Protecting Older Consumers 2024–2025

A Report of the Federal Trade Commission

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December 1, 2025

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FEDERAL TRADE COMMISSION

Andrew N. Ferguson, Chairman
Mark R. Meador, Commissioner

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I. Introduction

As the United States' principal consumer protection agency, the Federal Trade Commission ("FTC" or "Commission") has a broad mandate to protect consumers from unfair and deceptive acts and practices in the marketplace. Protecting older adults continues to be one of the FTC's primary objectives.[1] Over the past year, the FTC has continued its multipronged efforts to defend against unfair and deceptive acts and practices that impact older adults.[2] First, the FTC brings enforcement actions to stop unlawful practices and, when authorized to do so, returns money to consumers. For example, in fiscal year 2025, the FTC returned more than $311 million to consumers of all ages.

Second, the FTC continues to protect older adults through consumer education and outreach. The purpose of this outreach is to help older adults avoid being harmed by illegal schemes, by providing them with the tools to recognize and avoid common types of fraud. The FTC's continued innovative approach helps alert older adults to scammers' tactics and provides resources to help them protect themselves.

Third, the FTC is continuing its efforts to develop effective strategies to protect older adults from fraud. For example, the FTC collaborates with a wide variety of partners, including government, academia, AARP, industry, military family and veterans service organizations, and other older adult advocates. This collaboration includes its work under the Stop Senior Scams Act.[3]

In devising its strategies, the Commission also relies on its in-depth analysis of reports filed by consumers, to help it determine the issues faced by older adults. In 2024, older adults reported losing far more money to investment scams than to any other fraud type, often reporting that the scammers targeted them on social media. In fact, consumers of all ages report social media as the most common method of contact for investment scams. This year's report also highlights the dramatic increase in older adults' reported aggregate fraud losses, which have skyrocketed from about $600 million in 2020 to $2.4 billion in 2024. This increase was largely driven by reports of losses over $100,000, often to investment scams, romance scams, or impersonations. As many

[1] This report refers to persons 60 and older when using the terms "older adults" or "older consumers" to be consistent with the requirements in Section 2(1) of the Elder Abuse Prevention and Prosecution Act, which references Section 2011 of the Social Security Act (42 U.S.C. § 1397j(5)) (defining "elder" as an individual age 60 or older).

[2] This report focuses on the work of the Bureau of Consumer Protection to protect older adults. The FTC's Bureau of Competition also serves older adults through its work in various sectors of the economy, such as health care, consumer products and services, technology, manufacturing, and energy. The primary drafters of this staff report are Melissa Dickey and Patricia Hsue, Division of Marketing Practices; Emma Fletcher, Division of Consumer Response and Operations; and Kira Krown, Division of Consumer and Business Education. Additional acknowledgement goes to Kati Daffan, Division of Marketing Practices; Maria Mayo, Patti Poss, Christopher Stone, and Min Hee Kim, Division of Consumer Response and Operations; Jennifer Leach, Karen Hobbs, Division of Consumer and Business Education; Devesh Raval, Bureau of Economics; and Criminal Liaison Unit Chief Michelle Grajales. This report reflects the work of staff throughout the Federal Trade Commission's Bureau of Consumer Protection and its Regional Offices. Lois C. Greisman is the FTC's Elder Justice Coordinator.

[3] *See infra* Section IV.C.

frauds go unreported, the overall cost of fraud to older adults in 2024 is estimated to be between $10.1 billion and $81.5 billion, depending on methodology.[4]

The FTC submits this eighth annual report to the Committees on the Judiciary of the United States Senate and the United States House of Representatives to fulfill the reporting requirements of Section 101(c)(2) of the Elder Abuse Prevention and Prosecution Act of 2017.[5] As required by law, this report includes, in Appendix A, a list of every administrative and federal district court action filed in the last fiscal year that has affected older adults.[6]

II. FTC Enforcement Activities Affecting Older Adults

Aggressive law enforcement is the primary way the Commission acts to protect older adults. While the actual ages of people affected in a given case are generally unknown, FTC enforcement actions impact consumers of *all* ages. This year, the Commission brought cases involving a wide range of issues, including allegations regarding business opportunity and money-making schemes, unlawful robocalls, tech support or other impersonation scams, false or unsubstantiated claims about health products, unfair and deceptive fees, deceptive or unfair practices related to the privacy or security of consumers' personal information, and more.[7]

This section highlights seven enforcement actions and case resolutions filed within the last fiscal year in which the Commission noted a significant impact on older adults. It also describes other agency actions that affected older consumers, including consumer refunds and criminal actions brought by other agencies relating to FTC matters or pursued with FTC assistance.

A. Enforcement Actions

The Commission filed the following new enforcement actions in the last fiscal year that likely had a significant impact on older adults:

In the ***Accelerated Debt Settlement*** matter, the FTC filed a lawsuit against seven companies and three individuals who operated the "Accelerated Debt" program, an alleged debt-relief scam that

[4] *See infra* Section IV.A.1.g (discussion of methodologies used to estimate the overall cost of fraud to older adults).

[5] Public Law 115–70, 115th Congress (enacted Oct. 18, 2017).

[6] Under the law, the FTC Chair must file a report listing the FTC's enforcement actions "over the preceding year in each case in which not less than one victim was an elder or that involved a financial scheme or scam that was either targeted directly toward or largely affected elders."

[7] Appendix A lists almost all new enforcement actions taken by the FTC between October 1, 2024 and September 30, 2025, because older adults are affected in nearly every consumer protection case. This list includes cases involving violations of children's privacy laws. The perpetrators of such schemes may not typically target older adults, but the cases are listed because they involve large and diverse groups of consumers. The affected consumers may include an older parent or grandparent who wish to protect the online privacy of children for whom they are caring.

primarily targeted older consumers, some of whom are veterans.[8] According to the complaint, the defendants falsely claimed that they could reduce consumers' debt by up to 75% or more, and impersonated banks, credit card issuers, and government agencies to mislead consumers into paying for the alleged debt relief services. The complaint also alleged that defendants collected illegal advance fees from consumers, used prohibited remotely created checks, unlawfully obtained consumers' credit reports, and violated the FTC's Do Not Call requirements. Litigation in the matter is currently ongoing.

In ***Paddle***, the FTC settled charges that a payment processing company and its subsidiary facilitated schemes that allegedly engaged in deceptive telemarketing to sell costly tech support services and used fake virus alerts and pop-up messages to impersonate familiar brands, such as Microsoft and McAfee. The Commission also alleged that the defendants enabled overseas schemes to access the United States credit card system, collected payments from U.S. consumers, and evaded detection by merchant banks and card networks.[9] The case arose out of a previously settled litigation against defendants Restoro Cyprus Limited and Reimage Cyprus Limited regarding an alleged tech support scheme that particularly impacted older consumers.[10] The terms of the *Paddle* settlement require the defendant to turn over $5 million for consumer refunds and stop processing payments for tech support telemarketers.[11]

The FTC and the State of Colorado also filed a lawsuit against ***Greystar***, the nation's largest multi-family rental property manager, for allegedly deceiving consumers about monthly rent costs by tacking on numerous mandatory fees on top of advertised prices.[12] According to the complaint, the company's portfolio includes apartment buildings and complexes, senior housing, and student housing. The FTC and Colorado alleged that, at the time the complaint was filed, consumers could not rent a Greystar unit for the prices advertised by Greystar, but instead must pay a higher price inflated by deceptive fees, which can range from tens to hundreds of dollars a month and include "valet trash" fees, package handling fees, utility fees, fees to distribute utility bills, "validation" fees when consumers purchase renters' insurance from a non-preferred provider, and media/smart home packages. The FTC and Colorado said that consumers could not opt out of these fees even if they do not want or use the related services. Moreover, the complaint

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[8] *FTC v. Accelerated Debt Settlement Inc.*, No. 2:25-cv-2443 (D. Ariz. July 14, 2025), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/AccelDebt-Complaint.pdf.

[9] *FTC v. Paddle*, No. 1:25-cv-1886 (D.D.C. June 16, 2025), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/PaddleComplaintForPermanentInjunction%2CMonetaryJudgment%2CandOtherRelief.pdf.

[10] Press Release, FTC, *Tech Support Firms Will Pay $26 Million to Settle FTC Charges That They Deceived Consumers into Buying Repair Services* (Mar. 14, 2024), *available at* https://www.ftc.gov/news-events/news/press-releases/2024/03/tech-support-firms-will-pay-26-million-settle-ftc-charges-they-deceived-consumers-buying-repair.

[11] Press Release, FTC, *Paddle Will Pay $5 Million to Settle FTC Allegations of Unfair Payment-Processing Practices and Facilitation of Deceptive Tech Support Schemes* (June 2025), *available at* https://www.ftc.gov/news-events/news/press-releases/2025/06/paddle-will-pay-5-million-settle-ftc-allegations-unfair-payment-processing-practices-facilitation.

[12] *FTC and State of Colorado, ex rel Philip J. Weiser, Attorney General, v. Greystar Real Estate Partners, LLC*, No. 1:25-cv-165 (D. Colo. filed Jan. 16, 2025), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/greystar_complaint_-_filed.pdf.

alleged that some consumers had no way to learn about these deceptive fees until after they fill out inquiry forms with their personal information, click through small-print hyperlinks, or pay a substantial application fee or holding deposit. If consumers discover the existence of the fees after their application is approved and choose not to sign the lease, Greystar allegedly did not refund the application fees or holding deposits they paid, which can be hundreds of dollars. Litigation in the matter is currently ongoing.

B. Case Resolutions

In the last fiscal year, the Commission reached a resolution in two pending cases and received favorable court judgments in two cases that likely had a significant impact on older adults:

In ***Gravity Defyer***, the FTC settled charges that a footwear company made deceptive pain relief claims about its products.[13] The FTC alleged that the defendants targeted older adults suffering from arthritis, joint pain, and other medical conditions. The company claimed in its marketing to offer "clinically proven pain defying footwear," but the FTC asserted that it lacked competent and reliable scientific evidence to support such a claim. According to the FTC complaint, the defendants claimed that the unique technology in the soles of their shoes would relieve knee, back, and foot pain, as well as pain in people suffering from plantar fasciitis, arthritis, joint pain, and heel spurs. The owner of Gravity Defyer was previously barred from deceptive advertising by a 2001 FTC order, and the FTC alleged that the Gravity Defyer advertisements were violations of that order. The settlement bars Gravity Defyer and its owner from making pain relief claims or claims that a device will cure, mitigate, or treat any disease *unless* they have competent and reliable scientific evidence to back up the claims, including human clinical trials.[14] The settlement further prohibits Gravity Defyer and its owner from making health, efficacy, and safety claims about other products unless they are supported by scientific evidence, bars them from misrepresenting the results of any test, study, or research, and requires them to preserve certain scientific records related to human clinical studies. Finally, the settlement imposes a $175,000 civil penalty against the owner, and requires him to notify retailers selling Gravity Defyer footwear of the Commission's order.

[13] *FTC v. Gravity Defyer Medical Technology Corporation*, No. 1:22-cv-01464 (D.D.C., filed May 25, 2022), *available at* https://www.ftc.gov/legal-library/browse/cases-proceedings/1923117-gravity-defyer-ftc-v.

[14] Press Release, FTC, *FTC Secures Court Order Barring Gravity Defyer and its Owner from Making Unsupported Pain-Relief Claims to Market Company's Footwear* (Feb. 2025), *available at* https://www.ftc.gov/news-events/news/press-releases/2025/02/ftc-secures-court-order-barring-gravity-defyer-its-owner-making-unsupported-pain-relief-claims.

In ***Walmart Inc***., the FTC settled charges that Walmart engaged in practices that allowed its money transfer services to be used for fraud.[15] The FTC's 2022 complaint[16] and 2023 amended complaint[17] alleged that many consumers, and in particular older adults, were financially exploited by scams that made use of money transfers from Walmart stores. According to the FTC's complaints, Walmart knew that scammers induced people to use its money transfer services to send money to domestic and international fraud rings, but continued processing fraud-induced money transfers at its stores, without adopting policies and practices that effectively detect and prevent these transfers. The complaint further stated that Walmart did not properly train its employees and failed to warn customers about potential fraud related to money transfers. Under the settlement, Walmart paid $10 million and is prohibited from providing money transfer services without taking timely and appropriate action to effectively deter and prevent fraud-induced money transfers.[18] The settlement also bars Walmart from: sending or paying out any money transfer that it knows, or consciously avoids knowing, is a fraud-induced money transfer; substantially assisting or supporting any seller or telemarketer that it knows, or consciously avoids knowing, is accepting a cash-to-cash money transfer as payment for goods, services or charitable contributions sought through telemarketing; and substantially assisting or supporting any telemarketer that it knows, or consciously avoids knowing, has asked a consumer to pay in advance for a loan or credit extension.

In 2021, the FTC and Georgia Attorney General's Office filed a lawsuit against ***Stem Cell Institute of America***, ***LLC***, its co-founders and several related companies for making deceptive claims about the efficacy and approval of stem cell therapy injection treatments for a host of medical conditions, including osteoarthritis, neuropathy, and joint pain, and training other chiropractors and healthcare practitioners to make similar deceptive claims.[19] The group of consumers who purchased defendants' unproven stem cell therapy consisted almost exclusively of elderly and disabled people.[20] In March 2024, the United States for the Northern

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[15] Press Release, FTC, *Walmart to Pay $10 Million to Settle FTC Allegations it Allowed Scammers to Obtain Millions from Consumers Using Company's Wire Transfer Services* (July 20, 2025), *available at* https://www.ftc.gov/news-events/news/press-releases/2025/06/walmart-pay-10-million-settle-ftc-allegations-it-allowed-scammers-obtain-millions-consumers-using.

[16] *FTC v. Walmart Inc.*, No. 1:22-cv-3372 (N.D. Ill., filed June 28, 2022) *available at* https://www.ftc.gov/legal-library/browse/cases-proceedings/182-3012-walmart-ftc-v. The Commission vote to file the civil penalty complaint was 3-2.

[17] *FTC v. Walmart, Inc.*, No. 1:22-cv-3372 (N.D. Ill., filed June 30, 2023), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/x220026walmartfiledamendedcomplaint.pdf.

[18] Stipulated Order for Injunction and Monetary Judgment, *FTC v. Walmart Inc.*, No. 1:22-cv-3372 (N.D. Ill., June 20, 2025), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/WalmartStipulatedOrderforInjunctionandMonetaryJudgment.pdf.

[19] *FTC v. Steven D. Peyroux*, No. 1:21-cv-3329-AT (N.D. Ga. Aug. 16, 2021), *available at* https://www.ftc.gov/system/files/documents/cases/1._complaint.pdf.

