UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: **Lina M. Khan, Chair**
Noah Joshua Phillips
Rebecca Kelly Slaughter
Christine S. Wilson
Alvaro M. Bedoya

In the Matter of **HOMEADVISOR, INC., a corporation,** **d/b/a ANGI LEADS,** **d/b/a HOMEADVISOR POWERED BY ANGI.**	**DOCKET NO. 9407**

COMPLAINT COUNSEL'S MATERIALS FOR ORAL ARGUMENT ON COMPLAINT COUNSEL'S MOTION FOR SUMMARY DECISION

Pursuant to the Commission's July 7, 2022 Order Rescheduling Oral Argument, Complaint Counsel respectfully submits the attached electronic compilation of materials that they intend to use to facilitate their presentation during the July 21, 2022 oral argument before the Commission on Complaint Counsel's Motion for Summary Decision.

Respectfully submitted,

Dated: July 18, 2022

s/ Sophia H. Calderón

Sophia H. Calderón
Colin D. A. MacDonald
Breena M. Roos
M. Elizabeth Howe

Federal Trade Commission
Northwest Region
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Counsel Supporting the Complaint

In the Matter of HomeAdvisor, Inc., FTC Docket No. 9407

Complaint Counsel's Motion for Summary Decision

Sophia H. Calderón
Counsel Supporting the Complaint

July 21, 2022

HomeAdvisor's Lead Business

Homeowners

HomeAdvisor

HomeAdvisor

Angi Leads

HomeAdvisor POWERED BY Angi

Service Professionals



Lead Generators

JENSON brothers

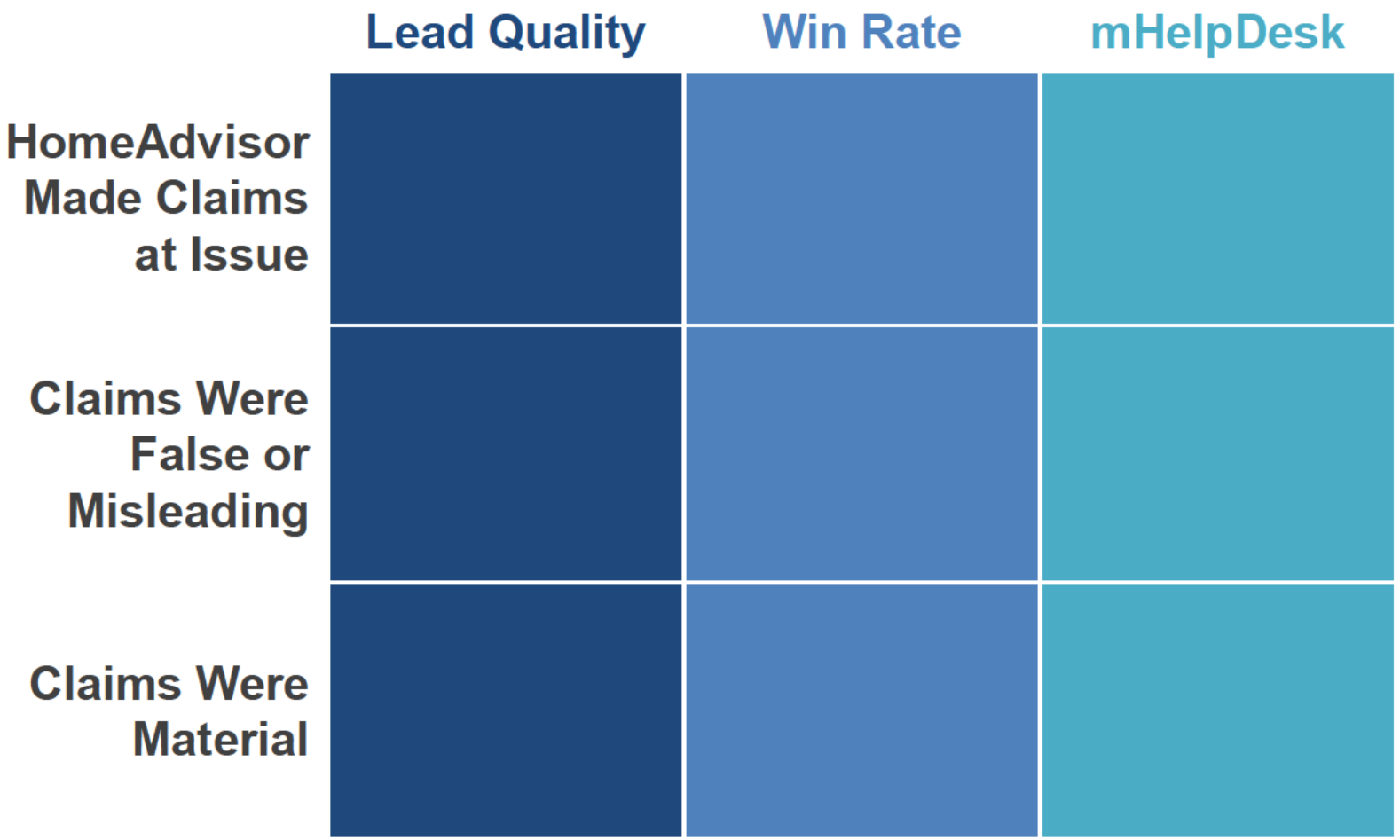
PARTNER CONTRACTOR REFERRALS

POWELL & SONS

Types of Deceptive Claims

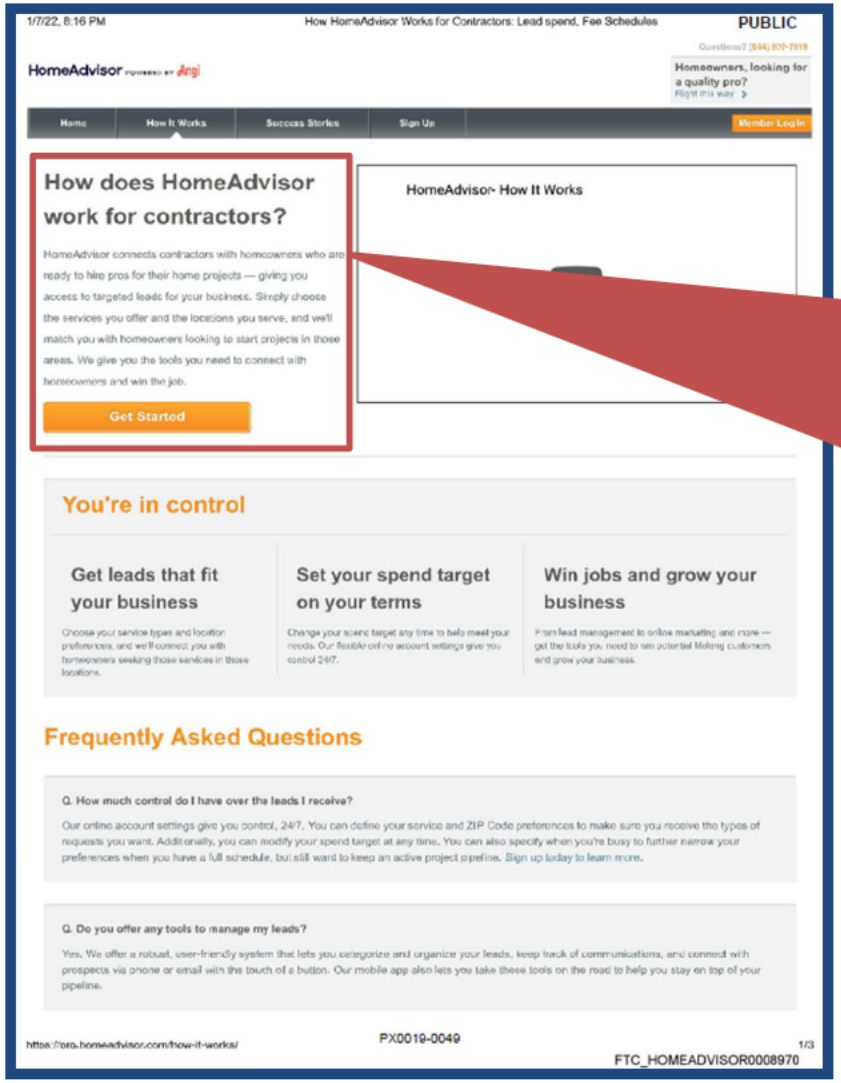
Count I: Lead Quality	Count II	Count III
Readiness to Hire	Win Rate	mHelpDesk
Task & Location Match		
Lead Source		

