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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

JUSTANSWER LLC, an Idaho limited
liability company; and

ANDREW “ANDY” KURTZIG, individually
and as an officer of JUSTANSWER LLC,

Defendants.

Case No. 3:26-cv-00333-JD

**COMPLAINT FOR PERMANENT
INJUNCTION, MONETARY
JUDGMENT, CIVIL PENALTY
JUDGMENT, AND OTHER RELIEF**

Plaintiff, the Federal Trade Commission (“FTC” or “Commission”), for its Complaint
alleges:

1. The FTC brings this action for Defendants’ violations of Section 5(a) of the
Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 45(a), and the Restore Online
Shoppers’ Confidence Act (“ROSCA”), 15 U.S.C. §§ 8401 *et seq.* For these violations, the FTC
seeks relief, including a permanent injunction, monetary relief, civil penalties, and other relief,
pursuant to Sections 5(m)(1)(A), 13(b), and 19 of the FTC Act, 15 U.S.C. §§ 45(m)(1)(A), 53(b),
and 57b, and Section 5 of ROSCA, 15 U.S.C. § 8404.

SUMMARY OF THE CASE

2. Defendant JustAnswer LLC (“JustAnswer”) operates an online question-and-answer service that connects consumers with experts in a wide variety of subjects whose credentials have been verified by JustAnswer (“Experts”). Defendant Andrew “Andy” Kurtzig (“Kurtzig”) is CEO of JustAnswer. He has been directly involved in the JustAnswer business practices described below.

3. Defendants deceive consumers into enrolling in a monthly recurring subscription by claiming that consumers can “join” JustAnswer and get access to Experts for a nominal fee (either \$1 or \$5, depending on the advertisement). In reality, consumers cannot join JustAnswer for \$1 or \$5. After consumers enter their credit card information to pay the nominal “join” fee, Defendants simultaneously charge them a subscription fee that has ranged between \$28 and \$125. Defendants then continue to charge the subscription fee every month until the consumer cancels their subscription.

4. While Defendants provide limited information about the required monthly subscription on their website, Defendants do not present it clearly and conspicuously. As a result, hundreds of thousands of consumers have provided their credit card information to Defendants without affirmatively consenting to enroll in an ongoing monthly subscription and pay the monthly fee.

5. In fact, between February 2020 and July 2024, Defendants received more than 679,000 complaints directly from consumers who said they were unaware that they had signed up for a recurring membership. In other words, for more than four years, an average of 12,500 consumers *every month* reported directly to Defendants that they did not know Defendants had enrolled them in a recurring subscription.

6. Defendants’ employees have repeatedly expressed concerns within the company that the company’s purchase flow is misleading consumers. For example, a customer service supervisor wrote to a subordinate, when discussing how to respond to complaining consumers, “because the majority of our complaints are related to membership charge confusion [we know] that our current sign up flow is misleading.”

DEFENDANTS**A. Corporate Defendant**

12. Defendant JustAnswer LLC is an Idaho limited liability company. At all times material to this Complaint until at least July 2023, JustAnswer's headquarters and principal place of business was located at 38 Keyes Avenue, Suite 150, San Francisco, California. JustAnswer now operates virtually in the United States but lists its principal place of business as 440 North Barranca Avenue, #7508, Covina, California.

13. At all times relevant to this Complaint, acting alone or in concert with others, JustAnswer has advertised, marketed, distributed, or sold its online question-and-answer service to consumers in this District and throughout the United States.

B. Individual Defendant

14. Defendant Andrew Kurtzig is the founder and Chief Executive Officer of Defendant JustAnswer. Kurtzig resides in this District and, in connection with the matters alleged herein, transacts or has transacted business in this District and throughout the United States.

15. At all times relevant to this Complaint, acting alone or in concert with others, Kurtzig has formulated, directed, controlled, had authority to control, or participated in the acts and practices of JustAnswer, including the acts and practices described in this Complaint.

16. Kurtzig has directly participated in the unlawful acts and practices set forth in this Complaint including, among other things: (a) reviewing, approving, or declining proposed changes to the content of the JustAnswer website, including all text related to the descriptions and cost of the service; (b) requesting and reviewing website tests relating to cost representations and fee disclosures; and (c) reviewing employee feedback and reports on consumer complaints.

17. Kurtzig knows, and has known at all times relevant to this Complaint, that JustAnswer's fee representations are misleading and that consumers have been harmed as a result. Among other things: (a) Kurtzig reviewed multiple presentations and communications from JustAnswer employees noting that "price transparency" was a major concern and that a significant number of consumers complained that they did not know that the company would

charge them a monthly subscription fee; (b) Kurtzig ordered website tests of JustAnswer’s purchase flow, which revealed that consumers did not understand that JustAnswer would enroll them in a recurring subscription plan or that the company would charge them a monthly subscription fee at sign-up, in addition to the \$1 or \$5 join fee consumers were told to pay to receive an answer to their question; (c) in July 2022, Kurtzig personally requested that employees review JustAnswer’s purchase flow from a consumer’s perspective, to which a customer service supervisor responded that the “join for only \$1” claim was misleading; (d) Kurtzig personally received emails from consumers stating that JustAnswer had tricked them into signing up for a membership after believing they would only pay a one-time fee of \$1 or \$5; and (e) Kurtzig received and reviewed internal memoranda, emails, and oral communications describing consumers’ payment confusion.

COMMERCE

18. At all times relevant to this Complaint, Defendants have maintained a substantial course of trade in or affecting commerce, as “commerce” is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

DEFENDANTS’ BUSINESS ACTIVITIES

A. JustAnswer Surreptitiously Enrolls Consumers in a Paid Monthly Subscription to Use Its Question-and-Answer Service

19. Defendant JustAnswer operates an online platform that offers consumers the opportunity to ask questions and receive answers from Experts in various subject areas through online chats or phone calls. The allegations below describe the company’s business practices from at least January 1, 2022.

20. Throughout the relevant time period, the vast majority of consumers have joined the JustAnswer question-and-answer service via a three-step search ad purchase flow. First, they click on a JustAnswer search engine ad related to the topic of their question. Second, they are taken to a landing page specific to their search topic on JustAnswer.com or one of hundreds of additional domains owned by JustAnswer (e.g., AskAVeterinarianOnline.com,

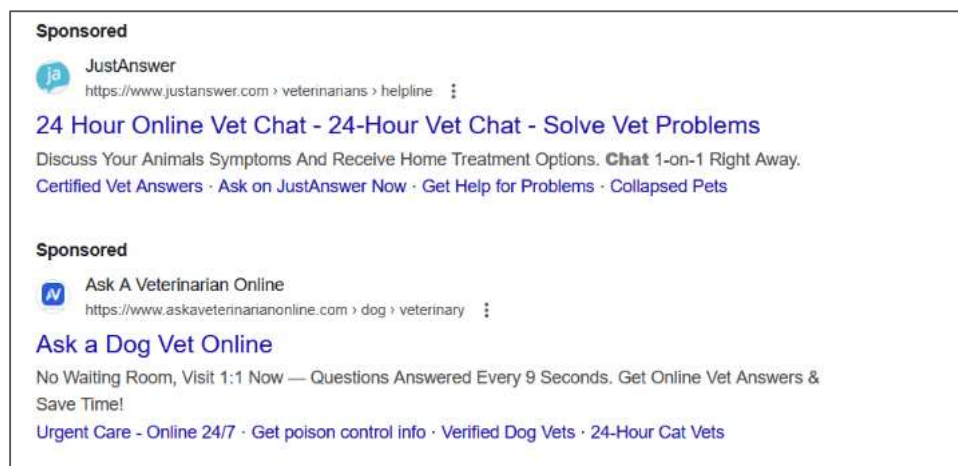
1 AskWomensHealth.com, AskALawyerOnCall.com, and Pearl.com). Third, they are taken to the
2 JustAnswer payment form where they enter their payment information.

3 21. Consumers also may sign up directly on the JustAnswer.com homepage, rather
4 than a JustAnswer.com landing page, or in the JustAnswer mobile app, but those consumers are
5 an exceedingly small minority. Indeed, as of spring 2023, 99% of JustAnswer's customers
6 signed up after clicking on a search ad and being taken to a JustAnswer.com landing page. The
7 small number of consumers who begin at the JustAnswer.com homepage or mobile app are
8 routed to a different purchase flow than those who click on a search ad.

9 22. Through its search ad purchase flow, JustAnswer misleads consumers about the
10 cost to join JustAnswer's question-and-answer service and omits material information about the
11 recurring subscription. The following subsections address each step of the search ad purchase
12 flow in turn. Complaint Attachments A through J are representative of what a consumer would
13 have seen in the search ad purchase flow since at least January 1, 2022.

14 **1. Search Ads**

15 23. Consumers searching for answers to a question online may come across a
16 JustAnswer search ad related to the topic of their question. For example, when searching for
17 "ask a vet online" on Google.com, a consumer might find a sponsored ad for JustAnswer's
18 veterinarian Experts on the search results page. *See* Figs. A and B below. JustAnswer does not
19 disclose its fee structure or required monthly subscription in its search advertisements.



28 *Figure A. JustAnswer Sponsored Google Ads (March 2025)*

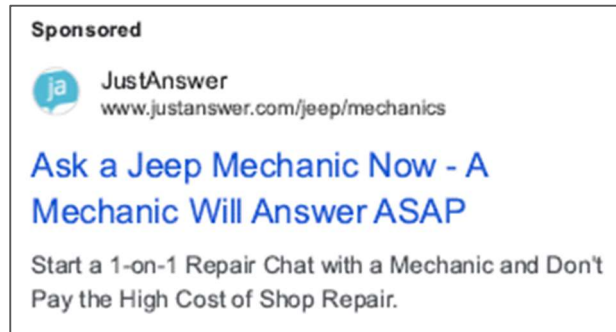


Figure B. JustAnswer Sponsored Google Ad (March 2025)

2. Landing Pages

24. JustAnswer's search ads link to specialized landing pages promoting JustAnswer's Expert services within a specific category of information related to the consumer's search. These JustAnswer landing pages can be accessed at a website address such as www.justanswer.com/sip/veterinary or www.justanswer.com/sip/cars, or through a specialized domain such as www.askaveterinarianonline.com/lp.

25. Since at least January 1, 2022, consumers who click on one of JustAnswer's search ad landing pages using a desktop computer will see a webpage similar to Figure C below.

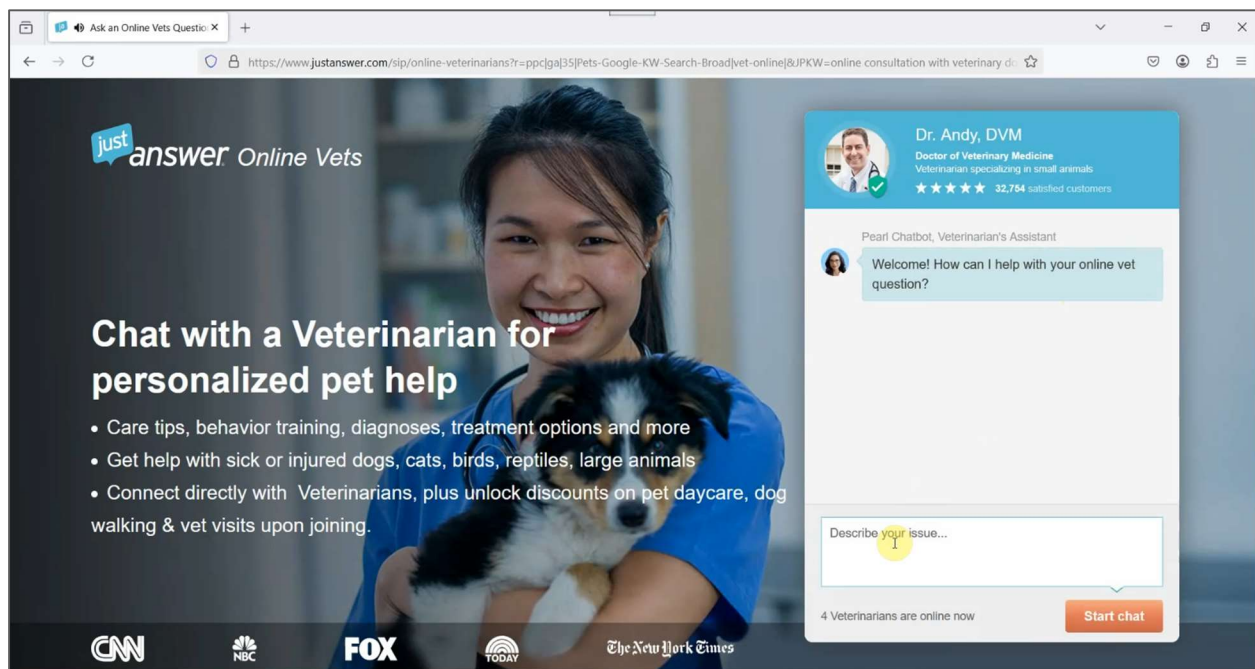


Figure C. Screenshot of JustAnswer Landing Page (desktop) (March 2025)

26. As shown in Figure C above, the left side of the desktop landing page shows a large image relevant to the specific Expert category (here, the veterinary category), with text superimposed over the image. The right-hand side of the screen shows a chat box, where JustAnswer's chatbot gathers basic information about the consumer's question. The chatbot is described as an "assistant" to the Expert (for example, a "Veterinarian's Assistant" in Figures C above and D below) and is typically referred to as "Pearl." JustAnswer requires that consumers interact with Pearl in order to use JustAnswer's question-and-answer service. The chat box remains on the right side of the screen even if the consumer scrolls down the page.

27. When a consumer first accesses the mobile version of JustAnswer's search ad landing page, the entirety of the screen is filled with the chat box, as shown in Figure D below.

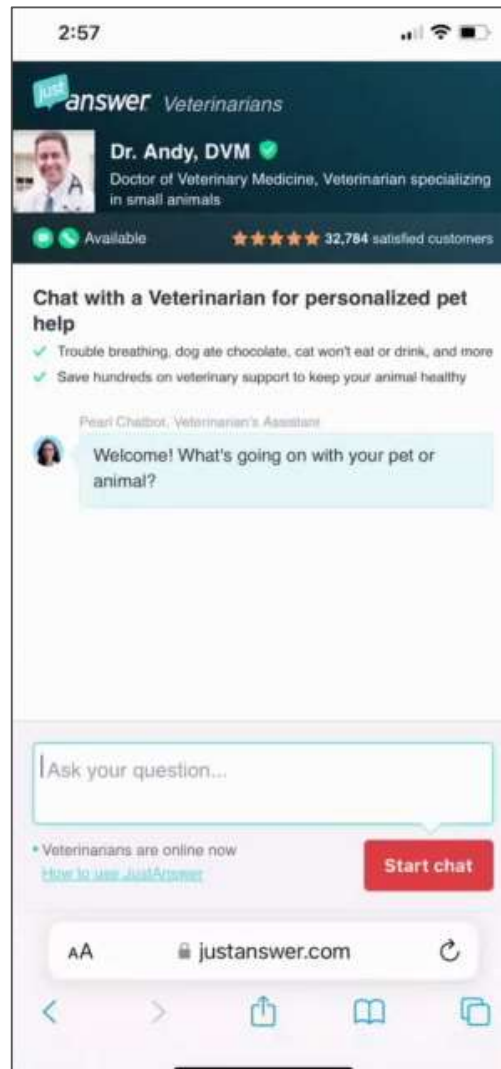


Figure D. Screenshot of JustAnswer Landing Page (mobile) (August 2025)

28. When a consumer reaches the landing page, Pearl prompts them to share information about their question or concern.

29. Since at least January 1, 2022, after soliciting basic information from the consumer, on both the desktop and mobile versions of the landing page, Pearl tells the consumer that they will be sent to a form where they can join JustAnswer's question-and-answer service for either \$1 or \$5, depending on the cost of the join fee at the time. For example, as seen in Figure E below, Pearl states, "OK, got it. Here's a secure form to join JustAnswer for \$5 (fully-refundable). While you're filling this out, I'll tell the Veterinarian about your situation and then connect you two."