[20] Press Release, FTC, *Stem Cell Institute Co-Founders and Companies Banned from Marketing Stem Cell Treatments and Ordered to Pay More than $5.1 Million for Refunds and Civil Actions* (Jan. 2025), *available at* https://www.ftc.gov/news-events/news/press-releases/2025/01/stem-cell-institute-co-founders-companies-banned-marketing-stem-cell-treatments-ordered-pay-more-51.

District of Georgia entered summary judgment in the FTC and Georgia's favor.[21] In December 2024, defendants were permanently banned from advertising, marketing, promoting, offering for sale, or selling any regenerative medicine treatments, including any treatment or therapy that falls under the definition of stem cell therapy.[22] In addition, they were prohibited from misrepresenting that any regenerative medicine compliance training program is approved by either the FTC or the U.S. Food and Drug Administration, and from providing others with the means of making false and misleading statements about regenerative medical treatment. Based on Georgia's state law claims, the co-founders were ordered to pay $3,310,146 that may be used to provide refunds to defrauded consumers, and the co-founders and one of the related businesses were also ordered to pay $1,845,000 in civil penalties.[23]

In 2017, the FTC and the New York State Attorney General charged the marketers of the dietary supplement ***Prevagen*** with making false and unsubstantiated claims that its product improves memory, including reducing memory problems associated with aging, and provides cognitive benefits.[24] On November 18, 2024, following a jury trial, the United States District Court entered a permanent injunction against the marketers. The order forbids the marketers from making the following claims, or similar claims, in connection with the promotion of Prevagen: Prevagen improves memory, Prevagen is clinically shown to improve memory, Prevagen improves memory within 90 days, Prevagen is clinically shown to improve memory within 90 days, Prevagen reduces and/or is clinically shown to reduce memory problems associated with aging, and Prevagen provides and/or is clinically shown to provide other cognitive benefits, including but not limited to healthy brain function, a sharper mind, and clearer thinking.[25] The defendants have appealed the judgment.

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[21] Opinion and Order, *FTC v. Peyroux* No. 1:21-cv-3329-AT (N.D. Ga. March 11, 2024), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/stem_cell_sj_order.pdf.

[22] Order Granting Injunctive Relief, *FTC v. Peyroux* No. 1:21-cv-3329-AT (N.D. Ga. Dec. 26, 2024), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/stem_cell_order_granting_injunctive_relief.pdf.

[23] Order Granting Monetary Relief, *FTC v. Peyroux*, No. 1:21-cv-3329-AT (N.D. Ga. Dec. 26, 2024), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/stemcell_order_granting_monetary_relief.pdf.

[24] *FTC and the People of the State of New York v. Quincy Bioscience Holding Co., Inc.*, No. 1:17-cv-00124 (S.D.N.Y. Jan. 9, 2017), *available at* https://www.ftc.gov/system/files/documents/cases/quincy_bioscience_complaint-filed_version.pdf.

[25] Memorandum and Judgment, *FTC v. Quincy Bioscience*, No. 1:17-cv-00124 (S.D.N.Y. Nov. 18, 2024), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/quincy_order_and_judgment.pdf; *see also* Order, *FTC v. Quincy Bioscience*, No. 1:17-cv-00124 (S.D.N.Y. Dec. 6, 2024), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/quincy_order.pdf.

C. Other Enforcement Highlights

1. Consumer Monetary Relief

In 2021, the Supreme Court unanimously held in *AMG Capital Management*[26] that Section 13(b) of the FTC Act does not authorize the Commission to seek equitable monetary relief for harmed consumers. The Commission does obtain monies for consumers through other avenues, such as by working with state attorneys general or by seeking relief pursuant to Section 19 of the FTC Act. In the 2025 fiscal year, FTC enforcement actions have resulted in relief of more than $311 million to consumers of all ages.[27]

In the last fiscal year, the FTC returned money to consumers in the following cases that likely had a significant impact on older adults:

In ***Publishers Clearing House***, the FTC charged that the company misled older adults and lower-income consumers into thinking either that consumers could not enter into sweepstakes without purchasing a product or that their chances of winning would be increased by purchasing products.[28] According to the complaint, PCH added deceptive shipping and handling fees and misrepresented that ordering was "risk-free," even though consumers who wanted refunds had to return products at their own expense.[29] The FTC also charged that the company misled consumers by sending emails with deceptive subject lines that led consumers to believe the email was related to official documents, such as tax forms. In April 2025, the Commission sent more than $18 million in refund checks to 281,274 consumers who ordered a product from Publishers Clearing House after receiving and clicking on one of the emails that the FTC alleged were deceptive.[30]

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[26] *AMG Capital Mgmt., LLC v. FTC*, 593 U.S. 67 (2021) (holding that Section 13(b) of the FTC Act does not authorize federal courts to require defendants to refund monies to consumers or give up unjust gains).

[27] The FTC provides updated statistics about where refunds were sent, the dollar amounts refunded, and the number of people who benefited from FTC refund programs. *See* FTC, FTC Refund Programs, *available at* www.ftc.gov/refunds; FTC, FTC Refunds to Consumers (last updated Sept. 12, 2025), *available at* https://public.tableau.com/app/profile/federal.trade.commission/viz/Refunds_15797958402020/RefundsbyCase.

[28] Press Release, FTC, *FTC Takes Action Against Publishers Clearing House for Misleading Consumers About Sweepstakes Entries* (June 27, 2023), *available at* https://www.ftc.gov/news-events/news/press-releases/2023/06/ftc-takes-action-against-publishers-clearing-house-misleading-consumers-about-sweepstakes-entries.

[29] *FTC v. Publishers Clearing House, LLC (PCH)*, No. 2:23-cv-04735 (E.D.N.Y. June 27, 2023), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/PCH-Complaint.pdf.

[30] Press Release, FTC, *FTC Sends More Than $18 Million to Consumers Harmed by Publishers Clearing House* (April 2025), *available at* https://www.ftc.gov/news-events/news/press-releases/2025/04/ftc-sends-more-18-million-consumers-harmed-publishers-clearing-house.

In ***Restoro Cyprus Limited***,[31] the FTC charged that defendants operated a tech support scheme that has cost consumers, particularly older consumers, millions of dollars. According to the complaint, defendants scared consumers using pop-ups with system warnings and threats into believing that their computers were suffering from performance or security issues requiring immediate attention. The pop-ups urged consumers to "scan" their computers to "avoid more damage." Defendants offered consumers a free scan, which they also separately marketed through online advertisements. Regardless of the computers' actual health, the scan inevitably found purported performance or security issues that required repair. The complaint alleged that defendants directed consumers to purchase "software" to "fix" the problems and to call their telemarketers to activate the software, but when contacted the telemarketers attempted to sell additional services. Under a court order, defendants are also barred from misrepresenting security or performance issues, or any other material issues related to the sale, marketing, or distribution of any product, and from engaging in deceptive telemarketing. Defendants also were required to pay $26 million, which the FTC used to provide redress to deceived consumers. In March 2025, the FTC began sending 736,375 payments totaling more than $25.5 million to people who paid for computer repair services from defendants.[32]

In ***Aqua Finance, Inc.***, the FTC alleged that a finance company's nationwide network of dealers went door to door, deceiving consumers about the financing terms for water filtering and softening products.[33] According to the complaint, the deceptive claims left consumers with thousands of dollars in unexpected debt and interest payments, while financing terms allowed the company to file fixture filings on the water treatment systems that impaired some consumers' ability to sell or refinance their homes. Many of the consumers harmed by the defendant's deceptive financing practices were older adults. The FTC settled the lawsuit, resulting in $20 million in refunds and an additional $23.6 million in debt forgiveness for consumers harmed by defendant's deceptive sales tactics. The settlement also requires that the defendant closely monitor its dealers, make clear and conspicuous disclosures about the nature and practical effects of its fixture filings, and stop misrepresenting financing terms. In February 2025, the FTC began sending 29,653 checks totaling more than $19.8 million people who got a loan from the company.[34]

In ***ACRO Services***, the FTC alleged that individual operators of an alleged credit card debt relief scheme took millions of dollars from consumers—often older and financially distressed

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[31] *FTC v. Restoro Cyprus Limited, et al.*, 1:24-cv-00735 (D.D.C. March 14, 2024), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/1-ComplaintagainstRestoro.pdf.

[32] Press Release, FTC, *FTC Sends More Than $25.5 Million to Consumers Impacted by Tech Support Firms' Scam* (March 2025), *available at* https://www.ftc.gov/news-events/news/press-releases/2025/03/ftc-sends-more-255-million-consumers-impacted-tech-support-firms-scam.

[33] *FTC v. Aqua Finance, Inc.*, 3:24-cv-00288 (W.D. Wis. May 1, 2024), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/AquaFinance-FiledComplaint.pdf.

[34] Press Release, FTC, *FTC Sends More Than $19.8 Million in Refunds to Consumers Harmed by Aqua Finance's Deceptive Sales Tactics* (Feb. 2025), *available at* https://www.ftc.gov/news-events/news/press-releases/2025/02/ftc-sends-more-198-million-refunds-consumers-harmed-aqua-finances-deceptive-sales-tactics.

individuals—by falsely claiming to eliminate or reduce their credit card debts.[35] In reality, according to the complaint, defendants neither reduced nor eliminated consumers' credit card debts, and many consumers ended up owing their original debts plus thousands in additional fees and interest, being sued by their creditors, and seeing their credit scores drop significantly.[36] The action was settled, which resulted in a court order that permanently bans the operators of this scheme from telemarketing and selling debt relief products or services, enjoins them from deceiving consumers about any other product or service they sell, and requires them to surrender certain property interests and assets to be used for possible refunds to consumers. In January 2025, the FTC began sending 7,687 checks, totaling more than $5 million, to people who paid the defendants for credit card debt relief.[37]

According to the FTC's first amended complaint in ***Nudge***, filed in November 2020, defendants marketed their real estate investment training opportunities through celebrities who promised to reveal strategies for making "amazing profits" at seminars—where they upsold additional training to unsuspecting consumers, including retirees and those on limited fixed incomes.[38] The FTC has sent two rounds of payments, in March 2024 and March 2025, to consumers harmed by the defendants' allegedly deceptive marketing practices, resulting in more than $14.5 million in refunds.[39]

The FTC and the Florida Attorney General alleged that ***Lifewatch Inc***., its officers and related entities bombarded consumers with at least a billion unsolicited robocalls pitching supposedly free medical alert systems, and claimed that the systems were endorsed or recommended by reputable organizations like the American Heart Association when they were not.[40] According to the complaint, the company's telemarketers often told consumers that they could receive the medical alert system "at no cost whatsoever," but consumers eventually learned that they were responsible for monthly monitoring fees, and it was difficult to cancel without paying a penalty. The order settling the lawsuit permanently banned defendants from telemarketing, prohibited

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[35] *FTC v. ACRO Services, LLC, et al*., No. 3:22-cv-00895 (M.D. Tenn. Nov. 30, 2022), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/Complaint-Unsealed.pdf.

[36] Press Release, FTC, *FTC Lawsuit Leads to Permanent Ban from Debt Relief, Telemarketing for Operators of Debt Relief Scam* (May 2023), *available at* https://www.ftc.gov/news-events/news/press-releases/2023/05/ftc-lawsuit-leads-permanent-ban-debt-relief-telemarketing-operators-debt-relief-scam.

[37] Press Release, FTC, *FTC Sends More Than $5 Million in Refunds to Consumers Harmed by Bogus Debt Relief Scheme* (Jan. 2025), *available at* https://www.ftc.gov/news-events/news/press-releases/2025/01/ftc-sends-more-5-million-refunds-consumers-harmed-bogus-debt-relief-scheme.

[38] *FTC v. Nudge LLC, et al.,* 2:19-cv-00867 (D. Utah Nov. 18, 2020), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/1823016-nudge-first-amended-complaint_-_redacted.pdf.

[39] Press Release, FTC, *FTC Sends More Than $10 Million in Refunds to Consumers Harmed by Real Estate Investment Training Scheme* (Mar. 21, 2024), *available at* https://www.ftc.gov/news-events/news/press-releases/2024/03/ftc-sends-more-10-million-refunds-consumers-harmed-real-estate-investment-training-scheme; Press Release, FTC sends payments to people who paid for a real estate investment training program (Mar. 2025) *available at* https://www.ftc.gov/enforcement/refunds/response-marketing-refunds.

[40] *FTC and State of Florida, Office of the Attorney General v. Lifewatch Inc*., No. 1:15-cv-05781 (N.D. Ill., filed June 30, 2015), *available at* https://www.ftc.gov/system/files/documents/cases/1606lifemanagementcmpt.pdf.

their misrepresentation of the terms associated with the sale of any product or service, and required them to pay $2 million for consumer redress.[41] The FTC previously sent two rounds of checks to consumers in December 2021 and September 2023, and sent a third round in April 2025, which resulted in consumers receiving more than $1.4 million in refunds.[42]

In May 2020, the FTC settled charges in ***AH Media Group, Inc***., resolving allegations that the defendants operated a scheme that deceived consumers with supposedly "free trial" offers for cosmetics and dietary supplements with claims that they promote younger-looking skin or weight loss, and then enrolled consumers in subscriptions and billed them without their consent.[43] The court orders ban the defendants from negative option marketing and require them to get consumers' consent before billing them. Defendants also agreed to turn over more than $4 million for consumer redress. The Commission has mailed two rounds of checks, in June 2022 and December 2024, to impacted consumers, resulting in more than $5 million returned to consumers.[44]

2. Criminal Liaison Unit

The Bureau of Consumer Protection's Criminal Liaison Unit works with federal and state criminal prosecutors to bring consumer fraud criminal cases, including cases affecting older adults.[45] The FTC's civil law enforcement actions often uncover key facts or evidence that subsequently support criminal fraud prosecutions involving charges such as wire fraud or mail fraud.

For example, the FTC brought a civil enforcement action against the operators of "8 Figure Dream Lifestyle LLC" in 2019.[46] This multilevel marketing scheme involved deceptive earnings claims and included targeted marketing of older consumers who needed money for living expenses or retirement, for example, with advertisements stating memberships were especially

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[41] *Id.*

[42] Press Release, FTC, *FTC sends checks to people who were charged for Lifewatch Medical Alert Systems* (April 2025), *available at* https://www.ftc.gov/enforcement/refunds/lifewatch-refunds.

[43] Press Release, FTC, *FTC Halts Online Subscription Scheme, that Deceived People with Free Trials* (May 8, 2020), *available at* https://www.ftc.gov/news-events/press-releases/2020/05/ftc-halts-online-subscription-scheme-deceived-people-free-trial.

