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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

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

**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. [REDACTED]

6. [REDACTED]

1           7.       Even though Defendants know their practices cause rampant consumer injury,  
2 they continue to falsely represent to consumers that they can join JustAnswer for just the cost of  
3 the \$1 or \$5 join fee.

4                                   **JURISDICTION**

5           8.       This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a),  
6 1345, and 1355 because this case is brought by an agency of the United States for claims arising  
7 under federal laws regulating commerce and seeks the recovery or enforcement of a penalty.

8                                   **VENUE**

9           9.       Venue is proper in this District under 28 U.S.C. §§ 1391(b)(1), (b)(2), (c)(1),  
10 (c)(2), and (d), and 1395(a), and 15 U.S.C. § 53(b).

11                                  **DIVISIONAL ASSIGNMENT**

12           10.      Pursuant to Rule 3-2(c) of the Civil Local Rules of the Northern District of  
13 California, there is a sufficient basis for assigning this action to the San Francisco Division or the  
14 Oakland Division. A substantial part of the events giving rise to the claims occurred in San  
15 Francisco County and Marin County. *See* Civ. L.R. 3-2(d). Until at least July 2023, Defendant  
16 JustAnswer LLC's headquarters and principal place of business was located in San Francisco  
17 County, and Defendant Andrew Kurtzig resides in Marin County.

18                                  **PLAINTIFF**

19           11.      The FTC is an agency of the United States Government created by the FTC Act,  
20 which authorizes the FTC to commence this district court civil action by its own attorneys.  
21 15 U.S.C. §§ 41–58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which  
22 prohibits unfair or deceptive acts or practices in or affecting commerce. The FTC also enforces  
23 ROSCA, 15 U.S.C. §§ 8401–8405, which prohibits the sale of goods or services on the Internet  
24 through negative option marketing without meeting certain requirements for disclosure, consent,  
25 and cancellation. A negative option is an offer in which the seller treats a consumer's silence—  
26 *i.e.*, their failure to reject an offer or cancel an agreement—as consent to be charged for goods  
27 and services. 16 C.F.R. § 310.2(w).

**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:

[REDACTED]

[REDACTED]

[REDACTED]

**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, [REDACTED] 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,

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

21. Consumers also may sign up directly on the JustAnswer.com homepage, rather than a JustAnswer.com landing page, or in the JustAnswer mobile app, [REDACTED]

[REDACTED] consumers who begin at the JustAnswer.com homepage or mobile app are routed to a different purchase flow than those who click on a search ad.

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

### 1. Search Ads

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

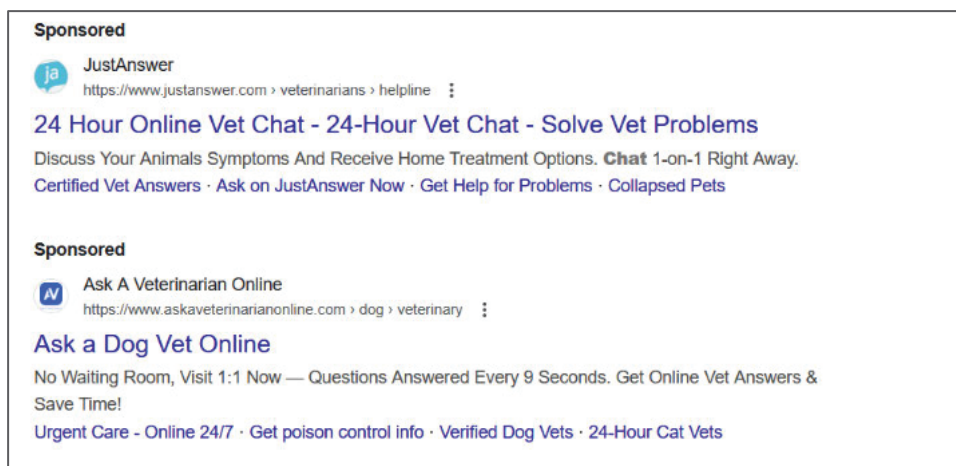


Figure A. JustAnswer Sponsored Google Ads (March 2025)



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](http://www.justanswer.com/sip/veterinary) or [www.justanswer.com/sip/cars](http://www.justanswer.com/sip/cars), or through a specialized domain such as [www.askaveterinarianonline.com/lp](http://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.

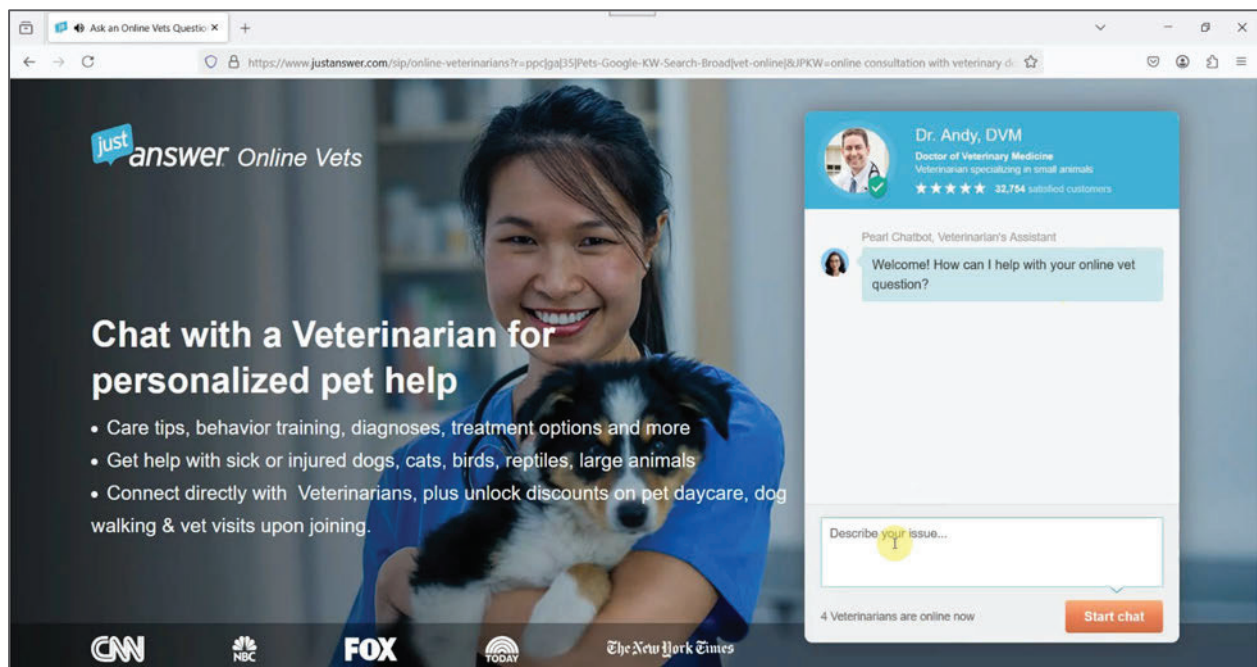


Figure C. Screenshot of JustAnswer Landing Page (desktop) (March 2025)



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.

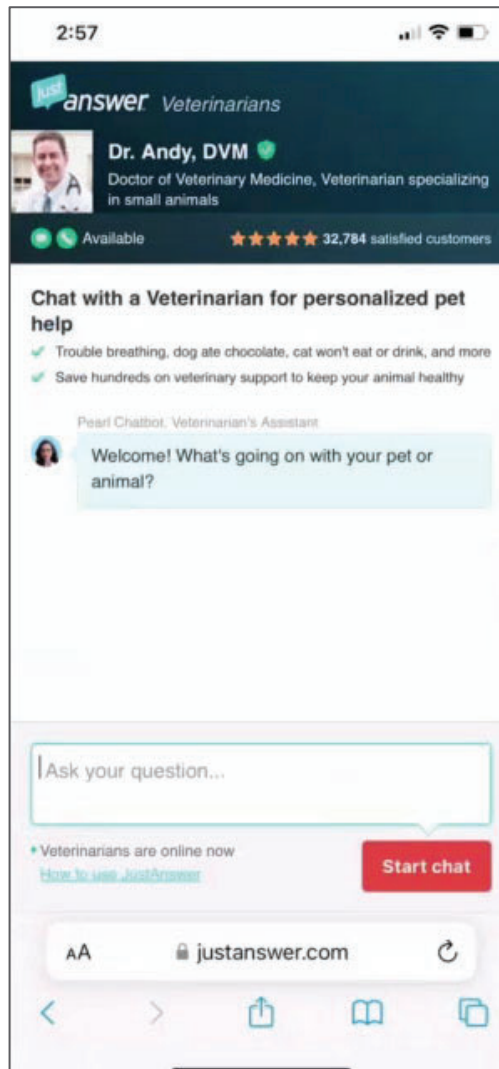


Figure D. Screenshot of JustAnswer Landing Page (mobile) (August 2025)



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."

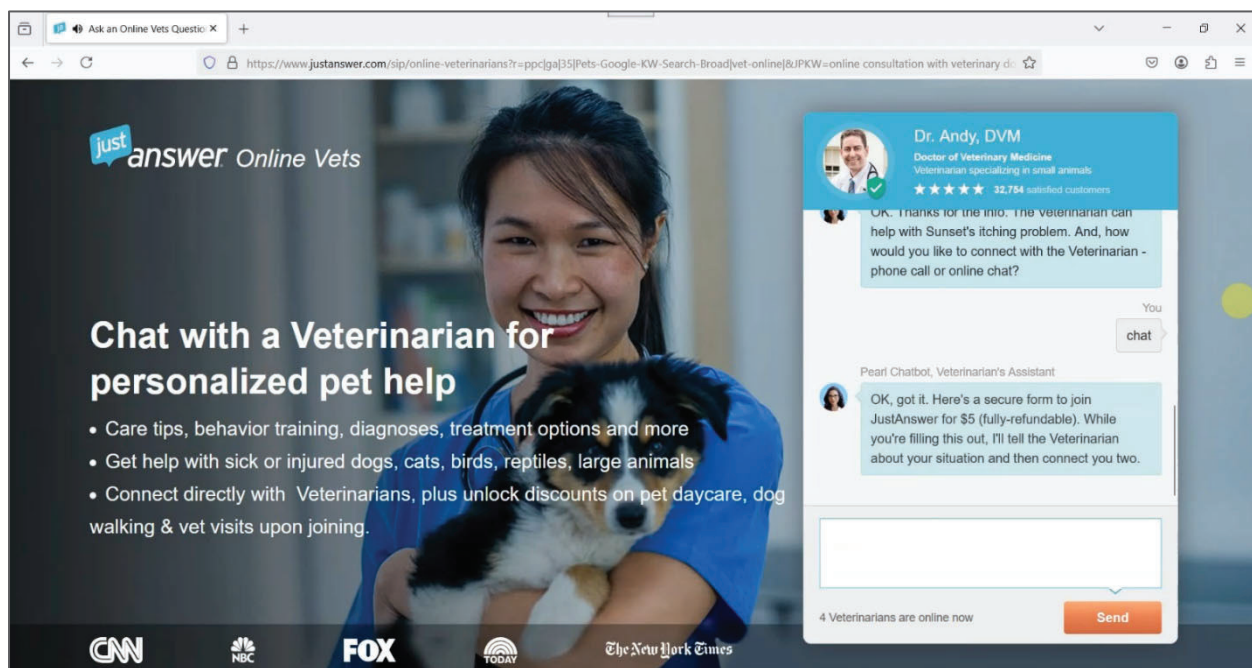


Figure E. Screenshot of JustAnswer Landing Page (desktop) (March 2025)

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. [REDACTED]

14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]

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.