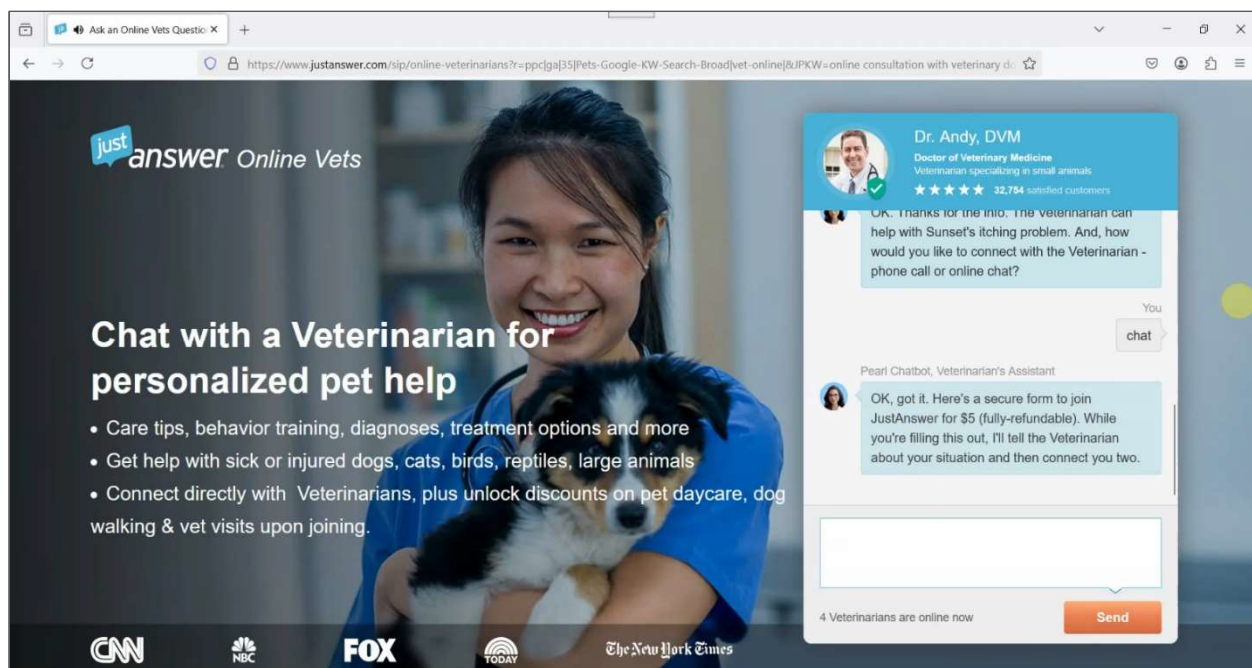


Figure E. Screenshot of JustAnswer Landing Page (desktop) (March 2025)

30. Based on Pearl's representation, a reasonable consumer at this step in the purchase flow would be under the false impression that they would be able to use the JustAnswer service and receive an answer to their question from an Expert for \$1 or \$5. In reality, consumers cannot join JustAnswer's question-and-answer service for \$1 or \$5. JustAnswer charges consumers both the \$1 or \$5 join fee *and* a significantly higher monthly subscription fee immediately at sign-up. JustAnswer will continue charging consumers the recurring subscription fee every month until they cancel.

1 31. The cost of the monthly subscription fee has varied depending on the Expert
2 category advertised in the purchase flow. For example, in October 2024, JustAnswer charged a
3 \$47 subscription fee for the mechanics category and a \$79 subscription fee for the legal category.
4 Regardless of the monthly subscription fee JustAnswer charged, JustAnswer permitted
5 consumers to ask questions of Experts from any category. As of at least November 2025,
6 JustAnswer claims to charge new customers a monthly subscription fee of \$65 for each Expert
7 category.

8 32. At times since January 1, 2022, JustAnswer has referred to the monthly
9 subscription fee on the landing page, as shown in Attachment G. On these iterations of the
10 landing page, however, JustAnswer has placed the fee information halfway down the page,
11 where consumers are unlikely to see it.

12 33. Consumers do not have to scroll down to interact with the Pearl chatbot or to
13 make a purchase. As a result, most consumers who reach JustAnswer's search ad landing page
14 do not scroll down. In fact, JustAnswer knows from data it collects about consumer scrolling
15 behavior that less than half of consumers who sign up for JustAnswer's service scroll *at all* on
16 the landing pages, and less than 10% scroll all the way to the bottom.

17 34. As of at least mid-2024, JustAnswer removed even this information about the
18 subscription fee, which consumers were unlikely to see, from landing pages that most consumers
19 visit.

20 3. ***Payment Form***

21 35. On desktop versions of JustAnswer's websites, after Pearl's final message, a
22 credit card payment form appears on the screen. *See* Fig. F below.

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The screenshot shows a web browser window with the URL <https://www.justanswer.com/sip/online-veterinarians?r=ppcjsa35Pets-Google-KW-Search-Broadvet-online&JPKW=online consultation with veterinary di>. The main content area is split into two panels. The left panel, titled "Ask a vet about Sunset's itching now", contains a payment form. It has two tabs: "Credit Card" (selected) and "PayPal". The form includes fields for "Email" (example@email.com), "Credit card number" (0000 0000 0000 0000), "Expiration" (MM / YY), "Security code" (CVV), and "ZIP / Postal code" (12345). Below these fields is a block of small text: "By clicking 'Confirm now,' I agree to the [Terms of Service](#), [Privacy Policy](#), to be charged the one-time join fee, and a **\$39 monthly** membership fee today and each month until I cancel. I can cancel via My Account to avoid future charges. Transaction may be processed by a third party." At the bottom of this panel is a large orange button labeled "Confirm now" and a small "100% GUARANTEE" badge. The right panel shows a chat window with Dr. Andy, DVM, and a chatbot named Pearl. The chatbot's final message says: "OK, got it. Here's a secure form to join JustAnswer for \$5 (fully-refundable). While you're filling this out, I'll tell the Veterinarian about your situation and then connect you two."

Figure F. Screenshot of JustAnswer Payment Form (desktop) (March 2025)

36. As seen in Figure F above, JustAnswer leaves Pearl’s final message—which includes the false claim that the consumer can “join JustAnswer for \$5 (fully-refundable)”—visible to the right as consumers enter their email address and payment info. Below the form is a large, brightly colored button labeled “Confirm now.”

37. Between the form and the “Confirm now” button is a block of text that reads:

By clicking “Confirm now” I agree to the [Terms of Service](#), [Privacy Policy](#), to be charged the one-time join fee, and a **\$39 monthly** membership fee today and each month until I cancel. I can cancel via My Account to avoid future charges. Transactions may be processed by a third party.

38. JustAnswer includes this language in substantially smaller print than almost any other text on the page—including the “join JustAnswer for \$5” claim in the Pearl chat. While the monthly subscription fee is bolded, it is still difficult to see in comparison to the much larger text throughout the credit card payment form. Consumers are therefore unlikely to notice the small print. And for the consumers who do notice, they are unlikely to understand the disclosure

language because it flatly contradicts the prominent express representation that they can join for \$5.

39. The payment form on mobile devices populates directly below the Pearl chat, rather than to the left of the chat, as shown in Figure G below. The mobile page scrolls automatically so the payment form appears below Pearl's final message. The block of text between the credit card fields and the large red "Confirm now" button reads similarly to the desktop version. Since at least mid-2024, this fine-print disclosure typically includes the only fee information on the page.

Figure G. Screenshot of JustAnswer Payment Form (mobile) (August 2025)

1 45. Many consumers also have complained that they did not know they would be
2 charged for the first month of membership at the time of sign-up.

3 46. In addition, many consumers have filed disputes with their banks or credit card
4 companies related to the recurring subscription charges.

5 ***1. Hundreds of Thousands of Consumers Have Complained to JustAnswer***
6 ***That They Thought They Were Going to Pay Only \$1 or \$5 to Get Their***
7 ***Question Answered***

8 47. JustAnswer receives complaints directly from consumers by phone and email and
9 through chats with Pearl. Consumers also post complaints on third-party review sites and file
10 complaints with the Better Business Bureau.

11 48. Many consumers complaining to JustAnswer have expressed confusion because
12 they thought they were paying only the join fee to get one question answered, but later saw the
13 recurring charges on their credit card account. For example:

14 a. One consumer wrote to JustAnswer in June 2023, “Hello, please refund
15 my \$35 back for a membership fee. I do not need a membership, I though[t] I
16 was . . . purchasing a one time only thing for \$5. So I cancelled my membership
17 already and just would like to be refunded.” JustAnswer does not appear to have
18 provided a refund.

19 b. In July 2023, a consumer posted on their conversation with their Expert,
20 requesting a refund because of membership confusion. The customer service
21 agent cancelled their membership but did not refund their payment. The
22 consumer responded, “Unfortunately I did not realize that the[re] would be a fee
23 on top of the \$5 . . . I had no idea[.] I never signed up for anything and the way I
24 read it was it was a one-time \$5 fee [and] if you wanted to use the service again
25 you had to sign up for membership.” The consumer expressed that he was a
26 senior on a fixed income and the additional \$46 charge beyond the \$5 he was
27 expecting was a substantial burden.
28

1 49. Other consumers have explicitly criticized JustAnswer's pricing practices and
2 expressed the view that the company had scammed them. For example:

3 a. In June 2023, a consumer wrote to JustAnswer and requested a refund.
4 After their request was denied, they responded: "The tab your customers click
5 specifi[es] 5 dollars. You are knowingly tricking people. After I put in my CC
6 info is when I got the total. Please do the right thing and refund the \$65. I will not
7 use the service for the rest of the month so it should validate your reimbursement
8 to me. I'm kindly asking you to do the right thing. If you check time stamps, I
9 immediately went and canceled." JustAnswer does not appear to have provided a
10 refund.

11 b. Another consumer wrote to JustAnswer in August 2023, after their refund
12 request was denied: "[H]ow [is it] I'm . . . not eligible for a refund[?] I made the
13 refund request minutes after I made the payment and I did not know that it was 46
14 dollars[.] [A]ll I saw and all I agreed on was the 5 dollars[.] [T]his is a straight
15 scam and I'm hoping that I get my money back[.] I did not chat with anyone no
16 one helped me[.] [E]ven if someone texted me or sent me anything it is not worth
17 51 dollars[.] GET ME MY MONEY BACK." JustAnswer ultimately refunded
18 the consumer's payment after repeated requests.

19 50. Between February 1, 2020, and July 19, 2024, JustAnswer received 679,035
20 complaints that its own customer service agents specifically tagged in JustAnswer's customer
21 relationship management database as "unaware of recurring membership." JustAnswer customer
22 service agents tag complaints as "unaware of recurring membership" when the consumer
23 complains that they (1) were "unaware of the ongoing charges associated with their account";
24 (2) "thought they were paying only one time for one question"; or (3) had "no knowledge of or
25 engagement in any recurring membership with JustAnswer."

26 51. The 679,035 consumer complaint figure does not include additional complaints
27 that JustAnswer tagged only as "unsure about the costs of membership." According to
28 JustAnswer's guidance for customer service representatives, they should mark complaints with

1 the “unsure” tag when consumers report, for example, that they “didn’t authorize \$66 to be taken
2 out of my account, I saw only the \$2,” or that they are “wondering why [they] paid \$5 to get an
3 answer from a vet and the card [was] charged for \$35 extra dollar[s],” or that they “wanted to
4 request a refund, [they were] under the impression it was only \$5.”

5 52. The categories of complaints described in Paragraphs 50 and 51 represent a
6 significant portion of all consumer contacts with the company. In late 2022, for example,
7 JustAnswer’s customer service supervisors found that complaints about “payment confusion”
8 comprised approximately 25% of all customer service contacts received by the company.
9 JustAnswer described “payment confusion” to include consumers who (1) thought they were
10 only paying for one question, (2) thought they were only paying \$1, or (3) didn’t realize they had
11 enrolled in a membership.

12 53. Similarly, in July 2022, a JustAnswer customer service supervisor wrote to a
13 subordinate, “we know that because the majority of our complaints are related to membership
14 charge confusion that our current sign up flow is misleading.”

15 54. In August 2022, an employee assigned to work on the purchase flow wrote to a
16 teammate, “like seriously wtf [*sic*] are we doing with this silly \$1 thing. customers’ [*sic*]
17 feedback is that they feel scammed.”

18 55. In October 2022, a JustAnswer product manager asked another employee about
19 the five biggest cost drivers to their customer service department. After soliciting input from a
20 customer service manager, the employee described one of the five biggest cost drivers as: “At the
21 time of sign up, customers are not clearly made aware of the membership details and charges,
22 which causes a large % of customers to reach out for cancellations. This can be easily avoided to
23 reduce [Customer Service] tickets and cost.”

24 56. Some consumers have escalated their complaints about payment confusion to
25 Kurtzig by emailing him directly. Kurtzig has forwarded those complaints to customer service
26 personnel to handle.
27
28

1 2. *Consumers Have Requested Refunds from JustAnswer and Disputed*
2 *Charges at a High Rate*

3 57. Consumers have frequently sought a refund from JustAnswer after realizing
4 JustAnswer had enrolled them in a monthly subscription when they joined.

5 58. JustAnswer generally refuses to refund subscription fees when a consumer
6 complains that they did not know they were signing up for a subscription, unless the consumer
7 threatens to pursue legal action, file bank or credit card disputes, or leave a bad review on a
8 third-party review site.

9 59. Consumers often have sought a refund by disputing the charge with their credit
10 cards or banks. In many of these instances, consumers have disputed a charge from JustAnswer
11 without first submitting a complaint to JustAnswer.

12 60. In 2023, JustAnswer employees created an internal presentation that summarized
13 data from 2022 about refund requests and payment disputes from consumers (“Refunds &
14 Disputes Presentation”). The Refunds & Disputes Presentation was shared with JustAnswer’s
15 executive team, including Kurtzig.

16 61. According to the Refunds & Disputes Presentation, approximately 238,000
17 consumers—more than 8% of all active JustAnswer users in 2022—contacted their credit card
18 company to dispute a charge from JustAnswer. More than 115,000 of these consumers told their
19 credit card companies that the charge from JustAnswer was fraudulent.

20 62. The Refunds & Disputes Presentation also notes that when consumers requested a
21 refund from JustAnswer, JustAnswer employees categorized the reason for the refund request.
22 The most common reason was called “Payment Confusion.” Examples of “Payment Confusion”
23 included consumers who “[d]idn’t realize they were signing up for a monthly membership” and
24 “[t]hought cost was only \$1/\$5.”

25 63. According to the Refund & Dispute Presentation, in 2022, JustAnswer issued
26 \$7.9 million in refunds to more than 90,000 consumers whose refund requests were categorized
27 as “Payment Confusion.” The presentation also noted that “50% of Payment Confusion requests
28 are declined by [JustAnswer customer service] agents.”

64. JustAnswer has paid millions of dollars for chargeback mitigation services to challenge credit card disputes from consumers.

65. JustAnswer has also used the rapid dispute resolution services (“RDR”) offered by Visa and Mastercard to reduce its chargeback rate. RDR prevents chargebacks by automatically providing a refund when consumers contact their credit card company to dispute a charge. According to data from the Refund & Disputes Presentation, in 2022, JustAnswer used RDR to refund 76% of disputes that would have ended up as chargebacks. The presentation claimed that using RDR had kept JustAnswer out of the enforcement programs that credit card networks impose on merchants with high chargeback levels. These programs involve additional monitoring requirements and, in some cases, financial penalties and account termination.