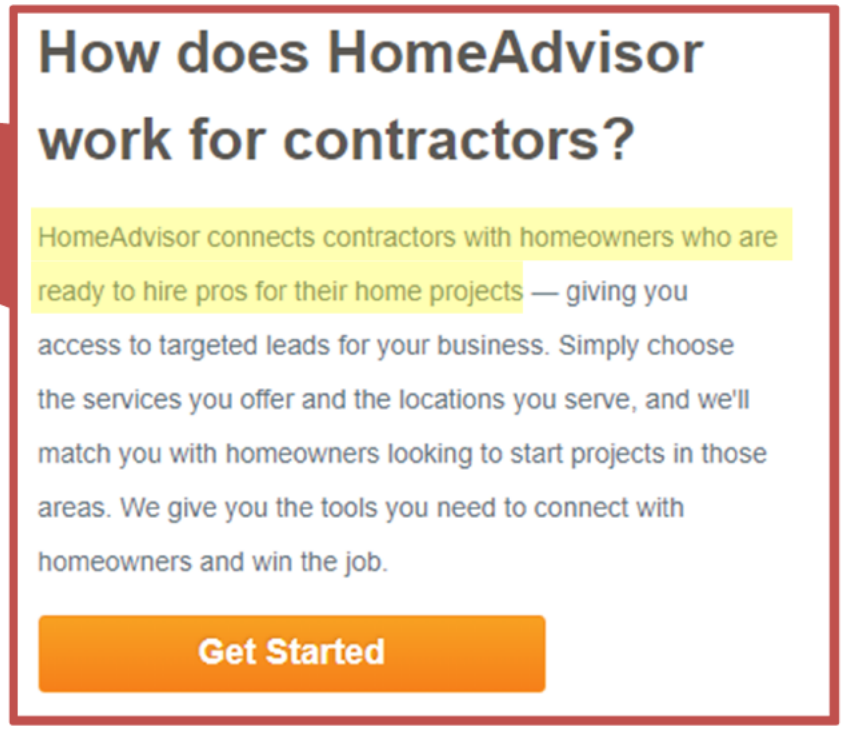
Claims and Elements



HA Made Lead Quality Claims: *Readiness to Hire*

	Lead Quality	Win Rate	mHelp Desk
Claims Made	✓		
False/ Misleading			
Material			

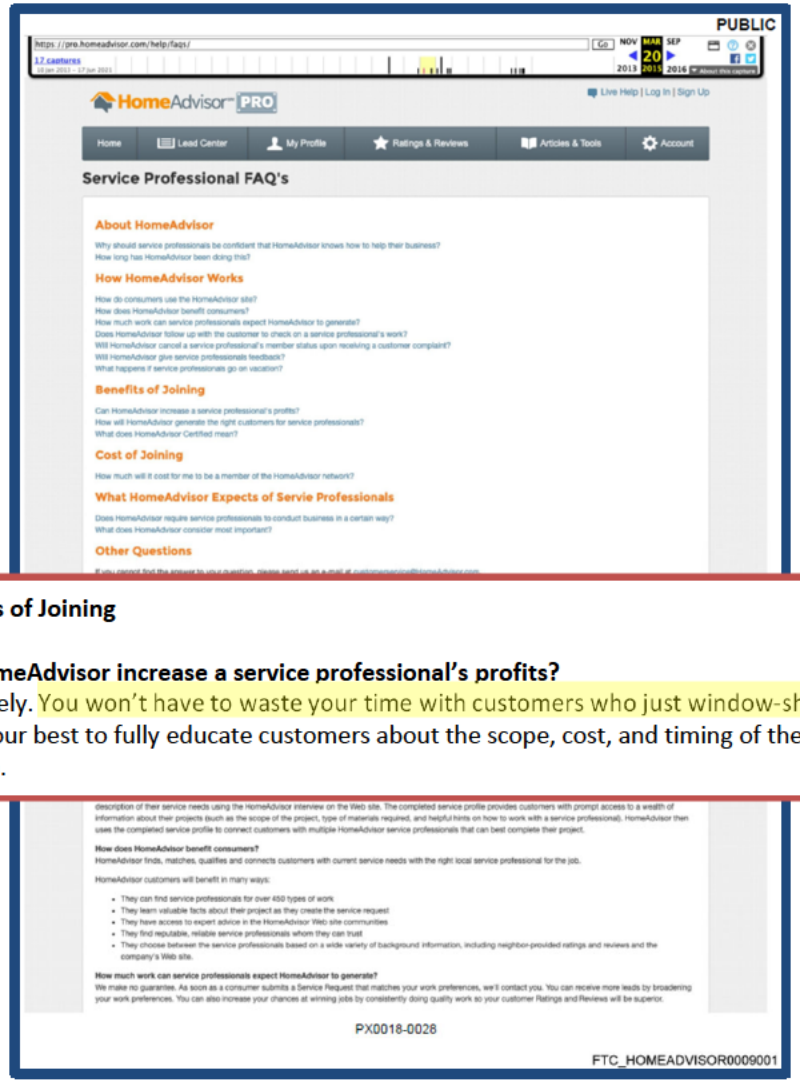




HA Made Lead Quality Claims: *Readiness to Hire*

	Lead Quality	Win Rate	mHelp Desk
Claims Made	✓		
False/ Misleading			
Material			

PUBLIC



HomeAdvisor PRO

Service Professional FAQ's

About HomeAdvisor

How HomeAdvisor Works

Benefits of Joining

Cost of Joining

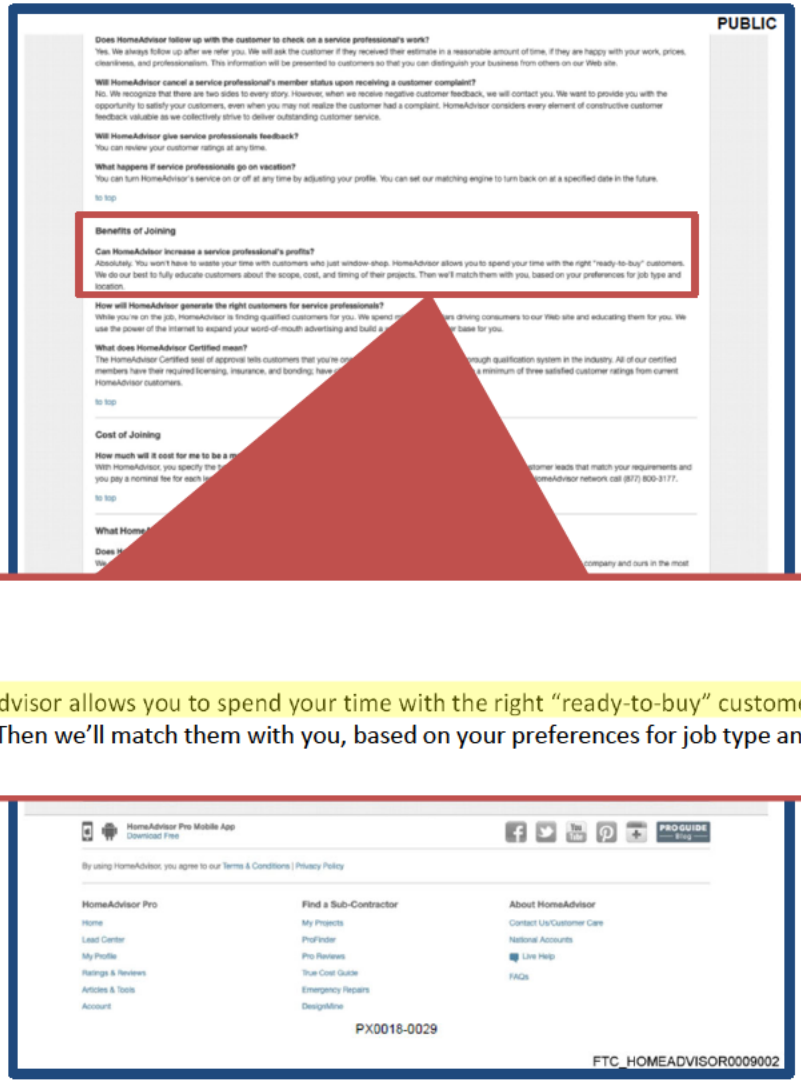
What HomeAdvisor Expects of Servie Professionals

Other Questions

PX0018-0028

FTC_HOMEADVISOR0009001

PUBLIC



Benefits of Joining

Can HomeAdvisor increase a service professional's profits?

