NourishLife, involved allegedly unsubstantiated claims for a supplement purporting to treat childhood speech and behavioral disorders, including those associated with autism.⁶² Among other things, the defendants set up a website, *apraxiaresearch.com*, which appeared to be an independent source of research findings but was in fact simply a marketing tool for defendants. We also alleged that the company failed to disclose that it gave free supplements to the parent endorsers that were featured in their marketing materials.

Our efforts to police these claims are all based on the fundamental principles that consumers – parents in the case of *NourishLife* – need to be able to properly evaluate the information they receive on health products in the marketplace.

But it's not just a problem in the health area. Last March, we alleged that ADT, the home security company, paid spokespeople to demonstrate and review its products on NBC's *Today Show*, and in other nationwide media, without disclosing this compensation.⁶³ In November, in connection with our action against Sony for deception claims about its gaming consoles,⁶⁴ we alleged that a manager at its ad agency, Deutsch, had directed employees to post positive tweets about the console as part of the Sony ad campaign.⁶⁵ And this February, we took action against shipment broker AmeriFreight for failing to disclose that it provided discounts and awards to customers who posted online reviews of its service.⁶⁶

To provide guidance about how to avoid deceptive endorsements in today's marketplace, we recently updated the FAQs for our Endorsement Guides.⁶⁷ The revised FAQs take a deeper

dive into forms of promotion that were relatively new when we did our last update – for example, Twitter, affiliate marketing, “like” buttons, employee endorsements, solicited endorsements, and uploaded videos. Last year, we also launched a project to highlight the importance of prominent disclosures as a means to prevent claims – including endorsements – from being misleading.⁶⁸ Also, in November 2013, we held a workshop on “native advertising” to explore the blending of advertising with news, entertainment, and editorial content in digital media.⁶⁹ We’ll be issuing guidance on that topic by the end of the year.

IV. Protecting Every Community

Last but not least, I want to highlight our work to protect every community from fraud. Stopping fraud is the FTC’s largest consumer protection program, and for good reason: fraud causes enormous harm to consumers. Our work in the last two years has targeted many different forms of fraud – sham charities,⁷⁰ illegal robocalling,⁷¹ phony business opportunities,⁷² investment schemes,⁷³ and imposter scams,⁷⁴ just to name a few. In doing so, we’ve significantly ramped up our efforts to reach and protect the many communities that are affected by fraud.

We’ve always tried to reach and protect different populations so this isn’t exactly new. But the U.S. population is changing. As a country, we are getting older and more diverse, and the FTC wants to be sure we meet the needs of a changing population.

Over the last two years, through the agency’s *Every Community Initiative*, we’ve done outreach and education, developed partnerships with trusted community advocates, and brought cases. For starters, we’ve hosted over a dozen major conferences to learn more about consumer protection issues in a wide range of communities. We’ve hosted workshops on how fraud affects every community;⁷⁵ how using Big Data can help or harm consumers;⁷⁶ how debt collection

affects the Latino community,⁷⁷ and how scams affect immigrant consumers.⁷⁸ Our regional offices brought together key players on consumer protection for Common Ground conferences.⁷⁹ And we partnered with the Navajo Human Rights Commission to reach the Navajo Nations,⁸⁰ and with the NAACP to reach African Americans.⁸¹

We've also conducted outreach – over 140 events in the last year alone all over the country. For example, during the last two years, we hosted the first-ever Military Consumer Protection Day to get the word out on issues affecting service members, veterans, and their families.⁸² And our regional and DC staff have given seminars and training to law students; held regular meetings with legal services partners; spoken at senior centers, schools, and libraries; briefed ethnic media; held webinars for consumer advocates and other partners; done events on military installations and at clinics for veterans; and presented at national and local conferences.

And we've used our strongest tool – enforcement – to protect communities that have been specifically targeted by fraudsters. Most of the cases we bring affect a broad cross-section of people, but scams are increasingly targeting specific groups, aided by the widespread availability of data profiles and leads on consumers.⁸³ For example, we halted the operations of a company that used false affiliation with the FTC – calling itself “FTC Credit Solutions” – to market bogus credit repair services to Spanish-speaking consumers.⁸⁴ Scams targeting the Spanish speaking population are pervasive, and we've taken action to address many different kinds – involving pyramids and business opportunities,⁸⁵ unordered merchandise,⁸⁶ and fraudulent debt collection.⁸⁷

We're also stopping scams that target older consumers. For example, we recently halted a global sweepstakes (*Mail Tree*) that used personalized letters to seniors to trick them into paying to claim their prizes and took in more than \$28 million.⁸⁸ Other frauds targeting seniors

that we've stopped involved tech support to fix nonexistent computer problems,⁸⁹ recovery scams purporting to recoup losses from other frauds,⁹⁰ and fraudulent health and safety schemes.⁹¹

We've also gone after companies that target military service members. For example, for-profit school Ashworth College targeted service members and their families and accepted their military benefits as payment.⁹² We alleged Ashworth misrepresented that students would get the training and credentials needed to switch careers or get a new job, and that the course credits they earned would transfer to other schools. In fact, we alleged neither claim was true. We have more cases like this in the pipeline.