[44] Press Release, FTC, *FTC sends second payment to people who were charged for free trial offers* (Dec. 2024), *available at* https://www.ftc.gov/enforcement/refunds/ah-media-group-refunds.

[45] *See* FTC, Criminal Liaison Unit, *available at* https://www.ftc.gov/enforcement/criminal-liaison-unit (providing more information about the Criminal Liaison Unit).

[46] Press Release, FTC, *FTC, Law Enforcement Partners Announce New Crackdown on Illegal Robocalls* (June 25, 2019), *available at* https://www.ftc.gov/news-events/news/press-releases/2019/06/ftc-law-enforcement-partners-announce-new-crackdown-illegal-robocalls; Press Release, FTC, *As Scammers Leverage Pandemic Fears, FTC and Law Enforcement Partners Crack Down on Deceptive Income Schemes Nationwide* (Dec. 14, 2020), *available at* https://www.ftc.gov/news-events/news/press-releases/2020/12/scammers-leverage-pandemic-fears-ftc-law-enforcement-partners-crack-down-deceptive-income-schemes.

"good" for "retirees" because the program would "[m]ake sure those golden years are actually 'Golden'!"[47] Three ringleaders were criminally prosecuted by the U. S. Attorney's Office for the District of Colorado, and ultimately sentenced to conspiracy to commit wire fraud: Alex Dee was sentenced on December 19, 2024 to 36 months incarceration, and Brian Kaplan and Jerrold Maurer were sentenced on March 10, 2025 to 22 months for their work on this scheme.[48]

Another example is the U.S. Attorney's Office for the Southern District of New York's indictment of Stuart Smith in connection with a business coaching scheme that he ran with a reality television star, Jennifer Shah.[49] The coaching services included tax preparation and website design services, which, among others, were often marketed to older adults who did not own computers.[50] The FTC assisted by providing critical information about the underlying scheme to the criminal prosecutors. Smith was convicted for conspiracy to commit wire fraud and was sentenced to 9 months incarceration on December 11, 2024.[51]

3. Referral to the FBI's Recovery Asset Team

The Federal Bureau of Investigation ("FBI") Internet Crime Complaint Center Recovery Asset Team ("IC3 RAT") initiates a process called the Financial Fraud Kill Chain ("FFKC") to notify banking partners in an attempt to freeze funds sent to scammers. In 2024, the FBI IC3 RAT initiated the FFKC for 2,651 incidents and, with the assistance of their banking partners, froze an impressive $469 million of the $651.5 million reported losses, making recovery possible for many consumers.[52]

The FTC refers consumer reports involving high dollar losses received through its www.ReportFraud.ftc.gov website and call center that meet certain criteria to the FBI IC3 RAT when the consumer agrees to the referral. In 2024, the FTC referred almost 700 reports through its Consumer Sentinel Network to the FBI IC3. Here are some recent FFKC success stories involving older adults shared by the FBI IC3 RAT:

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[47] *FTC v. 8 Figure Lifestyle LLC, et al*., SACV 19-01165 AG (KESx) (C.D. Cal. 2019), *available at* https://www.ftc.gov/system/files/documents/cases/182_3117_8_figure_dream_lifestyle_complaint_6-25-19.pdf.

[48] Pending Criminal Division Cases, Department of Justice Criminal Frauds Division, *8 Figure Dream Lifestyle LLC (8FDL) Cases* (June 10, 2025), *available at* https://www.justice.gov/criminal/case/united-states-v-brian-kaplan.

[49] Press Release, United States Attorney's Office for the Southern District of New York, *Reality Show Cast Members Charged With Running Nationwide Telemarketing Fraud Scheme* (March 30, 2021), *available at* https://www.justice.gov/usao-sdny/pr/reality-show-cast-members-charged-running-nationwide-telemarketing-fraud-scheme#_ftn1.

[50] *U.S. v. Shah, et al*., 19-cr-833 (SHS) (S.D.N.Y. 2021), *available at* https://www.justice.gov/usao-sdny/press-release/file/1381406/dl.

[51] *U.S. v. Smith*, 19-cr-833-12 (SHS) (S.D.N.Y. Dec. 11, 2024), *available at* https://www.law360.com/dockets/download/6759e28e0ac41b04d4bde2f1?doc_url=https%3A%2F%2Fecf.nysd.uscourts.gov%2Fdoc1%2F127136629236&label=Case+Filing.

[52] Department of Justice Federal Bureau of Investigation, *Federal Bureau of Investigation Internet Crime Report 2024* (2024), *available at* https://www.ic3.gov/AnnualReport/Reports/2024_IC3Report.pdf.

- In December 2024, an older adult reported to the FTC receiving a computer pop-up instructing the consumer to contact the Microsoft Help Desk at a provided phone number. The consumer called the phone number and was told that an unauthorized transaction was posted to the consumer's account and that the consumer's emails and phones were now compromised. Ultimately, the consumer was instructed to make a wire transfer of $49,500 to a fraudulent domestic bank account. The consumer was able to quickly report the matter to the FTC. The report was referred to the FBI IC3 RAT, which then initiated the FFKC. The FBI IC3 RAT contacted the recipient bank and froze the full wired amount for possible recovery.

- In October of 2024, an older adult received a spoofed email from Norton Security Plan advising of an active subscription and instructing the consumer to call a provided phone number with any concerns. The consumer called the phone number, and the scammers quickly took over the consumer's account and initiated an unauthorized wire transfer of $50,000 to a domestic bank account. The consumer contacted the FTC, and a report was referred to the FBI IC3 RAT, which then initiated the FFKC. The FBI IC3 RAT contacted the recipient bank and froze the full wired amount for possible recovery.

- In May 2024, an older adult received a spoofed email claiming to be from the FTC regarding fraudulent activities from the consumer's social security number and ID theft. The consumer contacted the "FTC" through the provided phone number in the spoofed email and was instructed to send a wire of $75,000 in order to resolve the issue. The consumer initiated the wire and then quickly realized the incident was fraudulent, contacted the FTC and a report was referred to the FBI IC3 RAT, which then initiated the FFKC. The FBI IC3 RAT contacted the recipient bank and froze the full wired amount for possible recovery.

The FTC is proud to partner with the FBI IC3's Recovery Asset Team to help consumers, particularly those experiencing large dollar losses, recover funds when possible.

4. Rulemaking

During this past fiscal year, the FTC has continued its efforts to develop tools to obtain monetary relief to redress consumers harmed by law violations. For many years, the Commission relied on Section 13(b) of the FTC Act for authority to obtain equitable monetary redress for consumers. Indeed, redress obtained under Section 13(b) accounted for the overwhelming majority of redress obtained for consumers in fraud cases. The Supreme Court unanimously concluded in *AMG Capital Management v. FTC*,[53] however, that Section 13(b) does not authorize courts to award monetary relief in Commission enforcement actions.[54] The Commission's current leadership

[53] 593 U.S. at 67.

[54] FTC Act, 15 U.S.C. § 53(b).

believes that *AMG Capital Management* was undoubtedly correctly decided. But obtaining monetary redress for consumers has become far more difficult since *AMG Capital Management* because Congress has not taken action that would authorize courts to award monetary relief in Commission enforcement actions brought directly in federal court under Section 13(b). The FTC therefore continues to urge Congress to take action that would provide the FTC the ability to seek monetary relief under Section 13(b) of the FTC Act—and looks forward to continuing to work with Congress to draft appropriate language to protect consumers—so that the Commission can provide refunds to harmed consumers and prevent violators from benefitting from their schemes by keeping their illegally gained profits. In the interim, the Commission continues its tireless efforts to protect consumers by relying predominantly on its more limited authority under Section 19 of the FTC Act to obtain consumer refunds in consumer protection cases involving rule violations.

On November 27, 2024, the FTC approved final amendments to the Telemarketing Sales Rule (TSR) that extended the rule's coverage to calls that consumers place to companies—or inbound telemarketing calls—pitching technical support services.[55] Many tech support scams try to trick consumers into calling them by placing deceptive online ads pretending an affiliation with well-known companies such as Microsoft. In 2024, consumers 60 and older were five times more likely than younger people to report losing money on a tech support scam. Older consumers reported $159 million in losses to tech support scams in 2024.

III. Outreach and Education Activities

A. *Pass It On* Education Campaign

Pass It On is the FTC's ongoing fraud prevention education campaign for older adults. In 2014, the FTC developed *Pass It On* (*¡Pásalo!* in Spanish) to change common narratives about older adults and fraud. *Pass It On* deploys older adults as part of the solution in the fight against fraud. Campaign materials show respect for the readers' life experience and accumulated knowledge and supply them with resources to read and "pass on" to family and friends. The materials encourage conversations about fraud that can help people avoid losing money to scams. The factsheets, bookmarks, videos, presentations, and other materials refresh and add to readers' knowledge by briefly explaining how certain scams work and what a reader can do to avoid them.

[55] Federal Register, Final Rule Amending the Telemarketing Sales Rule, 89 FR 99069 (published Dec. 10, 2024), *available at* https://www.federalregister.gov/documents/2024/12/10/2024-28399/telemarketing-sales-rule; *see also* Concurring Statement of Commissioner Melissa Holyoak Regarding Final Rule Amending the Telemarketing Sales Rule (Nov. 27, 2024), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/holyoak-tsr-concurrence.pdf; *but see* Dissenting Statement of Commissioner Andrew N. Ferguson Regarding the Telemarketing Sales Rule (Nov. 27, 2024), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/ferguson-tsr-dissent_0.pdf (dissenting from the rulemaking "not because it is bad policy, but because the time for rulemaking by the Biden-Harris FTC is over" given the election resulted in "a resounding victory for President Trump").

Since the campaign began, the FTC expanded the number of topics it covers in print and online, based on partners' requests and changes in fraud trends. The updated catalog of print and online material addresses these 13 common frauds:

- Business Impersonator Scams
- Charity Fraud
- Government Impersonator Scams
- Grandkid and Family Scams
- Health Insurance Scams
- Home Repair Scams
- Identity Theft
- Investment Scams
- Job and Money-Making Scams
- Romance Scams
- Tech Support Scams
- Unwanted Calls and Text Messages
- "You've Won" Scams

The FTC has distributed more than 23.5 million *Pass It On* items since the campaign began, including nearly 1.7 million items in fiscal year 2025. Many groups, organizations, and individuals request the free print material. Community banks, libraries, police departments, adult protective services offices, state attorneys general, military support groups, and educational and community groups nationwide order, use, and distribute *Pass It On* materials. Campaign materials are available at www.ftc.gov/passiton, www.ftc.gov/pasalo (Spanish), and can be ordered in print at www.bulkorder.ftc.gov.

The FTC routinely emails Consumer Alerts about the topics covered by *Pass It On*, as well as about phishing scams, online search scams, fraud relating to weather emergencies, and other common scams affecting older adults. The FTC emails the Alerts in English and Spanish to more than 438,000 subscribers who include individuals, community groups, advocates, national and local news media outlets, and other stakeholders. The FTC also posts these Alerts on its

consumer website, www.consumer.ftc.gov, so the public can read, link to, and share the prevention messages.[56]

In addition to Consumer Alerts, the FTC regularly develops and adapts topical consumer education materials based on new fraud trends. For example, in 2024 staff launched a series, "Anatomy of an Imposter Scam," in response to increasing reports of high-dollar losses to a complicated, multi-part imposter scam. The scam was predicated on convincing people to move money from their accounts supposedly to "protect it" — and the series outlines how readers might recognize, and then avoid, this scam.

B. Outreach to Older Adults

The FTC collaborates with many organizations across the country to share its consumer education messages and inform the public about its work. In this reporting period, FTC staff in Washington, DC and eight regional offices have presented, exhibited, or participated in nearly 500 outreach events with the public, other law enforcement agencies, and stakeholders focused on protecting members of a wide range of communities from scams. About 140 of these events served older adults and the people who work with them or engaged partner organizations in discussion and education about issues affecting older adults.

FTC staff participated in events for older adults together with local, state, and federal organizations including, among others, AARP, the Better Business Bureau ("BBB"), public libraries, houses of worship, consumer organizations, financial institutions, legal services providers, state attorneys general and consumer affairs offices, and other federal government agencies. The FTC also joined in multiple activities with groups including those described below.

1. AARP Members

Staff educated older adults through nearly 30 events with AARP members, including nationwide Facebook Live conversations, webinars, conference sessions, and tele-town halls focused on impersonators, holiday scams, Medicare scams, identity theft, and related topics.

For example, FTC staff shared information about imposters at a Montana tele-town hall attended by nearly 500 AARP members. Staff also presented on investment scams, imposters, and unwanted calls to more than 100 attendees at AARP Oregon's Vital Aging Conference.

[56] Information about subscribing to Consumer Alerts is available at www.ftc.gov/ConsumerAlerts.

2. Members of Congress

The FTC joined members of Congress in presenting during, for example, a scam prevention tele-workshop for older adults in eastern Kansas; a virtual town hall on scams targeting older adults in northern Illinois; and two virtual town halls focused on scams in and around central Florida.

The FTC also regularly supplies consumer education resources for senior fairs and other events hosted by members of Congress in their districts. In March, for example, FTC staff provided Pass It On materials to congressional offices in Pennsylvania, New York, and California for older adults-focused events.

3. Military Servicemembers and Veterans

With more than half (56%) of current veterans expected to be over age 60 at the end of FY 2025,[57] the agency's military outreach is another way of engaging with older adults.

The Military Consumer initiative, which the FTC created and manages in collaboration with Department of Defense's Office of Financial Readiness and the Consumer Financial Protection Bureau's Office of Servicemember Affairs, led its annual celebration of Military Consumer Month in July.[58] During the month, a large network of military partners, including military, federal, and state agencies, consumer and military advocates, and trade groups, collaborate to warn veterans and servicemembers about the scams that target them.

This year, some of the FTC's Military Consumer Month activities focused on older veterans. Agency staff partnered with groups like AARP's Veterans & Military Families Initiative, the BBB Institute for Marketplace Trust, and the Wounded Warrior Project to deliver live and virtual presentations for veterans on scams, identity theft, and how to keep their information safe. The FTC also published blog posts and social media on job scams, resources for military family members, and protecting personal information from scammers.

Agency staff also participate in the VA-organized Veteran Scam and Fraud Evasion Task Force (VSAFE), which maintains centralized tools to help veterans, servicemembers, and their families protect themselves and others from scams and fraud.

4. Older Adult Advocates and Allied Professionals

Commission staff distributed and/or provided *Pass It On* and other education materials at conferences, expos, and other events around the country related to aging and older adult services.