23     //  
24  
25  
26  
27  
28

The screenshot displays the JustAnswer website interface. On the left, a payment form titled "Ask a vet about Sunset's itching now" is visible. It includes fields for email (example@email.com), credit card number (0000 0000 0000 0000), expiration date (MM / YY), security code (CVV), and ZIP / Postal code (12345). A large orange "Confirm now" button is prominent. Below the button, small text states: "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." To the right, a chat window shows a conversation with Dr. Andy, DVM, and a chatbot named Pearl. The chatbot's final message reads: "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 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
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. [REDACTED]

4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]

11 b. [REDACTED]

12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]

19 50. [REDACTED]

20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

26 51. [REDACTED]

27 [REDACTED]  
28 [REDACTED]



1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 52. [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 53. [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 54. [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 55. [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 56. [REDACTED]

25 [REDACTED]

26 [REDACTED]

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.     [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]

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.     [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]

16          61.     [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]

20          62.     [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

25          63.     [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]

1 64. [REDACTED]

2 [REDACTED]

3 65. [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

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

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

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

25 **1. JustAnswer's Website Testing and Marketing Research Show That**  
26 **JustAnswer Misleads Consumers with Its Purchase Flow**

27 68. [REDACTED]

28 [REDACTED]

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[REDACTED]

69. [REDACTED]

[REDACTED]

70. [REDACTED]

[REDACTED]

71. [REDACTED]

[REDACTED]

72. [REDACTED]

[REDACTED]

73.

[REDACTED]

[REDACTED]

[REDACTED]

74.

[REDACTED]

75.

[REDACTED]

1 [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]

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, [REDACTED] 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 //

28

**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 \$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.

**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

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NY Bar No. 5132063

EVAN ROSE

Cal. Bar No. 253478

ALYSSA J. WU

Cal. Bar No. 339651

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Phone: (415) 848-5100

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

awul@ftc.gov

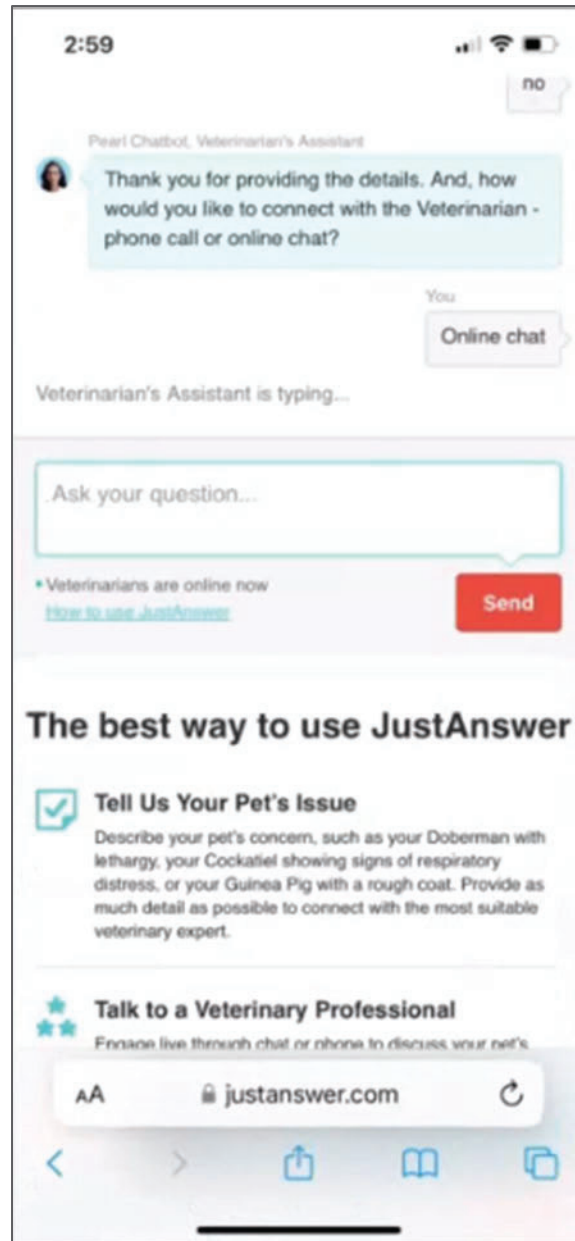
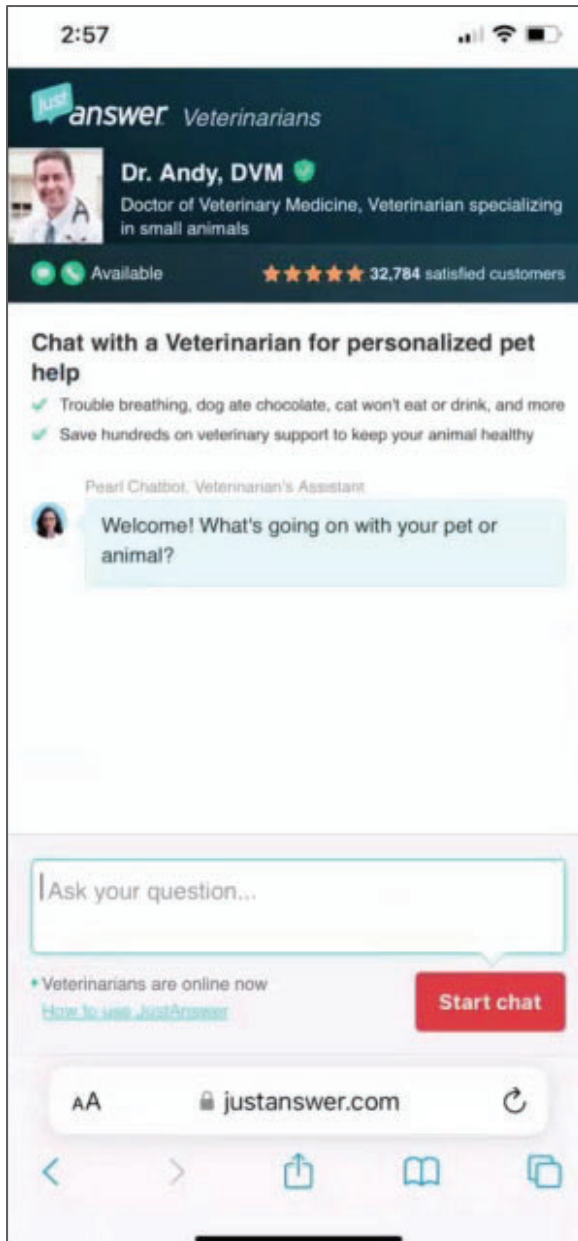
Attorneys for Plaintiff

FEDERAL TRADE COMMISSION

# **ATTACHMENT A**

## ATTACHMENT A

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



2:59

**Talk to a Veterinary Professional**

Engage live through chat or phone to discuss your pet's health or behavior. From understanding why your Siamese kitten is refusing food to addressing your Golden Retriever's sudden vomiting, veterinary experts are ready to assist you.

**Support Your Pet's Health with Confidence**


Follow step-by-step guidance on managing health concerns and preventing future issues. Whether it's adjusting your Labrador's diet to address obesity, soothing your Chihuahua's anxiety, or ensuring your Axolotl's water conditions are optimal, experts are there to answer questions every step of the way.

**Find Even More Support**

Explore additional categories to see how 12,000+ experts can assist you in other areas, including law, health, cars, and home improvement. Whether you're navigating pet care or managing a business, professional answers are just a message away.

CNN NBC FOX TODAY The New York Times

**What's included:**

 **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

**Find Even More Support**

Explore additional categories to see how 12,000+ experts can assist you in other areas, including law, health, cars, and home improvement. Whether you're navigating pet care or managing a business, professional answers are just a message away.


CNN NBC FOX TODAY The New York Times

**What's included:**



**1:1 Access to Veterinarians 24/7**

Connect with veterinary professionals anytime, day or night, to address your pet's health and wellness concerns. Whether your Labrador Retriever has ingested chocolate, 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.

