



Federal Trade Commission Accomplishments

June 2021–January 2025

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Letter from FTC Chair Lina M. Khan



Congress created the Federal Trade Commission over a century ago to protect Americans from unchecked monopoly power and the abuses that can follow. While the economy has transformed since the days of the robber barons and industrial trusts, what has stayed constant is the FTC’s mission to promote fair, honest, and competitive markets—even when it means going up against some of the most powerful corporations in the world.

Since [joining the agency in 2021](#), I have focused on ensuring the FTC is reinvigorating its full set of tools and authorities to deliver meaningful and material gains for American consumers, workers, and honest businesses.

We opened the agency’s doors and regularly engaged with, and learned from, people across the country. Americans from all walks of life shared their expertise and experience with us—informing our priorities, sharpening our thinking, and deepening our understanding of how today’s markets really work.

There are various ways to measure the success of a government agency like the FTC. You can count the number of shots it has taken, or how high it aimed. You can look at its record in court and the legal significance of its wins. Or you can look at the material impact the agency has had, the tangible benefits that people have seen, and the concrete ways that their lives are now better.

By each of these standards, the FTC’s work during this time has been extraordinary. This remarkable level of impact reflects the outstanding efforts of the FTC staff, whose talent and commitment have shown Americans what it means for government to fight on their behalf.

Thank you to everyone who has taken the time to submit a complaint or comment, speak at an open commission meeting, or engage with the FTC in some other way. It has been an honor to serve you in this role.

Best wishes,

A handwritten signature in black ink that reads "Lina Khan". The signature is written in a cursive, flowing style.

Lina M. Khan
Chair
Federal Trade Commission

The FTC Made Everyday Life Better for Americans

- **Tackled Daily Indignities and Put Money Back in People’s Pocketbooks**
 - Banned [junk fees](#) for short-term lodging and live-event ticketing, saving Americans more than **50 million hours** per year in wasted time and **\$11 billion** over the next decade.
 - Finalized a [“click to cancel”](#) rule requiring companies to make it just as easy to cancel subscriptions as it is to sign up.
 - [Challenged improperly listed patents on medical devices](#), including inhalers and epi-pens, in the FDA’s Orange Book, which led pharma companies to [slash out-of-pocket costs for inhalers](#) from \$500 or more down to just \$35.
 - Banned [noncompete clauses](#) from employment contracts, which we estimate would increase the average American worker’s wages by **\$524** a year, create more than **8,500 new businesses** each year, reduce healthcare costs by up to **\$194 billion** over the next decade, and give people greater freedoms to switch jobs or launch a business.¹
 - Banned [auto dealers](#) from sticking American consumers with junk fees—saving Americans nearly **\$3.5 billion a year**²—and sued dealers for discriminating against [Black](#), [Latino](#), and [Native American](#) consumers with higher costs and fees. Returned millions of dollars to consumers who were harmed.
 - Ordered food delivery platform [GrubHub](#) to end junk fees for consumers, honestly advertise pay to drivers, and list restaurants on its platform only with their consent, and **returned \$25 million to those harmed**.
 - Sued tax prep companies [Intuit](#) and [H&R Block](#) for deceptively advertising services as “free” when many consumers were ineligible, and issued orders prohibiting Intuit and H&R from misleading customers and requiring H&R Block to **pay back \$7 million** to those harmed.
 - Sued Fortnite developer [Epic Games](#) for tricking consumers into making unwanted purchases, obtaining **\$245 million towards refunding consumers**.
 - Sued [Amazon](#) for using dark patterns to enroll people in Amazon Prime without their consent and designing a complicated cancellation process that makes it difficult to cancel.
 - Sued software company [Adobe](#) for hiding early termination fees from users and making it difficult for consumers to cancel their subscriptions.

¹ The Noncompete Clause Rule is currently in active litigation.

² The Combatting Auto Retail Scams (CARS) Rule is currently in active litigation.