We're also fighting scams that specifically target consumers already facing financial difficulties. Our recent *HOPE Services* case – just one example – targeted a sham operation that allegedly told financially distressed homeowners it would help reduce their mortgages, but instead effectively stole their mortgage payments, leading some to foreclosure and bankruptcy.⁹³ The *Leap Lab* case I discussed, and others like it, involved unauthorized debits from financial strapped consumers' accounts.⁹⁴ And our cases involving abusive debt collection victimized consumers already in debt.⁹⁵

Finally, we've taken action against fraudsters who set their sights on small businesses. For example, the FTC recently halted two Canada-based schemes that defrauded small businesses and nonprofits in the US by billing them for unwanted listings in online "yellow pages" business directories.⁹⁶

In the coming year, we'll be doing more outreach and more cases like these. Every person we meet, every complaint we receive, and every case we bring – they help us better serve consumers in every community.

V. Conclusion

As you can see, the last two years have been incredibly busy – keeping pace with the rapid changes in the marketplace and taking action to promote compliance and deter the growth of harmful trends. Thank you for having me here today.

-
- ¹ The views expressed here are my own and do not necessarily represent the views of the Federal Trade Commission or any Commissioner.
- ² *Apple, Inc.*, No. C-4444 (Mar. 25, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/112-3108/apple-inc>.
- ³ *FTC v. Amazon.com*, No. 2:14-cv-01038 (W.D. Wash. filed July 10, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3238/amazoncom-inc>.
- ⁴ *Google, Inc.*, No. C-4499 (Dec. 2, 2014) (F.T.C. consent), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3237/google-inc>.
- ⁵ *FTC v. T-Mobile USA, Inc.*, No. 2:14-cv-0097-JLR (W.D. Wash. filed Dec. 19, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3231/t-mobile-usa-inc>.
- ⁶ *FTC v. AT&T Mobility, Inc.*, No. 1:14-cv-3227-HLM (N.D. Ga. filed Oct. 8, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3248/att-mobility-llc>.
- ⁷ See also *FTC v. Jesta Digital LLC*, No. 1:13-cv-01272 (D.D.C. filed Aug. 20, 2013), available at <https://www.ftc.gov/enforcement/cases-proceedings/112-3187/jesta-digital-llc-also-dba-jamster>; *FTC v. Wise Media LLC*, No. 113-CV-1234 (N.D. Ga. filed Apr. 17, 2013), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3182/wise-media-llc-et-al>; *FTC v. Tatto, Inc.*, No. 2:13-cv-08912-DSF-FFM (C.D. Cal. filed Dec. 5, 2013), available at <https://www.ftc.gov/enforcement/cases-proceedings/112-3181/tatto-inc-also-dba-winbigbidlow-tatto-media-et-al>.
- ⁸ To explore and address this and other consumer protection issues raised by the growing use of mobile payments, the Commission has held workshops and issued reports. See, e.g., FTC Staff Report, *Mobile Cramming: An FTC Staff Report* (July 2014), available at <https://www.ftc.gov/system/files/documents/reports/mobile-cramming-federal-trade-commission-staff-report-july-2014/140728mobilecramming.pdf>; FTC Staff Report, *What's the Deal?: An FTC Study on Mobile Shopping Apps* (Aug. 2014), available at <https://www.ftc.gov/reports/whats-deal-federal-trade-commission-study-mobile-shopping-apps-august-2014>.
- ⁹ *FTC v. AT&T Mobility, Inc.*, No. 14-cv-04785-EMC (N.D. Cal. filed Oct. 28, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3253/att-mobility-llc-mobile-data-service>.
- ¹⁰ *FTC v. TracFone Wireless, Inc.*, No. 3:15-cv-00392 (N.D. Cal. filed Jan. 28, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3176/straight-talk-wireless-tracfone-wireless-inc>.