 **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

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



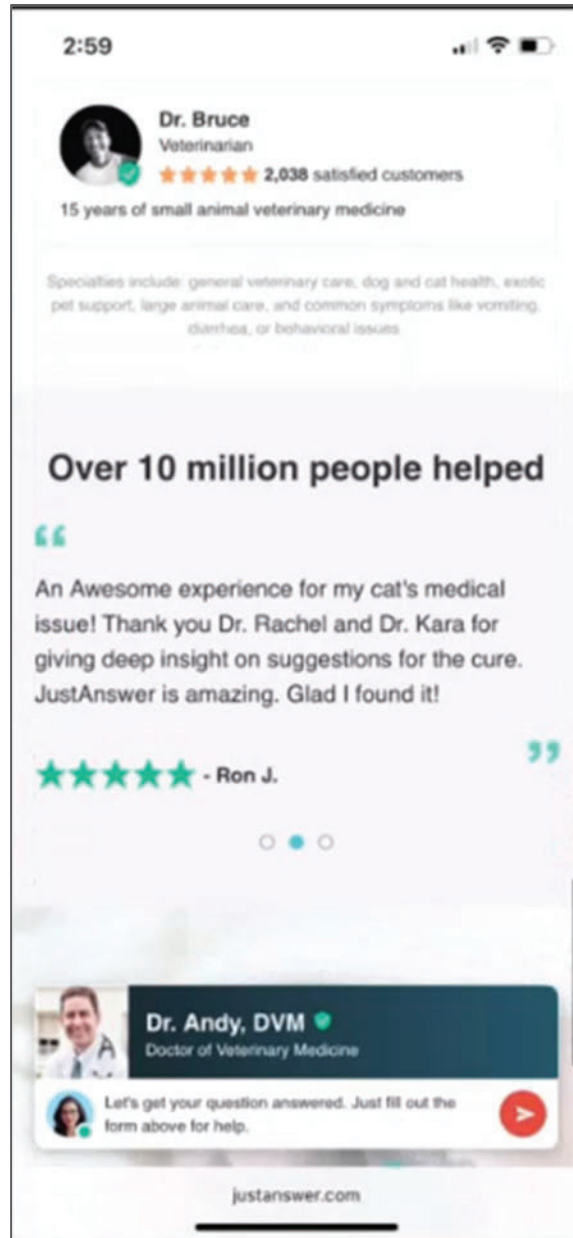
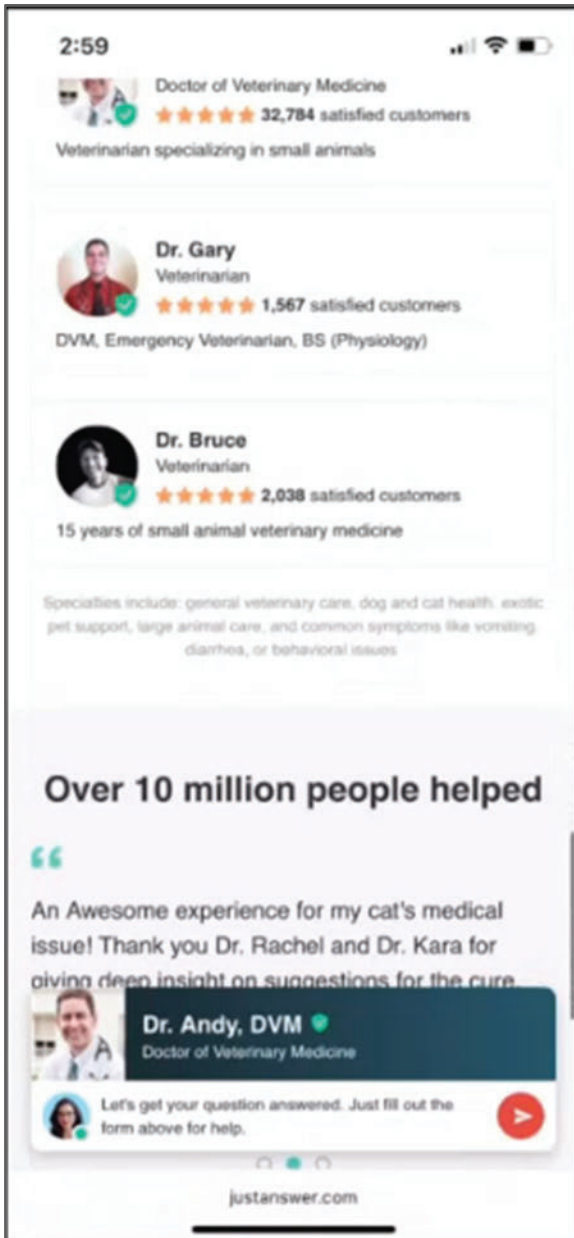
**Dr. Andy, DVM**   
Doctor of Veterinary Medicine

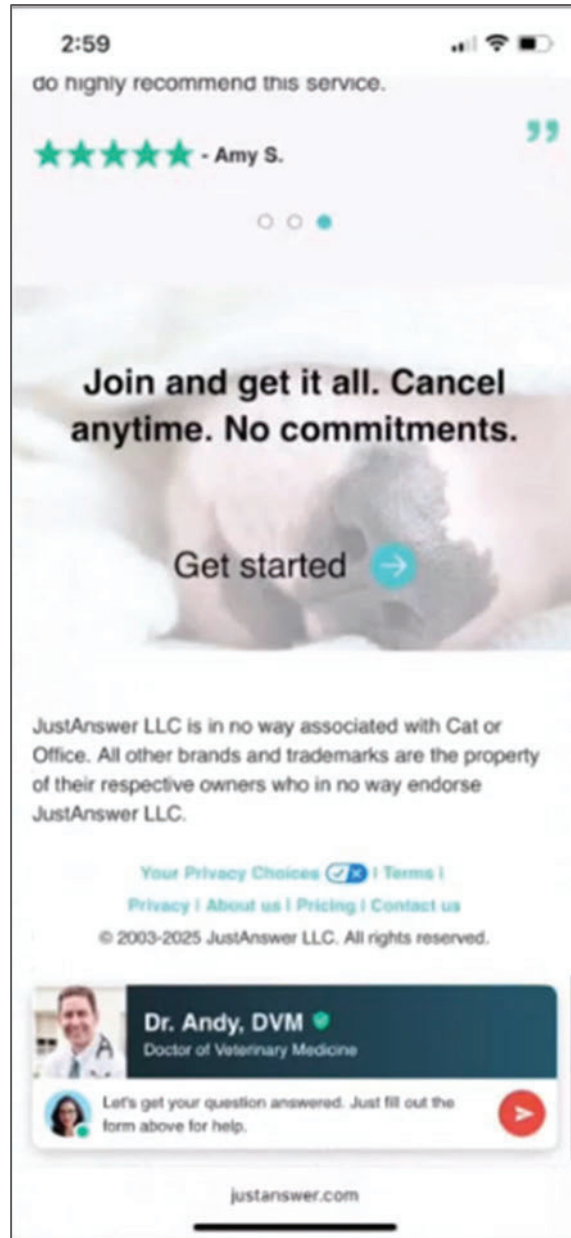
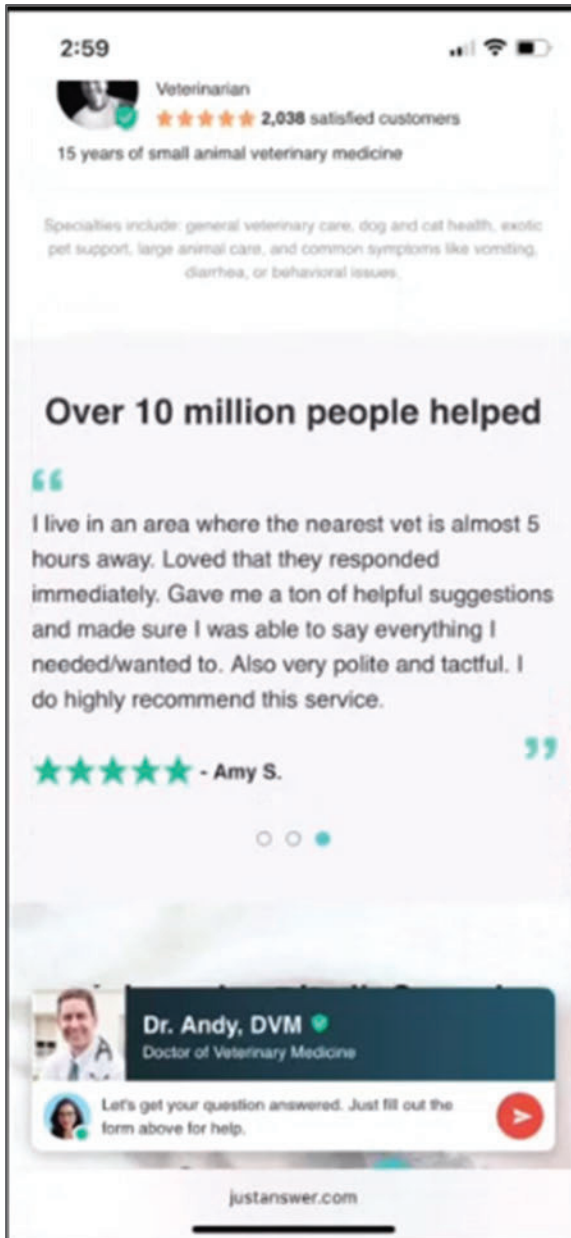


Let's get your question answered. Just fill out the form above for help.