C. Defendants Know that JustAnswer’s Purchase Flow Misleads Consumers but Have Refused to Change the Purchase Flow to Prevent Consumer Injury

66. JustAnswer and Kurtzig are aware that the company’s \$1 or \$5 join fee representation is misleading consumers, and that JustAnswer’s disclosures about the subscription do not correct this misleading representation or adequately disclose JustAnswer’s pricing and subscription terms. In addition to receiving significant numbers of consumer complaints, as described above, JustAnswer has conducted website testing and marketing research showing that JustAnswer misleads consumers with its purchase flow. Kurtzig directly participated in these efforts.

67. Despite their knowledge of rampant consumer deception, however, JustAnswer and Kurtzig have chosen not to change the JustAnswer purchase flow to prevent this deception or the resulting consumer injury. In fact, over time, JustAnswer has made the purchase flow more deceptive by reducing the amount of information in the purchase flow about its pricing and subscription terms.

1. JustAnswer’s Website Testing and Marketing Research Show That JustAnswer Misleads Consumers with Its Purchase Flow

68. JustAnswer has frequently tested the effectiveness of the purchase flow described in Section B above by adding or subtracting specific text or images to specific webpages and

1 then evaluating the numbers of consumers who signed up for the service via each version of the
2 purchase flow. This is often referred to as A/B testing.

3 69. Most of JustAnswer's A/B testing has focused on changes to the landing page or
4 payment page that do not affect the pricing or subscription information, such as altering the
5 language of the bullets above the fold on the landing page or changing the background
6 photographs. For example, JustAnswer has tested using personalized headings on the payment
7 form, comparing a generic control version ("Get your answer in minutes") to a heading more
8 tuned to the consumer's question ("Fix your laptop's power issue now").

9 70. JustAnswer has also run some A/B tests that focused on its disclosures. In a 2021
10 A/B test, for example, JustAnswer tested two new versions of the purchase flow. In one version,
11 Pearl's final message included the following sentence: "I'm sending you to a secure page to join
12 JustAnswer for only \$1 plus a monthly plan." JustAnswer did not include the "plus a monthly
13 plan" language in the other test version. JustAnswer found that including "plus a monthly plan"
14 significantly decreased the number of consumers who signed up for JustAnswer's service.

15 71. In 2021, JustAnswer also conducted one-on-one interviews with consumers about
16 the test versions of the purchase flow with and without the "plus a monthly plan" text. The
17 researchers found that when consumers saw that they would join "for only \$1 plus a monthly
18 plan," a majority "recognized it involved *immediate membership* sign-up" (emphasis in
19 original). The researchers noted that without the "and a monthly plan" language, JustAnswer's
20 pricing structure "was less understood as immediate, all-at-once paid membership sign-up." The
21 researchers suggested that there were "opportunities to refine how we explain pricing," namely
22 "Clarify '\$1 join fee'" and "Ensure concurrence of initial charges is understood."

23 72. The results of both the A/B website tests and qualitative tests relating to the "plus
24 a monthly plan" text in the purchase flow were reported to JustAnswer executives, including
25 Kurtzig. Despite the concerns raised by these tests, JustAnswer and Kurtzig chose to move
26 forward with the version of the purchase flow that did not include "plus a monthly plan" because
27 the phrase caused significantly fewer consumers to sign up for JustAnswer's service.
28

1 73. In or around late 2022 and early 2023, JustAnswer conducted a survey of past
2 customers to determine their familiarity with the company. For the survey respondents who
3 recalled being a JustAnswer customer, almost two-thirds responded negatively, with responses
4 “[c]entered on price transparency and amount, and answer quality.” Among other things, past
5 customers described the company in the following ways:

6 a. “Appears to be a rip-off.”

7 b. “A scam.”

8 c. “Very tricky ads, before you know it you are charged a good amount
9 unless you read the small print.”

10 d. “Decent source. However, it is not clear that paying to get a specific
11 answer also commits me to a recurring monthly charge whether I use the service
12 or not. Once I noticed the charge I was allowed to cancel the subscription.

13 However, there was no possibility of a refund for the paid but unused months. I
14 will NEVER use Just Answer again.”

15 The survey results were reported to JustAnswer executives, including Kurtzig, in a February
16 2023 presentation.

17 74. In September 2022, JustAnswer analyzed how cancelled customers described
18 their experience with the company’s question-and-answer service. JustAnswer employees
19 concluded that “[p]ayment issues are the biggest cause of dissatisfaction with customers who
20 cancelled recently.” The employees found that the “key issues” related to payments were: “Lack
21 of clarity in fees; Charge after the initial \$1; [Customer Service] not being able to help with
22 charge backs.”

23 75. Defendants have also sought feedback from JustAnswer employees about the
24 purchase flow and price representations. These employees have flagged that JustAnswer’s
25 purchase flow is misleading and that consumers, who may be acting in emergency or high-stress
26 situations and are focused on getting their question answered quickly, may not see the monthly
27 subscription fee information. For example, in July 2022, at Kurtzig’s request, JustAnswer asked
28 employees in the customer service department to provide feedback on the purchase flow. As part

1 of this exercise, a customer service supervisor walked through JustAnswer's purchase flow from
2 the perspective of a consumer. She reported that the Pearl message offering the \$1 join fee but
3 including "nothing about a membership charge" "leads to a lot of confusion with our customers."
4 She further noted that the membership charge on the payment form was "small enough to be
5 missed" because consumers assume "that they were already educated about the total cost of the
6 interaction." Feedback from this employee walk-through was shared with Kurtzig, but
7 JustAnswer did not make any changes to the purchase flow to address the concerns raised by the
8 customer service supervisor.

9 **2. Defendants Have Consistently Refused to Improve the Purchase Flow to**
10 **Prevent Consumer Deception and Injury**

11 76. JustAnswer has made iterative changes to its purchase flow since it first began
12 charging consumers the monthly subscription fee immediately at sign-up, but none have resolved
13 the company's deceptive practices.

14 77. On the contrary, JustAnswer has made changes to its purchase flow that make it
15 more likely to mislead consumers. For example, as noted above, some past versions of the
16 landing pages included a reference to a monthly fee, which JustAnswer placed far down the
17 page, where it knew, based on data it collects, that consumers were less likely to see it. As of at
18 least mid-2024, JustAnswer removed even this information about the subscription fee from the
19 landing pages most consumers visit.

20 78. Similarly, as noted above, in approximately mid-2024, JustAnswer further
21 concealed information about the monthly subscription fee on the payment forms most consumers
22 visit. Previously, the payment form included a subheading that read, "Unlimited
23 conversations—one-time \$[X] join fee and **\$[X]/month**. Cancel anytime." See Fig. H below
24 (red arrow added to indicate the disclosure language). In the revised version, JustAnswer
25 removed this subheading and moved the sole reference to the monthly subscription fee to the fine
26 print below the credit card fields. See Fig. I below.

27 //

Get your answer from an Expert in minutes
Unlimited conversations—one-time \$1 join fee and \$50/month. Cancel anytime.

☒ Credit Card ☐ PayPal

Email address
example@email.com

Credit card number
0000 0000 0000 0000

Expiration MM / YY CVV 12345 ZIP / Postal code 12345

By clicking "Confirm now," I agree to the [Terms of Service, Privacy Policy](#), and to be charged the one-time join fee and monthly membership fee above today and each month until I cancel. I can cancel via My Account to avoid future charges.

Confirm now

Avoid consultation fees. Get the answers you need. Cancel anytime.

Your information is secure

*Figure H. Screenshot of JustAnswer
Payment Form (October 2022)*

Ask a vet about Sunset's itching now

☒ Credit Card ☐ PayPal

Email
example@email.com

Credit card number
0000 0000 0000 0000

Expiration MM / YY Security code CVV 12345 ZIP / Postal code 12345

By clicking "Confirm now," I agree to the [Terms of Service, Privacy Policy](#), to be charged the one-time join fee, and a \$50 monthly membership fee today and each month until I cancel. I can cancel via My Account to avoid future charges. Transaction may be processed by a third party.

Confirm now

Avoid costly vet visits. Get the answer you need. Cancel anytime.

Your information is secure

*Figure I. Screenshot of JustAnswer
Payment Form (March 2025)*

79. Even when JustAnswer has included subscription fee information on the landing page, or in larger print on the payment form, consumers have complained to the company in consistently high numbers that they did not know that JustAnswer would enroll them in a subscription. The complaints show that JustAnswer's disclosures have not been sufficiently clear and conspicuous, especially in light of JustAnswer's contradictory claim that consumers can "join JustAnswer" for \$1 or \$5.

80. Kurtzig and JustAnswer know that the company is deceiving consumers, yet have refused to make changes to comply with the law.

81. Kurtzig and JustAnswer have significant experience with negative option marketing and are aware of the laws that apply to this form of marketing, such as the FTC Act and ROSCA. Under Kurtzig's control and with his direct participation, JustAnswer has engaged in negative option marketing for twenty-one years. The company has extensive legal resources, including in-house and outside counsel with expertise in the FTC Act and ROSCA. Kurtzig and JustAnswer were aware of significant government scrutiny into the company's subscription enrollment and pricing practices, including a Civil Investigative Demand issued to JustAnswer in February 2023 seeking documents and information pertaining to, among other things, potential

violations of the FTC Act and ROSCA. Nevertheless, JustAnswer continues to make the false claim that consumers can join JustAnswer's question-and-answer service for \$1 or \$5 and omit clear and conspicuous disclosures about the monthly subscription fee and the recurring subscription commitment.

82. Based on the facts and violations of law alleged in this Complaint, the FTC has reason to believe that Defendants are violating or are about to violate laws enforced by the Commission.

VIOLATION OF THE FTC ACT

83. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits "unfair or deceptive acts or practices in or affecting commerce."

84. Misrepresentations or deceptive omissions of material fact constitute deceptive acts or practices prohibited by Section 5(a) of the FTC Act.

COUNT I

Misrepresentation That Consumers Can Join JustAnswer's Question-and-Answer Service by Paying a Nominal One-Time Fee

85. In numerous instances in connection with the advertising, marketing, promotion, or offering for sale of its online question-and-answer service, as described in Paragraphs 20 to 81 above, Defendants represent, directly or indirectly, expressly or by implication, that consumers can join JustAnswer's question-and-answer service and have their question answered by paying a nominal one-time fee, such as \$1 or \$5.

86. In fact, consumers cannot join JustAnswer's question-and-answer service and have their question answered by paying a nominal one-time fee. Consumers must pay both the one-time "join" fee and a subscription fee that has ranged between \$28 and \$125 before they can use JustAnswer's service.

87. Therefore, Defendants' representation as described in Paragraph 85 is false or misleading and constitutes a deceptive act or practice in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

VIOLATIONS OF THE RESTORE ONLINE SHOPPERS' CONFIDENCE ACT

88. In 2010, Congress passed the Restore Online Shoppers' Confidence Act, 15 U.S.C. §§ 8401–8405, which became effective on December 29, 2010. Congress passed ROSCA because “[c]onsumer confidence is essential to the growth of online commerce. To continue its development as a marketplace, the Internet must provide consumers with clear, accurate information and give sellers an opportunity to fairly compete with one another for consumers’ business.” Section 2 of ROSCA, 15 U.S.C. § 8401.

89. Section 4 of ROSCA, 15 U.S.C. § 8403, generally prohibits charging consumers for goods or services sold in transactions effected on the Internet through a negative option feature, as that term is defined in the FTC’s Telemarketing Sales Rule (“TSR”), 16 C.F.R. § 310.2(w), unless the seller: (a) clearly and conspicuously discloses all material terms of the transaction before obtaining the consumer’s billing information; (b) obtains the consumer’s express informed consent before making the charge; and (c) provides simple mechanisms to stop recurring charges. *See* 15 U.S.C. § 8403.

90. The TSR defines a negative option feature as: “in an offer or agreement to sell or provide any goods or services, a provision under which the consumer’s silence or failure to take an affirmative action to reject goods or services or to cancel the agreement is interpreted by the seller as acceptance of the offer.” 16 C.F.R. § 310.2(w).

91. Defendants have sold a subscription service, in transactions effected on the internet, through a negative option feature as defined by the TSR, 16 C.F.R. § 310.2(w).

92. Pursuant to Section 5(a) of ROSCA, 15 U.S.C. § 8404(a), and Section 18(d)(3) of the FTC Act, 15 U.S.C. § 57a(d)(3), a violation of ROSCA shall be treated as a violation of a rule promulgated under Section 18 of the FTC Act, 15 U.S.C. § 57a, and therefore a violation of ROSCA constitutes an unfair or deceptive act or practice in or affecting commerce, in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

//

COUNT II**Failure to Clearly and Conspicuously Disclose Material Terms**

93. In numerous instances, in connection with charging consumers for goods or services sold in transactions effected on the Internet through a negative option feature, as described in Paragraphs 20 to 81 above, Defendants failed to clearly and conspicuously disclose all material terms of the transaction, including the price of using the JustAnswer question-and-answer service, its auto-renewal provision, and the timing of the first subscription fee, before obtaining the consumer's billing information.

94. Accordingly, consumers joined JustAnswer's question-and-answer service without knowing that JustAnswer would enroll them in a costly recurring subscription.

95. Defendants' acts or practices as set forth above are violations of Section 4(1) of ROSCA, 15 U.S.C. § 8403(1), and therefore constitute unfair or deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

COUNT III**Failure to Obtain Express Informed Consent**

96. In numerous instances, in connection with charging consumers for goods or services sold in transactions effected on the Internet through a negative option feature, as described in Paragraphs 20 to 81 above, Defendants failed to obtain the consumer's express informed consent before charging the consumer's credit card, debit card, bank account, or other financial account for the transaction.

97. Defendants' acts or practices as set forth above are violations of Section 4(2) of ROSCA, 15 U.S.C. § 8403(2), and therefore constitute unfair or deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

CONSUMER INJURY

98. Consumers are suffering, have suffered, and will continue to suffer substantial injury as a result of Defendants' violations of the FTC Act and ROSCA. Absent injunctive relief by this Court, Defendant is likely to continue to injure consumers and harm the public interest.

CIVIL PENALTIES

99. Section 5(m)(1)(A) of the FTC Act, 15 U.S.C. § 45(m)(1)(A), authorizes this Court to award civil penalties for each violation of ROSCA.

100. Defendants violated ROSCA with actual knowledge or knowledge fairly implied on the basis of objective circumstances, as required by Section 5(m)(1)(A) of the FTC Act, 15 U.S.C. § 45(m)(1)(A).