-
- ¹¹ See also *FTC v. DirecTV*, No. 3:15-cv-01129 (N.D. Cal. filed Mar. 11, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/102-3141/directv> (alleging company misrepresented costs of its cable service).
- ¹² *Health Discovery Corp.*, No. C-4516 (Mar. 13, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3211/health-discovery-corporation-melapp-matter>; *FTC v. New Consumer Solutions LLC et al.*, No. 15-C-1614 (N.D. Ill. filed Feb. 23, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3210/new-consumer-solutions-llc-mole-detective>.
- ¹³ See, e.g., *FTC v. Primary Group Inc.*, No. 1:15-CV-1645 (N.D. Ga. filed May 21, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/1423158/primary-group>; *FTC v. Unified Global Group, LLC*, No. 1:15-cv-00422-EAW (W.D.N.Y. filed May 21, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/1423140/unified-global-group>; *FTC v. Premier Debt Acquisitions LLC*, No. 1:15-cv-00421-FPG (W.D.N.Y. filed May 21, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/1423157/premier-debt-acquisitions>; *U.S. v. National Attorney Collection Services, Inc.*, No. 2:13-cv-06212-ODW-VBK (C.D. Cal. filed Aug. 23, 2013), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3032/national-attorney-collection-services-inc>.
- ¹⁴ See *FTC v. Advert Marketing Inc.*, No. 413-cv-00590 (S.D. Tex. stipulated order filed June 9, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3019-x130037/advert-marketing-inc-scott-dalrymple-robert-jerrold>; *FTC v. Jason Q. Cruz, Inc.*, No. 1:13-cv-01530 (N.D. Ill. stipulated order filed Jan. 16, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3051-113-cv-01530/cruz-jason-q-also-dba-appidemic-inc>; *FTC v. Ecommerce Merchants LLC.*, No. 113-cv-01534 (N.D. Ill. stipulated order filed Nov. 12, 2013), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3048/ecommerce-merchants-llc-dba-superior-affiliate-management-et>; *FTC v. Henry Nolan Kelly*, No. 113-cv-00647 (N.D. Ga. stipulated order filed July 17, 2013), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3057/kelly-henry-nolan>; *FTC v. Rentbro, Inc.*, No. 113-cv-01529 (N.D. Ill. stipulated order filed Sept. 13, 2013), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3049/rentbro-inc-daniel-pessin-jacob-engel>; *FTC v. SubscriberBASE Holdings, Inc.*, No. 113-cv-01527 (N.D. Ill. stipulated order filed Feb. 6, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3137/subscriberbase-holdings-inc-et-al>; *FTC v. Verma Holdings, LLC*, No. 4:13-cv-00594 (S.D. Tex. stipulated order filed July 15, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3018/verma-holdings-llc-rishab-verma>.
- ¹⁵ *FTC v. Equiliv Investments*, Matter No. 142-3144 (D.N.J. filed June 29, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3144/equiliv-investments-prized>; see also *FTC v. BF Labs, Inc.*, No. 4:14-cv-00815-BCW (W.D. Mo. filed Sept. 23, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3058/bf-labs-inc> (alleging that the company deceptively marketed computers designed to produce Bitcoins).

-
- ¹⁶ *FTC v. Erik Chevalier, Co.*, No. 3:15-cv-1029-AC (D. Ore. filed June 11, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3061/erik-chevalier-forking-path>.
- ¹⁷ *Dot Com Disclosures: How to Make Effective Disclosures in Digital Advertising* (Mar. 2013), available at <https://www.ftc.gov/tips-advice/business-center/guidance/com-disclosures-how-make-effective-disclosures-digital>.
- ¹⁸ See <https://www.consumer.ftc.gov/articles/pdf-0001-netcetera.pdf>.
- ¹⁹ See generally <https://www.ftc.gov/news-events/media-resources/mobile-technology>.
- ²⁰ See, e.g., Jessica Rich, *BCP's Office of Technology Research and Investigation: The Next Generation in Consumer Protection*, FTC Business Blog, Mar. 23, 2015, at <https://www.ftc.gov/news-events/blogs/business-blog/2015/03/bcps-office-technology-research-investigation-next>.
- ²¹ *Snapchat, Inc.*, No. C-4501 (Dec. 23, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3078/snapchat-inc-matter>.
- ²² *Goldenshores Technologies, LLC*, No. C-4446 (Mar. 31, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3087/goldenshores-technologies-llc-erik-m-geidl-matter>.
- ²³ *TRENDnet, Inc.*, No. C-4426 (Jan. 16, 2014), available at <http://www.ftc.gov/enforcement/cases-proceedings/122-3090/trendnet-inc-matter>.
- ²⁴ *Nomi Technologies, Inc.*, Matter No. 132-3251 (Apr. 23, 2015) (proposed consent agreement), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3251/nomi-technologies-inc-matter>.
- ²⁵ *HTC America, Inc.*, No. C-4406 (June 25, 2013), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3049/htc-america-inc-matter>.
- ²⁶ *Credit Karma, Inc.*, No. C-4480 (Aug. 13, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3091/credit-karma-inc>.
- ²⁷ *Fandango, LLC*, No. C-4481 (Aug. 13, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3089/fandango-llc>.
- ²⁸ *PaymentsMD, LLC*, No. C-4505 (Jan. 27, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3088/paymentsmd-llc-matter>.
- ²⁹ *Craig Brittain*, Matter No. 132-3120 (Jan. 29, 2015) (proposed consent agreement), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3120/craig-brittain-matter>.
- ³⁰ *Jerk, LLC*, Docket No. 9361 (Mar. 13, 2015) (summary judgment decision), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3141/jerk-llc-dba-jerkcom-matter>.
- ³¹ See, e.g., *Commission Statement Marking the FTC's 50th Data Security Settlement*, Jan. 31, 2014, available at <https://www.ftc.gov/system/files/documents/cases/140131gmrstatement.pdf>.
- ³² *Accretive Health, Inc.*, No. C-4432 (Feb. 5, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3077/accretive-health-inc-matter>.
- ³³ *Genelink, Inc.*, No. C-4456 (May 8, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/112-3095/genelink-inc-matter>.