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

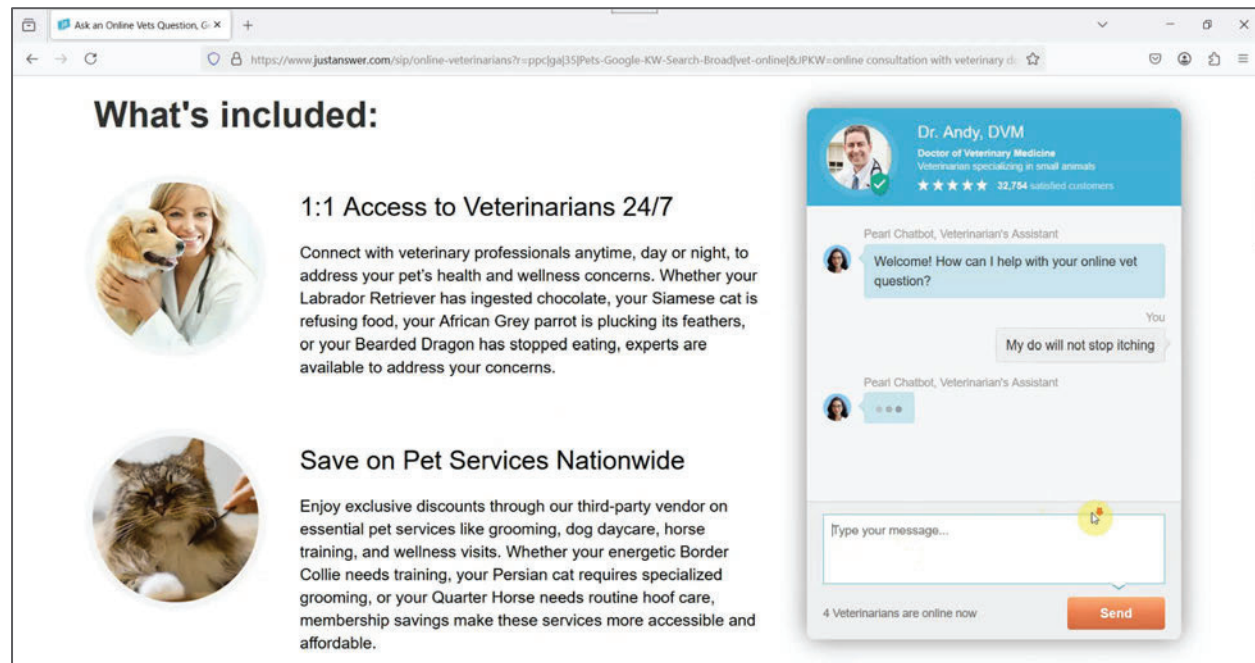
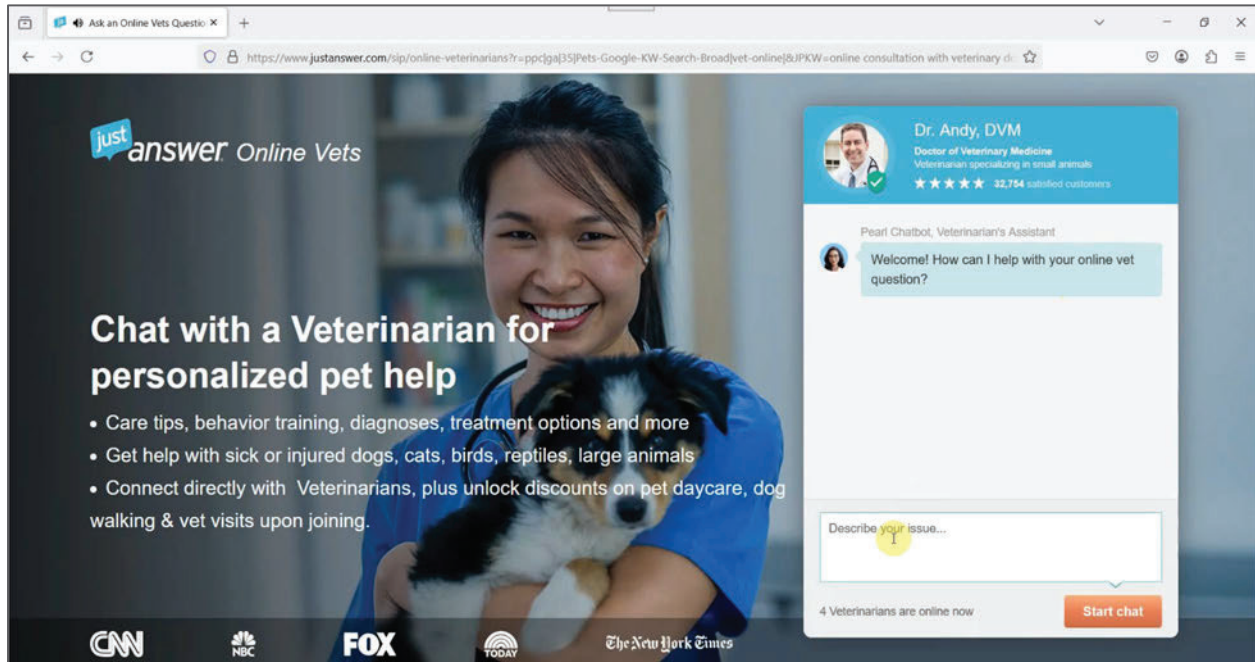
justanswer.com

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

**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.

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**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

**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  
★★★★★ 32,784 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**

**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  
★★★★★ 32,784 satisfied customers

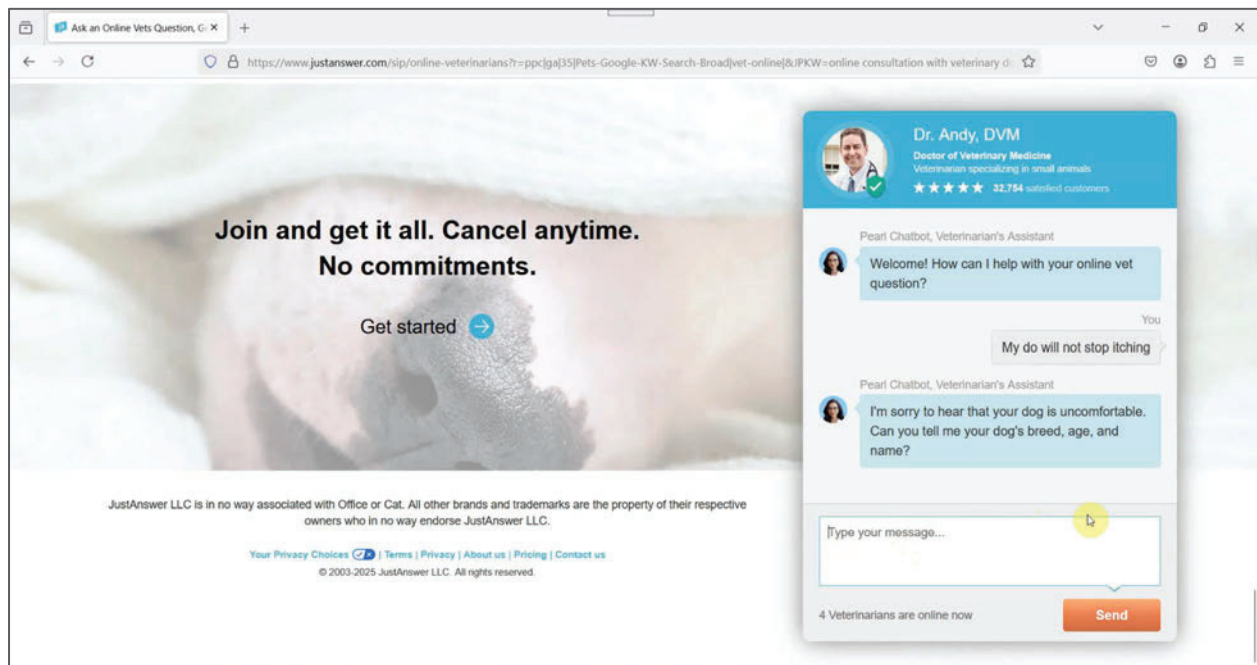
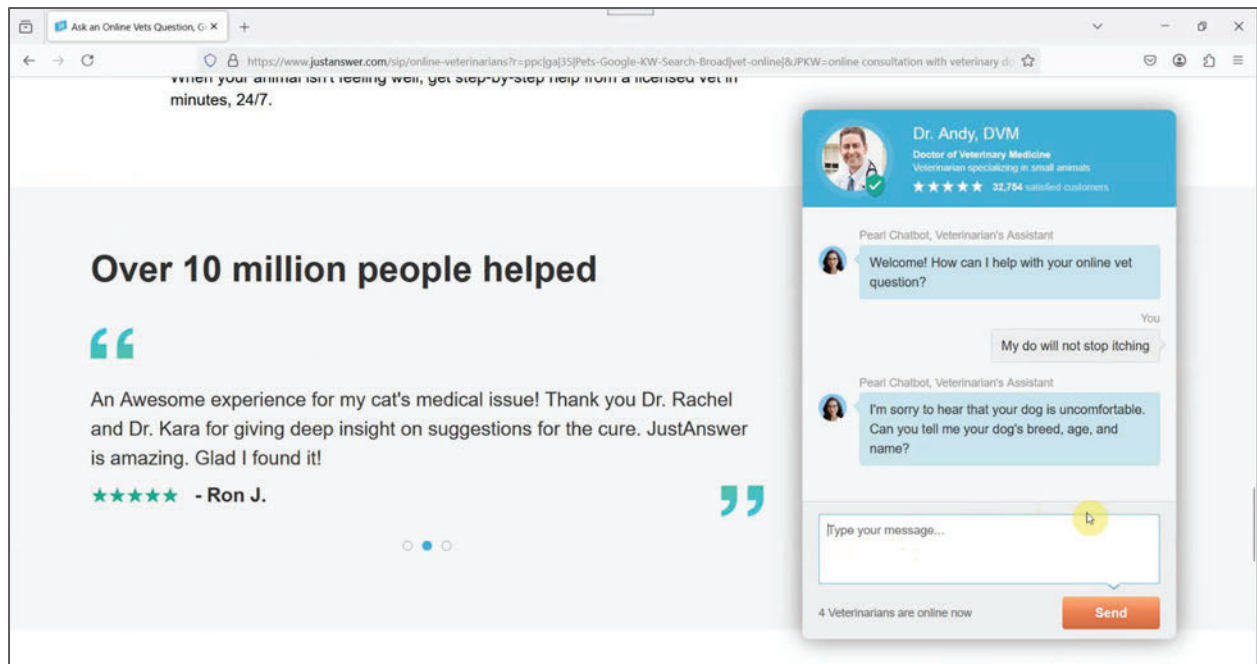
Pearl Chatbot, Veterinarian's Assistant  
Welcome! How can I help with your online vet question?

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**



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 URL [https://www.justanswer.com/sip/online-veterinarians?r=ppciga35\[Pets-Google-KW-Search-Broad\]vet-online&JPKW=online consultation with veterinarian dr](https://www.justanswer.com/sip/online-veterinarians?r=ppciga35[Pets-Google-KW-Search-Broad]vet-online&JPKW=online consultation with veterinarian dr). The page is titled "Ask a vet about Sunset's itching now".

**Payment Options:** Credit Card (selected) or PayPal.

**Form Fields:**

- Email: example@email.com
- Credit card number: 0000 0000 0000 0000
- Expiration: MM / YY
- Security code: CVV
- ZIP / Postal code: 12345

**Terms and Conditions:** 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.

**Confirm now** button with a "100% GUARANTEE" badge.

**Chat Interface:**

- Dr. Andy, DVM** (Doctor of Veterinary Medicine, Veterinarian specializing in small animals, 32,784 satisfied customers): changes in her diet or environment recently?
- You:** No
- Pearl Chatbot, Veterinarian's Assistant:** OK, Thanks for the info. The Veterinarian can help with Sunset's itching problem. And, how would you like to connect with the Veterinarian - phone call or online chat?
- You:** 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 and then connect you two.