PRAYER FOR RELIEF

Wherefore, the FTC requests that the Court:

A. Enter a permanent injunction to prevent future violations of the FTC Act and ROSCA by Defendants;

B. Award monetary and other relief within the Court's power to grant;

C. Impose civil penalties on Defendants for each violation of ROSCA; and

D. Award any additional relief as the Court determines to be just and proper.

Dated: January 13, 2026

Respectfully submitted,

/s/ Samantha Bennett

SAMANTHA BENNETT

NY Bar No. 5132063

EVAN ROSE

Cal. Bar No. 253478

ALYSSA J. WU

Cal. Bar No. 339651

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Federal Trade Commission

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Email: sbennett@ftc.gov, erose@ftc.gov,

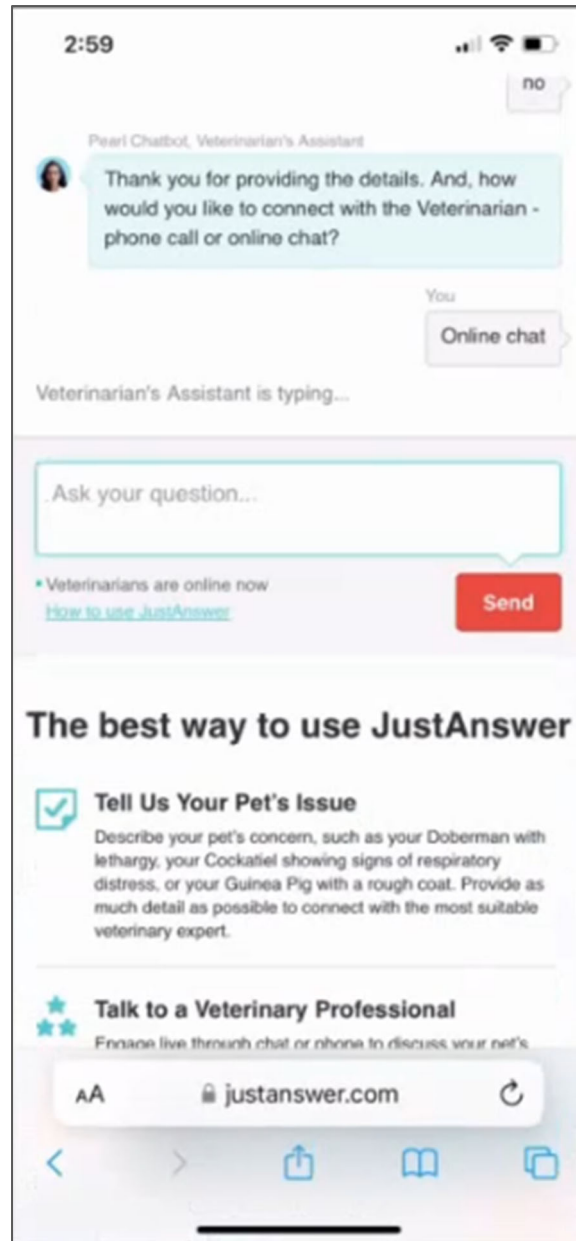
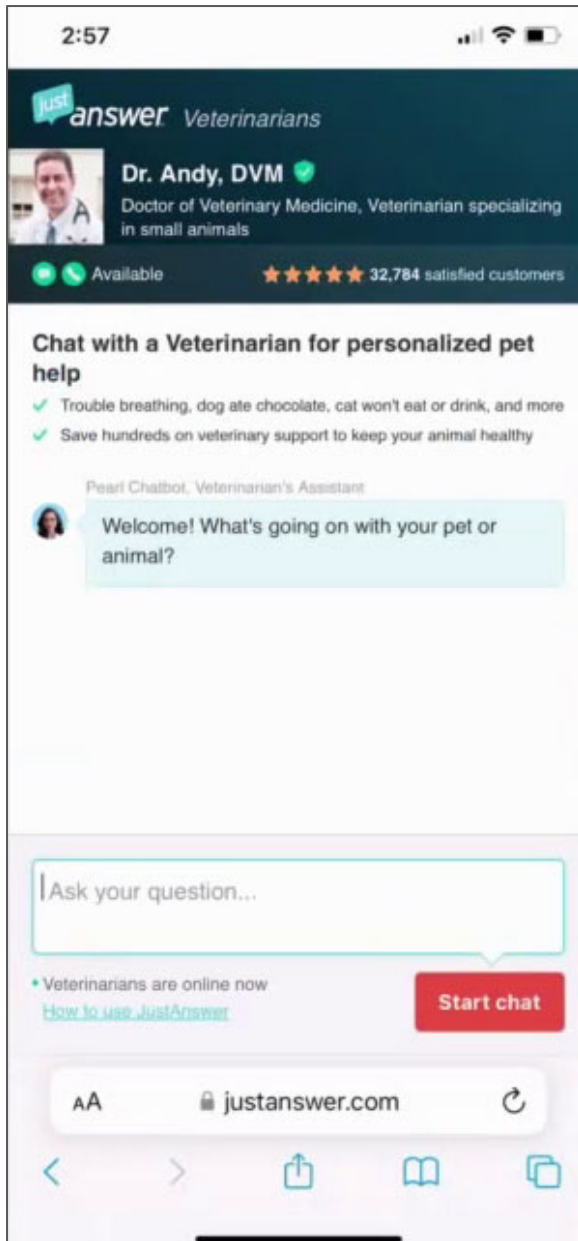
awul@ftc.gov

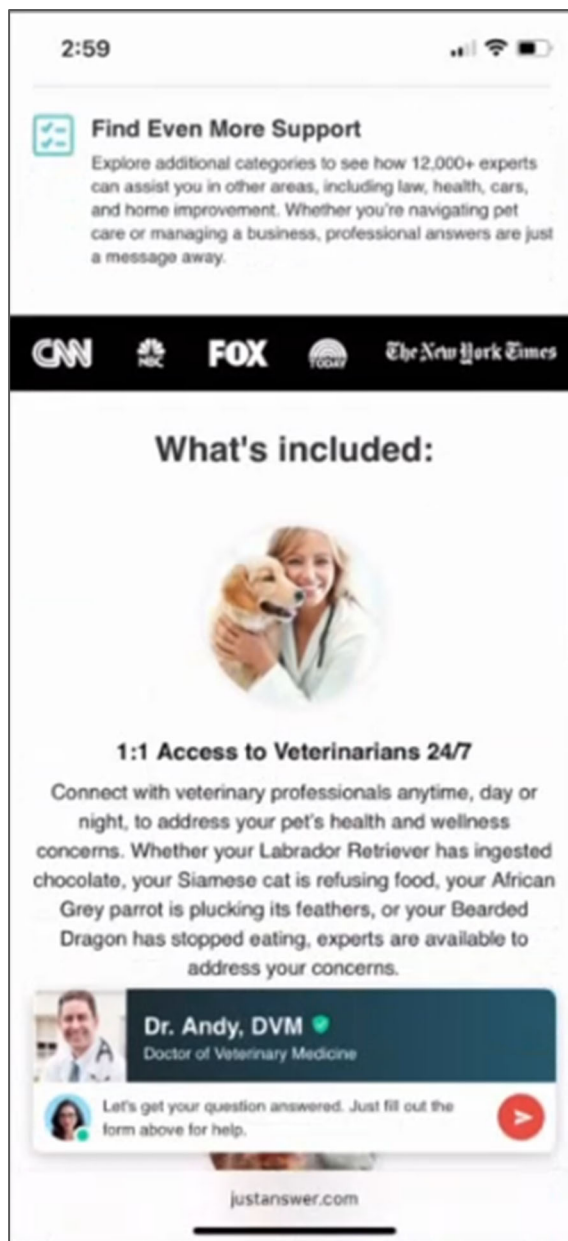
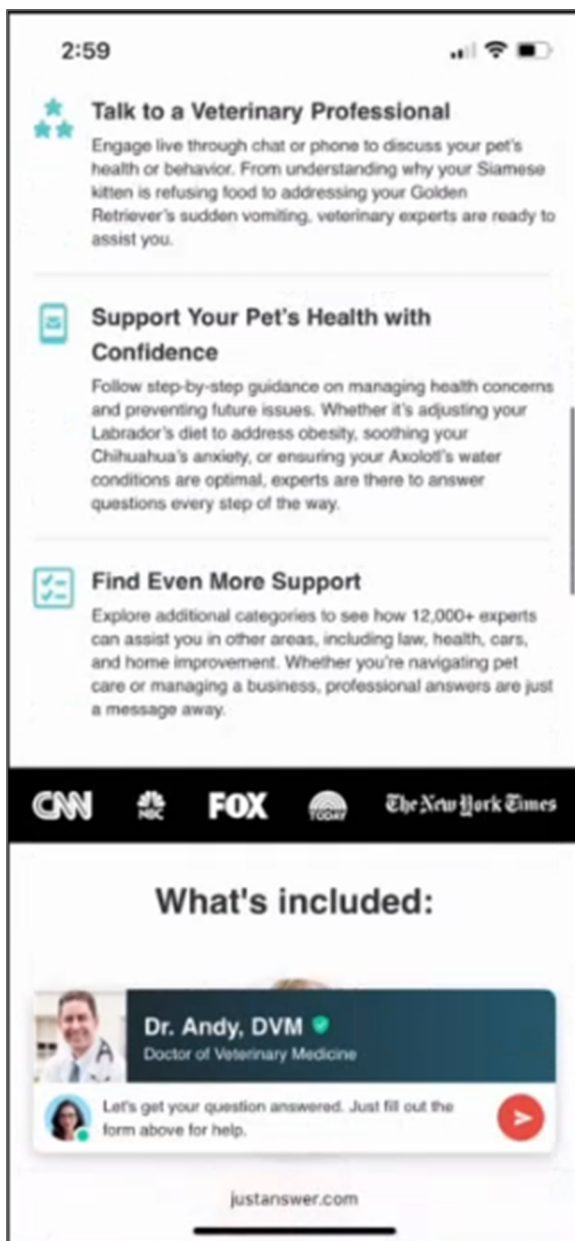
Attorneys for Plaintiff

FEDERAL TRADE COMMISSION

ATTACHMENT A

ATTACHMENT A

JustAnswer Veterinary Category Landing Page
(Mobile version with scrolling – August 2025)



2:59

cruciorate, your Siamese cat is refusing food, your African Grey parrot is plucking its feathers, or your Bearded Dragon has stopped eating, experts are available to address your concerns.



About any issue

We can help when your dog eats something odd or won't eat anything at all, when your cat starts limping, when your parakeet's beak turns red, and for any other issue impacting your pet's health and well-being.



For every animal

We have veterinarians and specialists available to help care for your dog, cat, bird, horse, guinea pig, chicken, and every other animal.



Dr. Andy, DVM 
Doctor of Veterinary Medicine



Let's get your question answered. Just fill out the form above for help.



justanswer.com

2:59

We have veterinarians and specialists available to help care for your dog, cat, bird, horse, guinea pig, chicken, and every other animal.



At any hour

A team of board-certified veterinarians is on call, 24/7, to keep your pet healthy and happy.

Thousands of highly rated, verified Veterinarians



Dr. Andy, DVM
Doctor of Veterinary Medicine
★★★★★ 32,784 satisfied customers
Veterinarian specializing in small animals



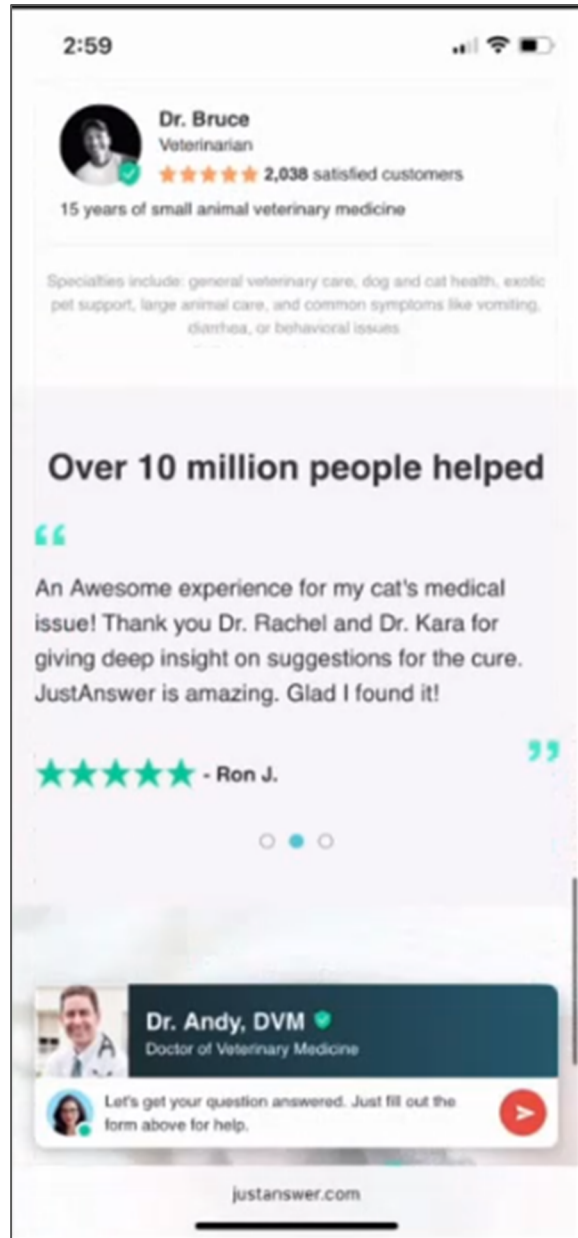
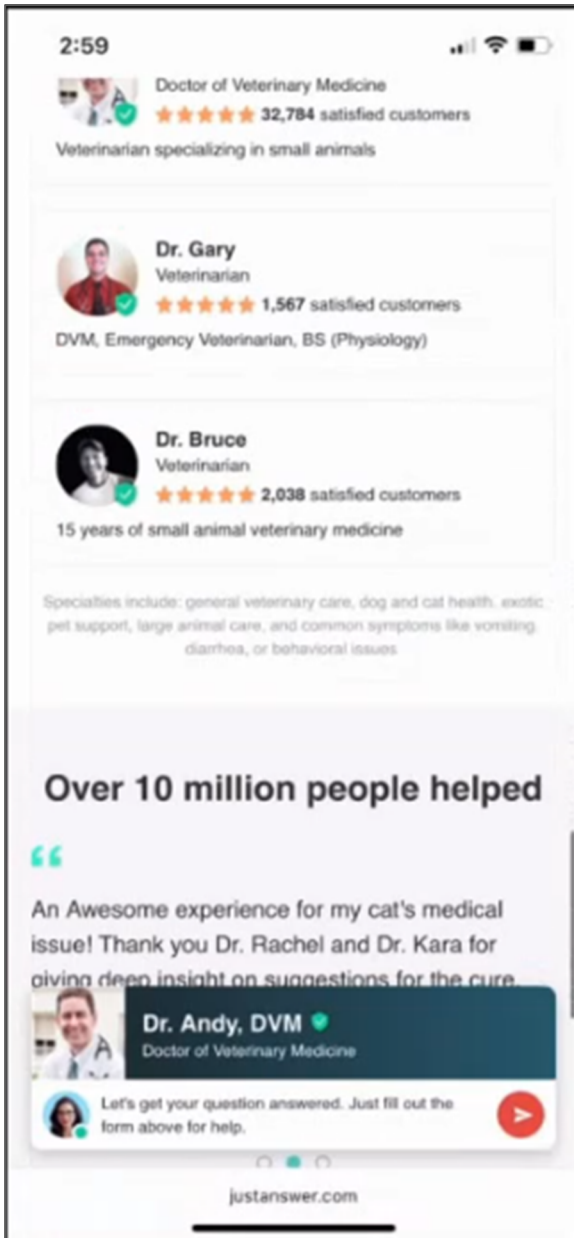
Dr. Andy, DVM 
Doctor of Veterinary Medicine