-
- ³⁴ *foru Int'l Corp.*, No. C-4457 (May 8, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/112-3095/forutm-international-corporation-matter>.
- ³⁵ *GMR Transcription Servs., Inc.*, No. C-4482 (Aug. 14, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3095/gmr-transcription-services-inc-matter>.
- ³⁶ *FTC v. Bayview Solutions LLC*, No. 1:14-cv-01830-RC (D.D.C. filed Oct. 31, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3226-x140062/bayview-solutions-llc>.
- ³⁷ *FTC v. Cornerstone & Co.*, No. 1:14-cv-01479-RC (D.D.C. filed Aug. 27, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3211-x150005/cornerstone-company-llc>.
- ³⁸ *FTC v. Wyndham Worldwide Corp.*, Civil No. 13-1887 (ES) (D.N.J. Apr. 7, 2014) (opinion denying defendant's motion to dismiss), available at <http://www.ftc.gov/enforcement/cases-proceedings/1023142/wyndham-worldwide-corporation>. An appeal of the district court's decision in this matter is pending in the Third Circuit. *FTC v. Wyndham Hotels & Resorts, LLC*, No. 14-3514.
- ³⁹ *LabMD Inc.*, Docket No. 9357 (filed Aug. 28, 2013), available at <https://www.ftc.gov/enforcement/cases-proceedings/102-3099/labmd-inc-matter>.
- ⁴⁰ *FTC v. Lifelock Inc.*, No. 2:10-cv-00530-MHM (D. Az. filed July 21, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/072-3069-x100023/lifelock-inc-corporation>.
- ⁴¹ See FTC Press Release, *FTC Kicks Off "Start with Security" Business Education Initiative*, June 30, 2015, available at <https://www.ftc.gov/news-events/press-releases/2015/06/ftc-kicks-start-security-business-education-initiative>.
- ⁴² *Start with Security: A Guide for Business* (June 2015), available at <https://www.ftc.gov/tips-advice/business-center/guidance/start-security-guide-business>.
- ⁴³ *U.S. v. Instant Checkmate, Inc.*, No. 3:14-cv-00675-H-JMA (S.D. Cal. Apr. 1, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3221/instant-checkmate-inc>; *U.S. v. Infotrack Information Servs., Inc.*, No. 1:14-cv-02054 (N.D. Ill. Mar. 24, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3092/infotrack-information-services-inc-et-al>; *U.S. v. Telecheck Servs., Inc.*, No. 1:14-cv-00062 (D.D.C. Jan. 16, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/112-3183/telecheck-services-inc>; *U.S. v. Certegy Check Servs., Inc.*, No. 1:13-cv-01247 (D.D.C. Aug. 15, 2013), available at <https://www.ftc.gov/enforcement/cases-proceedings/112-3184/certegy-check-services-inc>.
- ⁴⁴ See, e.g., *U.S. v. Yelp, Inc.*, No. 3:14-cv-04163 (N.D. Cal. filed Sept. 16, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3066/yelp-inc>; *U.S. v. TinyCo, Inc.*, No. 3:14-cv-04164 (N.D. Cal. filed Sept. 16, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3209/tinyco-inc>.
- ⁴⁵ See, e.g., *True Ultimate Standards Everywhere, Inc.*, No. C-4512 (Mar. 12, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3219/true-ultimate-standards-everywhere-inc-truste-matter>; *Apperian, Inc.*, No. C-4461 (June 19, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3017/apperian-inc>.