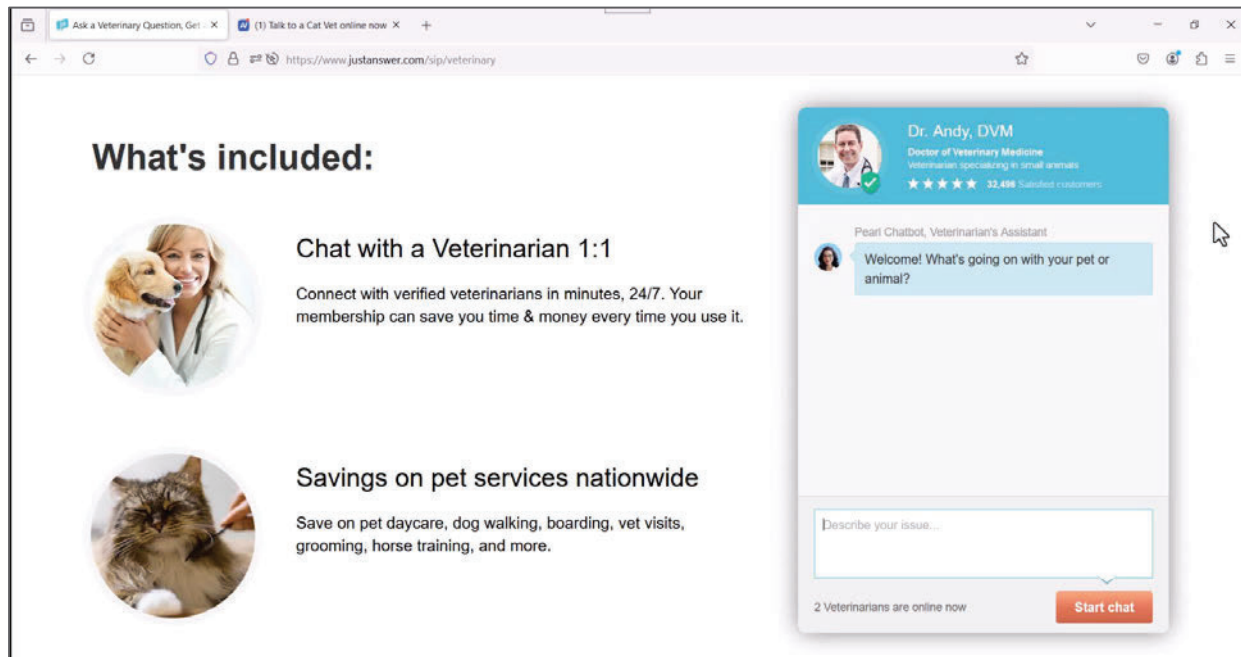
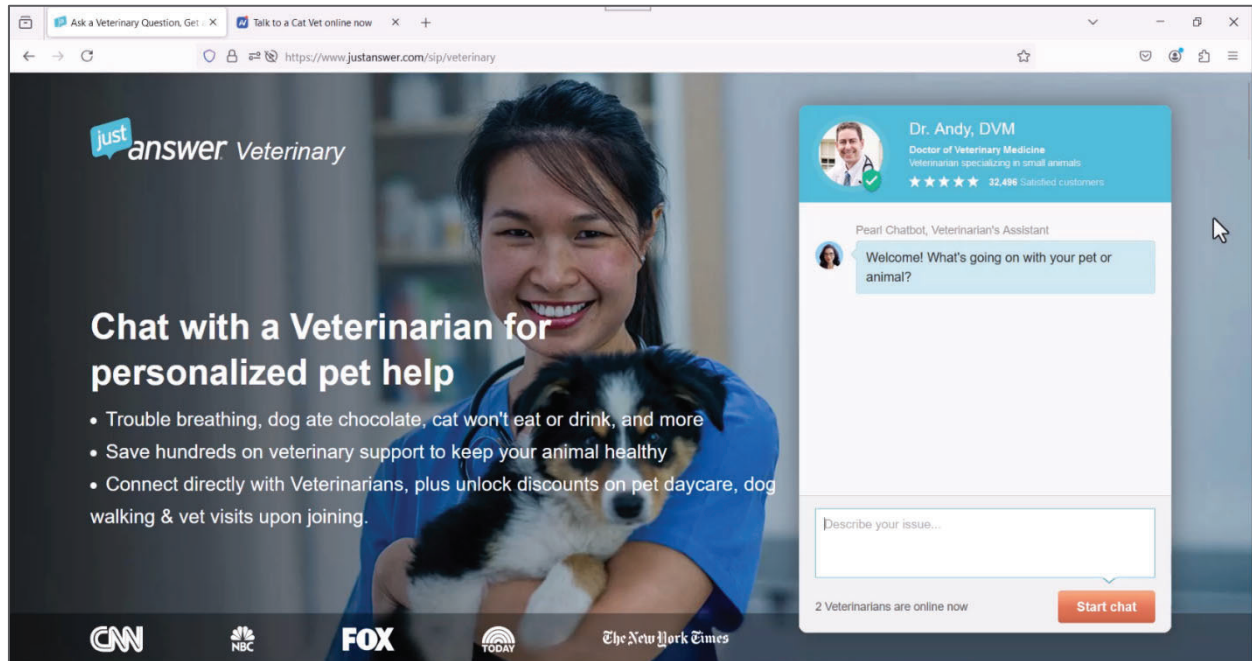
Source: FTC web capture

# **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  
★★★★★ 396 Satisfied customers  
I have been a veterinarian in emergency practice for 21 years and I have treated all types of family pets.

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

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

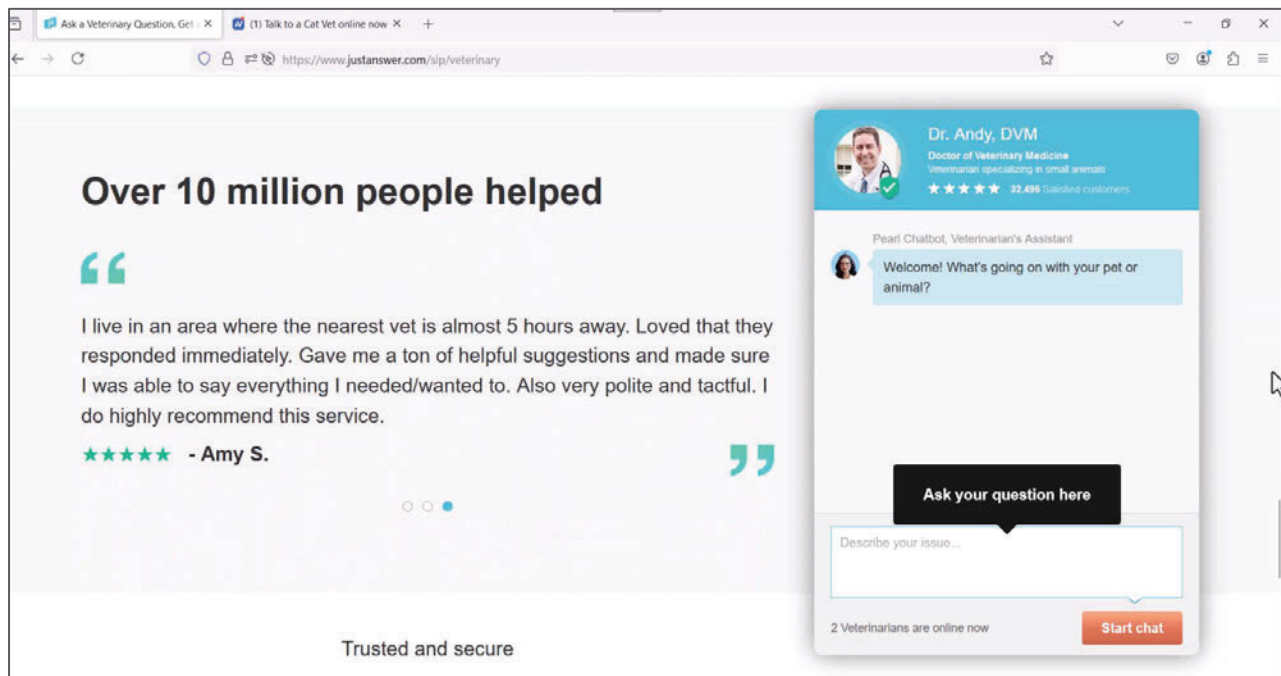
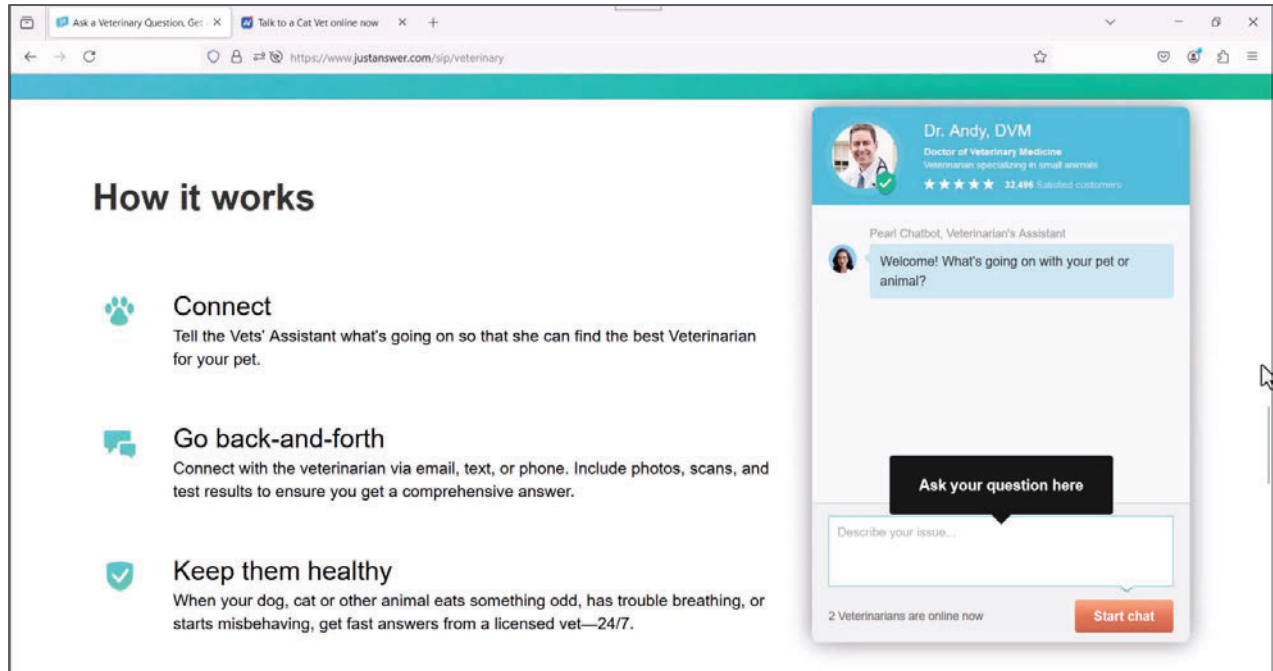
Pearl Chatbot, Veterinarian's Assistant