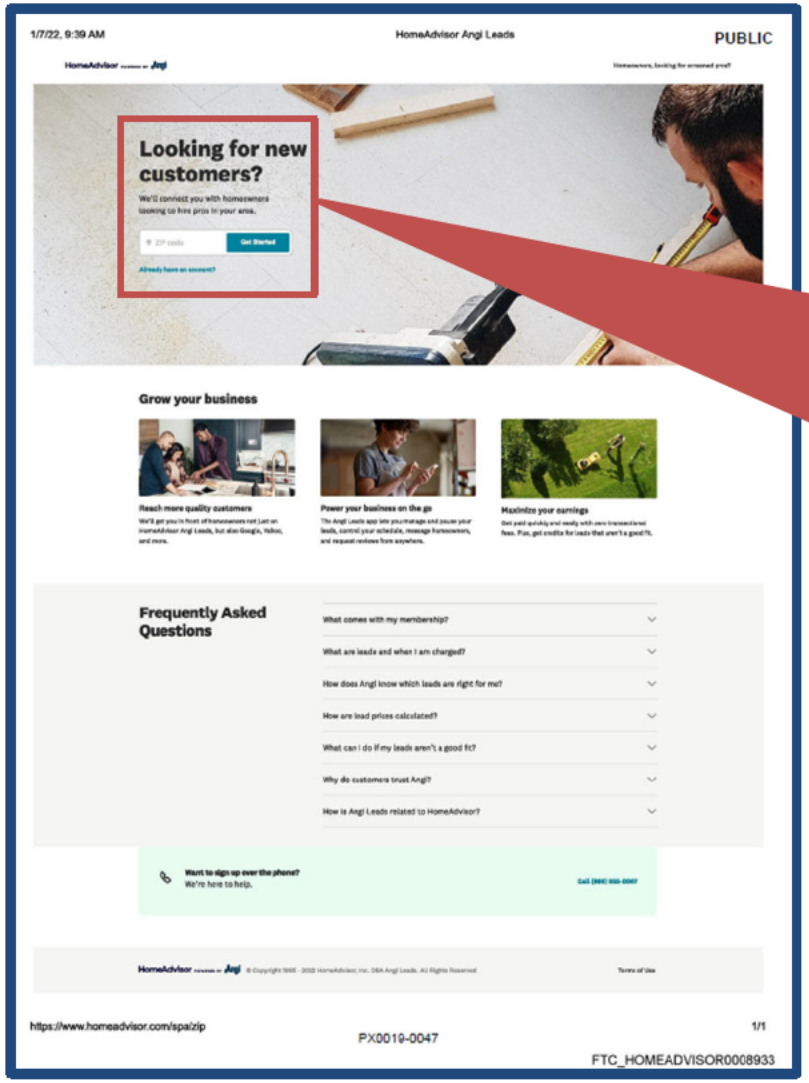
Absolutely. You won't have to waste your time with customers who just window-shop. HomeAdvisor allows you to spend your time with the right "ready-to-buy" customers. We do our best to fully educate customers about the scope, cost, and timing of their projects. Then we'll match them with you, based on your preferences for job type and location.

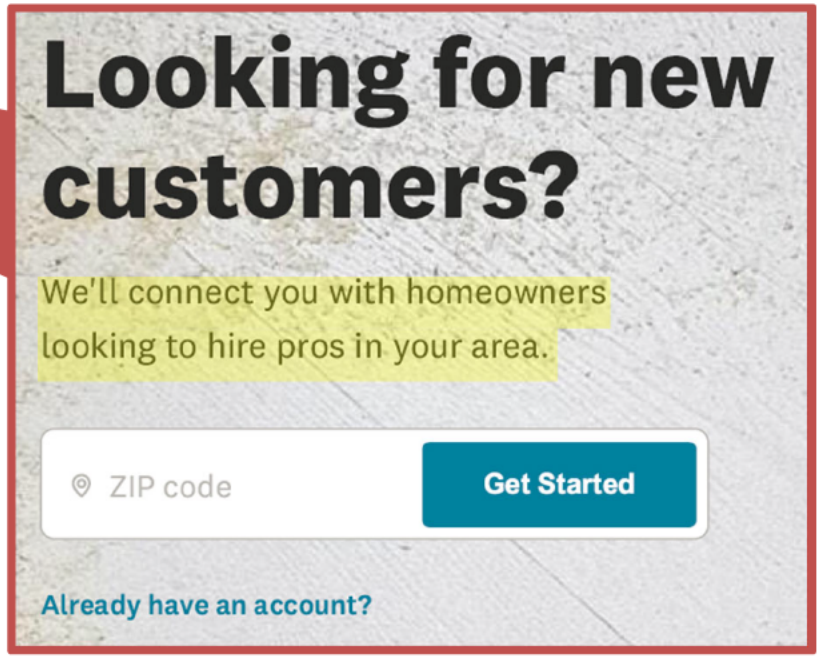
PX0018-0029

FTC_HOMEADVISOR0009002

HA Made Lead Quality Claims: *Readiness to Hire*

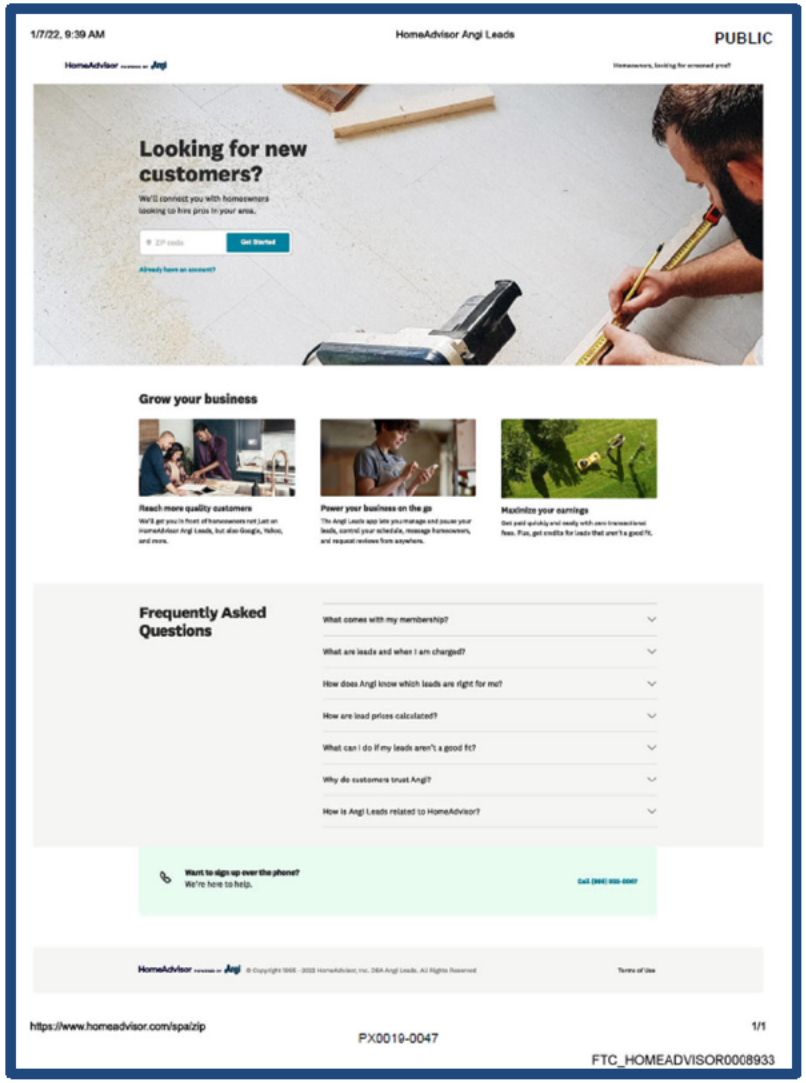
	Lead Quality	Win Rate	mHelp Desk
Claims Made	✓		
False/ Misleading			
Material			