- Ordered internet phone service provider [Vonage](#) to **refund \$100 million** to consumers, end junk fees, and provide an easy mechanism for customers to cancel unwanted telephone services.
- Ordered [Credit Karma](#) to return **\$2.5 million** to consumers who were tricked into applying for “pre-approved” credit offers they were not qualified for, denied credit, and saw their credit scores drop.
- In partnership with AGs from all 50 states, conducted the [largest telemarketing sweep in U.S. history](#), targeting operations responsible for billions of illegal robocalls to Americans, ordering law violators to pay **more than \$2 billion**, and collecting nearly **\$400 million** to refund to consumers.
- Banned scammers from cheating Americans by [impersonating businesses and government agencies](#), and proposed new protections to fight **AI-fueled impersonation fraud** of individuals.
- **Stopped Illegal Mergers that Raise Prices, Harm Innovation, and Hurt Communities**
 - Blocked the merger between [Kroger and Albertsons](#), which would have been the largest supermarket merger in U.S. history, charging that it would raise grocery prices for millions of Americans and result in lower wages and worse conditions for hundreds of thousands of unionized workers.
 - Stopped an [acquisition by pharma giant Sanofi](#) that would have allowed it to eliminate competition and extend its monopoly on a drug to treat a rare disease.
 - Stopped [Illumina's acquisition of Grail](#), which would have reduced competition and hindered innovation in the nascent market for cancer detection tests.
 - Blocked hospital mergers in [California](#), [Utah](#), [North Carolina](#), [New Jersey](#), and [Rhode Island](#) that raise prices for patients, harm workers, suppress innovation, and lower the quality of care for patients.
 - Blocked the merger between [Tapestry and Capri Holdings](#), which would have raised prices for millions of Americans purchasing handbags.
 - Blocked [NVIDIA's acquisition of Arm](#), which would have been the largest chip merger in history, protecting innovation in the critical semiconductor industry and leading to Arm's successful IPO.
 - Stopped [Lockheed Martin's acquisition of Aerojet Rocketdyne](#), which would have eliminated the country's last independent supplier of key missile propulsion inputs, risking higher prices to the government and diminished quality and innovation in markets critical to national security and defense.
 - Sued to stop [Tempur Sealy's acquisition of Mattress Firm](#), which would combine the world's largest mattress supplier with the largest U.S. mattress retailer, threatening to cut off rivals' access to Mattress Firm as a retail channel and inflating prices for mattresses.

- Pursued a lawsuit against [Meta](#) alleging that it engaged in a series of acquisitions, including buying Instagram and WhatsApp, to illegally maintain its monopoly. Defeated Meta’s motion for summary judgment and motion to dismiss the lawsuit in court, allowing the case to proceed to trial.
- **Made Healthcare More Affordable and Accessible**
 - [Challenged improperly listed patents on medical devices](#), including inhalers and epi-pens, in the FDA’s Orange Book, which led pharma companies to slash out-of-pocket costs for inhalers [from \\$500 or more down to just \\$35](#).
 - Sued [U.S. Anesthesia Partners](#) for engaging in a private equity-backed roll-up scheme that consolidated anesthesiology practices in Texas, suppressing competition and driving up prices for Texas patients and payors. Secured [consent order with private equity owner](#) requiring it to limit its involvement and notify the FTC of future acquisitions and investments in anesthesia and other hospital-based physician practices.
 - Stopped an [acquisition by pharma giant Sanofi](#) that would have allowed it to eliminate competition and extend its monopoly on a drug to treat a rare disease.
 - Stopped [Illumina’s acquisition of Grail](#), which would have reduced competition and hindered innovation in the nascent market for cancer detection tests.
 - Banned [“Pharma Bro” Martin Shkreli](#) from ever doing business in the pharmaceutical industry after Shkreli hiked the price of a lifesaving medication, Daraprim, from **\$17.50 to \$750 per tablet**.
 - Blocked hospital mergers in [California](#), [Utah](#), [North Carolina](#), [New Jersey](#), and [Rhode Island](#) that raise prices for patients, harm workers, suppress innovation, and lower the quality of care for patients. Voiced opposition to hospital mergers in [New York](#) and [Indiana](#) that were ultimately not pursued.
 - Secured consent order to resolve [Amgen’s acquisition of Horizon](#), prohibiting Amgen from leveraging its portfolio of blockbuster drugs in ways that could raise prices for Horizon’s thyroid eye disease and chronic refractory gout medication.
 - Sued the three largest pharmacy benefit managers (PBMs) for allegedly engaging in anticompetitive rebating practices that have [inflated the cost of insulin](#), boosting the PBMs’ profits at the expense of vulnerable patients.
 - Issued orders to the six largest [pharmacy benefit managers](#) (PBMs) and issued [two interim reports](#) that detail how increasing vertical integration and concentration have allowed PBMs to inflate drug costs for patients and squeeze independent Main Street pharmacies.
- **Secured Americans’ Access to Housing**
 - Took action against [Invitation Homes](#), a major corporate landlord, for saddling renters with junk fees, unjustly withholding security deposits, and unfairly

evicting people, and secured **\$48 million** to be refunded to renters who were harmed.