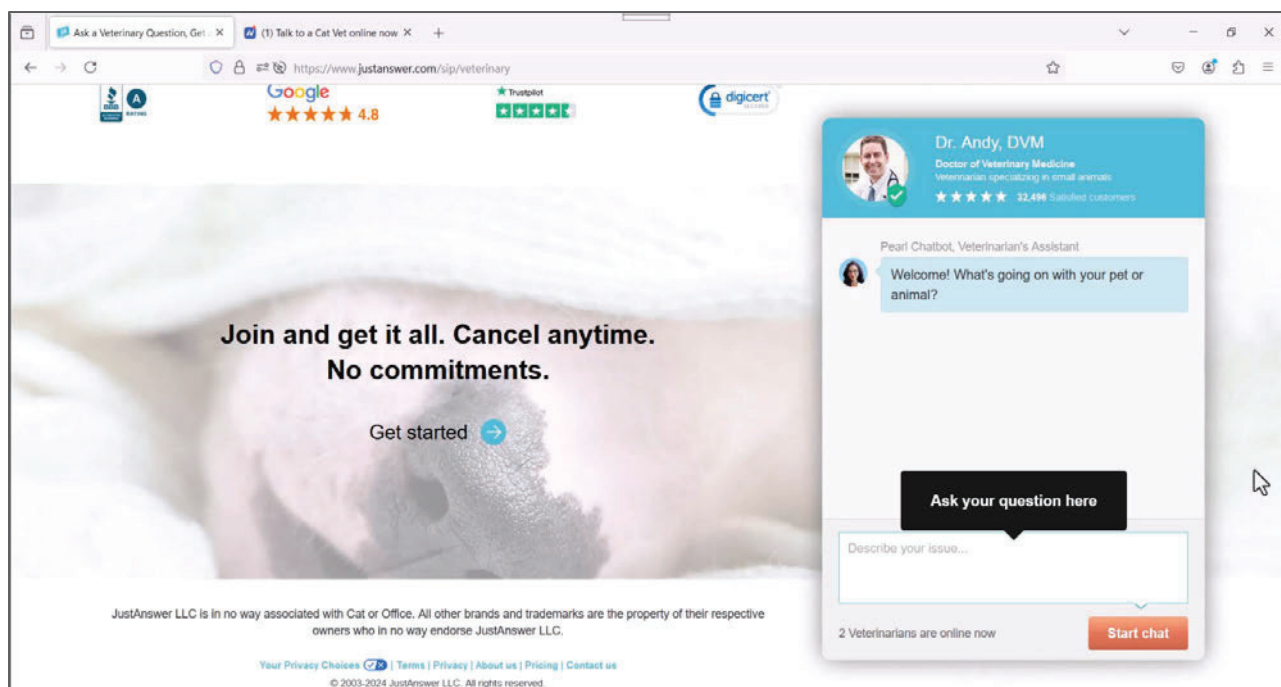
Welcome! What's going on with your pet or animal?

Describe your issue...

2 Veterinarians are online now **Start chat**







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:

Credit card number:

Expiration:  Security code:  ZIP / Postal code:

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.

**Savings on pet services nationwide**

**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

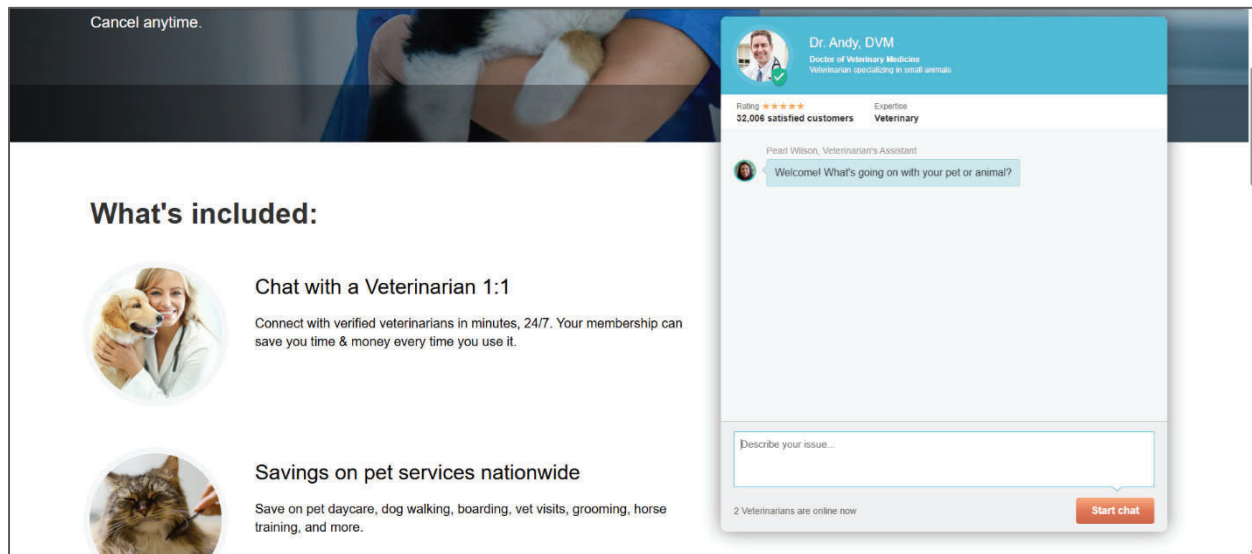
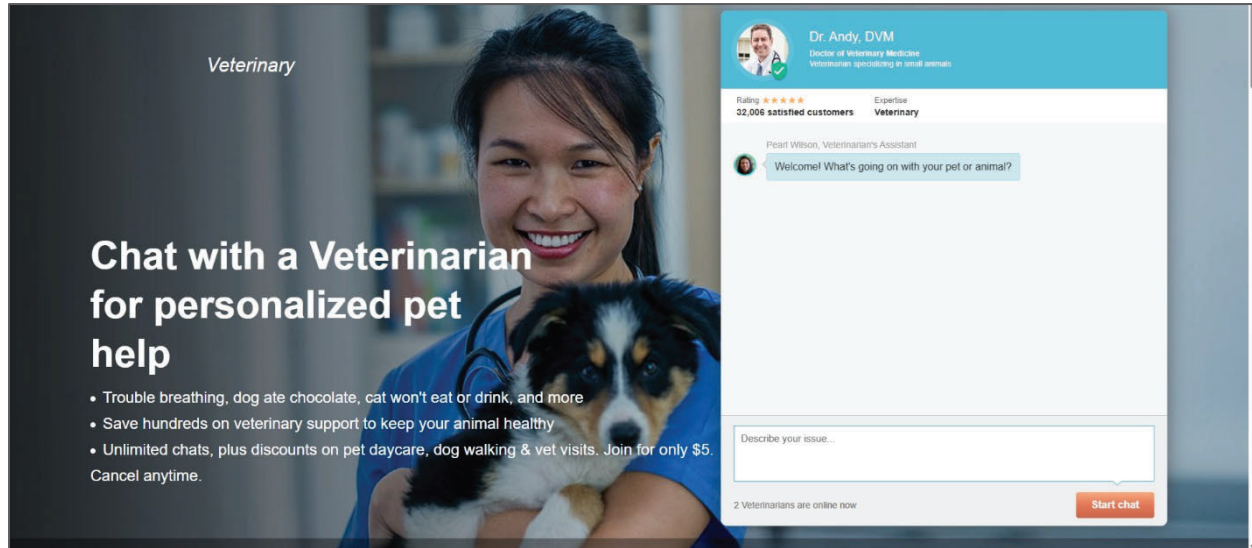
Pearl Chatbot, Veterinarian's Assistant: OK, got it. Here's a secure form to join JustAnswer for \$5 (fully-refundable). While you're filling this out, I'll tell the Veterinarian about your situation. You'll connect with them via an online chat.


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.



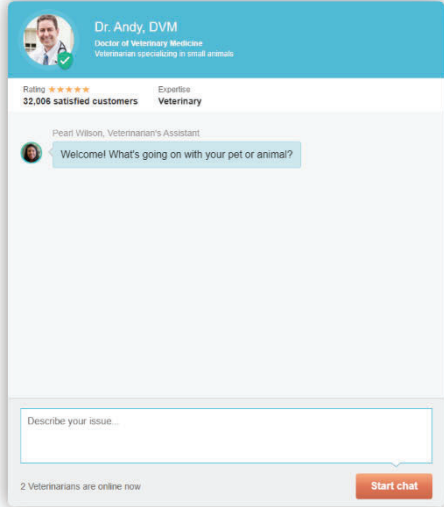
**More benefits beyond veterinary support**

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...

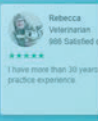
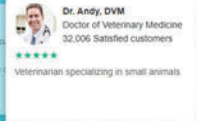
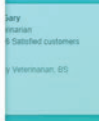
2 Veterinarians are online now [Start chat](#)

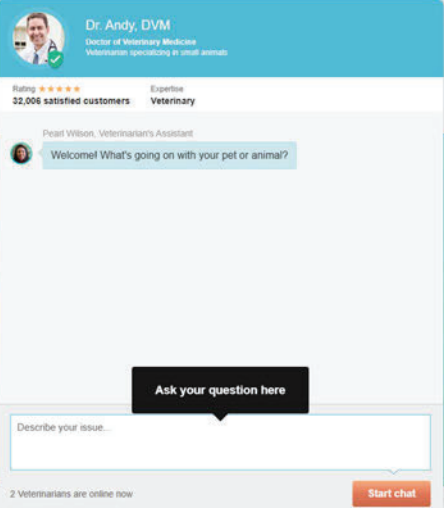


Vet fees can add up quickly, especially when you're charged by the hour. Every veterinarian's answer you get on JustAnswer **saves** you an average of **\$190**.