HA Made Lead Quality Claims: *Readiness to Hire*

	Lead Quality	Win Rate	mHelp Desk
Claims Made	✓		
False/ Misleading			
Material			

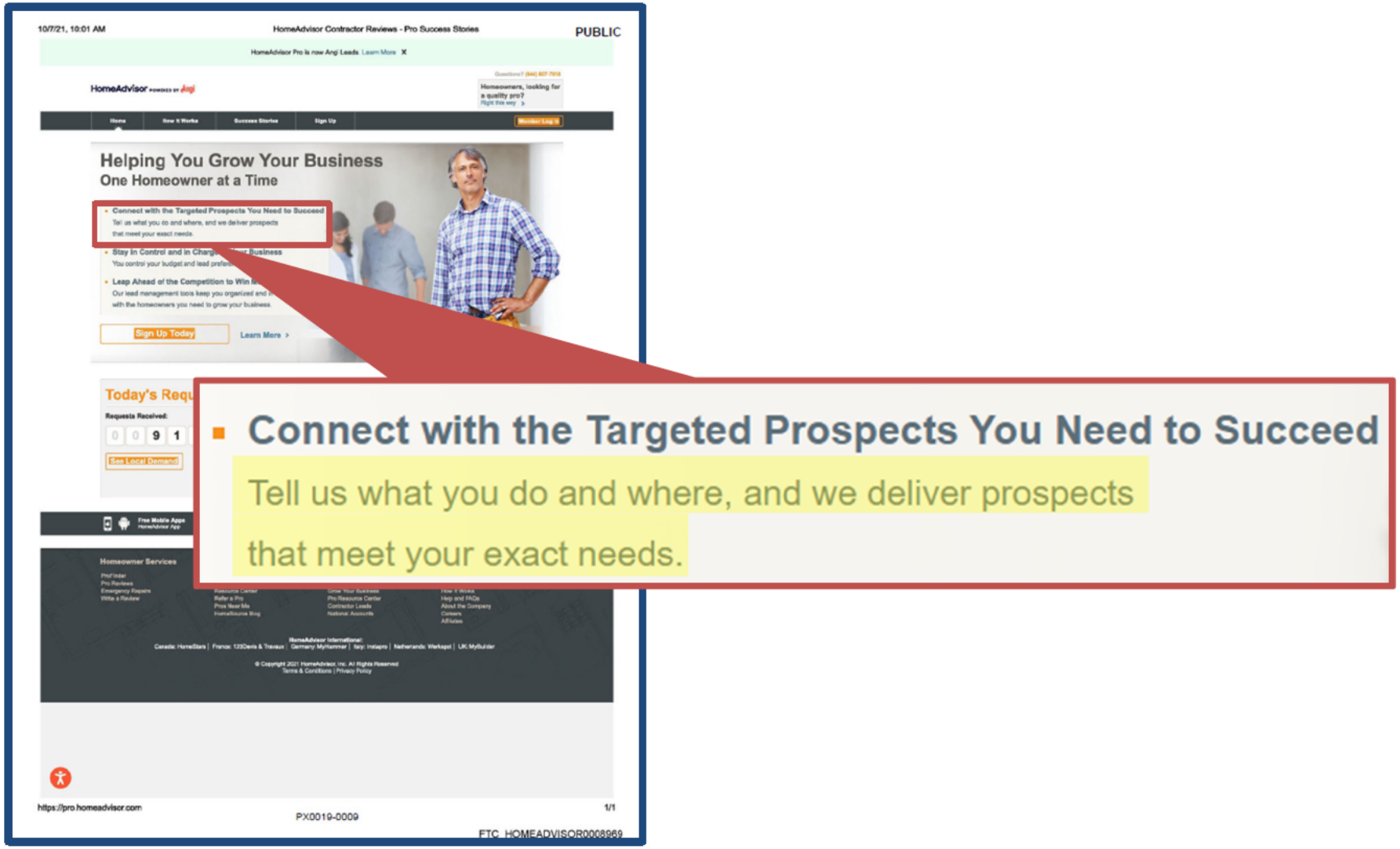


Confidential Materials

- Email Marketing
  - PX0041-0007
  - PX0099-0004
- Magazine Marketing
  - PX0101-0001 to -0002
- Radio Spots
  - PX0112-0001 to -0002

HA Made Lead Quality Claims: *Task and Location Match*

	Lead Quality	Win Rate	mHelp Desk
Claims Made	✓		
False/ Misleading			
Material			

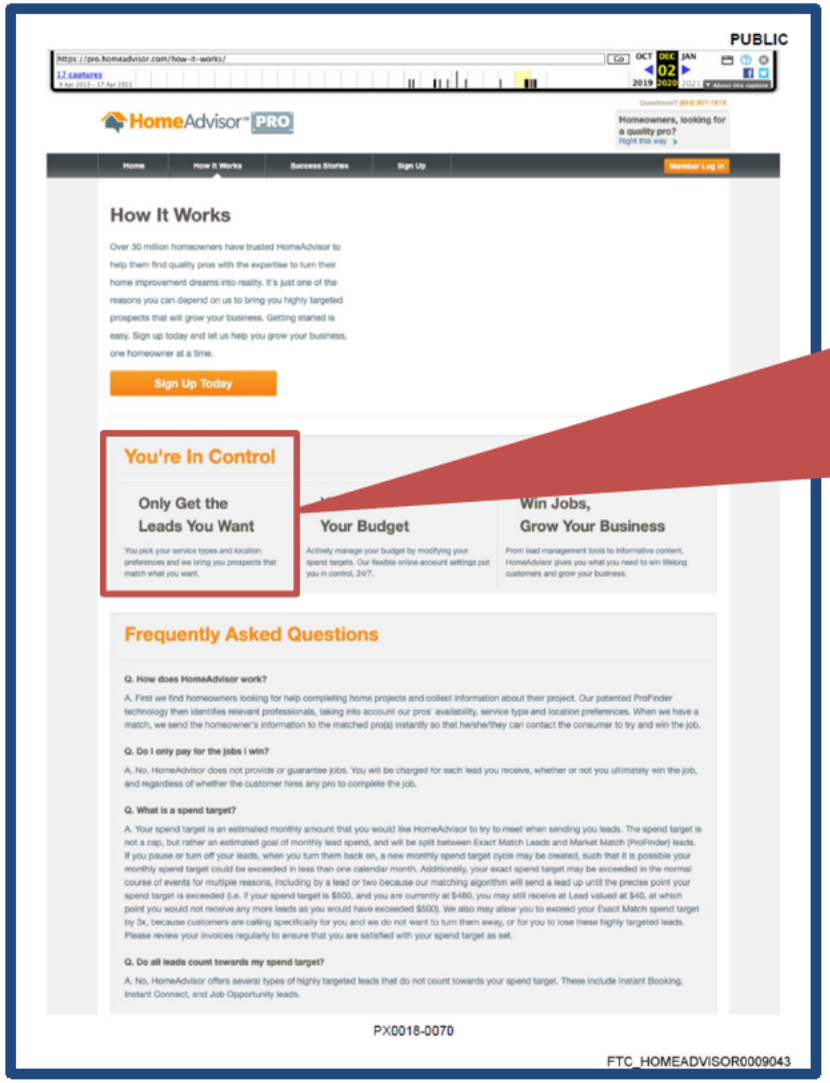


Connect with the Targeted Prospects You Need to Succeed

Tell us what you do and where, and we deliver prospects that meet your exact needs.