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[57] U.S. Dep't of Veterans Affairs, National Center for Veterans Analysis and Statistics, Population Tables: The Nation: Age/Sex: Table 1L, *available at* www.va.gov/vetdata/veteran_population.asp.

[58] *See* Military Consumer, MCM 2025 Digital Toolkit, *available at* www.MilitaryConsumer.gov/MCM2025 (providing information about Military Consumer Month).

For example, FTC staff reached thousands of older adults through presenting, distributing, or supplying Pass It On materials at events including, among others, a town hall for older adults in Georgetown, Texas focused on financial fraud; a health fair in Germantown, Maryland; a senior resource fair in El Cerrito, California; and a senior expo in Ruston, Louisiana.

The FTC works with organizations nationwide to help address questions about consumer issues, fraud, and avoiding scams and identity theft. For example, staff held a webinar series in partnership with the Association of Bookmobile and Outreach Services to deliver quarterly presentations about top scams and consumer education resources to librarians serving patrons in rural areas, including many senior centers. Staff also presented to hundreds of older adults through two webinars with the Association of Technology and Computer User Groups, a nonprofit that helps organizations teach their members about technology. The webinars focused on Pass It On, common scams affecting older adults, and keeping your information safe online.

The FTC's Community Advocate Center ("CAC") is a special program to support legal services organizations' consumer fraud reporting and strengthen the FTC's connections with lower-income consumers.[59] Participating legal service providers get a customized link to report fraud and other bad business practices directly to the FTC and receive periodic email updates and virtual briefings from the FTC. Forty-seven of the CAC members operate programs or have legal practice groups dedicated to serving older adults.

FTC staff also shared Pass It On and other consumer education materials with front line state and local agency staff at the National League of Cities 2024 Summit and the National Association of Counties 2024 Legislative Conference, which had a combined 4,500 attendees.

The FTC's outreach partnerships with agencies, groups, and communities throughout the country provide opportunities to share the FTC's important prevention messages and foster more direct communication lines so the FTC learns in real time about ongoing scams and other consumer protection problems affecting the public. This, in turn, can generate ideas for policy and education initiatives, as well as new case leads.

IV. Developing Effective Strategies to Protect Older Consumers

A. Research and Data Analysis

The FTC collects and analyzes consumer report information through its Consumer Sentinel Network ("Sentinel"). Sentinel is a secure online database that provides federal, state, and local law enforcement agencies with access to reports from consumers about fraud and other consumer

[59] *See* FTC, Community Advocate Center, *available at* https://reportfraud.ftc.gov/community.

problems. Law enforcement agencies and other organizations contribute consumer reports,[60] and the FTC collects reports directly from the public through its call center and online at ReportFraud.ftc.gov and ReporteFraude.ftc.gov (Spanish). The FTC and its law enforcement partners can search the Sentinel database by criteria such as the type of fraud or problem and the name, address, and telephone number of the reported entity. They also can search by age range, and identify reports filed by older adults to look for patterns and trends, identify problematic business practices and enforcement targets, and develop cases against targets under investigation.

1. Consumer Sentinel Reports from Older Adults

During calendar year 2024, Sentinel took in more than 6.5 million reports from consumers, both directly and through its data contributors, about problems they experienced in the market. Over 2.6 million of those reports were about fraud, more than 1.1 million were about identity theft, and nearly 2.8 million were about other consumer problems.[61] Consumers reported losing about $12.8 billion to fraud in 2024. About 45% of fraud reports filed in 2024 included consumer age information.[62] About 36% (421,031) of reports that included age information came from people 60 and older, and 109,580 of these reports indicated a monetary loss. Reported losses from people 60 and older totaled nearly $2.4 billion, up from about $1.9 billion in 2023. Because the vast majority of frauds are not reported, these numbers include only a fraction of older adults harmed by fraud.[63]

Key findings from the 2024 Sentinel data:

- Aggregate reported fraud losses by older adults (ages 60 and over) increased about four-fold from 2020 to 2024. This increase was driven largely by growing reports of extraordinarily large individual losses.

- Older adults continued to report much higher median individual dollar losses than younger adults. The disparity remained particularly large among people 80 and over, whose median reported loss exceeded $1,600.

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[60] FTC, Consumer Sentinel Network Data Contributors, *available at* https://www.ftc.gov/enforcement/consumer-sentinel-network/data-contributors (listing data contributors).

[61] *See generally* FTC, FTC Consumer Sentinel Network (last updated Aug. 12, 2025), *available at* https://public.tableau.com/profile/federal.trade.commission. Figures are based on reports made directly to the FTC and reports provided by all Sentinel data contributors. These figures do not include reports about unwanted calls. Sentinel data is self-reported and not a survey. As such, individuals decide whether to file a report and what information, if any, to provide. Not all consumers who file a report provide their age, payment method, amount of dollar loss, and other data. As referenced in the text above, "other consumer problems" include various categories of reports not classified as fraud, such as auto-related reports and reports about cable and satellite TV.

[62] Data provided by the Internet Crimes Complaint Center (IC3) are excluded here and throughout the remainder of this report, except where otherwise noted, due to differences in the age ranges collected from consumers.

[63] *See* Anderson, K. B., *To Whom Do Victims of Mass-Market Consumer Fraud Complain?* at 1 (May 2021), *available at* https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3852323 (showing that only 4.8 percent of victims of mass-market consumer fraud complained to a Better Business Bureau or a government entity).

- Older adults continued to report losing money to fraud at lower rates than younger adults and filed no-loss fraud reports at much higher rates.

- Older adults were much more likely than younger adults to report losing money on tech support scams, prize, sweepstakes, and lottery scams, romance scams, and government impersonation scams.

- Online shopping fraud continued to be the most commonly reported category of fraud in which people of all ages indicated they lost money, but older adults remained much less likely to report losing money to online shopping fraud than younger adults.

- Investment scams, business impersonation, and government impersonation scams were the top fraud type based on aggregate reported losses by older adults.

- Both aggregated reported losses and the number of reports of money lost by older adults were highest for frauds initiated on social media, but reported median individual losses continued to be highest for frauds that started with a phone call.

- Older adults reported the highest aggregate losses to frauds facilitated by bank transfers or payments to send money. The second highest aggregate reported losses were on frauds facilitated by cryptocurrency transfers. Credit cards and gift cards were the fraud payment methods most frequently reported by older adults.[64]

- Depending on different assumptions on the underreporting of fraud, we estimate the overall cost of fraud to older adults in 2024 to be between $10.1 billion and $81.5 billion. These figures reflect considerable degree of uncertainty because the scale of underreporting, particularly when losses are high, is not well understood.

These findings, explored more fully below, help inform the FTC's efforts to protect consumers through consumer education, law enforcement, and policy work.

a. Aggregate Reported Losses to Fraud by Older Adults Have Skyrocketed

As shown in Figure 1, reported fraud losses by older adults increased from about $600 million in 2020 to $2.4 billion in 2024, a 300% increase. Over the same period, the number of reports indicating any monetary loss showed a relatively small increase (59%), but reports of losses in

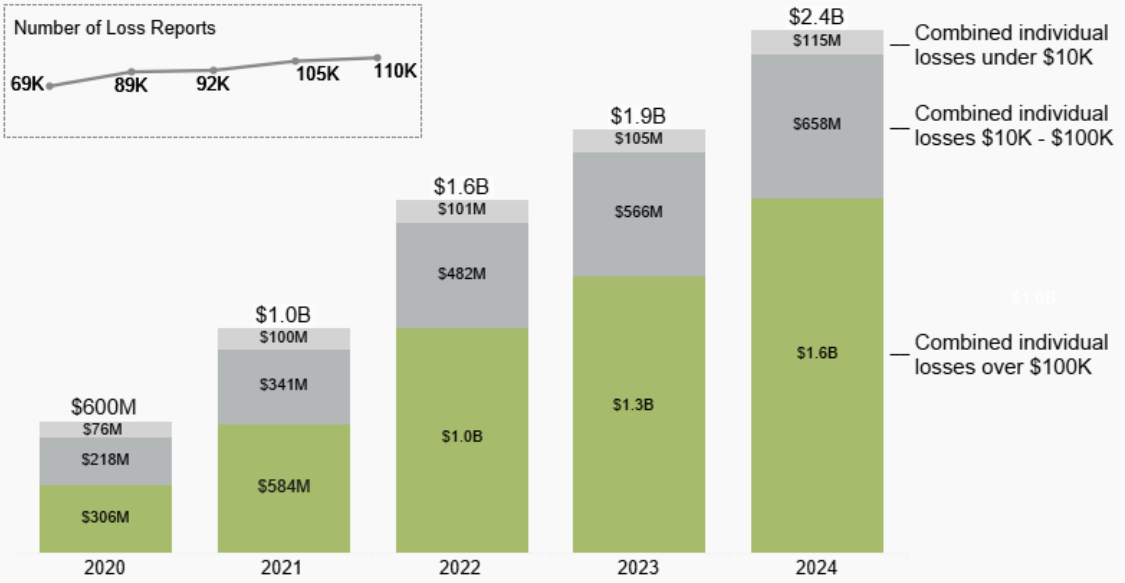
[64] The gift card payment method includes cards that hold a specific cash value that can be used for purchases and reload cards such as MoneyPak that are used to add value to these cards.

the tens and hundreds of thousands skyrocketed.[65] These increasing reports of extraordinarily high individual losses largely drove the upward trend in aggregate reported losses.

From 2020 to 2024, combined losses by older adults who reported losing over $100,000 increased more than fivefold. While these reports were relatively rare at 5% of older adults' loss reports in 2024, they accounted for 68% of their aggregate reported losses. Controlling for population size, older adults were nearly twice as likely as younger adults to report a six-figure fraud loss.[66] These reports were often about investment scams, romance scams, and scammers impersonating the FTC, banks, Publishers Clearing House, and Microsoft.

FIGURE 1: TOTAL REPORTED FRAUD LOSS BY YEAR AND INDIVIDUAL LOSS AMOUNT (AGES 60 AND OVER)

Aggregate reported fraud losses by older adults increased fourfold from 2020 to 2024. The combined individual losses of older adults who lost over $100K accounted for the largest share of the growth.



b. Older Adults Reported Higher Median Individual Dollar Losses than Younger Adults

In 2024, as in previous years, older adults who reported losing money reported higher median individual losses than younger adults (see Figure 2). The combined median loss reported by

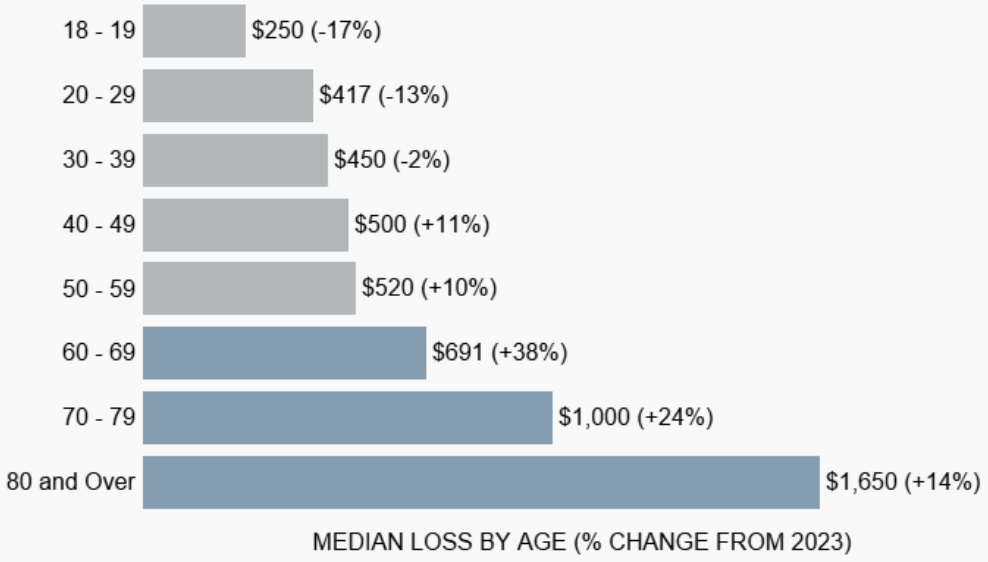
[65] From 2020 to 2024, the number of older adults who reported a loss over $100,000 increased 351% (from 1,136 reports to 5,125 reports), and the number who reported a loss from $10,000 to $100,000 increased 183% (from 6,965 to 19,679 reports). Over the same period, the number of older adults who reported a loss under $10,000 increased 39% (from 60,930 to 84,776 reports).

[66] This comparison of older adults and younger consumers is normalized against the population size of each age group. The analysis is based on U.S. Census Bureau data for population by age. *See U.S. Census Bureau,* 2019-2023 American Community Survey 5-Year Estimates, *available at* https://data.census.gov/table/ACSST5Y2023.S0101.

people ages 60 and over was $900, up from $650 in 2023. For people 80 and over, the reported median individual loss was $1,650, far higher than any other age group. Changes in the mix of fraud types that people report from year to year affect these figures since losses vary tremendously by fraud type.

FIGURE 2: 2024 MEDIAN INDIVIDUAL MONETARY LOSS REPORTED BY AGE

Older adults continued to report higher median fraud losses than younger age groups, and their median losses increased compared to 2023.



Some Sentinel reports are filed on behalf of consumers by adult children, spouses, caretakers, or others. In 2024, about 16% of reports filed for people 80 and over indicated they were submitted by a person on behalf of the consumer, a far higher rate than any other age group.[67] This is consistent with prior years. Reports submitted by third parties had higher median individual reported losses as compared to those that were self-reported. This was true for all age groups, but the disparity was particularly striking for older adults.[68]

[67] The percentage of reports submitted by another person on behalf of a consumer in 2024 were as follows: 15.8% reports (80 and over), 5.7% (70-79), 3.7% (60-69), 2.8% (50-59), 2.3% (40-49), 2.1% (30-39), 2.4% (20-29), and 3.9% (18-19). These figures exclude reports collected by Sentinel data contributors because of differences in identifying reports submitted by third parties.