- Sued [Greystar](#), the largest operator of rental apartments in America, for charging tenants unavoidable junk fees and hiding the true cost of rental apartments.
 - Fined credit reporting agency [TransUnion](#) **\$15 million** for including inaccurate and incomplete eviction records in consumers’ background screening reports, hampering their ability to obtain housing.
 - Proposed a market [inquiry](#) to better understand the role of **institutional investors in the rental housing market** and its effect on rents and housing prices.
 - Filed briefs with DOJ making clear that **landlords engaging in price fixing using algorithms are [violating the law](#)**.
- **Protected Workers from Coercion and Deception**
 - Banned [noncompete clauses](#) from employment contracts, which we estimate would increase the average American worker’s wages by **\$524 a year**, create more than **8,500 new businesses** each year, and reduce healthcare costs by up to **\$194 billion** over the next decade, and give people greater freedoms to switch jobs or launch a business.³
 - Ordered [security guard](#) company to drop coercive noncompete clauses on low-wage workers and required [glass container manufacturing](#) companies to drop anticompetitive noncompetes on employees, freeing thousands of workers to pursue better, high-paying jobs and enabling aspiring entrepreneurs start their own businesses.
 - Ordered two [building services contractors](#) to drop “no-hire” clauses with their customers, enabling hundreds of security guards, janitors, and other workers to freely switch jobs and negotiate for better pay or benefits.
 - Sued [Care.com](#), a gig platform for child and elder care, for making baseless promises about caregivers’ wages that did not live up to reality, and ordered Care.com to pay **\$8.5 million** to refund harmed caregivers.
 - Sued [Arise Virtual Solutions](#), a gig work company, for luring people to its platform with false promises about what they could earn, and ordered the company to pay \$7 million towards refunding consumers who were harmed.
 - Sent over **\$61 million** back to the pockets of more than 140,000 Amazon drivers after [Amazon](#) illegally withheld tips from its drivers.
 - Ordered gig platforms [Lyft](#) and [Grubhub](#) to stop deceiving drivers about how much they could expect to earn on the platform.

³ The Noncompete Clause Rule is currently in active litigation.

- Partnered with New York Attorney General to take action against [Handy](#) for luring workers onto its platform with false earnings claims and then charging undisclosed fines and fees, and required it to pay **\$2.95 million** in refunds.
- Issued a [policy statement](#) clarifying that independent contractors, including gig workers, are shielded from antitrust liability when engaging in protected bargaining and organizing activities, such as seeking better wages and working conditions.
- **Helped Small Businesses Compete on a Level Playing Field**
 - Sued [Amazon](#) for inflating costs for hundreds of thousands of sellers that rely on the platform to reach consumers—charging costly fees that force many businesses to pay Amazon close to 50 percent of their total revenues.
 - Reinvigorated enforcement of the **Robinson-Patman Act**, which prohibits price discrimination that squeezes independent retailers, by suing [Southern Glazer’s Wine and Spirits](#), the largest U.S. distributor of wine and spirits.
 - Sued [Pepsi](#) for violating the Robinson Patman Act by favoring larger retailers when providing promotions and services, leading to increased prices on Pepsi products for customers and rivals.
 - Ordered [Mastercard](#) to stop illegally blocking merchants from routing debit card payments through its payment network, raising costs for small businesses.
 - Sued pesticide manufacturers [Syngenta and Corteva](#) for using illegal loyalty programs that block generic competition, leaving farmers to pay higher prices for a critical agricultural input.
 - Protected **franchisees** from junk fees and preserved their [right to report law violations](#) to the government.
 - Took action to protect franchisees from deceptive business practices, including suing fast-food franchise [BurgerIM](#) for luring veterans with false promises and suing [Qargo Coffee](#) for concealing key business and financial information from aspiring franchisees.
 - Banned false [“Made in USA” labels](#), allowing honest U.S. manufacturers, farmers, and small businesses to compete fairly.
 - Took action against businesses for **illegally using false “Made in USA” labels**, including a record **\$3.17 million civil penalty** against home and kitchenware company [Williams-Sonoma](#), as well as settlements with tractor equipment company [Kubota](#), the manufacturer of [Pyrex](#) kitchen glassware, and others.
 - Won a [\\$20.3 million judgment in court](#) against a predatory merchant cash advance operation that cheated small businesses and threatened them with violence, and permanently banning the owner from the industry.
 - Banned businesses from producing or purchasing [fake reviews](#) for products, leveling the playing field for honest businesses.