[matter](https://www.ftc.gov/enforcement/cases-proceedings/142-3018/atlanta-falcons-football-club-llc-matter); *Atlanta Falcons Football Club, LLC*, No. C-4462 (June 19, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3018/atlanta-falcons-football-club-llc-matter>; *Baker Tilly Virchow Krause, LLP*, No. C-4463 (June 19, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3019/baker-tilly-virchow-krause-llp-matter>; *BitTorrent, Inc.*, No. C-4464 (June 19, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3020/bittorrent-inc-matter>; *Charles River Laboratories Int'l, Inc.*, No. C-4465 (June 19, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3022/charles-river-laboratories-intl-matter>; *DataMotion, Inc.*, No. C-4466 (June 19, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3023/datamotion-inc-corporation-matter>; *DDC Laboratories, Inc.*, No. C-4467 (June 19, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3024/ddc-laboratories-inc-also-dba-dna-diagnostics-center-matter>; *Level 3 Communications LLC*, No. C-4470 (June 19, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3028/level-3-communications-llc-matter>; *PDB Sports, Ltd.*, No. C-4468 (June 19, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3025/pdb-sports-ltd-dba-denver-broncos-football-club-matter>; *Reynolds Consumer Products Inc.*, No. C-4471 (June 19, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3030/reynolds-consumer-products-inc-matter>; *Receivable Management Servs. Corp.*, No. C-4472 (June 19, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3031/receivable-management-services-corporation-matter>; *Tennessee Football, Inc.*, No. C-4473 (June 19, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3032/tennessee-football-inc-matter>; *Fantage.com, Inc.*, No. C-4469 (June 19, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3026/fantagecom-inc-matter>; *American Apparel, Inc.*, No. C-4459 (June 16, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3036/american-apparel-inc-matter>.

⁴⁶ For example, in all of our “phantom debt” cases involving the collection of “debts” from financial strapped consumers that the consumers did not actually owe, the defendants had purchased detailed information about the consumers from payday lending sites and other sources. See, e.g., *FTC v. K.I.P., LLC*, No. 1:15-cv-02985 (N.D. Ill. Apr. 6, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/152-3048/kip-llc-payday-loan-recovery-group>; *FTCv. 4 Star Resolution, LLC*, No. 1:15-cv-0112-WMS (W.D.N.Y. Feb. 9, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3202/4-star-resolution-llc>.

⁴⁷ *FTC v. Sitemsearch Corp., LLC*, Matter No. 142-3192 (D. Az. filed Dec. 22, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3192/sitemsearch-corporation-doing-business-leaplab>.

⁴⁸ FTC Workshop, *Follow the Lead: An FTC Workshop on Lead Generation* (Oct. 30, 2015), available at <https://www.ftc.gov/news-events/events-calendar/2015/10/follow-lead-ftc-workshop-lead-generation>.

⁴⁹ FTC Seminar, *Spring Privacy Series: Mobile Device Tracking* (Feb. 19, 2014), available at <https://www.ftc.gov/news-events/events-calendar/2014/02/spring-privacy-series-mobile-device-tracking>.

-
- ⁵⁰ FTC Seminar, *Spring Privacy Series: Alternative Scoring Products* (Mar. 19, 2014), available at <https://www.ftc.gov/news-events/events-calendar/2014/03/spring-privacy-series-alternative-scoring-products>.
- ⁵¹ FTC Seminar, *Spring Privacy Series: Consumer Generated and Controlled Health Data* (May 7, 2014), available at <https://www.ftc.gov/news-events/events-calendar/2014/05/spring-privacy-series-consumer-generated-controlled-health-data>.
- ⁵² FTC Report, *Data Brokers: A Call For Transparency and Accountability* (May 2014), available at <https://www.ftc.gov/reports/data-brokers-call-transparency-accountability-report-federal-trade-commission-may-2014>.
- ⁵³ FTC Workshop, *Big Data: A Tool for Inclusion or Exclusion?* (Sept. 15, 2014), available at <https://www.ftc.gov/news-events/events-calendar/2014/09/big-data-tool-inclusion-or-exclusion>.
- ⁵⁴ FTC Staff Workshop Report, *The Internet of Things: Privacy and Security in a Connected World* (Jan. 2015), available at <https://www.ftc.gov/reports/federal-trade-commission-staff-report-november-2013-workshop-entitled-internet-things>.
- ⁵⁵ FTC Workshop, *Cross Device Tracking* (Nov. 16, 2015), available at <https://www.ftc.gov/news-events/events-calendar/2015/11/cross-device-tracking>.
- ⁵⁶ See, e.g., *POM Wonderful, LLC v. FTC*, No. 13-1060 (D.C. Cir. Jan. 30, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/pom-wonderful-llc-et-al>; *FTC v. TriVita, Inc.*, No. 2:14-cv-01557-DLR (D. Az. July 11, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3185/trivita-inc>; *FTC v. Gerber Products Co.*, No. 2:33-av-00001 (D.N.J. Oct. 30, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3009/gerber-products-co-doing-business-nestle-nutrition-et-al>; *Genelink, Inc.*, No. C-4456 (May 8, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/112-3095/genelink-inc-matter>; *foru Int'l Corp.*, No. C-4457 (May 8, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/112-3095/forutm-international-corporation-matter>; *Lornameade, Inc.*, No. C-4488 (Sept. 16, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3255/lornamead-inc-matter>.
- ⁵⁷ See, e.g., *Nice-Pak Products, Inc.*, Matter No. 132-3272 (May 18, 2015) (proposed consent agreement), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3272/nice-pak-products-inc-matter>; *ECM BioFilms, Inc.*, Docket No. 9358 (Jan. 28, 2015) (ALJ decision), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3118/ecm-biofilms-inc-also-dba-envioplastics-international-matter>; *Down to Earth Designs, Inc.*, No. C-4443 (Mar. 18, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3268/down-earth-designs-inc-dba-gdiapers-matter>; *FTC v. Lights of America, Inc.*, No. SACV10-1333 JVS (MLGx) (C.D. Cal. Feb. 15, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/092-3145/lights-america-inc-usman-vakil-farooq-vakil>.
- ⁵⁸ See, e.g., *First American Title Lending of Georgia, LLC*, No. C-4529 (June 2, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3264/first-american-title-lending-georgia-llc-matter>; *Finance Select, Inc.*, No. C-4528 (June 2, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3262/finance-select-inc-fast-cash-title-pawn-matter>; *FTC v. Abernathy Motor Co.*, No. 3:14-cv-00063-BRW (E.D. Ark. June 4, 2015), available at