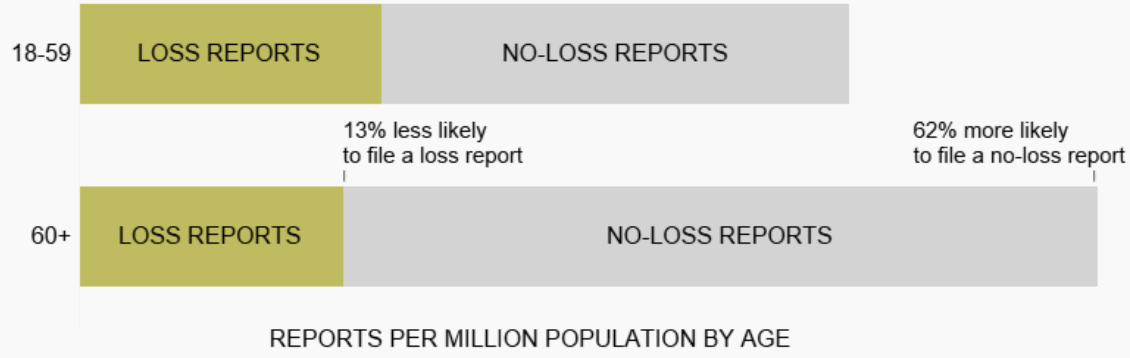
[68] The 2024 reported median individual dollar losses by age for this subset of reports were as follows: $6,000 (80 and over), $5,000 (70-79), $2,500 (60-69), $1,300 (50-59), $1,000 (40-49), $960 (30-39), $549 (20-29), $390 (18-19).

c. Older Adults Reported Losing Money to Fraud at Lower Rates than Younger Adults

Overall, older adults reported fraud at a higher rate than younger adults in 2024. However, about 74% of older adults' fraud reports did not indicate any monetary loss. Figure 3, which controls for population size, shows that older adults filed reports about frauds they spotted but avoided losing money to ("no loss-reports") at a much higher rate than people ages 18-59. Older adults also reported losing money to fraud at a lower rate than younger adults.[69] This is consistent with previous years and suggests that older adults may be more likely to avoid losing money when exposed to fraud, more inclined to report fraud when no loss has occurred, or a combination of these or other factors. Nonetheless, as shown in Figure 2 above, older adults who *did* report losing money to fraud experienced higher median individual losses than younger adults.

FIGURE 3: 2024 FRAUD LOSS AND NO-LOSS REPORTS PER MILLION POPULATION BY AGE

Controlling for population size, older adults filed fraud reports at a higher rate than younger adults overall but reported losing money at a lower rate.



Figures are normalized using U.S. Census Bureau data for population by age. See U.S. Census Bureau, 2019-2023 American Community Survey 5-Year Estimates.

d. Some Types of Fraud Affected Older Adults Differently from Younger Adults

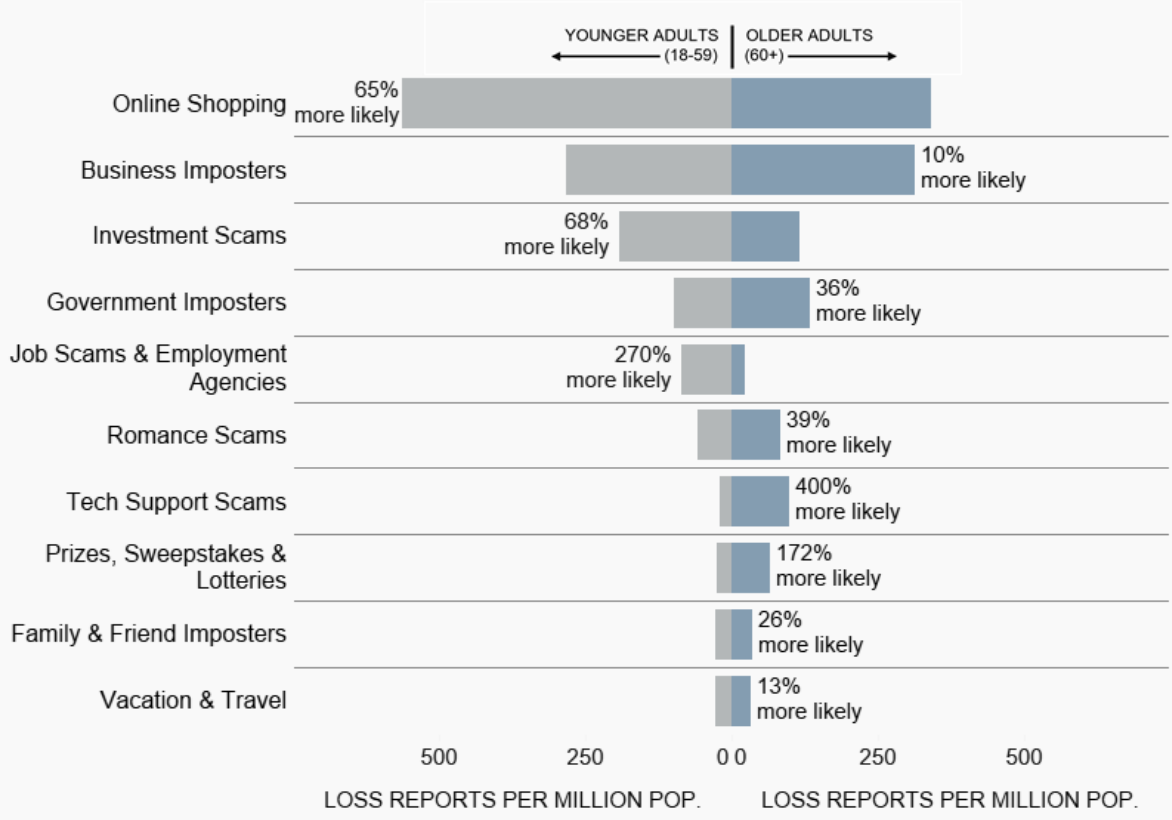
Figure 4 displays the top fraud types ranked by the combined number of fraud reports from both older and younger adults who said they lost money. The blue bars show loss reports filed by older adults, and the gray bars show loss reports filed by younger people for each top fraud. Controlling for population size, older adults were more likely than younger people to report financial losses to certain types of frauds. Four types of fraud stood out in 2024. Older adults

[69] The largest share of 2024 no-loss reports by older adults were about phone scams, and these were most often calls from scammers impersonating the government and well-known businesses, particularly Medicare, Amazon, and banks.

were: (1) five times (400%) more likely than younger people to report losing money on a tech support scam; (2) nearly three times (172%) more likely to report a loss on a prize, sweepstakes, or lottery scam; (3) 39% more likely to report a loss on romance scam; and (4) 36% more likely to report a loss on a government impersonation scam. Although older adults continued to be less likely than younger people to report losing money to online shopping fraud, the number of loss reports filed by older adults on this fraud type continued to exceed any other fraud type. Older adults were also much less likely to report losing money on investment scams and job scams relative to younger adults.[70]

FIGURE 4: 2024 LOSS REPORTS BY AGE AND FRAUD TYPE

Losses to some types of fraud are more likely to be reported by younger adults, while others are more likely to be reported by older adults.



Figures are normalized using U.S. Census Bureau data for population by age. See U.S. Census Bureau, 2019-2023 American Community Survey 5-Year Estimates. Fraud types are ranked by the combined number of loss reports for both younger and older adults. Reports categorized as unspecified are excluded.

[70] As discussed below, the aggregate reported losses by older adults on investment scams continued to exceed any other fraud type. Here and throughout this section of the report, investment scams refer to fraud reports classified as miscellaneous investments and investment advice and stocks and commodity futures trading.

Another way to understand the effect of fraud on older adults is to identify the magnitude of the financial injury. Analysis of total dollars reported lost by older adults by fraud type, shown in Figure 5, highlights the tremendous financial harm caused by investment scams, business impersonation scams, and government impersonation scams. Reported losses by older adults to investment scams were once again far higher than on any other fraud type. These consumers often described being lured to fake cryptocurrency investment platforms after being targeted on social media.[71] Losses to business impersonation scams were second, with the highest aggregate reported losses on scams impersonating banks.[72] These scams often work by convincing people that a security concern has put their accounts at risk. Reports show they are often directed to transfer money or deposit cash into Bitcoin ATM machines to keep it "safe."[73] Government impersonation scams moved into the third position in 2024, with reported losses jumping 47%. The largest share of these losses were on scams impersonating the FTC and the Social Security Administration. Reports showed an increasingly blurred line between government and business impersonation, with many scammers impersonating more than one entity in a single scam.[74] Increasing reports of a new type of job scam, the so-called "task scam,"[75] helped drive up older adults' reported job scam losses by nearly 300% compared to 2023.[76]

[71] In 2024, far more investment scam reports identified social media as the method of contact than any other contact method. This was true for both older and younger adults.

[72] For more information about these and other impersonation scams *see* FTC Consumer Protection Data Spotlight, Who's who in scams: a spring roundup (May 24, 2024), *available at* https://www.ftc.gov/news-events/data-visualizations/data-spotlight/2024/05/whos-who-scams-spring-roundup.

[73] *See* FTC Consumer Protection Data Spotlight, Bitcoin ATMs: A payment portal for scammers (Sept. 3, 2024), *available at* https://www.ftc.gov/news-events/data-visualizations/data-spotlight/2024/09/bitcoin-atms-payment-portal-scammers.

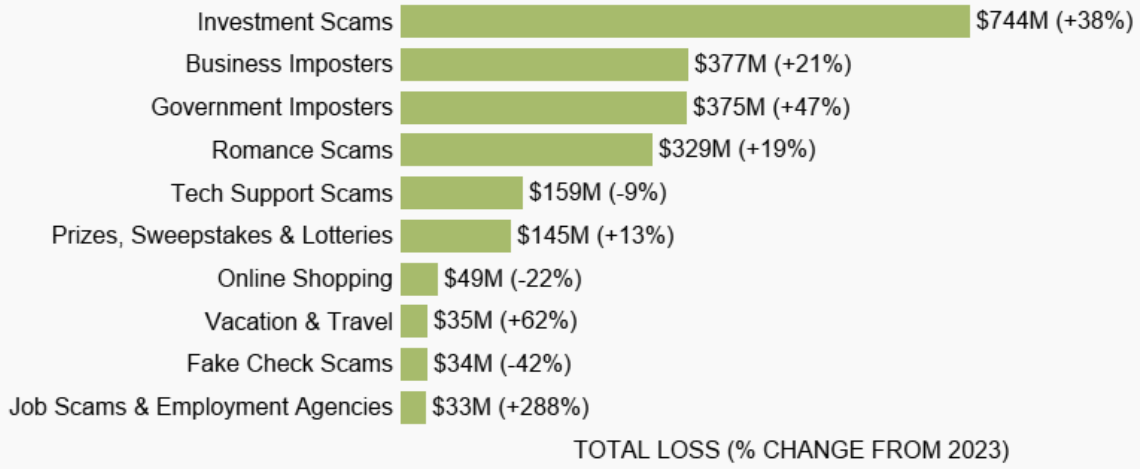
[74] *See* FTC Consumer Protection Data Spotlight, Impersonation scams: not what they used to be (April 1, 2024), *available at* https://www.ftc.gov/news-events/data-visualizations/data-spotlight/2024/04/impersonation-scams-not-what-they-used-be.

[75] In a task scam (also known as gamified job scams), the "job" is to perform simple, repetitive tasks in an app or online platform. People think they are earning commissions and are eventually told they must deposit money to complete their next set of tasks and withdraw their supposed earnings.

[76] *See* FTC Consumer Protection Data Spotlight, Paying to get paid: gamified job scams drive record losses (December 12, 2024), *available at* https://www.ftc.gov/news-events/data-visualizations/data-spotlight/2024/12/paying-get-paid-gamified-job-scams-drive-record-losses.

FIGURE 5: 2024 TOP FRAUD TYPES BY TOTAL DOLLARS LOST (AGES 60 AND OVER)

Reports suggest that some fraud types are far more costly to older adults in aggregate than others, and losses to a number of fraud types increased from 2023 to 2024.



Percent change from 2023 is shown in parentheses. Reports categorized as unspecified are excluded. The number of loss reports filed by older adults in 2024 about each fraud type are as follows: Investment scams (8,907), business imposters (24,183), government imposters (10,369), romance scams (6,361), tech support scams (7,669), prizes, sweepstakes & lotteries (5,062), online shopping (26,411), vacation & travel (2,461), fake check scams (1,378), job scams & employment agencies (1,775).

e. Older Adults' Aggregate Losses and Number of Loss Reports Were Highest on Fraud that Started on Social Media

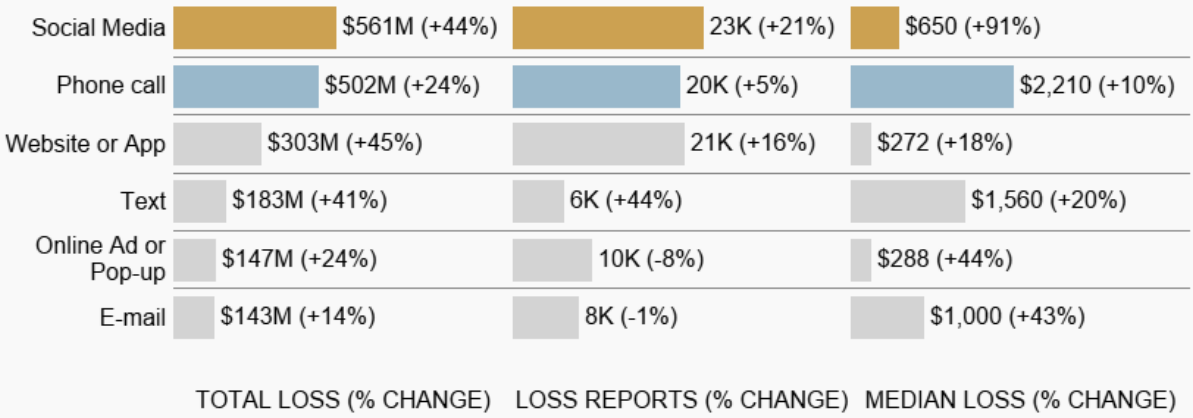
In 2024, older adults filed more loss reports and reported losing more money in the aggregate to fraud that started on social media than to fraud that reached them by any other method of contact (see Figure 6). In fact, aggregate reported losses by older adults to scams initiated on social media have increased nearly ninefold since 2020. However, reported median individual losses remained far higher for phone fraud at $2,210,[77] compared to $650 for fraud originating on social media. The trajectory of reported text scam losses was also notable, with aggregate reported losses by older adults up more than eightfold compared to 2020.

The contact methods reported by people 80 and over were an exception. In 2024, this age group reported far higher losses and filed far more loss reports on scams that started with a phone call compared to other methods of contact, with social media a distant second.

[77] Phone frauds are those in which the consumer reported first learning about the fraud via a phone call. Text frauds belong to a category separate from phone frauds.

FIGURE 6: 2024 TOP CONTACT METHODS RANKED BY LOSSES (AGES 60 AND OVER)

Older adults' aggregate losses and number of loss reports were highest on fraud that started on social media, but their median reported dollar losses were highest on fraud that started with a phone call.