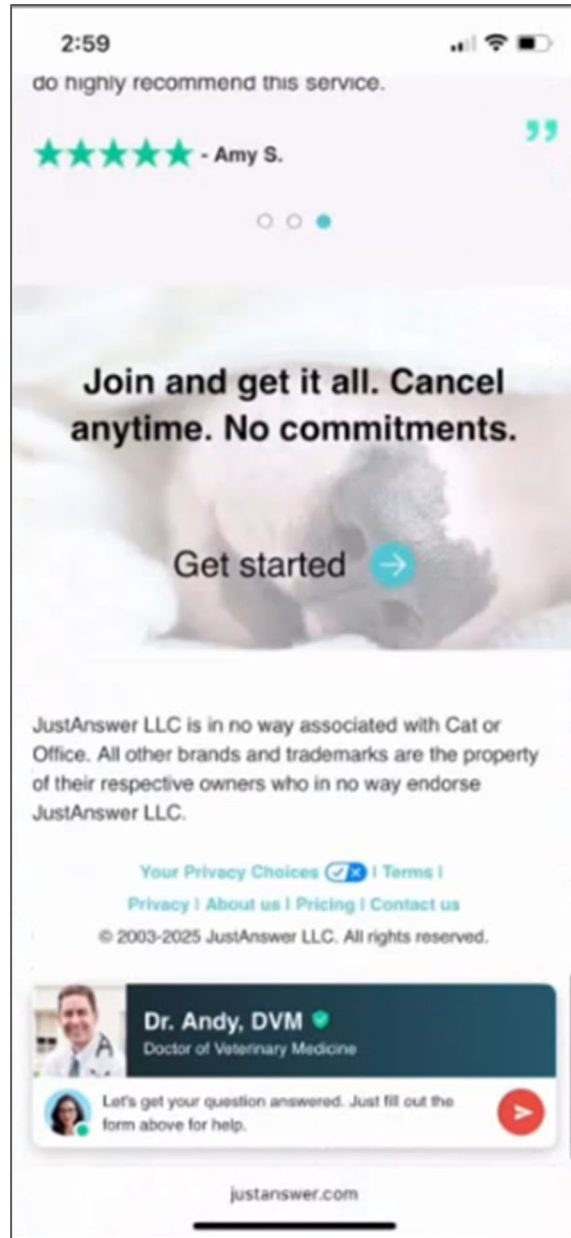
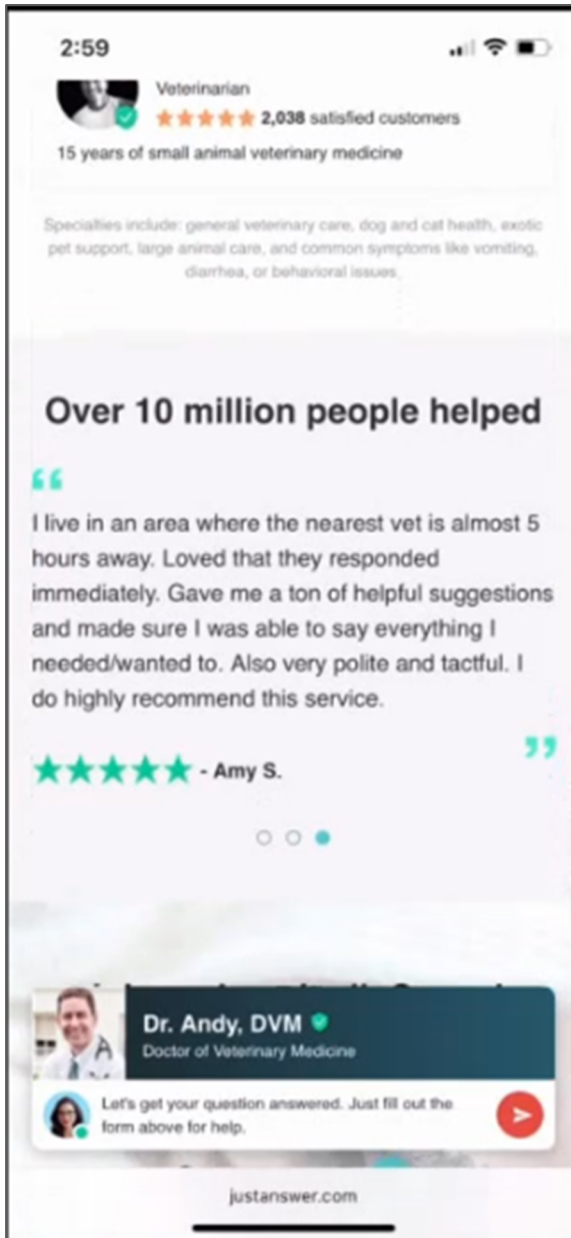


Let's get your question answered. Just fill out the form above for help.



justanswer.com





Source: FTC web capture

ATTACHMENT B

ATTACHMENT B

JustAnswer Veterinary Category Payment Form
(Mobile version, following landing page depicted in Attachment A – August 2025)

2:59

Pearl Chatbot, Veterinarian's Assistant

OK, got it. Below is a secure form to join JustAnswer for \$5 (fully-refundable). I'll tell the Veterinarian about your situation and then connect you two.

Help your cat feel better fast.

VISA Apple Pay PayPal

Please enter your email address

Card number CVV

Exp.MM Exp.YY ZIP/postal

By clicking "Confirm now," I agree to the [Terms of Service](#), [Privacy Policy](#), to be charged the one-time join fee above, and a **\$55 monthly** membership fee today and each month until I cancel. I can cancel via My Account to avoid future charges.

Confirm now

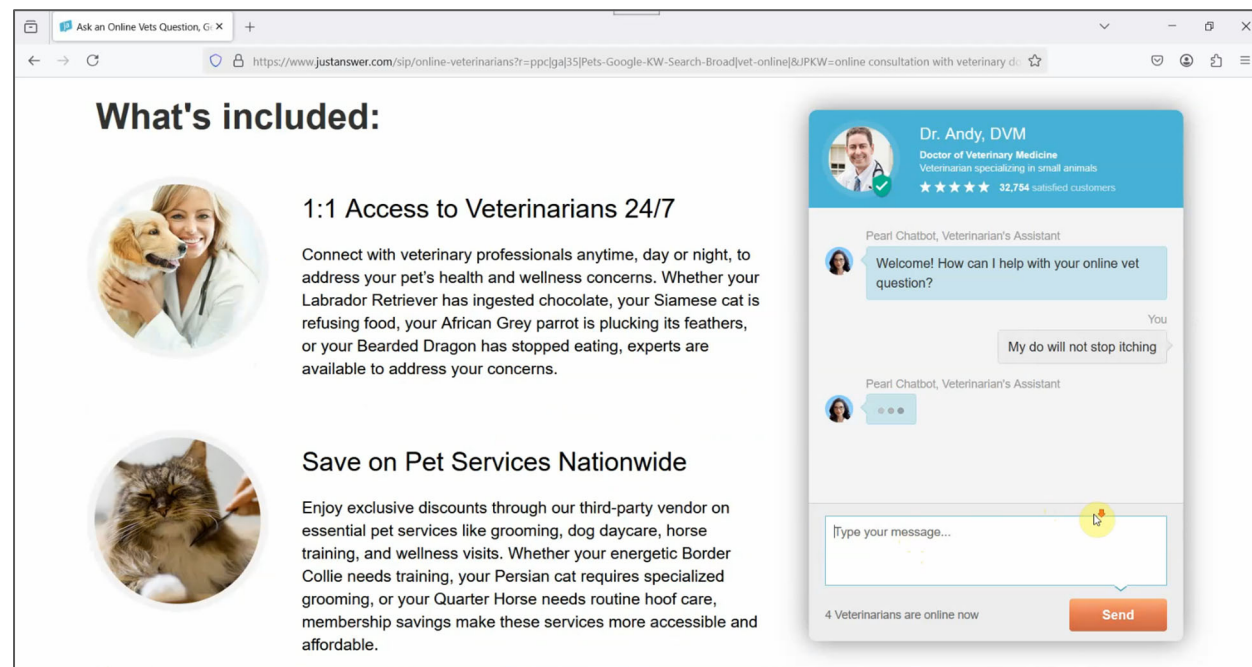
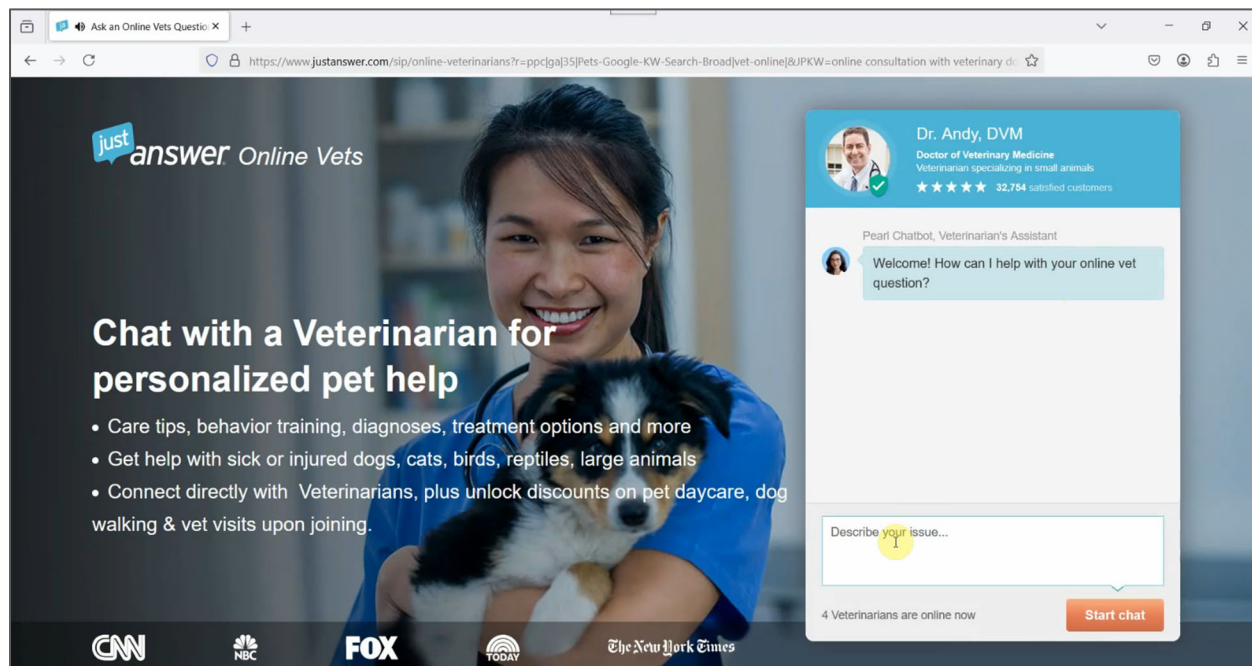
Google Trustpilot digicert

justanswer.com

Source: FTC web capture

ATTACHMENT C

ATTACHMENT C

JustAnswer Veterinary Category Landing Page
(Desktop version with scrolling – March 2025)

Affordable Pet Products

Access savings through our partner vendor for additional savings on supplements, preventive therapy, and specialty foods for pets like Dachshunds with back issues, French Bulldogs prone to allergies, or Siamese cats requiring specific diets for urinary health. Keep your pets healthy without exceeding your budget.

Exclusive Perks Beyond Veterinary Care

Gain access to resources that enhance your pet's overall wellness. Save on travel arrangements for your German Shepherd, training tools for your Sheepdog, or aquarium supplies for your Betta fish through our third-party vendor. Membership benefits extend to educational resources on enrichment, dietary tips, and stress management for pets of all species and temperaments.

Cost-Effective Vet Support Year-Round

Each veterinary interaction can save you hundreds while providing information for your pet's health. Whether your rabbit is experiencing GI stasis, your Cockapoo has developed a rash, or your Leopard Gecko's tail is thinning, your membership provides affordable answers year-round.

Thousands of highly rated, verified Veterinarians

Specialties include: general veterinary care, dog and cat health, exotic pet support, large animal care, and common symptoms like vomiting, diarrhea, or behavioral issues.

Dr. Andy, DVM
Doctor of Veterinary Medicine
Veterinarian specializing in small animals
★★★★★ 32,754 satisfied customers

Pearl Chatbot, Veterinarian's Assistant
Welcome! How can I help with your online vet question?

You
My dog will not stop itching

Pearl Chatbot, Veterinarian's Assistant
I'm sorry to hear that your dog is uncomfortable. Can you tell me your dog's breed, age, and name?

Type your message...

4 Veterinarians are online now **Send**

Cost-Effective Vet Support Year-Round

Each veterinary interaction can save you hundreds while providing information for your pet's health. Whether your rabbit is experiencing GI stasis, your Cockapoo has developed a rash, or your Leopard Gecko's tail is thinning, your membership provides affordable answers year-round.

Thousands of highly rated, verified Veterinarians

Specialties include: general veterinary care, dog and cat health, exotic pet support, large animal care, and common symptoms like vomiting, diarrhea, or behavioral issues.

ER Vet
Veterinarian
398 satisfied customers
★★★★★
I have been a veterinarian in emergency practice for 21 years. I have helped many families with their pets.

Dr. Andy, DVM
Doctor of Veterinary Medicine
32,754 satisfied customers
★★★★★
Veterinarian specializing in small animals

Dr. [Name]
Veterinarian, BS
7 satisfied customers
★★★★★

Dr. Andy, DVM
Doctor of Veterinary Medicine
Veterinarian specializing in small animals
★★★★★ 32,754 satisfied customers

Pearl Chatbot, Veterinarian's Assistant
Welcome! How can I help with your online vet question?

You
My dog will not stop itching

Pearl Chatbot, Veterinarian's Assistant
I'm sorry to hear that your dog is uncomfortable. Can you tell me your dog's breed, age, and name?

Type your message...

4 Veterinarians are online now **Send**

How it works

- Connect**
Tell the vet's assistant what's going on so that she can find the best online vet for your situation.
- Go back-and-forth**
Connect with the vet via chat, email, text or phone. Include details and photos to ensure you get the best answer.
- Help your animal fast**
When your animal isn't feeling well, get step-by-step help from a licensed vet in minutes, 24/7.

Dr. Andy, DVM
Doctor of Veterinary Medicine
Veterinarian specializing in small animals
★★★★★ 32,754 satisfied customers

Pearl Chatbot, Veterinarian's Assistant
Welcome! How can I help with your online vet question?

You
My do will not stop itching

Pearl Chatbot, Veterinarian's Assistant
I'm sorry to hear that your dog is uncomfortable. Can you tell me your dog's breed, age, and name?

Type your message...

4 Veterinarians are online now **Send**

Over 10 million people helped

“
An Awesome experience for my cat's medical issue! Thank you Dr. Rachel and Dr. Kara for giving deep insight on suggestions for the cure. JustAnswer is amazing. Glad I found it!
★★★★★ - Ron J.
”

Dr. Andy, DVM
Doctor of Veterinary Medicine
Veterinarian specializing in small animals
★★★★★ 32,754 satisfied customers