-
- <https://www.ftc.gov/enforcement/cases-proceedings/132-3173/abernathy-motor-company-et-al>. See also FTC Press Release, *FTC, Multiple Law Enforcement Partners Announce Crackdown on Deception, Fraud in Auto Sales, Financing and Leasing*, Mar. 26, 2015, available at <https://www.ftc.gov/news-events/press-releases/2015/03/ftc-multiple-law-enforcement-partners-announce-crackdown> (announcing “Operation Ruse Control,” which included six FTC cases with more than \$2.6 million in monetary judgments); FTC Press Release, *FTC Announces Sweep Against 10 Auto Dealers*, Jan. 9, 2014, available at <https://www.ftc.gov/news-events/press-releases/2014/01/ftc-announces-sweep-against-10-auto-dealers> (announcing “Operation Steer Clear,” which included 10 FTC cases involving deceptive auto practices).
- ⁵⁹ See *FTC v. Genesis Today, Inc.*, No. 1:15-cv-00062 (W.D. Tex. filed Jan. 26, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3283/genesis-today-pure-health-lindsey-duncan>.
- ⁶⁰ *FTC v. NPB Advertising, Inc.*, No. 8:14-cv-0155-SDM-TGW (M.D. Fla. filed May 15, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3116/npb-advertising-inc-et-al>.
- ⁶¹ See *FTC & Connecticut v. Leanspa, LLC*, No. 311-cv-01715 (D. Conn. Apr. 6, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/1123135/leanspa-llc-et-al>; see also *FTC v. Lunada Biomedical, Inc.*, No. 2:15-cv-03380-MWF (PLAx) (C.D. Cal. filed May 12, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3067/lunada-biomedical-inc> (alleging among other things that the supposedly independent bloggers recommending their supplements for weight loss and menopause symptoms were actually paid to do so).
- ⁶² *FTC v. NourishLife, LLC*, No. 1:15-cv-00093 (N.D. Ill. filed Jan. 7, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3152/nourishlife-llc>.
- ⁶³ *ADT LLC*, No. C-4460 (June 18, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3121/adt-llc-matter>.
- ⁶⁴ *Sony Computer Entertainment America LLC*, No. C-4514 (Mar. 24, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3252/sony-computer-entertainment-america-llc-matter>.
- ⁶⁵ *Deutsch LA, Inc.*, No. C-4515 (Mar. 24, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3252/deutsch-la-inc-matter>.
- ⁶⁶ *AmeriFreight, Inc.*, No. C-4518 (Apr. 13, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3249/amerifreight-inc-matter>.
- ⁶⁷ *The FTC’s Endorsement Guides: What People Are Asking* (May 2015), available at <https://www.ftc.gov/tips-advice/business-center/guidance/ftcs-endorsement-guides-what-people-are-asking>.
- ⁶⁸ See FTC Press Release, *Operation ‘Full Disclosure’ Targets More Than 60 National Advertisers*, Sept. 23, 2014, available at <https://www.ftc.gov/news-events/press-releases/2014/09/operation-full-disclosure-targets-more-60-national-advertisers> (noting that staff contacted over 60 companies, including 20 of the biggest advertisers in the country, to alert them to problems with disclosures in their TV and magazine ads).
- ⁶⁹ FTC Workshop, *Blurred Lines: Advertising or Content?*, Dec. 4, 2013, available at <https://www.ftc.gov/news-events/events-calendar/2013/12/blurred-lines-advertising-or-content-ftc-workshop-native>.