Percent change from 2023 is shown in parentheses. Reports that did not indicate a contact method and contact methods classified as "other," including contact methods consumers wrote in, were excluded.

The types of frauds older adults most frequently reported losing money to varied by contact method. When the contact method was a phone call, older adults most often reported dollar losses on business impersonation scams (40%), followed by government impersonation scams (23%), and prize, sweepstakes, and lottery scams (15%).[78] When social media was the contact method, older adults most often reported losing money to online shopping scams (31%), but their highest aggregate reported losses were on investment scams (51%) followed by romance scams (28%). The largest share of text scam loss reports by older adults were about texts impersonating well-known businesses (28%), particularly Amazon and banks. These texts often look like account security alerts about suspicious activity or an unauthorized purchase.

f. Consumers Report that the Top Payment Methods Used in Frauds, Measured by Total Dollars Lost, are Bank Transfers and Cryptocurrency

People reporting fraud frequently indicate the payment method they used. The first column in Figure 7 shows the aggregate dollar losses that older adults reported for the payment methods shown. Fraud reports from older consumers once again point to bank transfers and cryptocurrency as the most costly payment mechanisms in terms of aggregate reported losses. Since 2020, reported fraud losses by older adults have increased over eightfold on scams using bank transfer as the payment method and over twentyfold on scams using cryptocurrency as the

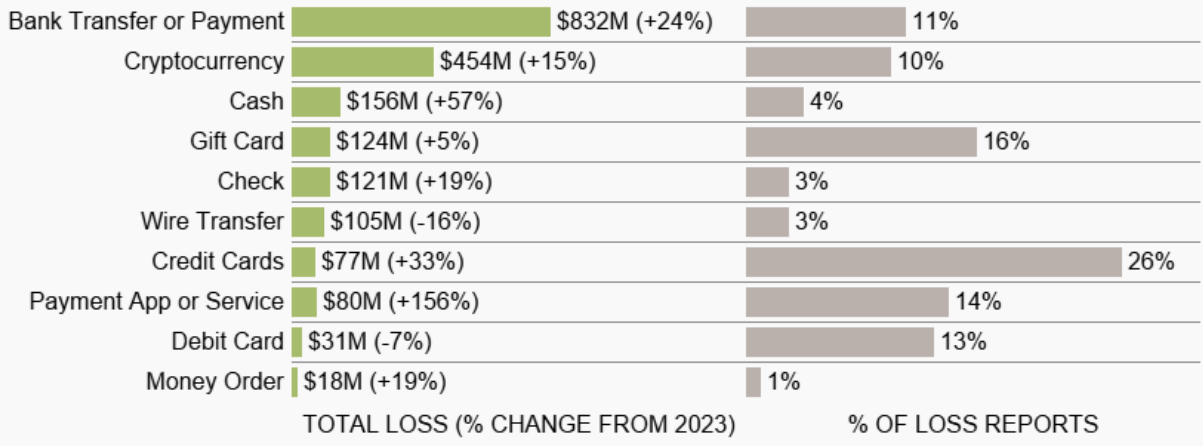
[78] These and other percentages in noted in this paragraph exclude reports categorized as unspecified. Some reports are classified as more than one fraud type.

payment method. The largest share of aggregated reported losses by older adults using bank transfers or cryptocurrency were on investment scams and scams impersonating well-known businesses, particularly banks.

The second column in Figure 7 shows that, in 2024, older adults most often reported paying scammers with credit cards followed by gift cards. About half their reported credit card payments were on online shopping fraud, while their reported gift card payments were overwhelmingly on impersonation scams. Gift cards were once again the most frequent payment method reported by older adults on several common fraud types, including government impersonation scams, tech support scams, romance scams, and family and friend impersonation scams.

FIGURE 7: 2024 TOTAL LOSSES AND LOSS REPORTS BY PAYMENT METHOD (AGES 60 AND OVER)

Bank transfers and payments and cryptocurrency were highest on total reported dollar losses, but credit cards and gift cards were the most frequently reported payment methods.



Reports that did not indicate a payment method and other payment methods consumers wrote in were excluded.

g. Estimating the Overall Cost of Fraud to Older Adults

Estimating the true cost of fraud to older adults based on reporting data is challenging. Sentinel provides invaluable information about the nature of fraud that enables the Commission to direct its enforcement efforts towards the most harmful conduct. The losses reported in Sentinel, however, are the "tip of the iceberg," as research indicates that most consumers do not report being victimized to anyone other than family and friends.[79] Since we do not know the exact degree of underreporting, especially for consumers losing large amounts of money, it is difficult

[79] *See* Anderson, *supra* note 63.

to calculate the missing losses to estimate the overall financial harm. We describe a methodology to calculate the overall cost of fraud below and show how the uncertainty in underreporting rates affects our estimates.

A study of mass market fraud analyzed several FTC surveys and found that just 4.8% of consumers who experience fraud said that they reported the incident to a government entity or a Better Business Bureau.[80] The frauds covered in the survey, however, generally resulted in low loss amounts.[81]

Another study took a more direct and novel approach; it matched data in nine FTC law enforcement cases to consumer reports about the same companies.[82] Consumers named in the case records affected by the frauds were compared to Sentinel reports to determine whether each consumer had reported their experience to the FTC or other data contributors. These results showed an average 2.0% reporting rate in cases with average losses of less than $1,000 and a 6.7% reporting rate in cases with an average loss of over $1,000. None of the nine cases in the study had an average loss of $10,000 or more.

These estimated reporting rates can be used to extrapolate the missing losses. We assume that Sentinel includes just 2.0% of all losses from consumers who lost under $1,000 and 6.7% of all losses from consumers who lost $1,000 or more. Given these assumptions, the estimated 2024 overall loss, adjusted to account for underreporting, was $195.9 billion,[83] with an estimated $81.5 billion lost by older adults.[84]

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[80] *Id.* (showing in a study that 2.3% consumers reported to a Better Business Bureau and 2.6% consumers reported to a government entity).

[81] *See* Anderson, K.B., *Mass Market Consumer Fraud in the U.S.: A 2017 Update* at 56 (October 2019), *available at* https://www.ftc.gov/system/files/documents/reports/mass-market-consumer-fraud-united-states-2017-update/p105502massmarketconsumerfraud2017report.pdf (basing the reporting estimates on consumer self-reports from surveys sponsored by the FTC and finding in a 2017 survey that the median loss of fraud victims reporting a dollar loss amount was $100, and the 75th percentile loss was $250).

[82] *See* Raval, D., *Whose Voice Do We Hear in the Marketplace? Evidence from Consumer Complaining Behavior,* Marketing Science (2020), 39 (1), 168-87, *available at* https://deveshraval.github.io/complaintBehavior.pdf.

[83] The 2024 reported fraud loss figured used for this purpose are $154 million (combined reported losses under $1,000) and $12.6 billion (combined reported losses of $1,000 or more). This includes the subset of IC3 data that is contributed to Sentinel.

[84] About 73% of the reported losses used in this analysis included age data, and 42% of these losses were reported by adults 60 and older. We assumed that age data was "missing at random" conditional on loss amount. That is, that consumers who did report age had the same age distribution as consumers who did not report age for a given loss bracket. This assumption may be conservative. For example, after conducting an independent examination on a change to the FTC's reporting website that improved usability, two economists found that change substantially increased consumer reports *and* reduced the share of consumers not reporting age, and the share of older adults who filed a report increased the most compared to other age groups. *See* Grosz, M. & Raval, D., *Hassle Costs and Consumer Voice: Evidence from a Website Redesign* (July 9, 2024), *available at*https://deveshraval.github.io/websiteRedesign.pdf. This could reflect either an increase in the number of reports from older adults or that older adults were previously more likely to omit age information than other groups.

However, these estimates are highly sensitive to assumptions about reporting rates for high-dollar loss frauds as these account for the lion's share of all losses reported to Sentinel.[85] A more conservative approach assumes that reporting rates are higher still for frauds that cause higher losses. If we assume that 100% of people who experienced losses of $10,000 or more did in fact submit a report and are therefore included in Sentinel, we would calculate a very conservative estimate of $31.3 billion in overall fraud losses in 2024, with $10.1 billion lost by older adults.[86]

2. Hearing Directly from Older Adults About FTC Impersonators

The FTC continues to receive reports about scammers pretending to work at or be affiliated with the FTC.[87] These scammers tell a variety of lies to convince people to buy gift cards and share the codes, send cash or gold, transfer money, or put cash into a cryptocurrency ATM. In many of the reports, the scammers have been telling people that their money, including their retirement accounts, is at risk and they must move it to "protect it." Once the scammer gets access to the funds, the money is gone. Losses from these scams can be devastating, involving hundreds of thousands of dollars. For older adults in particular, the large dollar losses from these scams can completely drain their life savings.[88]

The FTC has continued its program to contact older adults who report losing money to FTC impersonators, and people who appear to be in the middle of this scam and at immediate risk of losing money. When speaking with these consumers, FTC staff makes sure they know that the experiences are scams and to stop all contact with the scammers. Often the older adults tell FTC staff that they were more likely to do as the scammers requested because they believed the caller

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[85] While just 13% of people who reported a fraud loss in 2024 lost $10,000 or more, their combined losses were equal to 93% of all 2024 losses reported to Sentinel.

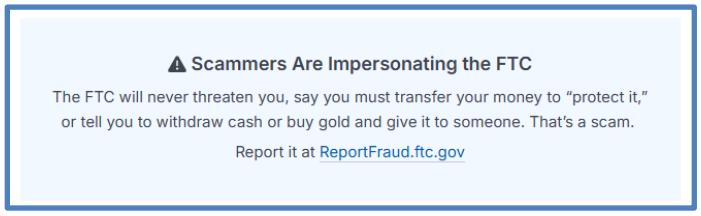
[86] The 2024 reported fraud loss figures used for this purpose are $154 million (combined reported losses under $1,000), $791 million (combined reported losses between $1,000 and $10,000), and $11.8 billion (combined reported losses of $10,000 or more). This includes the subset of IC3 data that is contributed to Sentinel. Losses reported by older adults made up 22% of losses under $1,000, 28% of losses of $1,000 to $10,000, and 43% of losses of $10,000 or more.

[87] FTC impersonators are one of the top 5 types of government impersonator reports. *See* FTC, Explore Government Imposter Scams (last updated Aug. 12, 2025), *available at* public.tableau.com/app/profile/federal.trade.commission/viz/GovernmentImposter/Infographic; FTC Consumer Protection Data Spotlight, False alarm, real scam: how scammers are stealing older adults' life savings (Aug. 7, 2025), *available at* https://www.ftc.gov/news-events/data-visualizations/data-spotlight/2025/08/false-alarm-real-scam-how-scammers-are-stealing-older-adults-life-savings; FTC, No, FTC "agents" with badge numbers aren't calling you (May 27, 2025), *available at* https://consumer.ftc.gov/consumer-alerts/2025/05/no-ftc-agents-badge-numbers-arent-calling-you; FTC, Getting the word out about FTC imposter scams (March 26, 2025), *available at* consumer.ftc.gov/consumer-alerts/2025/03/getting-word-out-about-ftc-imposter-scams; FTC, Scammers impersonate FTC officials, including Chairman Andrew N. Ferguson (Feb. 3, 2025), *available at* consumer.ftc.gov/consumer-alerts/2025/02/scammers-impersonate-ftc-officials-including-chairman-andrew-ferguson; FTC, How To Avoid a Government Impersonation Scam (Nov. 2023), *available at* consumer.ftc.gov/articles/how-avoid-government-impersonation-scam.

[88] See FTC Consumer Protection Data Spotlight, False alarm, real scam: how scammers are stealing older adults' life savings (Aug. 7, 2025), *available at* https://www.ftc.gov/news-events/data-visualizations/data-spotlight/2025/08/false-alarm-real-scam-how-scammers-are-stealing-older-adults-life-savings.

was a part of a federal agency or law enforcement branch. The threats of legal action against the older adults caused them to act before they had time to consider what was being asked of them, or before they could reach out to consult with family, friends, or real law enforcement. It can be challenging to help people believe that FTC staff are legitimate, and that the previous callers were scammers.

In addition to the consumer education efforts described in Section III, the FTC has also placed prominent warnings on its websites, such as FTC.gov, to caution consumers about FTC impersonation scams. People have reported finding the FTC advice just in time to hang up on the scammers and report it to the FTC.[89]



B. Coordinated Efforts to Protect Older Consumers

The FTC's strategic planning for the protection of older adults is led by its Every Community Team, which works to protect older adults, military families, lower income consumers, and others. The Team relies on research and input from numerous stakeholders, including the FTC's Senior Fraud Advisory Office,[90] to develop strategies to prevent fraud, inform the agency's law enforcement program, and expand outreach. The FTC's partnerships with stakeholders across the country have been an extremely valuable aspect of the FTC's approach to protecting older adults from financial loss.

For example, to pursue law enforcement actions that have the largest possible impact, the FTC coordinates with federal, state, local, and international agencies, including those with criminal authority as discussed in Section II above. In so doing, the FTC leverages resources to track down fraudsters and build cases to stop them. In particular, the FTC participates in the Global Anti-fraud Enforcement Network, a multilateral network of agencies that enforces laws prohibiting mass marketing fraud. The Network has been pivotal in enforcement actions against entities that have defrauded millions of older consumers. The FTC also participates in a network

[89] FTC, Getting the word out about FTC imposter scams (March 26, 2025), *available at* consumer.ftc.gov/consumer-alerts/2025/03/getting-word-out-about-ftc-imposter-scams.

[90] The FTC created the Senior Fraud Advisory Office pursuant to the Seniors Fraud Prevention Act of 2022. The Office advises the Commission on fraud prevention strategies, monitors the market for emerging fraud trends impacting older adults, and coordinates with our law enforcement partners to disseminate consumer education regarding these new trends. *See* Fraud and Scam Reduction Act, Section 101, Division Q of the Consolidated Appropriations Act, Subtitle B, 2022, Pub. L. No. 117-103, *available at* https://www.congress.gov/117/plaws/publ103/PLAW-117publ103.pdf .

of federal agencies focused on elder justice issues led by the Department of Justice ("DOJ Elder Justice Working Group").

During the 2025 fiscal year, the FTC was also an active member of the Elder Justice Coordinating Council, a multi-agency federal entity tasked with coordinating activities across the federal government related to elder abuse, neglect, and exploitation.[91] The EJCC and its staff-level working group have strengthened the FTC's connections with other federal government offices that are also working to combat elder abuse and have facilitated valuable information sharing and coordination.