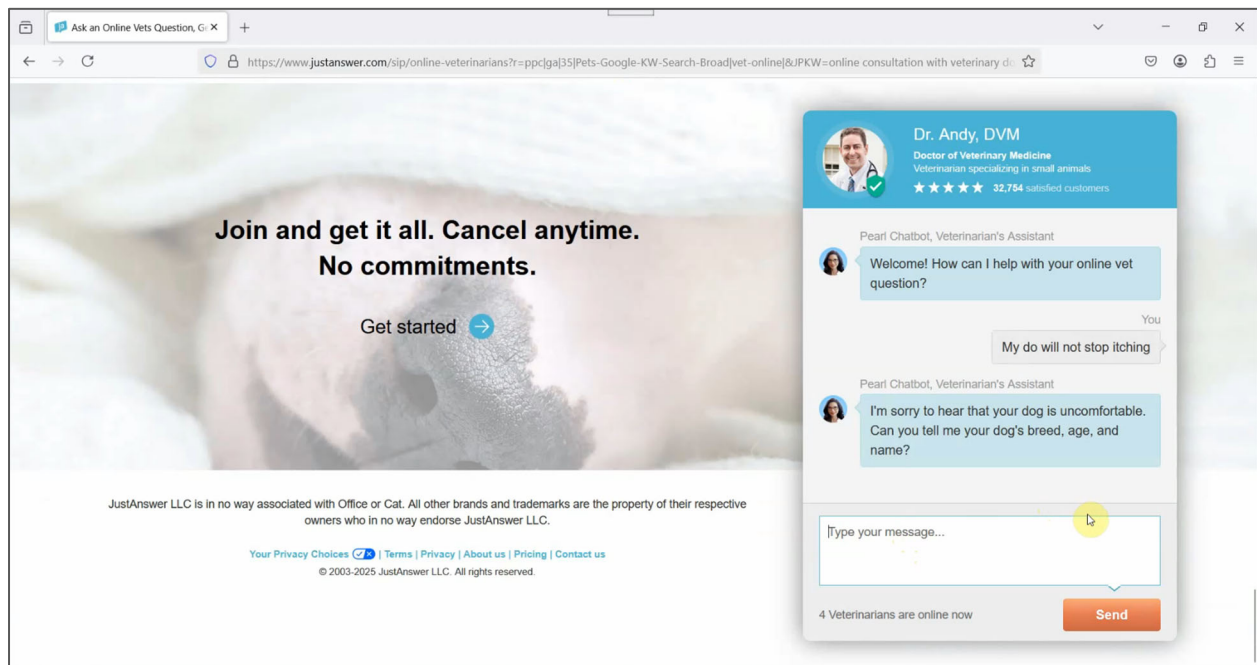
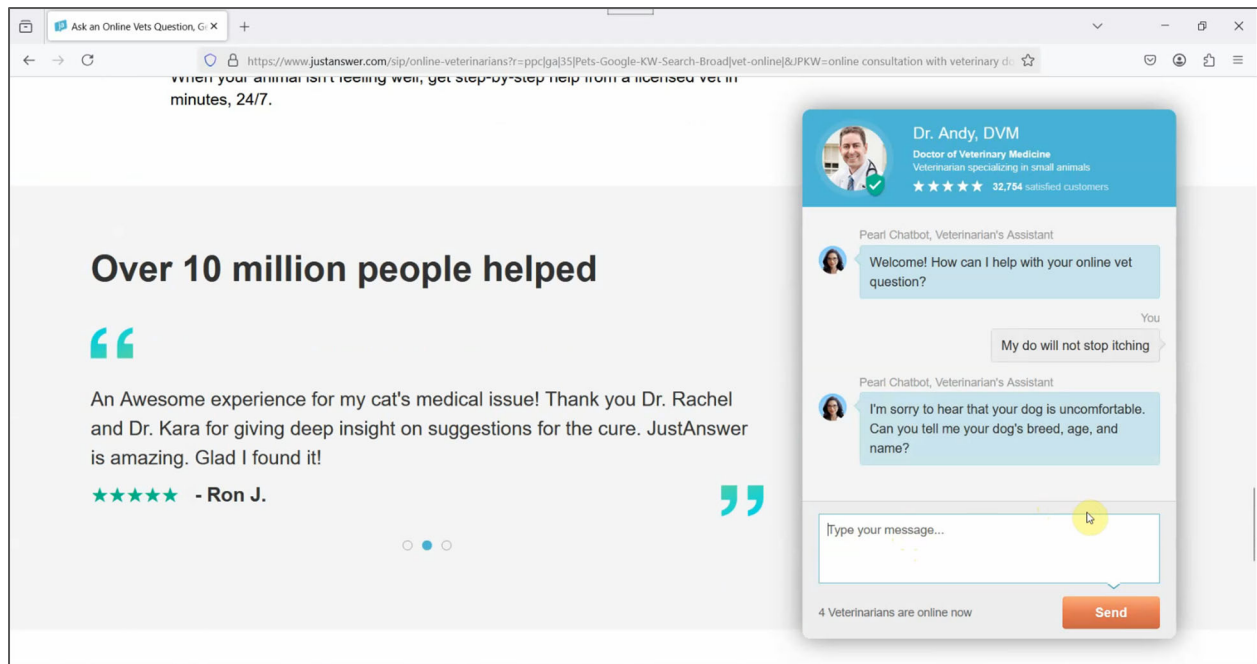
Pearl Chatbot, Veterinarian's Assistant
Welcome! How can I help with your online vet question?

You
My do will not stop itching

Pearl Chatbot, Veterinarian's Assistant
I'm sorry to hear that your dog is uncomfortable. Can you tell me your dog's breed, age, and name?

Type your message...

4 Veterinarians are online now **Send**



Source: FTC web capture

ATTACHMENT D

ATTACHMENT D

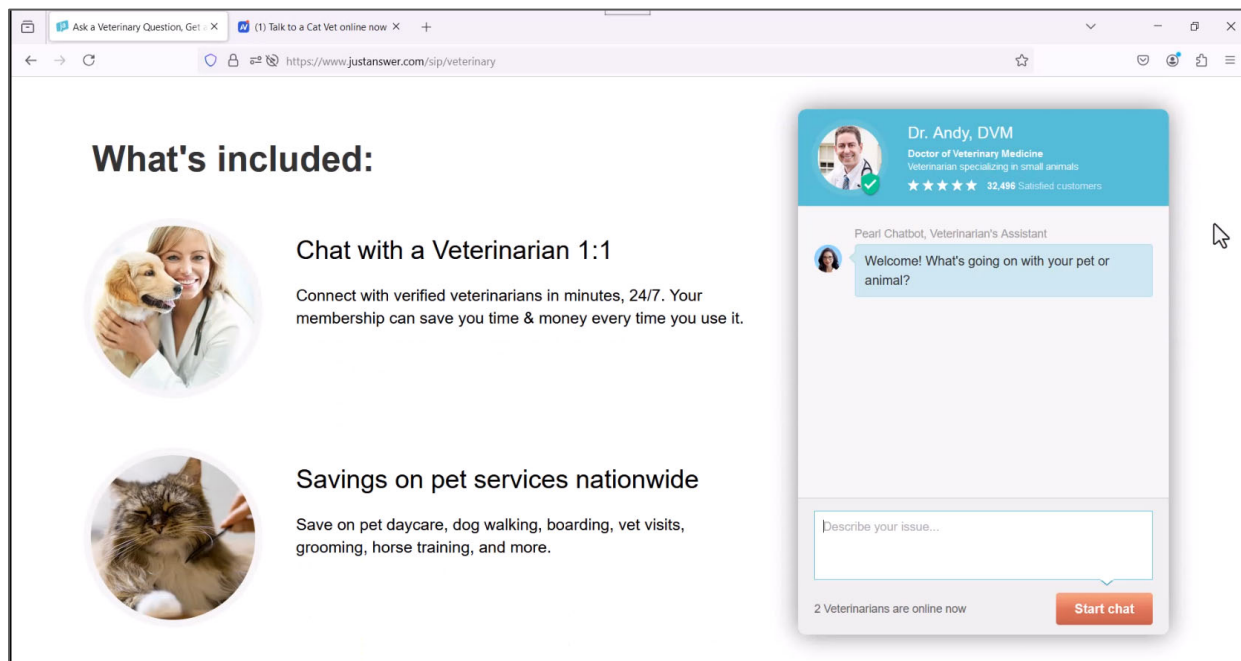
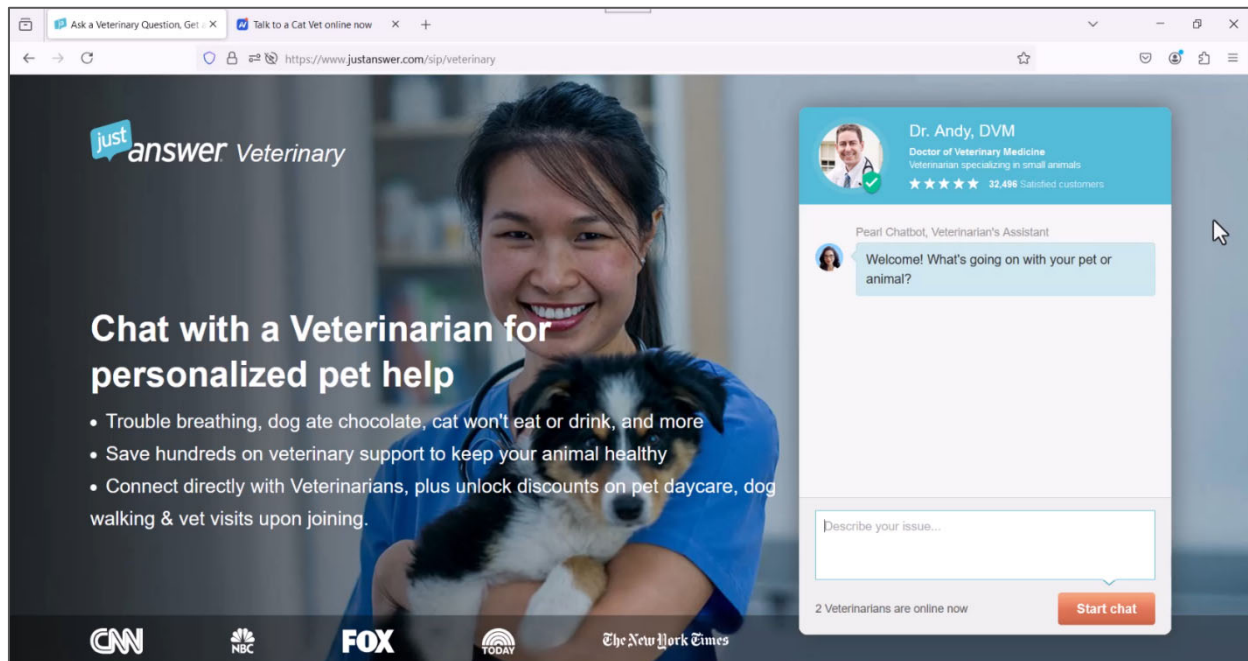
JustAnswer Veterinary Category Payment Form
 (Desktop version, following landing page depicted in Attachment C – March 2025)

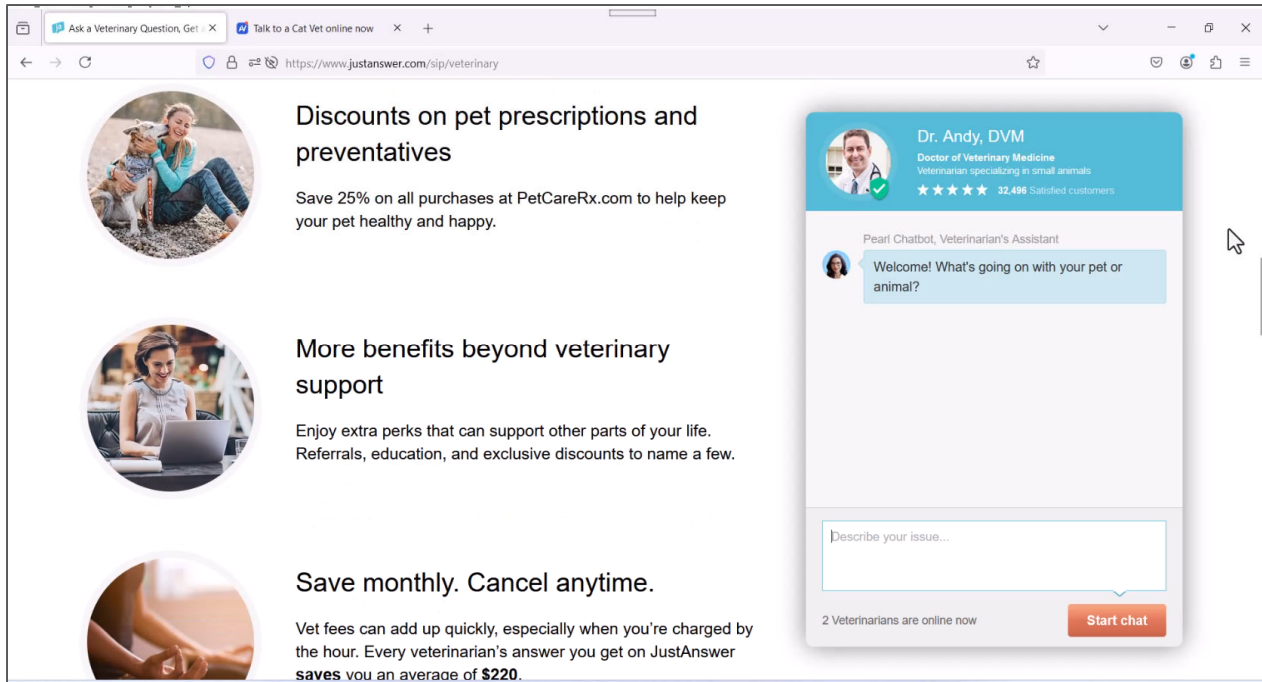
The screenshot shows a web browser window with the JustAnswer website. The main content area displays a payment form titled "Ask a vet about Sunset's itching now". The form includes fields for Email (example@email.com), Credit card number (0000 0000 0000 0000), Expiration (MM / YY), Security code (CVV), and ZIP / Postal code (12345). Below the form is a "Confirm now" button and a "100% GUARANTEE" badge. A disclaimer states: "By clicking 'Confirm now,' I agree to the Terms of Service, Privacy Policy, to be charged the one-time join fee, and a \$29 monthly membership fee today and each month until I cancel. I can cancel via My Account to avoid future charges. Transaction may be processed by a third party." Below the disclaimer is a note: "Avoid costly vet visits. Get the answer you need. Cancel anytime. Your information is secure." To the right of the form is a chat interface with Dr. Andy, DVM, a Veterinarian specializing in small animals, with 32,784 satisfied customers. The chat history shows a question about "changes in her diet or environment recently?" with a "No" response, and a follow-up question about connecting with the Veterinarian via phone call or online chat, with a "chat" response.

Source: FTC web capture

ATTACHMENT E

ATTACHMENT E

JustAnswer Veterinary Category Landing Page
(Desktop version with scrolling – December 2024)



Ask a Veterinary Question, Get... x (1) Talk to a Cat Vet online now x +

https://www.justanswer.com/sip/veterinary

Discounts on pet prescriptions and preventatives

Save 25% on all purchases at PetCareRx.com to help keep your pet healthy and happy.

More benefits beyond veterinary support

Enjoy extra perks that can support other parts of your life. Referrals, education, and exclusive discounts to name a few.

Save monthly. Cancel anytime.

Vet fees can add up quickly, especially when you're charged by the hour. Every veterinarian's answer you get on JustAnswer **saves you an average of \$220.**

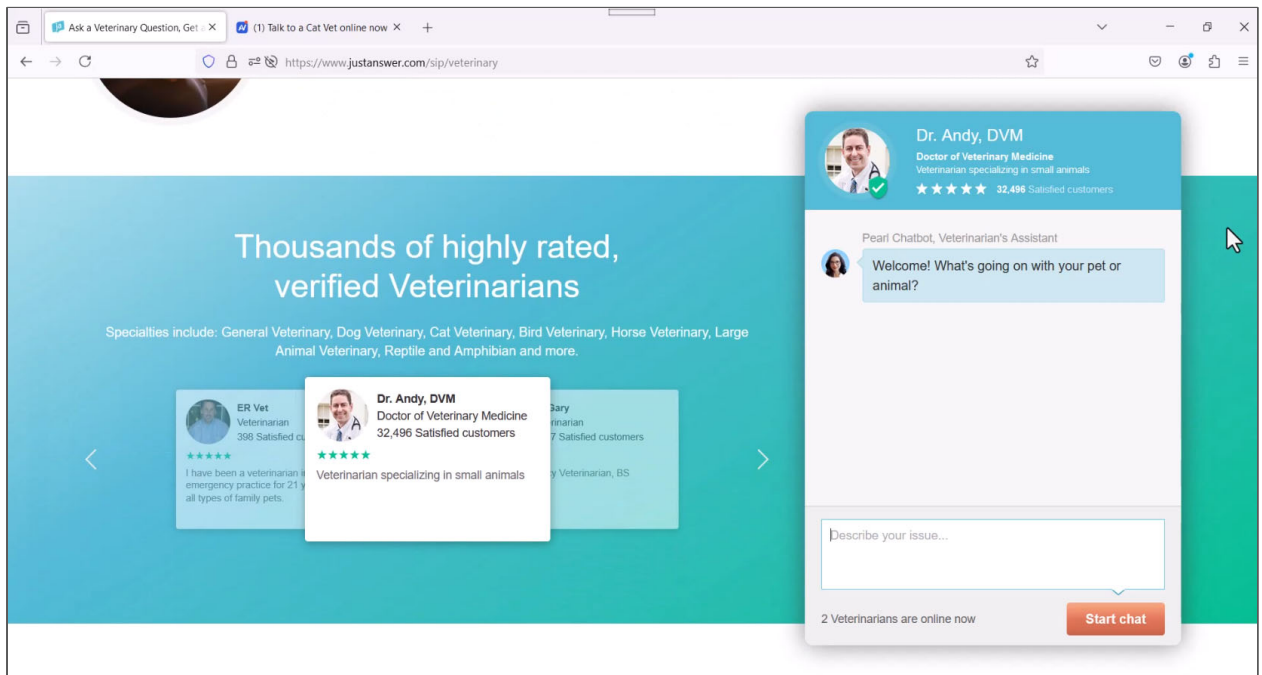
Dr. Andy, DVM
Doctor of Veterinary Medicine
Veterinarian specializing in small animals
★★★★★ 32,496 Satisfied customers

Pearl Chatbot, Veterinarian's Assistant

Welcome! What's going on with your pet or animal?