**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

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**

## How it works




**Connect**

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



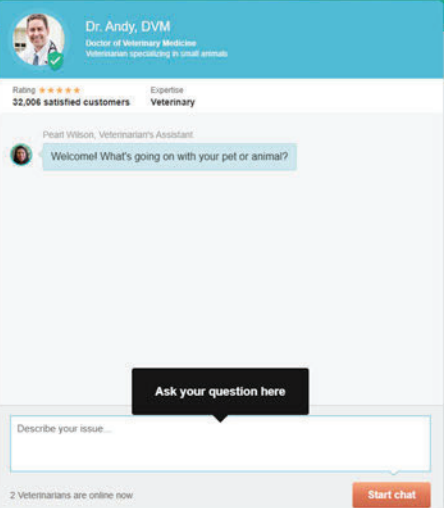
**Go back-and-forth**

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**

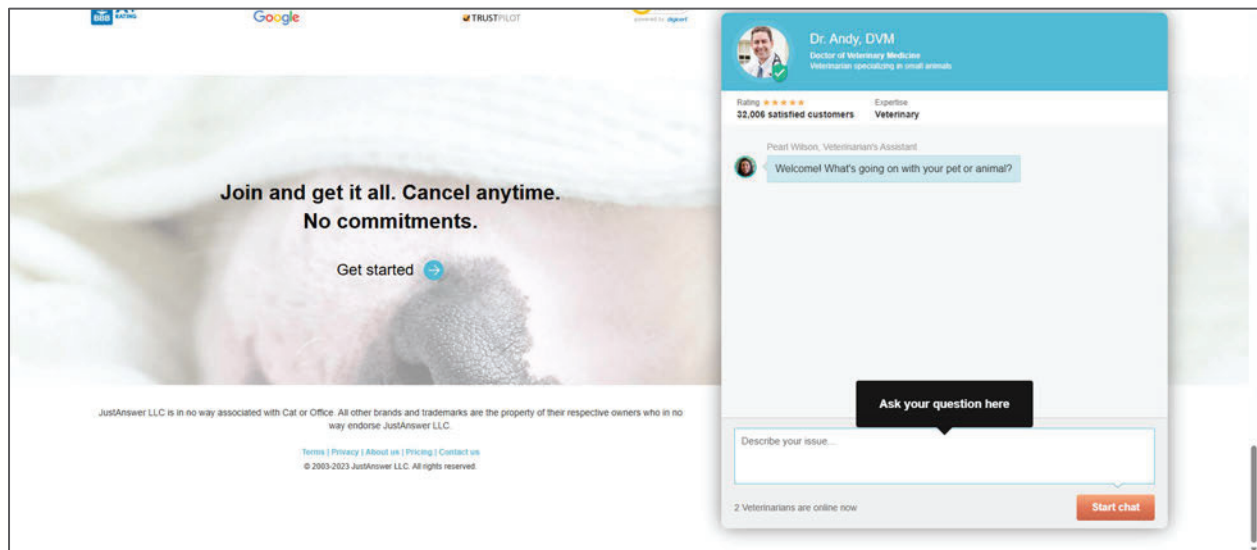
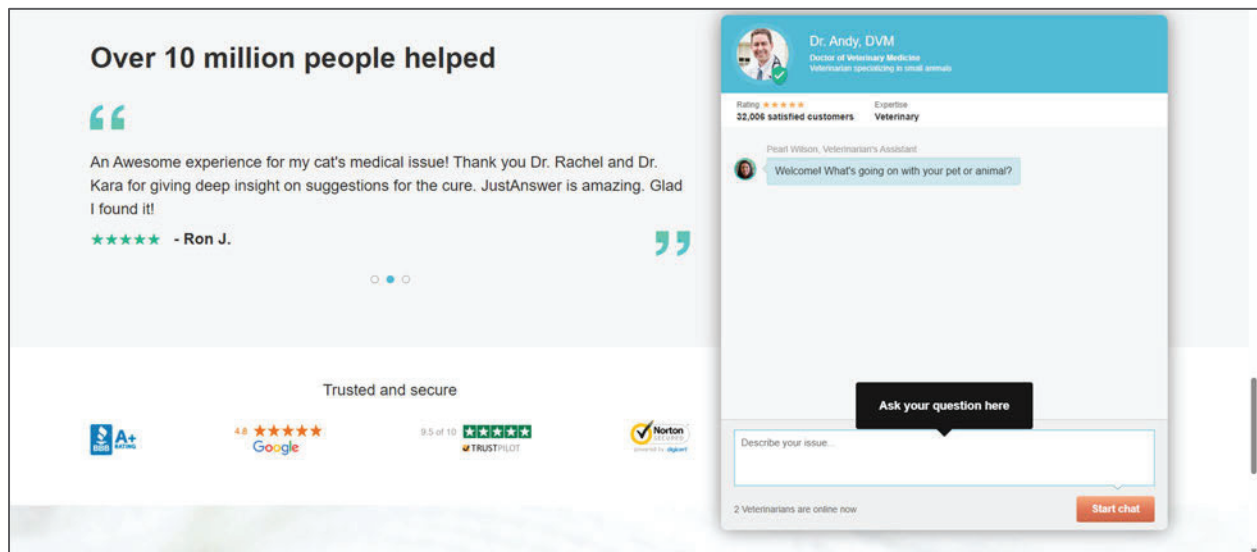
Pearl Wilson, Veterinarian's Assistant  
Welcome! What's going on with your pet or animal?

Describe your issue...

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

**Ask your question here**





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)

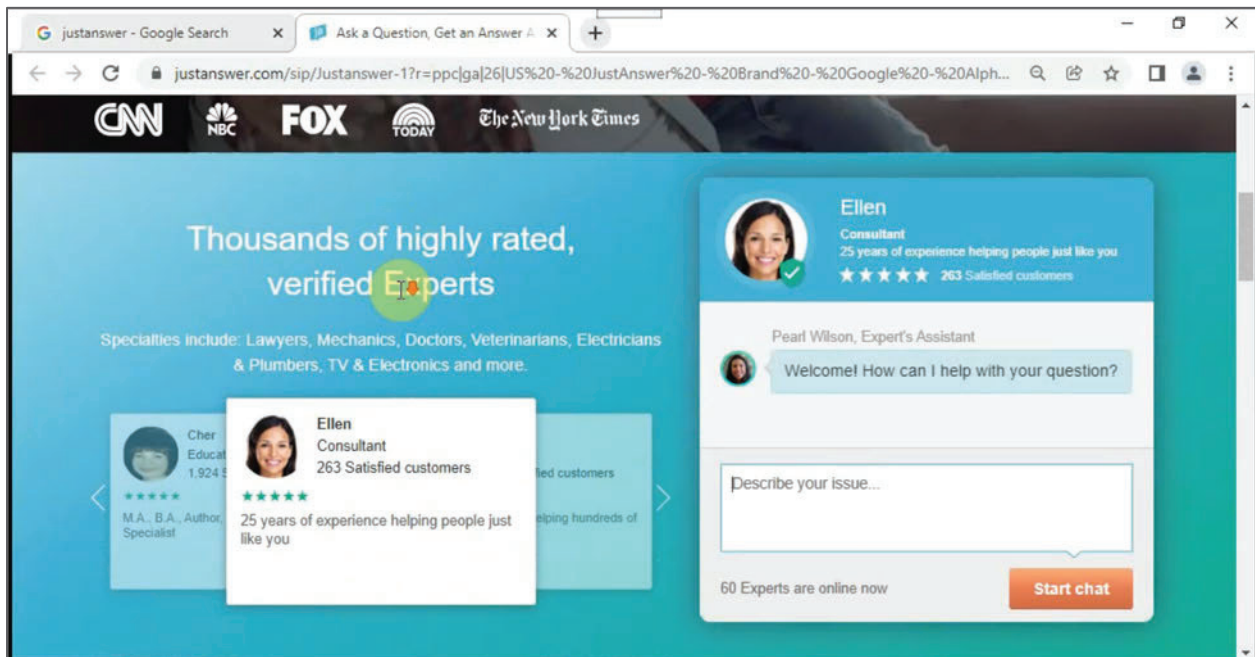
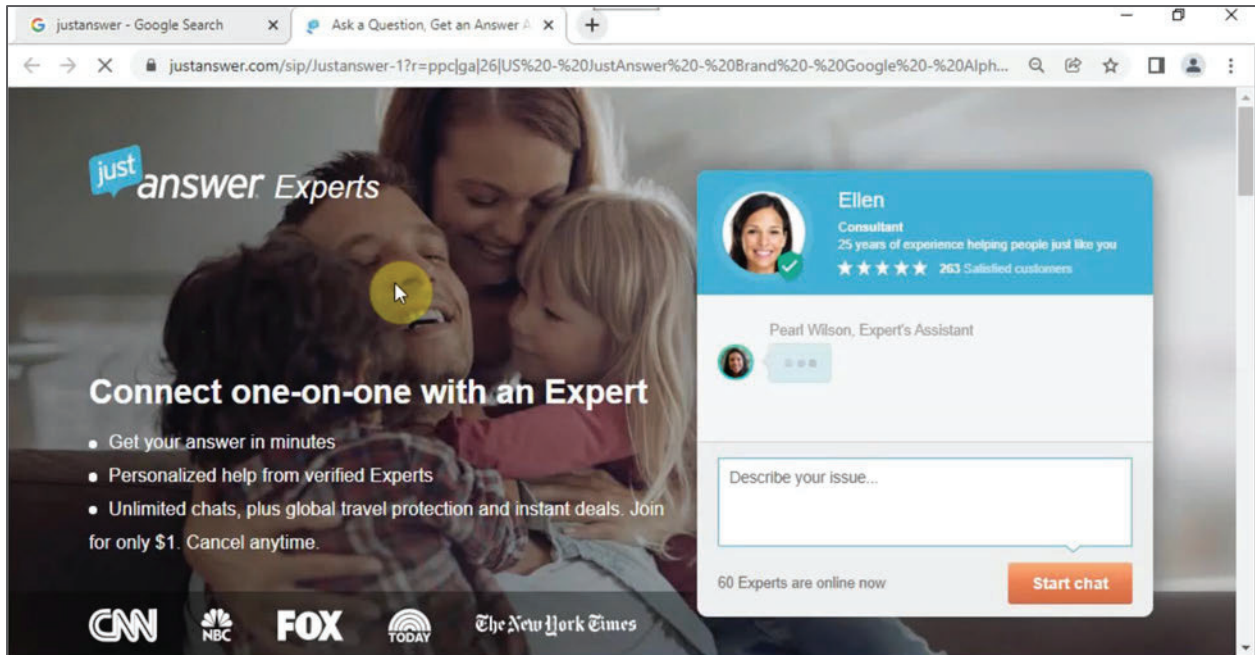