HA Made Lead Quality Claims:
Task and Location Match

	Lead Quality	Win Rate	mHelp Desk
Claims Made	✓		
False/ Misleading			
Material			



You're In Control

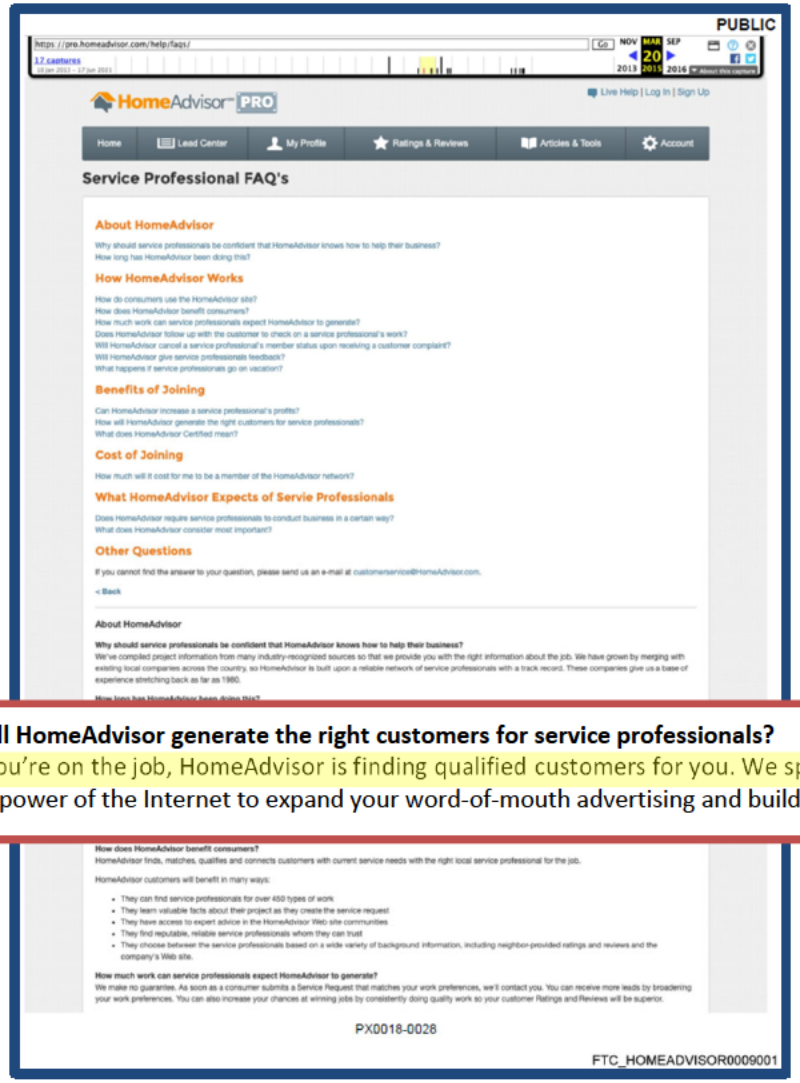
Only Get the Leads You Want

You pick your service types and location preferences and we bring you prospects that match what you want.

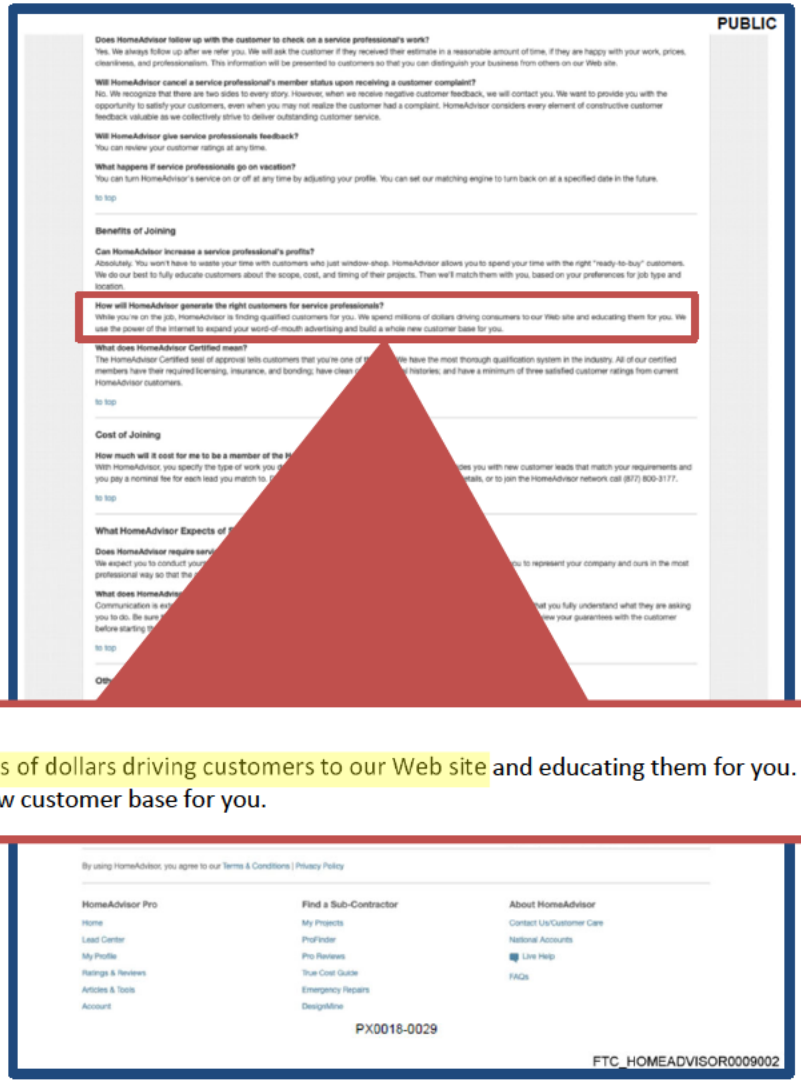
HA Made Lead Quality Claims: *Lead Source*