Describe your issue...

2 Veterinarians are online now **Start chat**



Ask a Veterinary Question, Get... x (1) Talk to a Cat Vet online now x +

https://www.justanswer.com/sip/veterinary

Thousands of highly rated, verified Veterinarians

Specialties include: General Veterinary, Dog Veterinary, Cat Veterinary, Bird Veterinary, Horse Veterinary, Large Animal Veterinary, Reptile and Amphibian and more.

ER Vet
Veterinarian
398 Satisfied customers
★★★★★
I have been a veterinarian in emergency practice for 21 years and have treated all types of family pets.

Dr. Andy, DVM
Doctor of Veterinary Medicine
32,496 Satisfied customers
★★★★★
Veterinarian specializing in small animals

Dr. [Name]
Veterinarian
7 Satisfied customers
★★★★★
Veterinarian, BS

Pearl Chatbot, Veterinarian's Assistant

Welcome! What's going on with your pet or animal?

Describe your issue...

2 Veterinarians are online now **Start chat**

How it works

- Connect**
Tell the Vets' Assistant what's going on so that she can find the best Veterinarian for your pet.
- Go back-and-forth**
Connect with the veterinarian via email, text, or phone. Include photos, scans, and test results to ensure you get a comprehensive answer.
- Keep them healthy**
When your dog, cat or other animal eats something odd, has trouble breathing, or starts misbehaving, get fast answers from a licensed vet—24/7.

Dr. Andy, DVM
Doctor of Veterinary Medicine
Veterinarian specializing in small animals
★★★★★ 32,496 Satisfied customers

Pearl Chatbot, Veterinarian's Assistant
Welcome! What's going on with your pet or animal?

Ask your question here

Describe your issue...

2 Veterinarians are online now **Start chat**

Over 10 million people helped

“
I live in an area where the nearest vet is almost 5 hours away. Loved that they responded immediately. Gave me a ton of helpful suggestions and made sure I was able to say everything I needed/wanted to. Also very polite and tactful. I do highly recommend this service.
★★★★★ - Amy S.
”

Trusted and secure

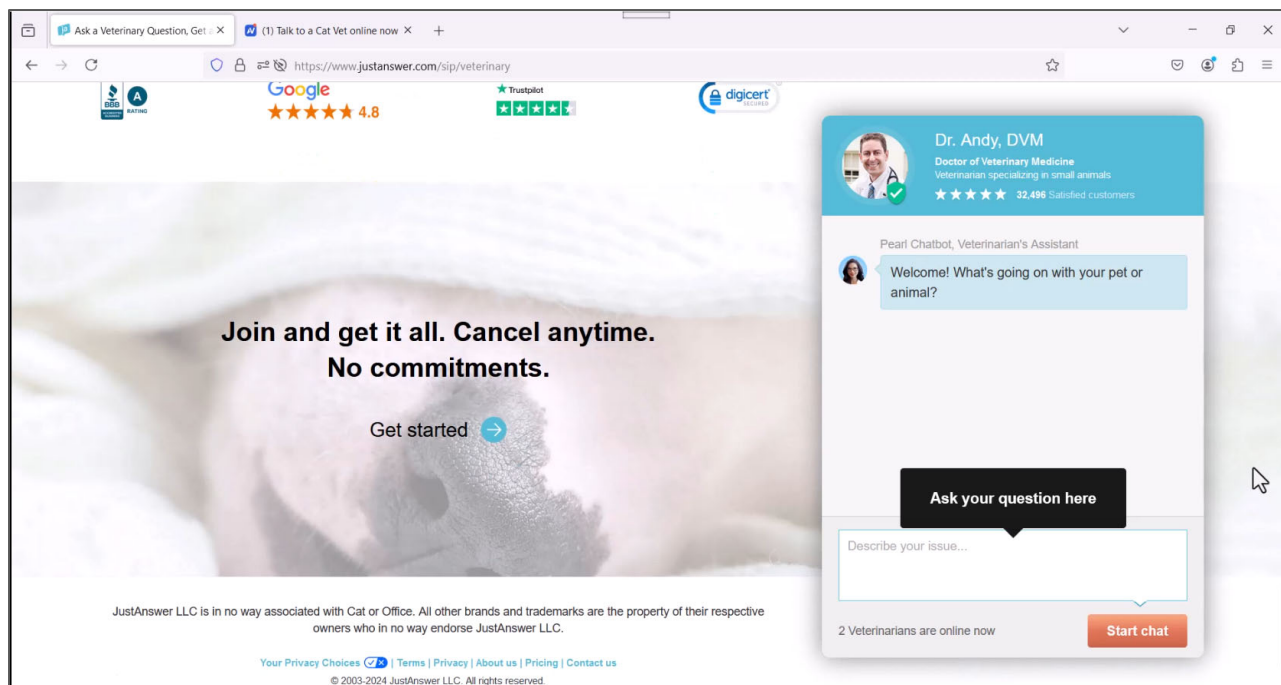
Dr. Andy, DVM
Doctor of Veterinary Medicine
Veterinarian specializing in small animals
★★★★★ 32,496 Satisfied customers

Pearl Chatbot, Veterinarian's Assistant
Welcome! What's going on with your pet or animal?

Ask your question here

Describe your issue...

2 Veterinarians are online now **Start chat**



Source: FTC web capture

ATTACHMENT F

ATTACHMENT F

JustAnswer Veterinary Category Payment Form
(Desktop version, following landing page depicted in Attachment E – December 2024)

Ask a vet about Fluff's coughing now.

☐ Credit Card ☐ PayPal

Email
example@email.com

Credit card number
0000 0000 0000 0000

Expiration Security code ZIP / Postal code
MM / YY CVV 12345

By clicking "Confirm now" I agree to the [Terms of Service](#), [Privacy Policy](#), to be charged the one-time join fee, and a \$47 monthly membership fee today and each month until I cancel. I can cancel via My Account to avoid future charges.

Confirm now

Avoid costly vet visits. Get the answer you need. Cancel anytime.
Your information is [secure](#)

Dr. Andy, DVM
Doctor of Veterinary Medicine
Veterinarian specializing in small animals
★★★★★ 32,496 Satisfied customers

You: for two days now

Pearl Chatbot, Veterinarian's Assistant
Thank you for providing the details. The Veterinarian can help you address Fluff's coughing issue. And, how would you like to connect with the Veterinarian - phone call or online chat?

You: Online chat

Pearl Chatbot, Veterinarian's Assistant
OK, got it. Here's a secure form to join JustAnswer for \$5 (fully-refundable). While you're filling this out, I'll tell the Veterinarian about your situation. You'll connect with them via an online chat.

What's included:

Chat with a Veterinarian 1:1
Connect with verified veterinarians in minutes, 24/7. Your membership can save you time & money every time you use it.

Dr. Andy, DVM
Doctor of Veterinary Medicine
Veterinarian specializing in small animals
★★★★★ 32,496 Satisfied customers

You: for two days now

Pearl Chatbot, Veterinarian's Assistant
Thank you for providing the details. The Veterinarian can help you address Fluff's coughing issue. And, how would you like to connect with the Veterinarian - phone call or online chat?

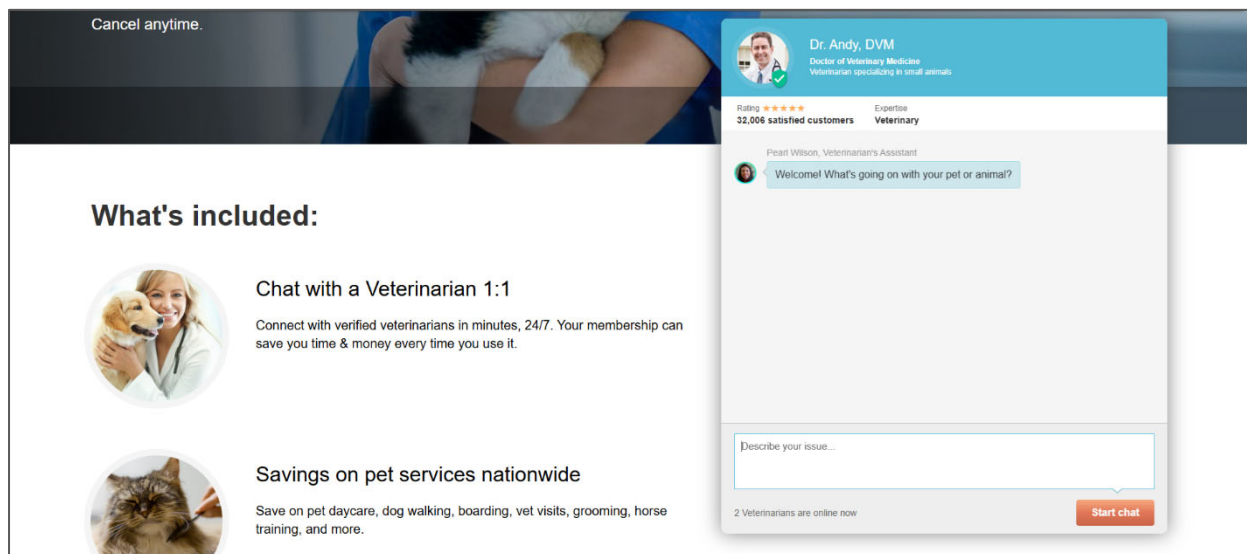
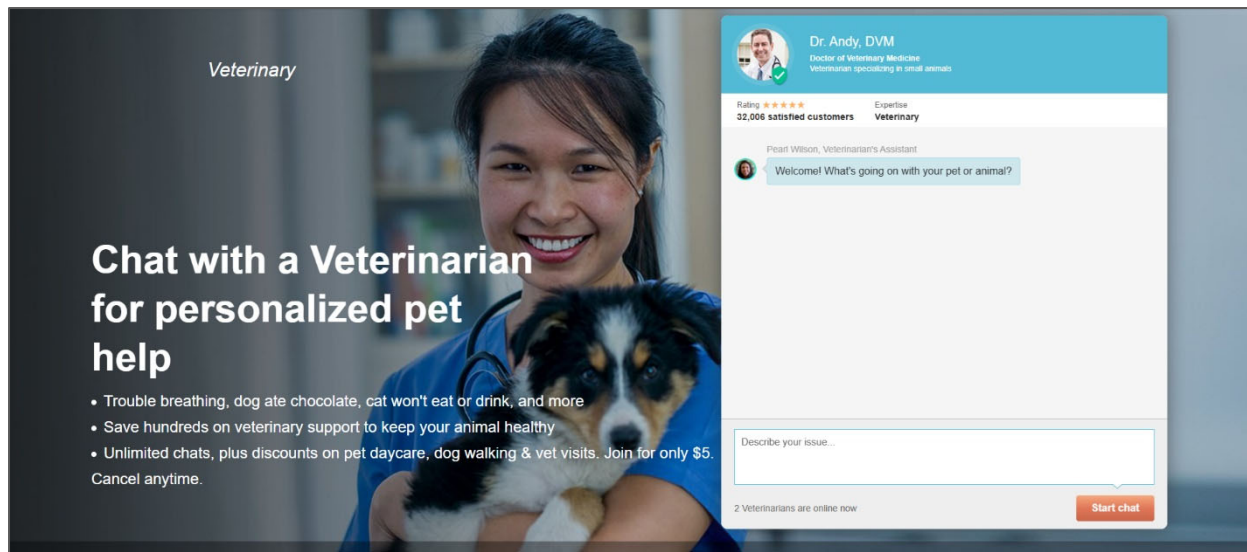
You: Online chat

Pearl Chatbot, Veterinarian's Assistant
OK, got it. Here's a secure form to join JustAnswer for \$5 (fully-refundable). While you're filling this out, I'll tell the Veterinarian about your situation. You'll connect with them via an online chat.

Source: FTC web capture

ATTACHMENT G

ATTACHMENT G

JustAnswer Veterinary Category Landing Page
(Desktop version with scrolling – January 2023)



Discounts on pet prescriptions and preventatives

Save 25% on all purchases at PetCareRx.com to help keep your pet healthy and happy.



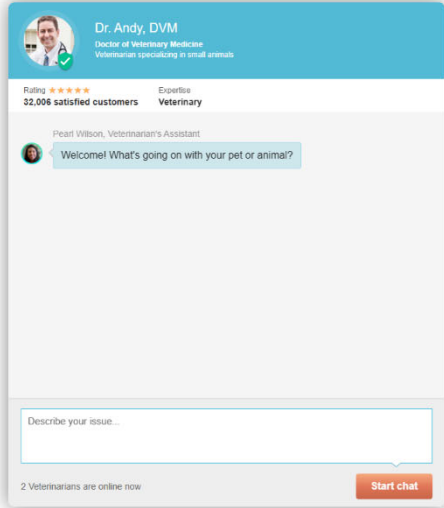
More benefits beyond veterinary support

Enjoy extra perks that can support other parts of your life. Referrals, education, and exclusive discounts to name a few.



Only \$33/month. Cancel anytime.

Vet fees can add up quickly, especially when you're charged by the hour. Every veterinarian's answer you get on JustAnswer **saves** you an average of **\$190**.



Dr. Andy, DVM
Doctor of Veterinary Medicine
Veterinarian specializing in small animals

Rating ★★★★★
32,006 satisfied customers

Expertise: **Veterinary**

Pearl Wilson, Veterinarian's Assistant
Welcome! What's going on with your pet or animal?

Describe your issue...

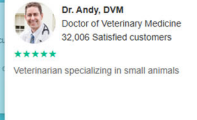
2 Veterinarians are online now [Start chat](#)

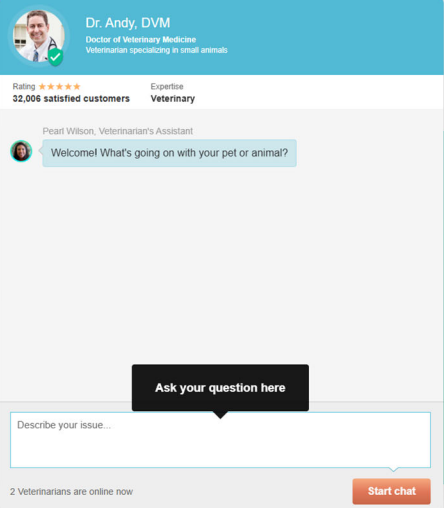


Vet fees can add up quickly, especially when you're charged by the hour. Every veterinarian's answer you get on JustAnswer **saves** you an average of **\$190**.

Thousands of highly rated, verified Veterinarians

Specialties include: General Veterinary, Dog Veterinary, Cat Veterinary, Bird Veterinary, Horse Veterinary, Large Animal Veterinary, Reptile and Amphibian and more.

Dr. Andy, DVM
Doctor of Veterinary Medicine
Veterinarian specializing in small animals

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32,006 satisfied customers

Expertise: **Veterinary**

Pearl Wilson, Veterinarian's Assistant
Welcome! What's going on with your pet or animal?

Describe your issue...