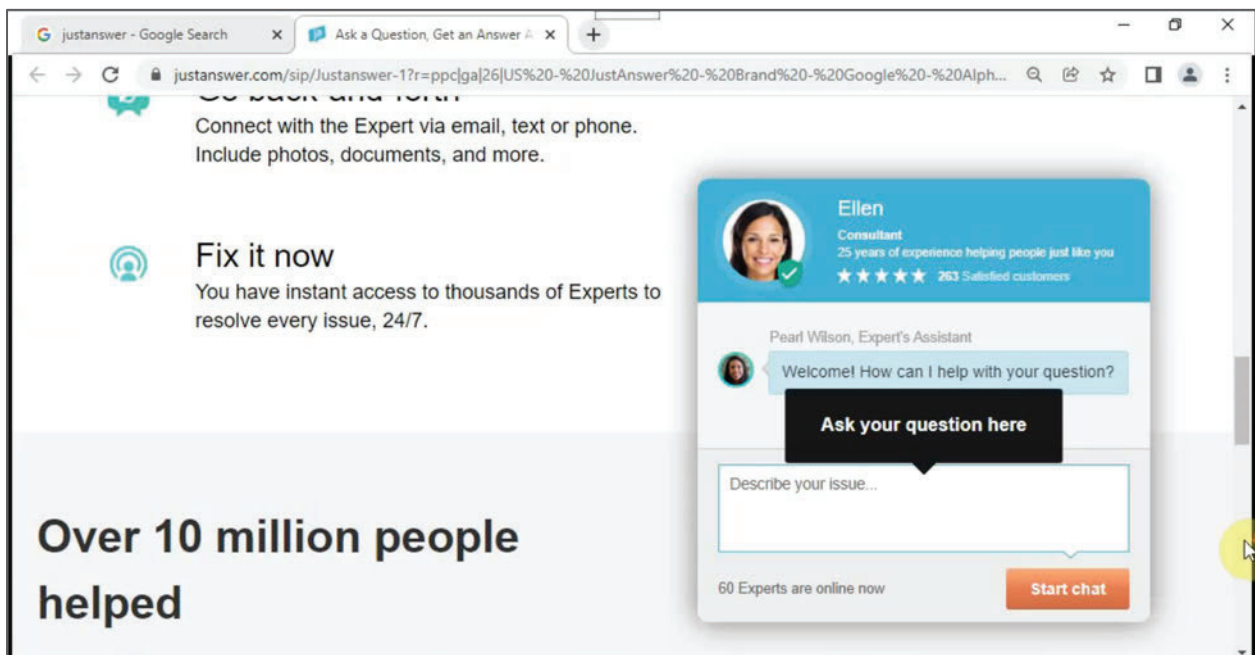
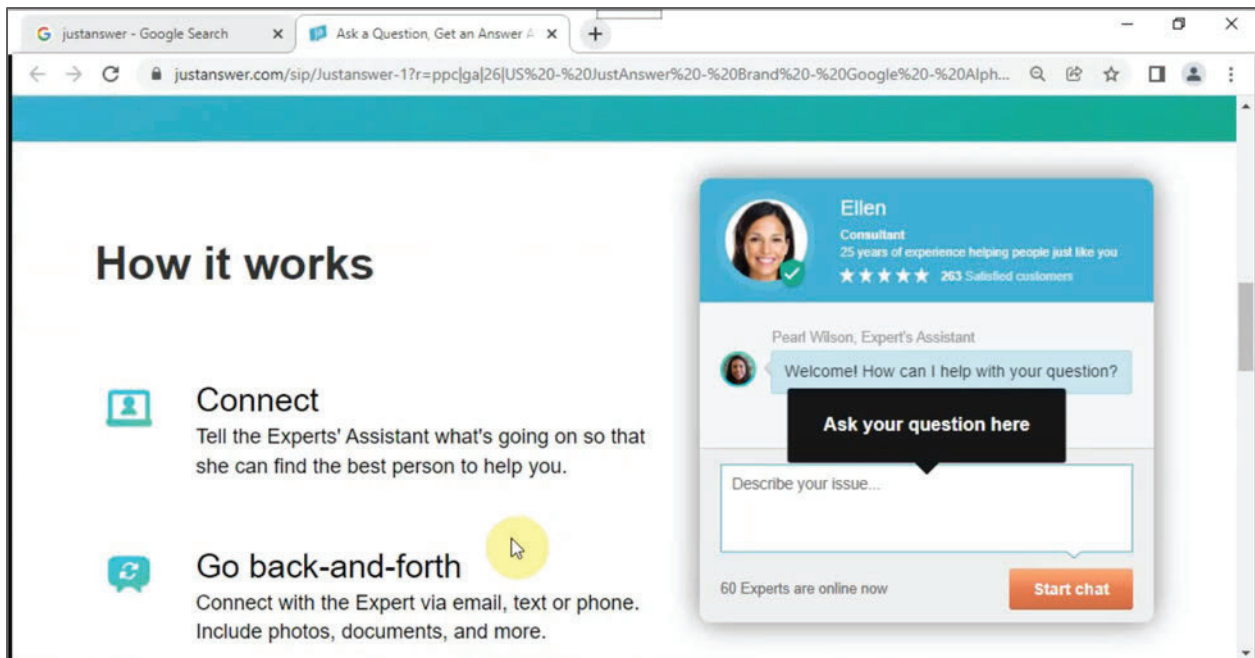
Source: JustAnswer

# ATTACHMENT I

## ATTACHMENT I

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





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



**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?

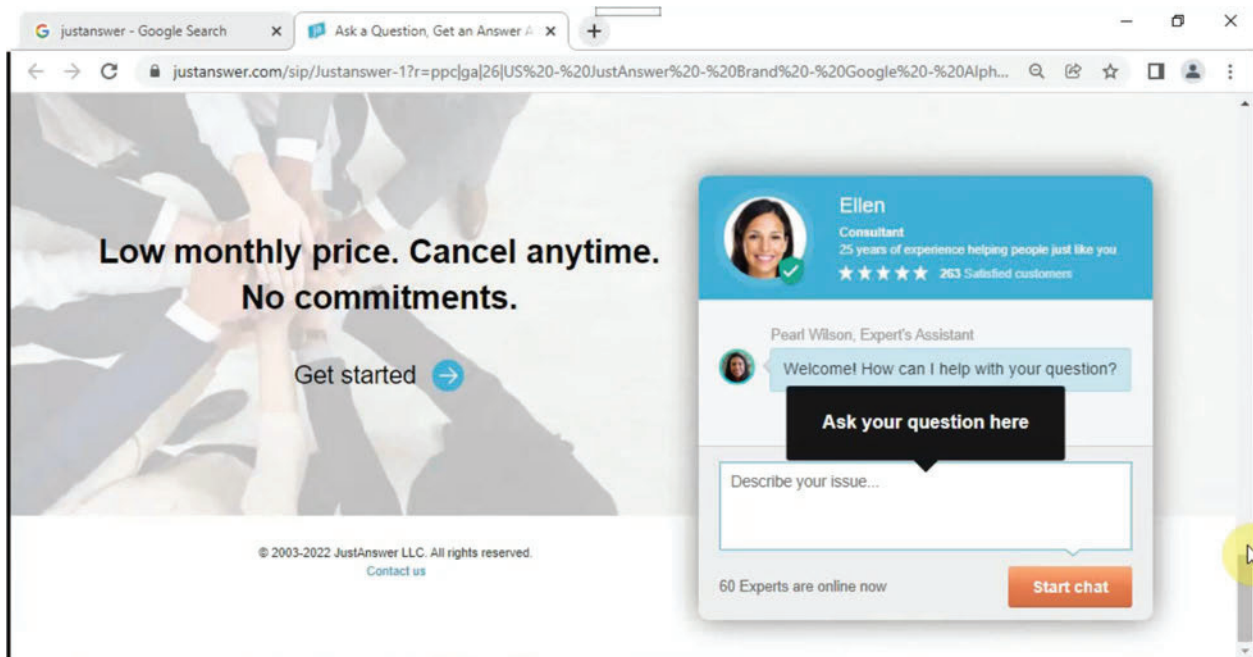
**Ask your question here**

Describe your issue...

60 Experts are online now

**Start chat**

**Low monthly price. Cancel anytime.**  
**No commitments.**



Source: FTC web capture

# **ATTACHMENT J**



## ATTACHMENT J

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

The image displays two screenshots of the JustAnswer Appliance Category Payment Form on a desktop browser. The browser tabs show 'justanswer - Google Search' and 'JustAnswer'. The address bar indicates the URL: 'my-secure.justanswer.com/membershiponly/payment?pqid=6ec0c37801794f4c8d22fd47620c43258&va=4e1579da974b43e...'.

**Top Screenshot:**

- Header:** 'just answer Appliance' logo.
- Text:** 'Get your answer from an Expert in minutes. Unlimited conversations—one-time \$1 join fee and \$37/month. Cancel anytime.'
- Payment Options:** Radio buttons for 'Credit Card' (selected) and 'PayPal'.
- Form Fields:**
  - Email address: 'example@email.com' (with a help icon).
  - Credit card number: '0000 0000 0000 0000' (with a card icon).
  - Expiration: 'MM / YY'.
  - CVV: 'CVV' (with a help icon).
  - ZIP / Postal code: '12345'.
- Agreement:** A checkbox is checked, with text: '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.'
- Footer:** 'Waiting for va justanswer.com this membership renews automatically and'.
- Right Panel:**
  - Text: '60 Appliance Experts are online now'.
  - Profile picture of 'Tyler Z'.
  - Text: 'Tyler Z Appliance Expert 122,457 Satisfied Customers'.
  - Membership Benefits:**
    - ✓ Answers from Home Repair Experts in minutes, 24/7.

**Bottom Screenshot:**

- Form Fields:** Same as the top screenshot.
- Agreement:** Same as the top screenshot.
- Buttons:**
  - 'Connect now' (orange button).
  - 'Verified Experts 100%' (yellow badge).
- Footer:**
  - 'Avoid contractor fees. Get the answer you need. Cancel anytime.'
  - 'Your information is secure' (with a lock icon).
- Right Panel:**
  - Same profile information as the top screenshot.
  - 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