- Ordered small business credit reporting provider [Dun & Bradstreet](#) to make it easier for small businesses to correct credit reporting errors, and launched an [inquiry into the small business credit reporting industry](#) that can dictate small businesses’ access to capital.
- Expanded the [Telemarketing Sales Rule](#) to cover to business-to-business calls, better protecting small businesses from telemarketing tricks and traps.
- Recovered a [record \\$59 million for small businesses](#) harmed by deceptive Paycheck Protection Program loans during the COVID-19 pandemic.
- **Protected Americans’ Right to Repair**
 - Sued [John Deere](#) for illegally restricting farmers’ ability to repair their own equipment and blocking them from freely using independent repair providers.
 - Pursued **enforcement actions** against the makers of [Weber](#) grills, [Harley-Davidson](#) motorcycles, and [Westinghouse](#) outdoor power equipment—saving Americans money and giving independent repair shops a fair shot to compete.
 - Issued a [policy statement](#) laying out how repair restrictions can violate the antitrust and consumer protection laws and committing the agency to ramping up law enforcement against illegal right to repair restrictions.
 - Sent [warning letters](#) to eight companies about warranty practices that may prevent consumers from preventing products that have purchased.
 - **Testified or advocated in state legislatures** across the country on behalf of legislation advancing Americans’ right to repair, leading to passage of legislation in [Colorado](#) protecting the right to repair.
 - Urged the U.S. Copyright Office to [adopt regulations](#) that would facilitate consumers’ and businesses’ right to repair their own products, a change that resulted in [more easily fixable McDonald’s McFlurry machines](#).
- **Protected Americans from Harmful Commercial Surveillance**
 - Banned [General Motors](#) from sharing drivers’ precise geolocation data without their permission for five years, in the FTC’s first privacy action concerning connected cars.
 - Banned [data brokers](#) from [illegally selling](#) consumers’ geolocation data for **advertising**—including information that could be used to track people’s visits to reproductive health clinics, places of worship, or addiction recovery facilities.
 - Banned digital health apps and other firms from **selling or disclosing consumers’ health information for advertising**—including telehealth and discount prescription drug provider [GoodRx](#), fertility tracking apps [Premom](#) and [Flo](#), alcohol addiction treatment service [Monument](#), and mental health platforms [Cerebral](#) and [BetterHelp](#).

- Banned browser antivirus software [Avast](#) from selling users’ sensitive browsing data for advertising purposes and obtained the largest-ever redress judgment in a privacy case, ordering Avast to return \$16.5 million to consumers.
 - Prohibited companies **from retaining personal data longer than necessary** and required them to curb lax data security practices that left millions of Americans’ personal data exposed during data breaches—including breaches at [Marriott Hotels](#), home security camera companies [Verkada](#) and [Ring](#), software company [Blackbaud](#), online alcohol marketplace [Drizly](#), online retail platform [CaféPress](#), web hosting company [GoDaddy](#), and others.
 - Ordered [Twitter](#) to pay \$150 million for violating an earlier FTC order by deceptively using account security data to sell targeted ads.
 - Published a [report](#) showing how social media and video streaming services collect and monetize vast swaths of Americans’ personal data, including from kids and teens, while endangering their privacy and exposing them to harms like identity theft and stalking.
 - Issued [information orders](#) to investigate and published [initial insights](#) on how companies use **surveillance pricing** software that leverages personal data, including finances and browser history, to set and target individualized prices.
- **Protected Kids and Teens Online**
 - Strengthened the [COPPA Rule](#) to further limit companies’ ability to profit from kids’ data and outsource liability to parents.
 - Sued [TikTok](#) for allegedly violating COPPA by collecting and using personal information from children under 13 without parental consent.
 - Held [Facebook](#) accountable for violating its privacy promises and proposed a blanket ban on monetizing children’s data.
 - Fined [Epic Games](#) \$275 million—the largest COPPA penalty ever obtained—for collecting kids’ personal information without their parents’ consent and for using default settings that exposed kids and teens to bullying and harassment.
 - Fined [Amazon](#) \$25 million for promising parents that they could delete kids’ Alexa voice recording and geolocation data but then keeping it for years.
 - Fined [Microsoft](#) \$20 million for illegally collecting kids’ data on its Xbox service without their parents’ consent.
 - Banned [NGL Labs](#) from marketing an anonymous messaging app to kids under 18 that exposed them to cyberbullying and harassment.
 - Banned game developer [Cognosphere](#) from using in-game loot box practices that led to kids and teens paying hundreds of dollars for prizes they were unlikely to win in the popular video game Genshin Impact.