2 Veterinarians are online now [Start chat](#)

[Ask your question here](#)

How it works

- 

Connect

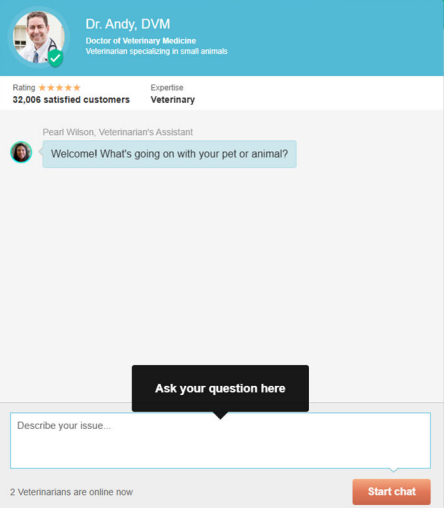
Tell the Vets' Assistant what's going on so that she can find the best Veterinarian for your pet.
- 

Go back-and-forth

Connect with the veterinarian via email, text, or phone. Include photos, scans, and test results to ensure you get a comprehensive answer.
- 

Keep them healthy

When your dog, cat or other animal eats something odd, has trouble breathing, or starts misbehaving, get fast answers from a licensed vet—24/7.



Dr. Andy, DVM
Doctor of Veterinary Medicine
Veterinarian specializing in small animals

Rating ★★★★★
32,006 satisfied customers

Expertise: **Veterinary**

Pearl Wilson, Veterinarian's Assistant
Welcome! What's going on with your pet or animal?

Describe your issue...

2 Veterinarians are online now [Start chat](#)

[Ask your question here](#)

Over 10 million people helped

“

An Awesome experience for my cat's medical issue! Thank you Dr. Rachel and Dr. Kara for giving deep insight on suggestions for the cure. JustAnswer is amazing. Glad I found it!

★★★★★ - Ron J.

”

Trusted and secure








Dr. Andy, DVM
Doctor of Veterinary Medicine
Veterinarian specializing in small animals

Rating ★★★★★
32,006 satisfied customers

Expertise
Veterinary

Pearl Wilson, Veterinarian's Assistant

Welcomel What's going on with your pet or animal?

Ask your question here

Describe your issue...

2 Veterinarians are online now

Start chat

Join and get it all. Cancel anytime.
No commitments.

Get started →

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Expertise
Veterinary

Pearl Wilson, Veterinarian's Assistant

Welcomel What's going on with your pet or animal?

Ask your question here

Describe your issue...

2 Veterinarians are online now

Start chat

Source: JustAnswer Veterinary Landing Page, Internet Archive, archived January 10, 2023, available at <https://web.archive.org/web/20230110192319/https://www.justanswer.com/sip/veterinary/> (last accessed Sept. 8, 2025)

ATTACHMENT H

ATTACHMENT H

JustAnswer Payment Form
(Desktop version – October 2022)



Get your answer from an Expert in minutes
Unlimited conversations—one-time \$1 join fee and **\$50/month**. Cancel anytime.

☒ Credit Card
 ☐  PayPal

Email address

example@email.com

Credit card number

0000 0000 0000 0000

Expiration CVV ZIP / Postal code

MM / YY CVV 12345

By clicking "Confirm now," I agree to the [Terms of Service](#), [Privacy Policy](#), and to be charged the one-time join fee and monthly membership fee above today and each month until I cancel. I can cancel via My Account to avoid future charges.

Confirm now

Avoid consultation fees. Get the answers you need. Cancel anytime.

Your information is [secure](#)



4 Experts are online now



James
Consultant
15,674 Satisfied Customers

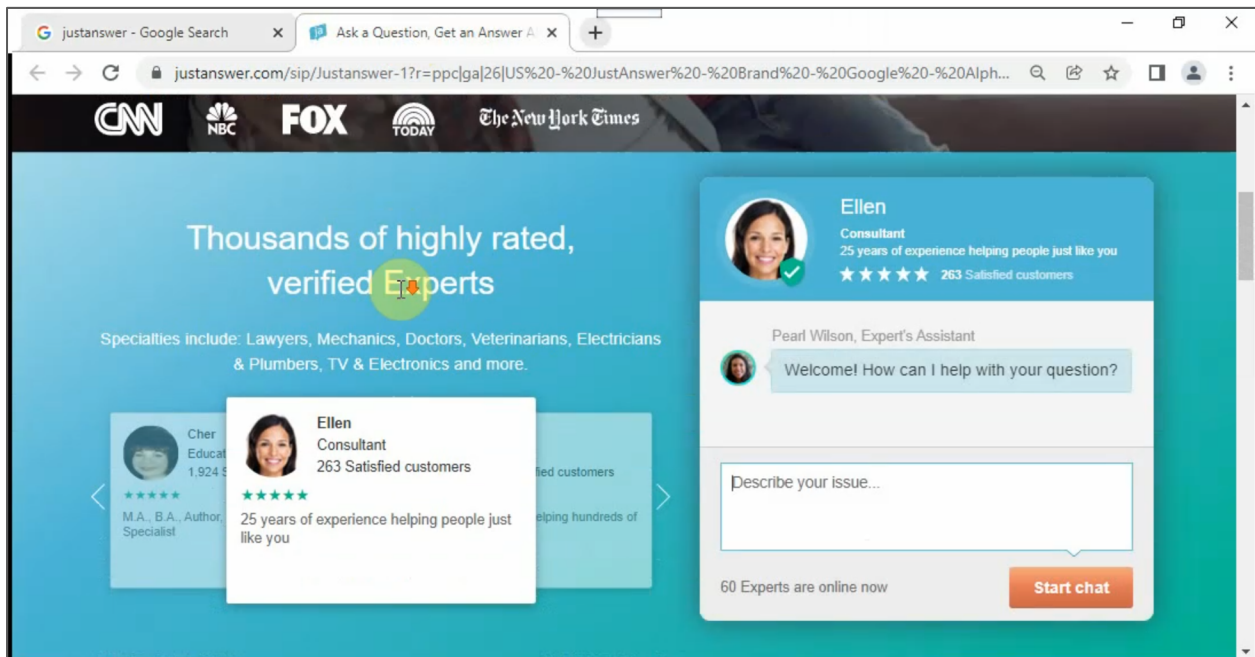
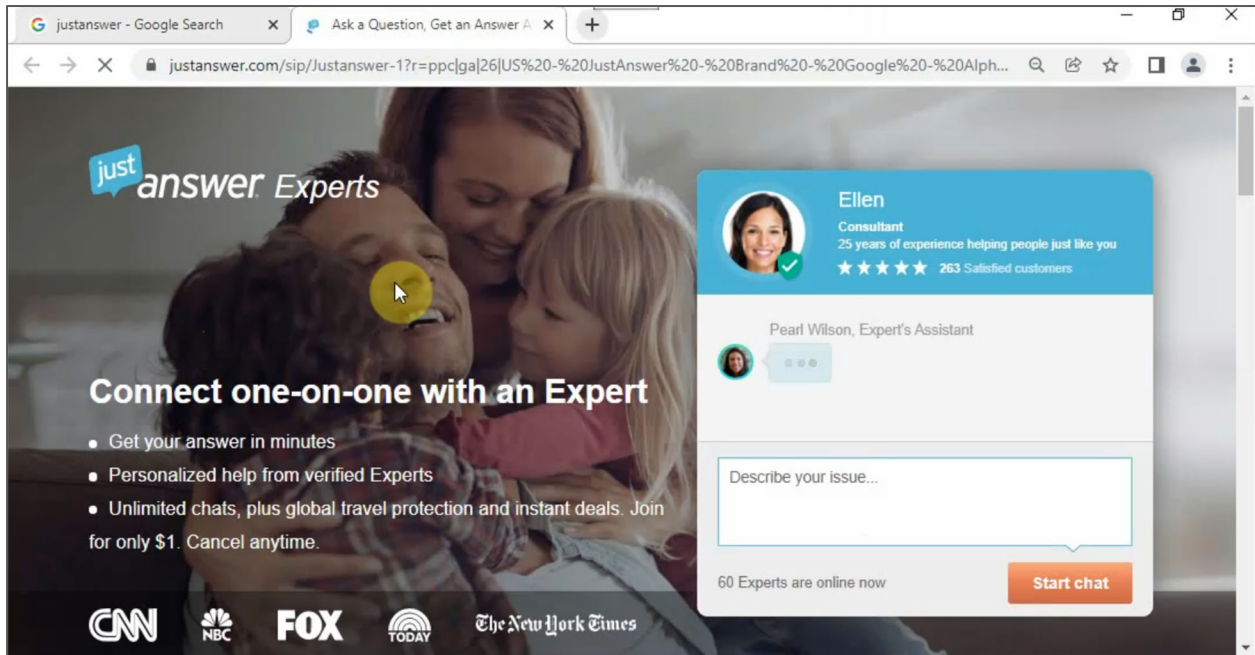
Membership Benefits:

- ✓ Answers from Experts in minutes, 24/7
- ✓ Global travel protection to assist your family on trips
- ✓ Personalized financial guidance on your budget, savings, and goals

Source: JustAnswer

ATTACHMENT I

ATTACHMENT I

JustAnswer Landing Page
(Desktop version with scrolling – June 2022)

How it works

Connect
Tell the Experts' Assistant what's going on so that she can find the best person to help you.

Go back-and-forth
Connect with the Expert via email, text or phone. Include photos, documents, and more.

Ellen
Consultant
25 years of experience helping people just like you
★★★★★ 263 Satisfied customers

Pearl Wilson, Expert's Assistant
Welcome! How can I help with your question?

Ask your question here

Describe your issue...

60 Experts are online now **Start chat**

Fix it now
You have instant access to thousands of Experts to resolve every issue, 24/7.

Over 10 million people helped

Ellen
Consultant
25 years of experience helping people just like you
★★★★★ 263 Satisfied customers

Pearl Wilson, Expert's Assistant
Welcome! How can I help with your question?

Ask your question here

Describe your issue...

60 Experts are online now **Start chat**

justanswer - Google Search x Ask a Question, Get an Answer x +

justanswer.com/sip/Justanswer-1?r=ppc[ga]26[US%20-%20JustAnswer%20-%20Brand%20-%20Google%20-%20Alph...

Over 10 million people helped

“

Wonderful service, prompt, efficient, and accurate. Couldn't have asked for more. I cannot thank you enough for your help.

★★★★★ - Mary C.

”

Ellen
Consultant
25 years of experience helping people just like you
★★★★★ 263 Satisfied customers

Pearl Wilson, Expert's Assistant
Welcome! How can I help with your question?

Ask your question here

Describe your issue...

60 Experts are online now **Start chat**

justanswer - Google Search x Ask a Question, Get an Answer x +

justanswer.com/sip/Justanswer-1?r=ppc[ga]26[US%20-%20JustAnswer%20-%20Brand%20-%20Google%20-%20Alph...

Trusted and secure

BBB A+ RATING 4.8 ★★★★★ Google 9.5 of 10 ★★★★★ TRUSTPILOT Norton SECURED powered by digicert

Low monthly price. Cancel anytime.
No commitments.

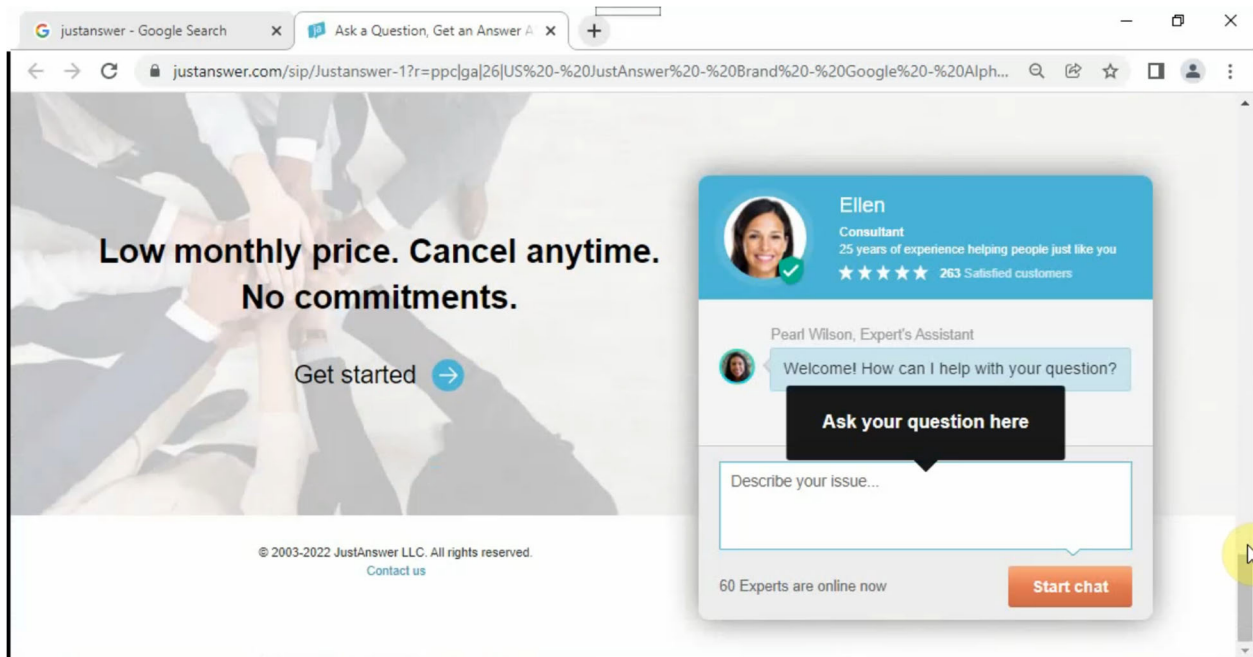
Ellen
Consultant
25 years of experience helping people just like you
★★★★★ 263 Satisfied customers

Pearl Wilson, Expert's Assistant
Welcome! How can I help with your question?

Ask your question here

Describe your issue...

60 Experts are online now **Start chat**



Source: FTC web capture

ATTACHMENT J

ATTACHMENT J

JustAnswer Appliance Category Payment Form
(Desktop version, following landing page depicted in Attachment I – June 2022)

just answer Appliance

Get your answer from an Expert in minutes
Unlimited conversations—one-time \$1 join fee and \$37/month. Cancel anytime.

☒ Credit Card ☐ PayPal

Email address
example@email.com

Credit card number
0000 0000 0000 0000

Expiration CVV ZIP / Postal code
MM / YY CVV 12345

☒ I agree to the [Terms of Service](#), [Privacy Policy](#), and am 13+ years old. I understand this membership renews automatically and will continue until I cancel. I can cancel anytime. Prior charges will not be refunded.

Connect now

Avoid contractor fees. Get the answer you need. Cancel anytime.
Your information is [secure](#)

60 Appliance Experts are online now

Tyler Z
Appliance Expert
122,457 Satisfied Customers

Membership Benefits:

- ✓ Answers from Home Repair Experts in minutes, 24/7

just answer Appliance

Get your answer from an Expert in minutes
Unlimited conversations—one-time \$1 join fee and \$37/month. Cancel anytime.

☒ Credit Card ☐ PayPal

Email address
example@email.com

Credit card number
0000 0000 0000 0000

Expiration CVV ZIP / Postal code
MM / YY CVV 12345

☒ I agree to the [Terms of Service](#), [Privacy Policy](#), and am 13+ years old. I understand this membership renews automatically and will continue until I cancel. I can cancel anytime. Prior charges will not be refunded.

Connect now

Avoid contractor fees. Get the answer you need. Cancel anytime.
Your information is [secure](#)

60 Appliance Experts are online now

Tyler Z
Appliance Expert
122,457 Satisfied Customers

Membership Benefits:

- ✓ Answers from Home Repair Experts in minutes, 24/7
- ✓ Global travel protection to assist your family on trips
- ✓ Personalized financial guidance on your budget, savings, and goals

Source: FTC web capture