	Lead Quality	Win Rate	mHelp Desk
Claims Made	✓		
False/ Misleading			
Material			

PUBLIC



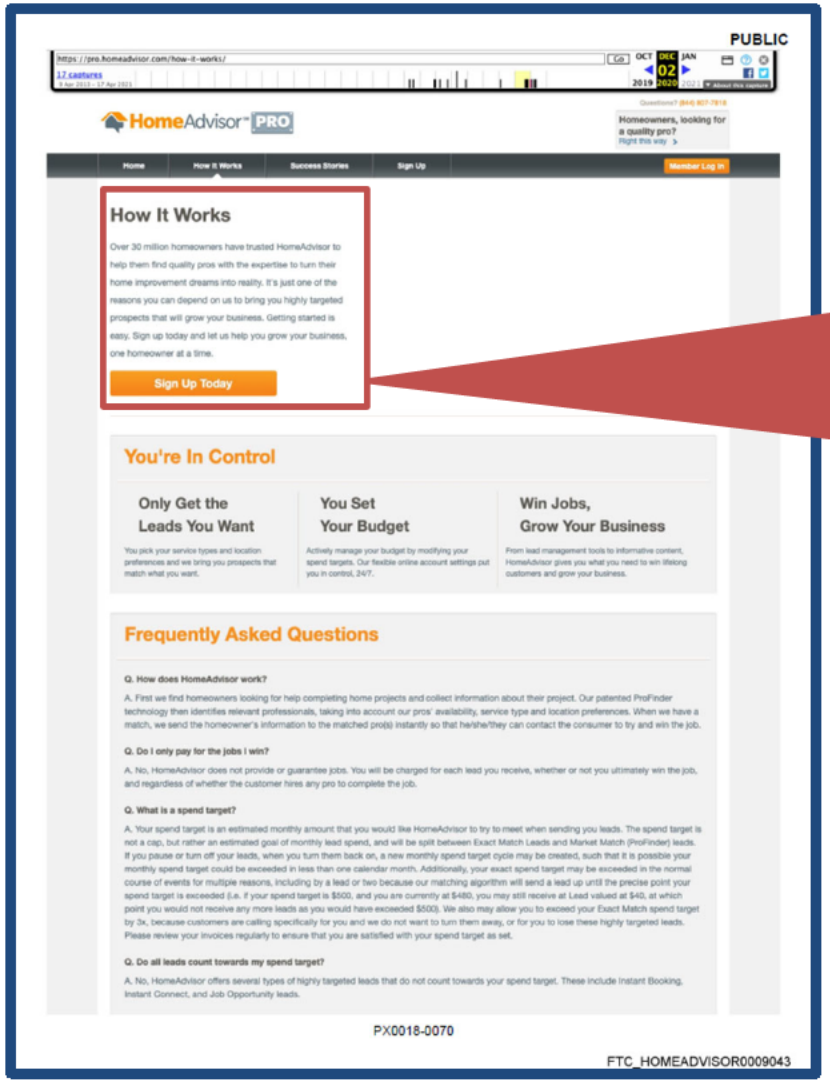
PUBLIC



How will HomeAdvisor generate the right customers for service professionals?
While you're on the job, HomeAdvisor is finding qualified customers for you. We spend millions of dollars driving customers to our Web site and educating them for you. We use the power of the Internet to expand your word-of-mouth advertising and build a whole new customer base for you.

HA Made Lead Quality Claims: *Lead Source*

	Lead Quality	Win Rate	mHelp Desk
Claims Made	✓		
False/ Misleading			
Material			



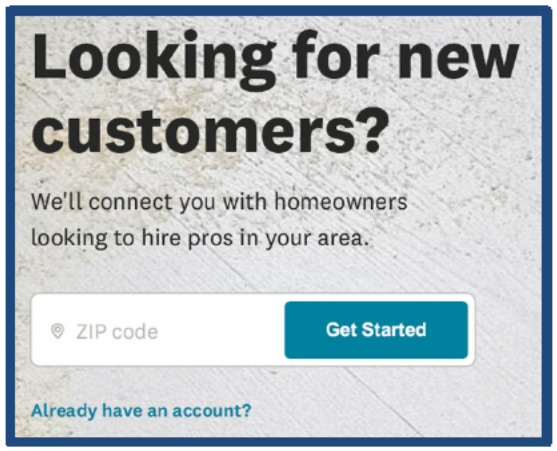
How It Works

Over 30 million homeowners have trusted HomeAdvisor to help them find quality pros with the expertise to turn their home improvement dreams into reality. It's just one of the reasons you can depend on us to bring you highly targeted prospects that will grow your business. Getting started is easy. Sign up today and let us help you grow your business, one homeowner at a time.

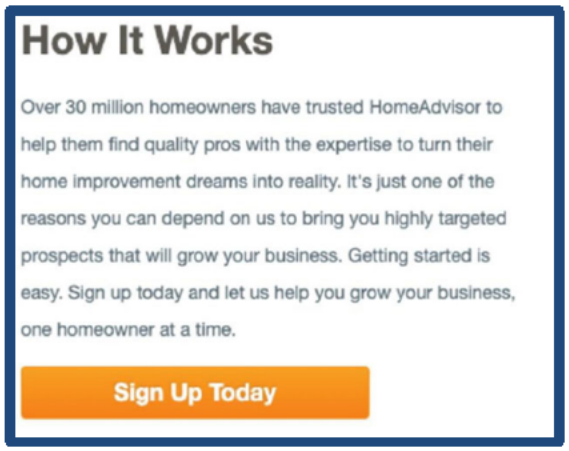
Sign Up Today

HA Made All Claims:
Sales Calls

	Lead Quality	Win Rate	mHelp Desk
Claims Made	✓	✓	✓
False/ Misleading			
Material			













HA Made Lead Quality Claims: *Confidential Materials*

	Lead Quality	Win Rate	mHelp Desk
Claims Made	✓		
False/ Misleading			
Material			

Readiness to Hire

- Sales Calls
- Approved Claims for Sales
  - PX0050-0003

Task & Location Match

- Sales Calls
- Sales Scripts
  - PX0051-0001, -0002
  - PX0052-0002
  - PX0132-0002
  - PX0111-0005
- Training Materials
  - PX0072-0007

Lead Source

- Sales Calls
- Sales Scripts
  - PX0051-0001
  - PX0052-0001
  - PX0111-0006, -0012
  - PX0132-0001







HA Made Win Rate Claims: *Confidential Materials*

	Lead Quality	Win Rate	mHelp Desk
Claims Made	✓	✓	
False/ Misleading			
Material			

Win Rate

- Sales Calls
- Training Materials
  - PX0042-0021
- QA Guidance
  - PX0045-0002
  - PX0049-0002
  - SMF ¶¶ 104, 105





HA Made mHelpDesk Claims: *Confidential Materials*

	Lead Quality	Win Rate	mHelp Desk
Claims Made	✓	✓	✓
False/ Misleading			
Material			

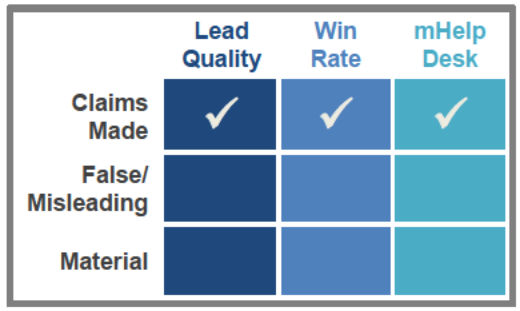
mHelpDesk Claims

- Sales Calls
- Sales Scripts
  - PX0051-0003
  - PX0052-0003
  - PX0132-0003





HA Made All Claims



Readiness to Hire

- Sales Calls
- Advertising
- Approved Claims for Sales

Task & Location Match

- Sales Calls
- Advertising
- Sales Scripts
- Training Materials

Source

- Sales Calls
- Advertising
- Sales Scripts

Win Rate

- Sales Calls
- Internal Sales Agent Guidance
- QA Guidance

mHelpDesk

- Sales Calls
- Sales Scripts

Homeowners Are Not Ready to Hire

	Lead Quality	Win Rate	mHelp Desk
Claims Made	✓	✓	✓
False/ Misleading	✓		
Material			

How does HomeAdvisor work for contractors?

HomeAdvisor connects contractors with homeowners who are ready to hire pros for their home projects — giving you access to targeted leads for your business. Simply choose the services you offer and the locations you serve, and we'll match you with homeowners looking to start projects in those areas. We give you the tools you need to connect with homeowners and win the job.

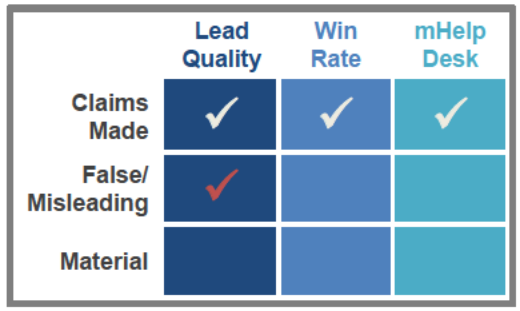
Get Started

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Confidential Materials

- Lead Screening
  - CID Responses, PX0036-0008 to -0009
  - PX0054-0070
  - RX0001 at 28
- Credit Request Data
  - PX0037
- Survey Responses
  - PX0108-0002
  - PX0110-0003
- Internal Correspondence
  - SMF ¶ 67

Projects Do Not Match Task and Location Preferences



You're In Control

Only Get the Leads You Want

You pick your service types and location preferences and we bring you prospects that match what you want.