- Prohibited online educational software [Edmodo](#) from collecting more personal data from students than necessary after it illegally used kids’ data for advertising and outsourced COPPA compliance to school districts.
- Ordered [Weight Watchers](#) to delete personal information it illegally collected from kids as young as eight and to destroy any algorithms it trained on that data.
- **Tackled Unfair, Deceptive, and Anticompetitive Conduct in AI**
 - Blocked [NVIDIA’s acquisition of Arm](#), which would have been the largest chip merger in history, protecting innovation in the critical semiconductor industry and leading to Arm’s successful IPO.
 - Banned [Rite Aid](#) from using discriminatory AI facial recognition technologies that wrongly accused innocent people, including children, of shoplifting.
 - Banned AI-enabled [impersonation](#) of government agencies and businesses and AI-generated [fake reviews](#), and extended consumer [telemarketing](#) protections to AI-generated calls.
 - Launched an [inquiry](#) and [published a report](#) into how **partnerships and investments between dominant technology firms and emerging AI providers** may risk distorting innovation and undermining competition.
 - Filed briefs with DOJ making clear that [hotels](#) and [residential landlords](#) engaging in **algorithmic collusion** are breaking the law, and that price fixing by algorithm is still illegal price fixing.
 - Ordered companies to stop making **unsubstantiated claims about the efficacy of its AI tools**, including companies offering [AI security screening systems](#) and [AI web accessibility software](#).
 - [Cracked down](#) on companies offering an AI tool to create **fake customer reviews**, a company **claiming to sell “AI lawyer” services**, and companies making **deceptive earnings claims** to customers that AI could help them earn money.
 - Conducted a public [Voice Cloning Challenge](#) to solicit multi-disciplinary solutions to rooting out AI-driven voice cloning that can turbocharge fraud.

The FTC Won Significant Victories in Court

- **Merger Litigation**

- Since 2021, at least half of the FTC’s merger litigations challenged deals valued in excess of a billion dollars:
 - Illumina/Grail (\$7.1 billion biotechnology merger)
 - Nvidia/Arm (\$40 billion semiconductor merger)
 - Lockheed/Aerojet (\$4.4 billion defense merger)
 - ICE/Black Knight (\$13.1 billion mortgage loan technology merger)
 - Microsoft/Activision (\$69 billion gaming merger)
 - Amgen/Horizon (\$27.8 billion pharmaceutical merger)
 - Tapestry/Capri (\$8.5 billion fashion merger)
 - Kroger/Albertsons (\$24.6 billion grocery merger)
 - Tempur Sealy/Mattress Firm (\$4 billion mattress supplier/retailer merger)
- Since 2021, the FTC brought at least seven vertical merger challenges, and achieved the agency’s first-ever fully litigated vertical merger win in decades in Illumina/Grail:
 - Illumina/Grail (biotechnology)
 - Nvidia/Arm (semiconductors)
 - Lockheed/Aerojet (defense)
 - Microsoft/Activision (gaming)
 - ICE/Black Knight (mortgage loan technology)
 - IQVIA/Propel Media (healthcare advertising)
 - Tempur Sealy/Mattress Firm (mattress supplier/retailer)
- Between 2021-2025, the FTC had an overall merger litigation win rate of 93.75%.⁴

⁴ Wins include matters in which a preliminary injunction was granted by a district court, administrative proceedings were resolved in favor of the FTC, the parties abandoned their deal after the FTC filed a complaint in court, or the FTC and the parties reached a settlement after a complaint was filed that resolved competitive concerns. The comparative figures for prior administrations are: 80% (Trump administration), 83.33% (Obama administration, second term), 91.67% (Obama administration, first term), 72.73% (Bush administration, second term), and 80% (Bush administration, first term).