-
- ⁷⁰ See, e.g., *FTC v. Cancer Fund of America, Inc. et al.*, No. CV15-884 PHX NW (D. Az. filed May 18, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3005/cancer-fund-america-inc>.
- ⁷¹ See, e.g., *FTC v. Caribbean Cruise Line, Inc. et al.*, No. 0:15-cv-60423 (S.D. Fla. Mar. 4, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3196/caribbean-cruise-line-inc>; *FTC v. Worldwide Info Servs., Inc.*, No. 6:14-cv-8-ORL-28DAB (M.D. Fla. Nov. 13, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3175/worldwide-info-services-inc>; *FTC v. All Us Marketing LLC*, No. 6:15CV1016-ORL-28GJK (M.D. Fla. June 29, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3256/all-us-marketing-llc-formerly-known-payless-solutions-llc>; *FTC v. Lifewatch, Inc.*, No. 1:15-cv-05781 (N.D. Ill. June 30, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3123/lifewatch-inc>.
- ⁷² See, e.g., *FTC v. The Online Entrepreneur, Inc.*, No. 812-cv-2500-T-27MAP (M.D. Fla. July 30, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3186/online-entrepreneur-inc-et-al>; *U.S. v. Business Recovery Services, LLC*, No. 2:11-cv-00390-JAT (D. Az. Sept. 30, 2013), available at <https://www.ftc.gov/enforcement/cases-proceedings/1123009/business-recovery-services-llc-et-al>; *U.S. v. The Zaken Corp.*, No. CV12-09631 (C.D. Cal. Oct. 21, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3293/zaken-group-also-dba-zaken-corporation-quicksell-quiksell>.
- ⁷³ See, e.g., *FTC v. Consumer Collection Advocates, Corp.*, No. 0:14-cv-62491-BB (S.D. Fla. Nov. 3, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3082/consumer-collection-advocates-corp>.
- ⁷⁴ See, e.g., *FTC v. First Time Credit Solution, Corp.*, No. CV15-01921-DDP-PJW (C.D. Cal. filed Mar. 16, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/152-3114/first-time-credit-solution-corp-ftc-credit-solutions>.
- ⁷⁵ See, e.g., FTC Workshop, *Fraud Affects Every Community*, Oct. 29, 2014, available at <https://www.ftc.gov/news-events/events-calendar/2014/10/fraud-affects-every-community>.
- ⁷⁶ FTC Workshop, *Big Data: A Tool for Inclusion or Exclusion?*, Sept. 15, 2014, available at <https://www.ftc.gov/news-events/events-calendar/2014/09/big-data-tool-inclusion-or-exclusion>.
- ⁷⁷ FTC Roundtable, *Debt Collection & the Latino Community Roundtable*, Oct. 23, 2014, available at <https://www.ftc.gov/news-events/events-calendar/2014/10/debt-collection-latino-community-roundtable>.
- ⁷⁸ FTC Conference, *Working Together to Advance Protections for Immigrant Consumers*, Apr. 21, 2014, available at <https://www.ftc.gov/news-events/events-calendar/2014/04/working-together-advance-protections-immigrant-consumers>.
- ⁷⁹ See, e.g., *Colorado Common Ground Conference: Working Together to Protect Colorado Consumers*, Apr. 24, 2015, available at <https://www.ftc.gov/news-events/events-calendar/2015/04/colorado-common-ground-conference-working-together-protect> (joint event with Colorado Attorney General's Office); *NW Common Ground Conference*, Nov. 18-19, 2014, available at <https://www.ftc.gov/news-events/events-calendar/2014/11/nw-common-ground-conference> (joint event with Washington State