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Confidential Materials

- Credit Request Data
  - PX0037
  - HomeAdvisor Opposition at 24-25
- Survey Responses
  - PX0109-0002
  - PX0110-0003

Homeowners Do Not Seek Out HomeAdvisor

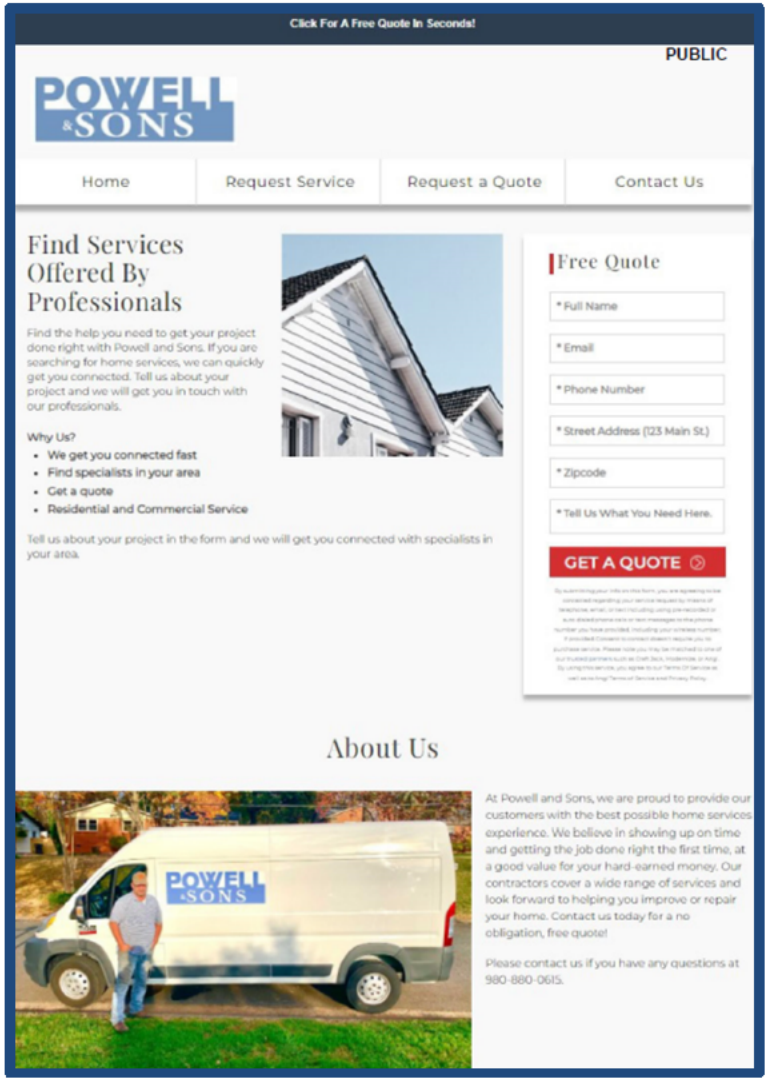
	Lead Quality	Win Rate	mHelp Desk
Claims Made	✓	✓	✓
False/ Misleading	✓		
Material			

How It Works

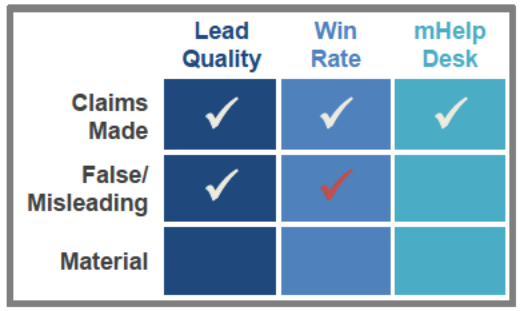
Over 30 million homeowners have trusted HomeAdvisor to help them find quality pros with the expertise to turn their home improvement dreams into reality. It's just one of the reasons you can depend on us to bring you highly targeted prospects that will grow your business. Getting started is easy. Sign up today and let us help you grow your business, one homeowner at a time.

Sign Up Today

≠



Win Rate Claims Were Unsubstantiated and False



Confidential Materials

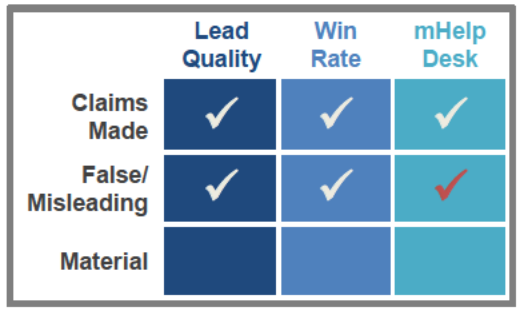
- Sales Calls
- Training Materials
  - PX0042-0021
- QA Guidance
  - PX0045-0002
  - PX0049-0002
  - SMF ¶¶ 104, 105

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Confidential Materials

- HomeAdvisor's Win Rate Data
  - PX0054-0004, -0006
  - PX0055-0048 to -0049
- HomeAdvisor's CID Responses
  - PX0034-0023
- HomeAdvisor's Opposition at 27

First Month of mHelpDesk Was Not Free



Confidential Materials

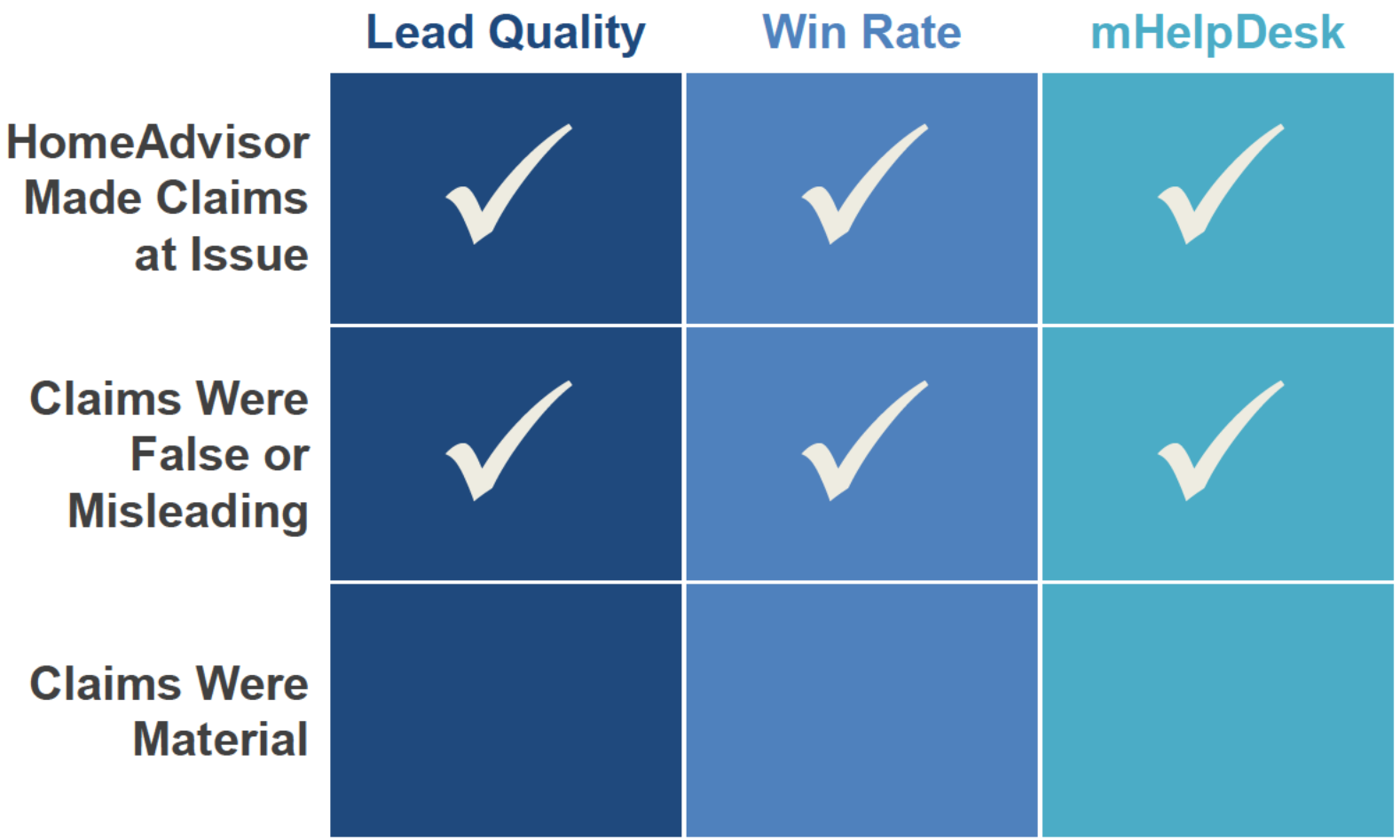
• Sales Calls
• Sales Scripts
  • PX0051-0003
  • PX0052-0003
  • PX0132-0003