- **Competition Wins in Court**

- **Kroger/Albertsons** (Dec. 2024): secured preliminary injunction halting Kroger’s \$24.6 billion acquisition of Albertsons, leading the parties to abandon what would have been the largest grocery merger in history.
- **Meta monopolization** (Nov. 2024): court denied Meta’s motion for summary judgment in nearly all respects and granted the FTC’s cross-motion for summary judgment with respect to one of Meta’s affirmative defenses, allowing the case to proceed to trial. Follows the court denying Meta’s motion to dismiss after the Commission in August 2021 refiled an amended complaint.
- **Tapestry/Capri** (Oct. 2024): secured preliminary injunction halting Tapestry’s acquisition of Capri, leading the parties to abandon the transaction that would have driven up prices for handbags.
- **Amazon** (Sept. 2024): court denied Amazon’s motion to dismiss, allowing the FTC’s case against Amazon to move forward in full, including its standalone unfair methods of competition claim under Section 5 of the FTC Act.
- **Novant/Community Health Systems** (June 2024): secured preliminary injunction to halt a North Carolina hospital merger after appealing a district court decision to the Fourth Circuit.
- **U.S. Anesthesia Partners** (May 2024): defeated USAP’s motion to dismiss the FTC’s lawsuit alleging USAP had illegally monopolized the Texas anesthesiology market through a series of roll-ups, raising prices for patients and payors; court upheld FTC’s legal approach to serial acquisitions, upheld the FTC’s market definition, and rejected arguments regarding the agency’s constitutionality.
- **IQVIA/Propel** (Jan. 2024): secured preliminary injunction in the FTC’s lawsuit to block IQVIA’s acquisition of Propel Media, involving both horizontal and vertical theories of harm in a healthcare advertising technology deal; defendants walked away from the deal.
- **Syngenta and Corteva** (Jan. 2024): defeated defendants’ motion to dismiss the FTC’s lawsuit challenging pesticide pay-to-block schemes that have led farmers to overpay for key inputs; court upheld the FTC’s claims in full, including exclusive dealing under Section 3 of the Clayton Act and a standalone unfair method of competition claim under Section 5 of the FTC Act.
- **Martin Shkreli** (Jan. 2024): Second Circuit affirmed a district court’s finding that “pharma bro” Martin Shkreli was liable for raising the cost of a life-saving drug from \$17.50 to \$750, and imposed a lifetime ban on Shkreli from entering the pharmaceutical industry.
- **Illumina/Grail** (Dec. 2023): Fifth Circuit upheld the Commission’s decision and analysis blocking Illumina’s acquisition of Grail, leading Illumina to divest Grail—the first litigated vertical merger win by the government since 1979.

- **Surescripts** (Mar. 2023): Court found that Surescripts possessed monopoly power in the market for e-prescription services; the FTC settled with Surescripts, prohibiting the company from engaging in further exclusionary conduct.
- **Hackensack/Englewood** (Mar. 2022): Third Circuit upheld the district court’s decision to grant a preliminary injunction halting a hospital merger in New Jersey, following the FTC’s challenge; parties then abandoned the merger.
- **Consumer Protection Wins in Court**
 - **Amazon Prime dark patterns** (May 2024): defeated Amazon’s motion to dismiss the FTC’s lawsuit alleging that Amazon used illegal dark patterns to trick consumers into enrolling Amazon Prime and making it difficult for consumers to cancel their membership. The judge upheld the Commission’s decision to name Amazon executives.
 - **Stem Cell Institute of America** (Mar. 2024) and **Quincy Biosciences** (Dec. 2024): secured wins in unsubstantiated health claim cases, including summary judgment in a case concerning stem cell therapy injection treatments and a jury trial victory in a case concerning the dietary supplement Prevagen.
 - **Voyager Crypto** (Feb. 2024) and **Celsius** (Apr. 2024): secured motion to dismiss wins on Gramm-Leach-Bliley claims in two crypto cases.
 - **Kochava** (Feb. 2024): defeated Kochava’s motion to dismiss our lawsuit against the data broker for illegally selling sensitive geolocation data, including visits to health clinics and to places of worship. The judge affirmed, for the first time, that harm to privacy is a cognizable consumer injury under the FTC Act.
 - **Home Matters USA** (Feb. 2024): secured summary judgment against mortgage relief scammer.
 - **Simple Health** (Feb. 2024): secured \$195 million judgment against sham health insurance plan over charges that they deceived consumers into signing up for sham health plans, did not deliver the promised coverage and benefits, and left consumers exposed to exorbitant medical expenses.
 - **Intuit** (Jan. 2024): Commission sided with complaint counsel that the maker of the popular TurboTax tax filing software used deceptive ads for “free” tax products when many consumers were in fact ineligible.
 - **Richmond Capital Group** (Oct. 2023): won a jury trial and a \$20 million judgment against a small business financing operation for preying on small businesses with unfair lending and collection practices, and a permanent ban against owner Jonathan Braun from the merchant cash advance and debt collection industries.
 - **EduTrek** (Sept. 2023): secured summary judgment and permanent telemarketing ban against operators of a telemarketing company.