-
- Attorney General's Office); *Sharing a Common Ground: A Common Ground Conference in St. Louis*, May 1, 2014, available at <https://www.ftc.gov/news-events/events-calendar/2014/05/sharing-common-ground-common-ground-conference-st-louis> (joint event with United States Attorney's Office for the Southern District of Illinois).
- ⁸⁰ FTC Roundtable, *Navajo Consumer Credit Seminar and Roundtable*, Apr. 17, 2015, available at <https://www.ftc.gov/news-events/events-calendar/2015/04/navajo-consumer-credit-seminar-roundtable>.
- ⁸¹ *Obstacles to Economic Opportunity: A Joint Conference of the FTC and the NAACP Examining Frauds that Affect the African American Community*, May 19, 2015, available at <https://www.ftc.gov/news-events/events-calendar/2015/05/obstacles-economic-opportunity-joint-conference-ftc-naacp>.
- ⁸² See generally <http://www.military.ncpw.gov/>.
- ⁸³ See *supra* n.46, 47.
- ⁸⁴ *FTC v. First Time Credit Solution, Corp.*, No. CV15-01921-DDP-PJW (C.D. Cal. Aug. 3, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/152-3114/first-time-credit-solution-corp-ftc-credit-solutions>.
- ⁸⁵ See, e.g., *FTC v. Oro Marketing, Inc.*, No. 2:13-CV-08843 (C.D. Cal. Dec 22, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3047-x140010/oro-marketing-inc-et-al>; *FTC v. Fortune Hi-Tech Marketing, Inc.*, No. 5:13-cv-00123-GFVT-REW (N.D. Ill. May 9, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/112-3069/fortune-hi-tech-marketing-inc-et-al>.
- ⁸⁶ See, e.g., *FTC v. Hispanic Global Way Corp.*, No. 14-22018-CIV-ALTONGA/O'Sullivan (Feb 26, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3113/hispanic-global-way-corporation>.
- ⁸⁷ See, e.g., *FTC v. Centro Natural Corp.*, No. 14:23879-CIV-ALTONAGA/O'Sullivan (S.D. Fla. June 30, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3159/centro-natural-corp>.
- ⁸⁸ *FTC v. Mail Tree Inc.*, No. 0:15-cv-61034-JIC (S.D. Fla. June 12, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3068/mail-tree-inc>.
- ⁸⁹ See, e.g., *FTC v. Inbound Call Experts, LLC*, No. 9:14-cv-81395-KAM (S.D. Fla. Nov. 10, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3135/inbound-call-experts-llc>; *FTC v. Boost Software, Inc.*, No. 14-cv-81397 (klr) (S.D. Fla. Nov. 19, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3283/boost-software-inc>.
- ⁹⁰ See, e.g., *FTC v. Consumer Collection Advocates, Corp.*, No. 0:14-cv-62491-BB (S.D. Fla. Nov. 3, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3082/consumer-collection-advocates-corp>.
- ⁹¹ See, e.g., *FTC v. Sunbright Ventures LLC*, No. 8:14-cv-02153-JDW-EAJ (M.D. Fla. July 22, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3217/sun-bright-ventures-llc-gmy-llc>; *FTC v. Instant Response Systems LLC*, No. 1:13-cv-00976 (E.D.N.Y. Apr. 14, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/1223041/instant-response-systems-llc-et-al>.

-
- ⁹² *FTC v. Professional Career Development Institute, LLC*, No. 1:15-cv-01872-WSD (N.D. Ga. June 4, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3225/ashworth-college>.
- ⁹³ See, e.g., *FTC v. C.C. Enterprises, Inc.*, No. 8:15-cv-00585-CJC-JPR (C.D. Cal. Apr. 16, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/112-3136-x120014/householdrelief>; *FTC v. Sameer Lakhany*, No. 8:12-cv-00337-CJC-JPR (C.D. Cal. Apr. 29, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/112-3136/lakhany-sameer-credit-shop-llc-fidelity-legal-services-llc>; *FTC v. Wealth Educators Inc.*, No. cv15-2357 (C.D. Cal. Apr. 10, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/1523004/wealth-educators-inc>.
- ⁹⁴ See also *FTC v. CWB Servs. LLC*, No. 4:14-cv-00783-DW (W.D. Mo. July 7, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3184/cwb-services-llc>.
- ⁹⁵ See, e.g., *FTC & CFPB v. Green Tree Servicing, LLC*, No. 0:15-cv-02064 (D. Minn. filed Apr. 21, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/112-3008/green-tree-servicing-llc>; *FTC v. Asset & Capital Mgmt. Group*, No. CV13-5267 (C.D. Cal. May 19, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3031/asset-capital-management-group-dba-acm-group>; *FTC v. Goldman Schwartz, Inc.*, No. 4:13-cv-00106 (S.D. Tex. May 28, 2014), available at <https://www.ftc.gov/enforcement/cases-proceedings/122-3096/goldman-schwartz-inc>.
- ⁹⁶ See *FTC v. OnlineYellowPagesToday.com, Inc.*, No. 2:14-cv-00838-RAJ (W.D. Wash. Mar. 10, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/132-3043-x140047/onlineyellowpagestodaycom-inc>; *FTC v. American Yellow Browser, Inc.*, No. 15CV2047 (N.D. Ill. Mar. 26, 2015), available at <https://www.ftc.gov/enforcement/cases-proceedings/142-3252/medical-yellow-directories-inc-american-yellow-corporation>.