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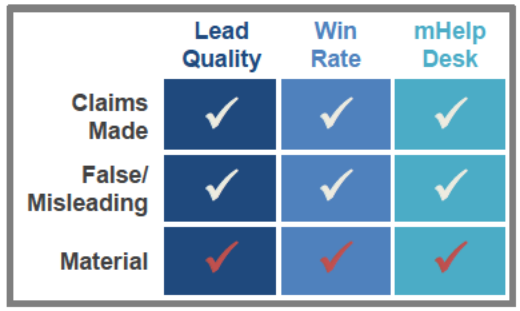
Confidential Materials

• CID Response
  • PX0044-0005 to -0006
• Internal Documents
  • PX0126-0003
  • PX0127-0002
  • PX0128-0002
  • PX0130-0009

Claims and Elements



HA's Claims Are Presumptively Material



Readiness to Hire

- Express Claims
- Related to Purpose
- Related to Central Characteristics

Task & Location Match

- Express Claims
- Related to Purpose
- Related to Central Characteristics

Lead Source

- Express Claims
- Related to Purpose
- Related to Central Characteristics

Win Rate

- Express Claims
- Related to Efficacy

mHelpDesk

- Express Claims
- Related to Price

Undisputed Evidence of Materiality

	Lead Quality	Win Rate	mHelp Desk
Claims Made	✓	✓	✓
False/ Misleading	✓	✓	✓
Material	✓	✓	✓

"Home Advisor charges us (contractors) for leads from clients that submit requests through their websites. However, I recently purchased a lead through their platform and the client specifically told me that they had not submitted any requests through home advisor. Instead, the potential client had submitted a posts [sic] through craigslist and had not gone into homeadvisor at all."

"[P]art of your pitch to me was also that you had such high conversion success at 60-70% . . . ."



"I was assured that there would be NO leads outside of the zip codes I wanted . . . ."

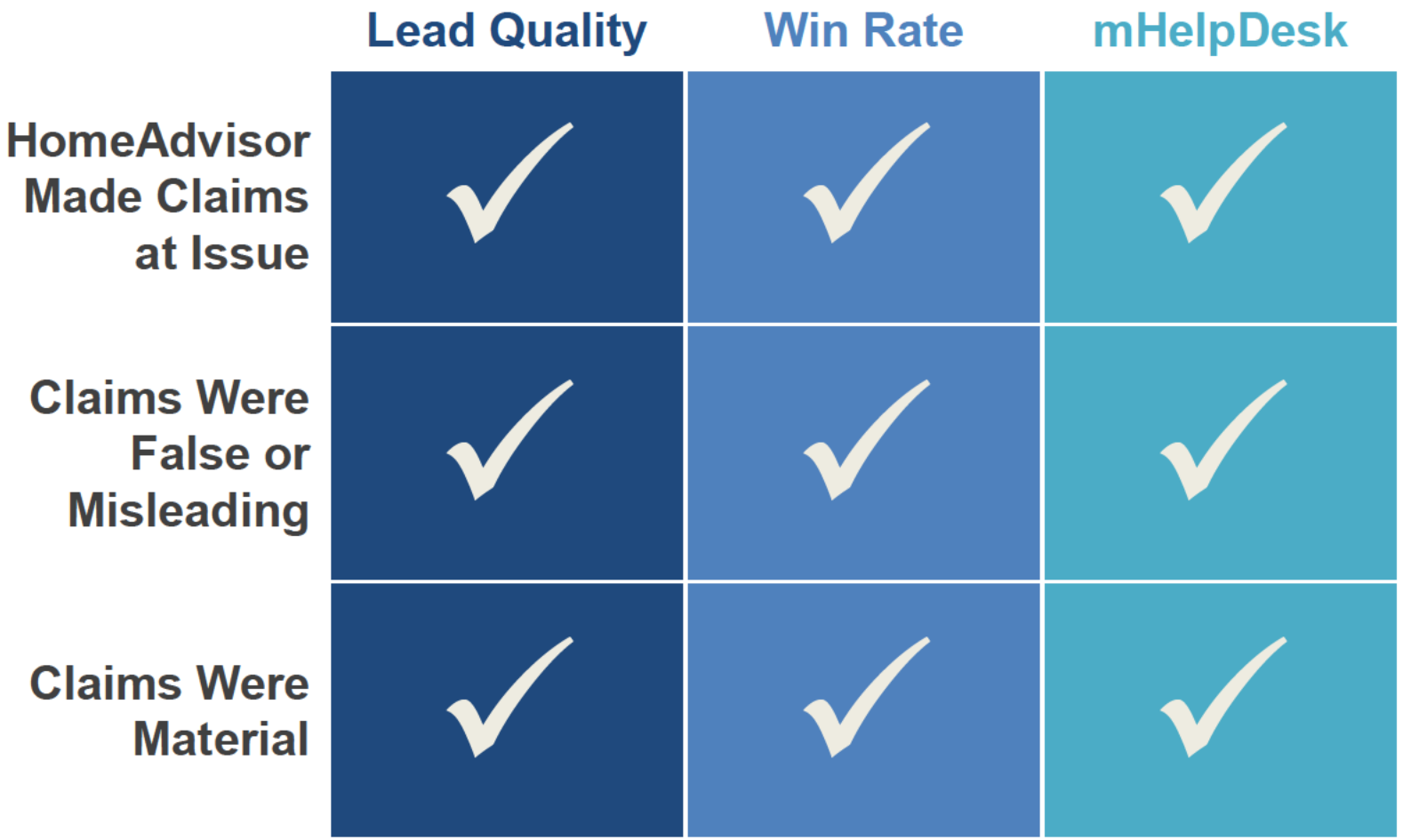
"I was charged for attempts by the public to receive a quote for services, but the representative of Home Advisor stated to me that these were leads 'ready to hire' me for my services."

Confidential Materials

- Survey Responses
  - PX0088-0036
  - PX0110-0002, -0003
- Internal Documents
  - PX00134-0014
  - PX00135-0014
- MHelpDesk Usage Data
  - PX0053

Source: PX0019-0081, -0110, -0145, -0149

Claims and Elements



CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2022, I filed the foregoing document electronically using the FTC's E-Filing system, which will send notification of such filing to:

April Tabor
Office of the Secretary
Federal Trade Commission
Constitution Center
400 Seventh Street, SW, Suite 5610
Washington, D.C. 20024
ElectronicFilings@ftc.gov

The Honorable D. Michael Chappell
Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-110
Washington, DC 20580

I further certify that on July 18, 2022, I caused the foregoing document to be served via email to:

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Dawn Y. Yamane Hewett
Kyra R. Simon
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Counsel for Respondent HomeAdvisor, Inc.

Dated: July 18, 2022 By: *s/ Sophia H. Calderón*
Sophia H. Calderón

Counsel Supporting the Complaint