C. Scams Against Older Adults Advisory Group

In addition to working with partners through the Every Community Team, the EJCC, and other networks, the FTC has also coordinated efforts with a wide variety of stakeholders through an Advisory Group it established in 2022 pursuant to the Stop Senior Scams Act.[92] The Scams Against Older Adults Advisory Group ("Advisory Group") is comprised of government partners, consumer advocates, and industry representatives.[93] The Advisory Group completed its work through four committees that it formed to fulfill its mission.[94] The committees focused on: expanding consumer education and outreach; improving industry training on scam prevention; examining technological solutions and other innovations; and reviewing research on consumer messaging to prevent scams. The Advisory Group made its work available to the public on its website at www.ftc.gov/olderadults.[95]

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[91] HHS convened the Elder Justice Coordinating Council in accordance with the Elder Justice Act passed in 2010. The Council consists of heads of federal departments and other government entities identified as having responsibilities, or administering programs, relating to elder abuse, neglect, and exploitation. *See* HHS, What is the Elder Justice Coordinating Council? (last modified Nov. 1, 2022), *available at* https://www.acl.gov/programs/elder-justice/elder-justice-coordinating-council-ejcc.

[92] Congress enacted the Fraud and Scam Reduction Act, Section 101, Division Q of the Consolidated Appropriations Act, 2022, Pub. L. No. 117-103 on March 15, 2022. *See* https://www.congress.gov/117/plaws/publ103/PLAW-117publ103.pdf. Subtitle A of the Act, referred to as the "Stop Senior Scams Act," required the FTC to create an Advisory Group comprised of various members, including those identified in the Act.

[93] Press Release, FTC, *FTC to Convene First Meeting of Scams Against Older Adults Advisory Group on Sept. 29* (Sept. 12, 2022), *available at* https://www.ftc.gov/news-events/news/press-releases/2022/09/ftc-convene-first-meeting-scams-against-older-adults-advisory-group-sept-29; *see also* Scams Against Older Adults Advisory Group Meeting, *available at* https://www.ftc.gov/news-events/events/2022/09/scams-against-older-adults-advisory-group-meeting.

[94] Press Release, FTC, *FTC Announces Members of the Stop Senior Scams Act Advisory Committees Aimed at Protecting Older Adults Against Scams*, *available at* https://www.ftc.gov/news-events/news/press-releases/2022/12/ftc-announces-members-stop-senior-scams-act-advisory-committees-aimed-protecting-older-adults; *see also* Scams Against Older Adults Committee Members (last modified Oct. 2024), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/sssa-committee-list.pdf.

[95] Press Release, FTC, *FTC Convenes Advisory Group to Fight Scams Against Older Adults* (March 7, 2024), *available at* https://www.ftc.gov/news-events/news/press-releases/2024/03/ftc-convenes-advisory-group-fight-scams-against-older-adults.

The Advisory Group's deliverables have included: 1) a reference sheet on core principles on fraud prevention messaging that can guide any organization in communicating with its target audience; 2) guiding principles of effective employee training on identifying and preventing scams; and 3) a report highlighting research-based challenges to scam prevention messaging and how to counteract them, special considerations for effective scam prevention messaging to older adults, and key questions where additional research is needed.

Earlier this year, the Advisory Group's Technology and New Methods Committee completed the four projects it initiated in November 2023.[96] First, the committee finalized and disseminated best practices on mitigating fraud for each stakeholder across the gift card ecosystem including retailers, integrators, and gift card brands. This work was led by Blackhawk Network and the FTC with critical input from the rest of the project group members.[97] The best practices information is intended to encourage broader adoption of fraud prevention tactics to tackle gift card fraud. Second, the committee produced an inventory of existing and emerging information sharing mechanisms to combat fraud, which includes sector-specific, cross-industry, and public-private information sharing initiatives. The inventory was created to foster further information sharing efforts by providing a roadmap of what mechanisms exist, identifying where there may be gaps and need for further development, and providing a contact point for entities interested in engaging with these initiatives. This project was led by USTelecom, Western Union, and the American Bankers Association ("ABA"). Third, the committee also made available a survey that ABA completed on whether and to what extent its members utilize state laws that allow financial institutions to hold transactions suspected of being related to scams. The survey follows up on the research that the committee previously completed on existing state laws that allow financial institutions and broker-dealers or investment advisors to hold transactions if a scam is suspected. That project was co-led by the DOJ and the ABA.

The fourth project was co-led by the FTC and the Cellular Telecommunications and Internet Association ("CTIA") on mitigating the impact of fraud that utilizes text messages to contact older adults ("Text Message Project"). When the 2023-2024 Protecting Older Consumers Report was released, the Text Message Project had committed to continuing to explore "how to increase data sharing between industry cross-sectors (e.g., between members of the telecommunication and financial sectors) or public-private data sharing in order to facilitate targeting and disrupting spam and scam text messages" including 7726, "report junk," or "block & report scam" information, identified phishing campaigns, and common methods, channels and routes used by bad actors.[98] The Text Message Project met several times to discuss data sharing and did not

[96] FTC, Protecting Older Consumers 2023-2024 at 35-37 (Oct. 18, 2024), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/federal-trade-commission-protecting-older-adults-report_102024.pdf.

[97] *See* FTC, Addressing Scams Affecting Older Adults, *available at* www.ftc.gov/olderadults (listing the committee members who engaged in this project).

[98] FTC, Protecting Older Consumers 2023-2024 at 36 (Oct. 18, 2024), *available at* https://www.ftc.gov/system/files/ftc_gov/pdf/federal-trade-commission-protecting-older-adults-report_102024.pdf.

reach any consensus.[99] However, the members agreed that the dialogues were helpful and they would continue informal collaboration.

V. Conclusion

The FTC protects older adults through aggressive law enforcement and broad outreach and education. The FTC will continue to seek new ways to prevent harm to older adults through its ongoing collaboration with a variety of government and private stakeholders.

[99] In particular, representatives from the financial and telecommunications sectors disagreed upon what, if any, data could be shared regarding text messages that impersonate banks, and whether any data could be shared on a broader systematic basis rather than on a one-to-one basis between entities.

Appendix A – Federal Trade Commission FY 2025

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
In the Matter of Marriott International, Inc. *et al.*	FTC Matter No. 1923022	FTC Administrative Matter	10/9/2024	Data Privacy/ Security	Alleged the defendants made false or misleading claims concerning their use of appropriate safeguards to protect consumers' personal information and failed to implement reasonable data security, which resulted in at least three separate data breaches.	Consent Order
Federal Trade Commission v. Ecom Genie Consulting LLC, *et al.*	1:24-cv-23976-RKA	Southern District of Florida	10/15/2024	Deceptive/ Misleading Conduct; Business Opportunity Rule	Alleged the defendants, in connection with an e-commerce business opportunity scam, made false or unsubstantiated earnings claims, misrepresented their refund policy, and failed to provide required disclosures.	Full Settlement
Federal Trade Commission v. Qargo Coffee, Inc., *et al.*	1:24-cv-23978	Southern District of Florida	10/16/2024	Franchise Rule	Alleged the defendants misrepresented the typical time it would take for a franchisee to open an outlet, omitted information about the business history and experience of its executives, and failed to disclose critical information required by the Franchise Rule.	Full Settlement
United States of America v. Lyft, Inc.	3:24-cv-07443	Northern District of California	10/25/2024	Deceptive/ Misleading Conduct	Alleged the defendant made deceptive earnings claims about how much money drivers could expect to make	Full Settlement

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
					per hour and how much they could earn in special incentives.	
Federal Trade Commission v. Global Circulation, Inc., *et al.*	1:24-cv-4927	Northern District of Georgia	10/29/2024	Deceptive/ Misleading Conduct; Fair Debt Collection Practices Act ("FDCPA"); Gramm-Leach-Bliley Act ("GLB Act"); Impersonation Rule	Alleged the defendants deceptively claimed that consumers owed debts and would face dire consequences if the purported debt was not paid. Also, alleged defendants claimed false affiliation with specific lenders to trick consumers into paying.	Full Settlement
Federal Trade Commission v. Seek Capital, LLC, *et al.*	2:24-cv-09511-RGK-MAA	Central District of California	11/4/2024	Deceptive/ Misleading Conduct; Telemarketing Sales Rule ("TSR"); Consumer Review Fairness Act of 2016 ("CRFA")	Alleged the defendants falsely advertised that they could secure business loans or lines of credit and instead charged clients thousands of dollars simply to open credit cards in the owners' names. Also alleged the defendants pressured consumers to provide five-star reviews, deleted negative consumer reviews, encouraged employees to post positive reviews, and illegally prohibited clients from leaving negative reviews.	Litigation Ongoing

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
Federal Trade Commission v. Dave, Inc.	2:24-cv-09566	Central District of California	11/5/2024	Deceptive/ Misleading Conduct; Restore Online Shoppers' Confidence Act ("ROSCA")	Alleged the defendant deceived consumers about the amount of its cash advances, charged consumers undisclosed fees, and charged so-called "tips" to consumers without their consent.	Litigation referred to U.S. Departme nt of Justice, litigation is ongoing
In the Matter of GGL Projects, Inc., also dba Sitejabber	Docket No. 232-3060	FTC Administrative Matter	11/6/2024	Deceptive/ Misleading Conduct	Alleged the defendant misrepresented that the ratings and reviews it published came from customers who experienced the reviewed product or service.	Consent Order
Federal Trade Commission v. Superior Servicing, LLC, *et al.*	2:24-cv-02163-GMN-MDC	District of Nevada	11/18/2024	Deceptive/ Misleading Conduct; TSR; GLB Act; Impersonation Rule	Alleged the defendants falsely claimed that consumers enrolled in defendants' program could obtain benefits such as loan consolidation, reduced interest rates on their student loans, reduced monthly student loan payments, or loan forgiveness, and collected illegal advance fees. Also alleged that defendants misrepresented that consumers' payments would be applied to their student debt, and that defendants were affiliated with the U.S. Department of Education or its approved loan servicers.	Litigation Ongoing

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
Federal Trade Commission v. Evolv Technologies Holdings, Inc.	1:24-cv-12940	District of Massachusetts	11/26/2024	Deceptive/ Misleading Conduct	Alleged the defendant made false claims about the extent to which its AI-powered security screening system could detect weapons and ignore harmless personal items, including in school settings. Also alleged the defendants falsely represented that its system would detect weapons more accurately and faster than metal detectors; reduce false alarm rates; and cut labor costs by 70% compared to metal detectors.	Full Settlement
Federal Trade Commission v. 1661, Inc., dba GOAT, a corporation	2:24-cv-10329	Central District of California	12/2/2024	Deceptive/ Misleading Conduct; Trade Regulation Rule Concerning the Sale of Mail, Internet, or Telephone Order Merchandise ("MITOR")	Alleged the defendant misrepresented that it offered "Buyer Protection," and did not put customer service protections in place to protect consumers who received defective products. Also alleged the defendant represented it would ship products within the same day or next day, without having a reasonable basis to expect it could do so, failed to ship products in the timeframe required by MITOR, and failed to offer consumers the opportunity to consent to a delay in shipping or to cancel their order and receive a prompt refund.	Full Settlement

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
In the Matter of Intellivision Technologies Corp.	FTC Matter No. 2323023	FTC Administrative Matter	12/3/2024	Data Privacy/ Security	Alleged the defendant made false, misleading, or unsubstantiated claims that its AI-powered facial recognition software had one of the highest accuracy rates on the market, had been trained on millions of faces, performed with zero gender or racial bias, and that its anti-spoofing technology ensured the system couldn't be tricked by a photo or video image.	Consent Order
In the Matter of Mobilewalla, Inc.	FTC Matter No. 2023196	FTC Administrative Matter	12/3/2024	Data Privacy/ Security	Alleged the defendant, a data broker, unlawfully sold consumers' sensitive location data; targeted consumers into audience segments based on sensitive characteristics and then sold that information for marketing and other purposes; collected and retained sensitive data from advertising exchanges; and collected and used data without taking reasonable steps to verify consumers' consent.	Consent Order
In the Matter of Gravy Analytics, Inc., *et al.*	FTC Matter No. 2123035	FTC Administrative Matter	12/3/2024	Data Privacy/ Security	Alleged the defendants unlawfully tracked and sold sensitive location data from users, targeted consumers into audience segments based on sensitive characteristics and then sold that information for marketing and other purposes, and collected and used	Consent Order

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
					consumers' location data without obtaining verifiable user consent.	
Federal Trade Commission and the People of the State of Illinois v. Grubhub Inc., *et al.*	1:24-cv-12923	Northern District of Illinois	12/17/2024	Deceptive/ Misleading Conduct; ROSCA; Impersonation Rule	Alleged the defendants deceived diners about delivery costs and prices, blocked access to diners' accounts and funds without notice or providing recourse to restore such use, deceived workers about how much money they would make delivering food, and unfairly and deceptively listed restaurants on their platform without consent.	Full Settlement
Federal Trade Commission and the People of the State of Illinois v. ACIA17 Automotive Inc., dba Leader Automotive Group, *et al.*	1:24-cv-13047	Northern District of Illinois	12/19/2024	Deceptive/ Misleading Conduct; Used Motor Vehicle Trade Regulation Rule ("Used Car Rule")	Alleged the defendants deceived consumers about the price and availability of vehicles, charged them for expensive add-ons without consent, tacked on unwanted fees to purchases, posted fake reviews, misrepresented at least some of their cars' warranty status, and failed to disclose that U.S. customers were buying cars imported from Canada. Also, alleged that defendants required employees to post fake positive reviews about their dealership on Google and other review sites, and pressured consumers into posting five-star reviews.	Litigation Ongoing

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
Federal Trade Commission and the Office of the Maryland Attorney General, Consumer Protection Division v. Lindsay Chevrolet, LLC, *et al.*	1:24-cv-02362	Eastern District of Virginia	12/27/2024	Deceptive/ Misleading Conduct	Alleged the defendants regularly listed deceptive prices on their website and in their advertising, and falsely claimed consumers needed to obtain financing through the dealership. Also, alleged the defendants charged consumers for add-on products they did not consent to purchase—such as extra service plans, tire and rim protection, and "guaranteed asset protection" coverage—or falsely told consumers the add-ons were mandatory.	Litigation Ongoing
In the Matter of accessiBe Inc., a corporation, *et al.*	FTC Matter No. 2223156	FTC Administrative Matter	1/3/2025	Deceptive/ Misleading Conduct	Alleged the defendants misrepresented the ability of their AI-powered web accessibility tool to make any website compliant with the Web Content Accessibility Guidelines for people with disabilities.	Consent Order
Federal Trade Commission and the People of the State of New York v. Handy Technologies,	1:25-cv-00122	Southern District of New York	1/7/2025	Deceptive/ Misleading Conduct	Alleged the defendant made false, misleading, or unsubstantiated claims that workers would earn or were likely to earn income, and that workers could be paid "daily" or "as soon as the job [wa]s done." Also, alleged defendant failed to disclose fines that would be deducted from workers' pay and unfairly imposed fines on workers who could not complete a job due to the	Full Settlement

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
Inc. dba Angi Services					action of customers, unless the workers complied with an undisclosed multi-step protocol.	
Federal Trade Commission v. Evoke Wellness, LLC, *et al.*	0:25-cv-60073-MD	Southern District of Florida	1/13/2025	Opioid Addiction Recovery Fraud Prevention Act of 2018 ("OARFPA")	Alleged the defendants tricked consumers into calling their substance use disorder treatment clinics by using deceptive Google advertisements that appeared to be for a different substance use disorder treatment provider and then continuing the deception during the telephone calls.	Full Settlement
In the Matter of GoDaddy Inc., *et al.*	FTC Matter No. 2023133	FTC Administrative Matter	1/15/2025	Data Privacy/ Security	Alleged the defendants failed to implement reasonable and appropriate security measures and misled customers about the extent of the data security protections on their website hosting services.	Consent Order
In the Matter of General Motors, LLC, *et al.*	FTC Matter No. 2423052	FTC Administrative Matter	1/16/2025	Data Privacy/ Security	Alleged the defendant collected, used, and sold drivers' precise geolocation data and driving behavior information without adequately notifying consumers and obtaining their affirmative consent.	Consent Order
Federal Trade Commission and the State of Colorado	1:25-cv-00165	District of Colorado	1/16/2025	Deceptive/ Misleading	Alleged the defendants misrepresented the total cost of renting a unit because	Litigation Ongoing

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
v. Greystar Real Estate Partners, LLC, *et al.*				Conduct; GLB Act	the advertised price did not include mandatory recurring fees.	
United States v. Cognosphere, LLC, *et al.*	2:25-cv-00447	Central District of California	1/17/2025	Data Privacy/ Security; Children's Online Privacy Protection Rule	Alleged the defendants, despite knowing their game had child-directed features and that children used the game, collected personal information from children before (and without ever) notifying parents and obtaining parental consent. Also alleged that defendants unfairly sold loot boxes and virtual currency to children and misrepresented the cost of the loot boxes and the odds that loot boxes would contain a particular prize.	Full Settlement
Federal Trade Commission v. Growth Cave, LLC, e*t al.*	2:25-cv-01115-DOC-RAO	Central District of California	2/10/2025	Deceptive/ Misleading Conduct; Business Opportunity Rule; Credit Repair Organizations Act; Trade Regulation Rule on the Use of Consumer	Alleged the defendants established a bogus credit repair scheme and operated a business opportunity scheme that falsely promised huge income, used false consumer testimonials, failed to make mandatory disclosures, and misrepresented material aspects of the assistance it provided.	Litigation Ongoing

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
				Reviews and Testimonials		
Federal Trade Commission v. Blackrock Services, Inc., *et al.*	8:25-cv-00363-HDV-(ADSx)	Central District of California	2/24/2025	Deceptive/ Misleading Conduct; FDCPA; GLB Act; Impersonation Rule	Alleged the defendants operated a phantom debt scheme where they sent consumers deceptive warning and collection letters for debt that did not exist, or called them directly and claimed they would take legal action if the consumer did not pay. Also alleged that, in operating the scheme, the defendants falsely posed as a law firm.	Full Settlement
Federal Trade Commission v. Click Profit, LLC, *et al.*	1:25-cv-20973-JB	Southern District of Florida	3/3/2025	Deceptive/ Misleading Conduct; Business Opportunity Rule; CRFA; Impersonation Rule	Alleged the defendants offered an e-commerce business opportunity that made deceptive earnings claims, misrepresented their affiliation with major brands, and falsely claimed they use artificial intelligence to select profitable products. Also alleged they failed to make mandatory disclosures, used unlawful non-disparagement clauses in their contracts, and engaged in other conduct to unfairly suppress negative reviews.	Litigation Ongoing
Federal Trade Commission v. Cleo AI, Inc.	1:25-cv-02594-ALC	Southern District of New York	3/28/2025	Deceptive/ Misleading Conduct; ROSCA	Alleged the defendant deceived consumers about the amount and timing of available cash advances, and	Full Settlement

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
					then made it difficult for consumers to cancel its subscription service.	
Federal Trade Commission v. Uber Technologies, Inc., *et al.*	3:25-cv-03477	Northern District of California	4/21/2025	Deceptive/ Misleading Conduct; ROSCA	Alleged the defendants made false and misleading claims regarding their Uber One subscription service, failed to provide a simple mechanism to stop recurring charges, and charged customers without their consent.	Litigation Ongoing
In the Matter of Workado, LLC	FTC Matter No. 2323092	FTC Administrative Matter	5/1/2025	Deceptive/ Misleading Conduct	Alleged the defendant deceptively advertised the accuracy of its artificial intelligence (AI) detection products.	Consent Order
Federal Trade Commission and the State of Nevada v. International Markets Live, Inc., *et al.*	2:25-cv-00760	District of Nevada	5/1/2025	Deceptive / Misleading Conduct; TSR; ROSCA	Alleged the defendants made false or unsubstantiated earnings claims to entice consumers to (1) purchase training on financial topics, and (2) buy into the defendants' multi-level marketing business venture.	Litigation Ongoing
Federal Trade Commission v. Paddle Market Limited	1:25-cv-1886	District Court for the District of Columbia	6/16/2025	Deceptive / Misleading Conduct; ROSCA	Alleged the defendants facilitated tech support schemes and enabled schemes based overseas to access the U.S. credit card system, collect payments from U.S. consumers, and evade detection by merchant banks and card networks.	Full Settlement

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
Federal Trade Commission v. Mercury Marketing, LLC, *et al.*	1:25-cv-02021-MJM	District of Maryland	6/24/2025	OARFPA; Impersonation Rule	Alleged the defendants impersonated substance use disorder treatment clinics in Google search ads and on the phone to deceptively route consumers to defendants' clinics.	Litigation Ongoing
In the Matter of Southern Health Solutions, *et al.*	FTC Matter No. 232-3040	FTC Administrative Matter	07/14/2025	Deceptive / Misleading Conduct; Electronic Fund Transfer Act and Regulation E	Alleged the defendants sold telehealth weight-loss programs without adequately disclosing that its advertised monthly prices did not include the actual cost of the GLP-1 drug or other costs. Also alleged that the defendants suppressed negative reviews, generated false positive reviews, made unsubstantiated weight loss claims, published fake testimonials, failed to adequately disclose the terms of its membership program, including the 12 month commitment and early termination fee, failed to process consumers' cancellation and refund requests in a timely manner due to having insufficient staffing and capacity to handle those request, and failed to obtain informed consent to charge consumers.	Proposed Full Settlement
Federal Trade Commission v.	2:25-cv-2443	District of Arizona	07/14/2025	Deceptive / Misleading Conduct; TSR;	Alleged the defendants operated an alleged debt-relief scam that falsely claimed they could reduce consumers'	Litigation Ongoing

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
Accelerated Debt Settlement Inc., *et al.*				Impersonation Rule; Fair Credit Reporting Act; GLB Act	debt, and impersonated banks, credit card issuers and government agencies.	
Federal Trade Commission v. Assurance IQ, LLC	2:25-cv-01485	Western District of Washington	08/06/2025	Deceptive / Misleading Conduct; TSR	Alleged the defendant misled consumers in need of health insurance about the actual costs and benefits of the health plans it offered, including that they provided coverage for preexisting conditions, did not have caps on benefits, allowed access to medical provider networks that would lower consumers' costs significantly, and incorporated supplemental products. Also alleged the defendant charged consumers for products or services for which the consumers had not provided express informed consent.	Full Settlement
Federal Trade Commission v. MediaAlpha, Inc., *et al.*	2:25-cv-07263	Central District of California	08/06/2025	Deceptive / Misleading Conduct; TSR; Impersonation Rule	Alleged the defendants deceived consumers interested in health plans and other products into revealing personal information so it could be used for robocalls and sold to the highest bidder. Also alleged the defendants (1) used misleading domains that implied they were associated with the government, (2)	Full Settlement

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
					misrepresented that consumers would be able to buy low-cost, comprehensive health insurance that complied with the Affordable Care Act, (3) made false or misleading endorsements, and (4) initiated calls to numbers on the National Do Not Call Registry.	
Federal Trade Commission vs. Key Investment Group, *et al.*	1:25-cv-2716	District of Maryland	08/18/2025	Better Online Ticket Sales Act ("BOTS Act")	Alleged the defendants exceeded ticket purchasing limits for many popular events, including by using thousands of Ticketmaster accounts, including fictitious and third party accounts, utilizing thousands of credit card numbers, hiding their identity by using proxy or spoofed IP addresses, and using SIM boxes to facilitate the receipt of verification codes sent to the phone numbers associated with the thousands of fake and third-party accounts they used to purchase tickets.	Litigation Ongoing
Federal Trade Commission vs. Fitness International, LLC, *et al.*	8:25-cv-1841	Central District of California	08/20/2025	Deceptive / Misleading Conduct; ROSCA	Alleged the defendants' unreasonable cancellation practices make it difficult for consumers to cancel memberships and other recurring charges.	Litigation Ongoing

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
Federal Trade Commission v. Air Ai Technologies, Inc., *et al.*	2:25-cv-3068	District of Arizona	08/25/2025	Deceptive / Misleading Conduct; TSR; Business Opportunity Rule	Alleged the defendants deceptively marketed and sold business coaching materials and support, as well as licenses to resell their services, by making deceptive claims against business growth, earnings potential, and refund guarantees. Also alleged the defendants failed to provide consumers with required disclosure documents and earnings claims statements, and failed to provide refunds when consumers met the refund policy requirements.	Litigation Ongoing
United States of America v. Disney WorldWide Services, Inc., *et al.*	2:25-cv-8223	Central District of California	09/02/2025	Children's Online Privacy Protection Rule ("COPPA Rule")	Alleged that defendants failed to mark video as child-directed and, in some cases, allowed targeted advertising through collection of personal information from children without parental notice or consent.	Full Settlement
United States of America v. Apitor Technology Co., Ltd.	2:25-cv-7363	Northern District of California	09/02/2025	COPPA Rule	Alleged that, despite claims in its privacy policies that it complies with the COPPA Rule, the defendant failed to notify parents and obtain their consent before collecting, or causing a third party to collect, geolocation data from children.	Full Settlement

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
Federal Trade Commission and Utah Division of Consumer Protection vs. Aylo Group Ltd., *et al.*	2:25-cv-752	District of Utah	09/03/2025	Deceptive / Misleading Conduct; Privacy; Data Security	Alleged the defendants distributed child sexual abuse material (CSAM) and nonconsensual material (NCM) on their pornography-streaming website, despite claiming that their websites do not contain CSAM or NCM and this content is "strictly prohibited". Also alleged the defendants misrepresented that: they review and remove content from their websites that has been flagged as illegal; they would prevent flagged CSAM material from being re-uploaded to their websites; and that they review all videos before they go live and this review is effective at identifying CSAM and NCM. In addition, alleged that the defendants failed to disclose that they collect and retain consumers' sensitive personal information and misrepresented that the defendants take reasonable precautions to protect consumers' personal information.	Full Settlement
United States of America v. WhaleCo, Inc., d/b/a Temu	1:25-cv-12466	District of Massachusetts	09/05/2025	INFORM Consumers Act	Alleged the defendant failed to provide consumers with required information and tools to help them avoid and report stolen, counterfeit or unsafe goods while shopping online.	Full Settlement

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
Federal Trade Commission v. Chegg, Inc.	5:25-cv-7827	Northern District of California	09/15/2025	ROSCA	Alleged the defendant failed to provide subscribers with a simple mechanism to cancel recurring charges for online learning tools.	Full Settlement
Federal Trade Commission, *et al.* v. Live Nation Entertainment Inc., *et al.*	2:25-cv-8884	Central District of California	09/18/2025	Deceptive / Misleading Conduct; BOTS Act	Alleged the defendants deceptively represented that they imposed strict ticket limits for individual events and knowingly allowed and encouraged brokers to use multiple Ticketmaster accounts to circumvent Ticketmaster's own security measures and access control systems. Also alleged the defendants displayed deceptively low ticket prices to consumers.	Litigation Ongoing
Federal Trade Commission, *et al.* v. Kars-R-Us.com, Inc., *et al.*	2:25-cv-9150	Central District of California	9/25/2025	Deceptive / Misleading Conduct	Alleged the defendants deceptively solicited charitable donations by representing that their vehicle donations allowed United Breast Charity foundation, Inc. to "save lives" by providing free and low-cost breast screening. In reality, only a tiny fraction of donated money went to provide free or low-cost breast cancer screening.	Full Settlement
United States of America v. Iconic Hearts	2:25-cv-9310	Central District of California	09/29/2025	Deceptive / Misleading Conduct;	Alleged the defendants, developers of a social media messaging app designed for children and young teenagers, unfairly and deceptively tricked users	Litigation Ongoing

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
Holdings, Inc., *et al.*				COPPA Rule; ROSCA	into purchasing paid subscriptions, by sending fake messages to users that were often provocative and sexual in nature and then encouraging users to buy membership to reveal who sent the message. Also alleged the defendants knowingly and unlawfully collected personal information from numerous children under the age of 13, without informing parents or obtaining their consent, and failed to clearly disclose the terms of their subscription plans.	
United States of America v. Dun & Bradstreet, Inc.	2:25-cv-1158	Middle District of Florida	9/29/25	Deceptive / Misleading Conduct; Contempt	Alleged the defendant violated the terms of 2022 FTC administrative order by sending inaccurate auto-renewal notices and then overcharging customers by renewing their subscriptions at higher than list prices. Also alleged the defendant failed to ensure that its employees did not misrepresent to potential consumers that purchasing fee-based products would help improve their credit score and failed to retain required voice recordings for oral offers of products that defendant automatically renews.	Full Settlement

Case Name	Case Number	Court Name	Date of Complaint	Case Type	Description	Outcome
United States of America v. Citizens Disability, LLC, *et al.*	1:25-cv-12826	District of Massachusetts	9/30/25	Deceptive / Misleading Conduct; TSR	Alleged the defendants initiated or caused others to initiate millions of unlawful robocalls and millions of unlawful calls to numbers on the National Do Not Call Registry. Also alleged the defendants misrepresented that they were calling consumers in response to the consumer's inquiry into his or her eligibility for Social Security Disability (SSDI) benefits.	Full Settlement

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