- **Credit Bureau Center** (Aug. 2023), **Mission Hills** (June 2022), **Preferred Law** (Jan. 2022): appellate courts upheld monetary relief under Section 19.
- **Nudge** (May 2023): secured partial summary judgment on TSR and presumption of reliance in a case involving a coaching scam.
- **James Noland** (May 2023): won at trial and secured permanent multilevel marketing ban, plus \$7.3 million judgment, against pyramid schemes operator.
- **FleetCor** (Aug. 2022): won on summary judgment in district court and affirmed individual accountability.
- **American Screening** (Aug. 2022), **Glowwy** (Apr. 2022), and **Trend Deploy** (June 2023): secured summary judgment wins in several COVID fraud cases, including for failure to deliver products on time and for violating the Mail, Internet, or Telephone Order Rule (MITOR).
- **SPM Thermo-Shield** (June 2022), **Superior Products** (Nov. 2022), **FGI** (Oct. 2022): secured summary judgment in false insulation and green marketing cases.
- **On Point Global** (Apr. 2022): trial victory secured \$102 million in consumer refunds over a fake government website scam.

The FTC Advanced the Law

- **Clayton Act**

- Established favorable case law for **challenging vertical mergers** in the Fifth Circuit in *Illumina/Grail*—the first litigated vertical merger victory for the government in over 40 years.
- Confirmed that the **Philadelphia National Bank presumption** is still valid and that mergers concentrating more than 30% share are presumed unlawful, subject to a rebuttal, including in *IQVIA*, *Tapestry/Capri*, and *Kroger/Albertsons*.
- Confirmed that the elimination of **head-to-head competition** can be an independent pathway for establishing Section 7 liability in *Kroger/Albertsons*.
- Established **harm to labor markets** as a valid basis for Section 7 liability through the court’s decision enjoining the *Kroger/Albertsons* merger.
- Protected competition in nascent markets by affirming the viability of **research and development markets** in *Illumina/Grail*, as well as affirming the application of the **potential competition** doctrine to nascent markets in *Meta/Within*, a favorable settlement in *Sanofi/Maze*, and *Nvidia/Arm*.
- Advanced a **serial acquisitions** theory of harm as a basis for Section 7 liability in *FTC v. U.S. Anesthesia Partners*, defeating USAP’s motion to dismiss and putting Welsh Carson under order.
- Advanced a **portfolio leveraging and entrenchment** theory of harm as a basis for Section 7 liability in the FTC’s lawsuit and settlement in *Amgen/Horizon*.
- Revived enforcement of Clayton Act Section 8, which prohibits **interlocking directorates**, in *EQT/Quantum*.
- Advanced the **increased risk of coordination** as a basis for Section 7 liability through *Exxon/Pioneer* and *Chevron/Hess*.
- Advanced in *Kroger/Albertsons* that risky divestitures and flimsy promises from merging parties can be a valid basis for **rejecting proposed remedies**, strengthening enforcers’ hand when forced to “litigate the fix.”
- Published the **2023 Merger Guidelines** to provide updated guidance that faithfully reflects legal precedent and the realities of how firms do business in the modern economy. The Guidelines were cited and treated as persuasive authority in subsequent court decisions, including *IQVIA/PMI*, *Tapestry/Capri*, and *Kroger/Albertsons*.

- **Sherman Act**

- Established **Section 2 as a viable method of challenging a merger** in the summary judgment victory in *FTC v. Meta*, in which the court recognized a

presumption of illegality when a **monopolist acquires a nascent competitor**, and by filing suit in *Sanofi/Maze*, prompting the parties to abandon.

- Established Section 2 as a viable method of **challenging serial acquisitions** through *FTC v. U.S. Anesthesia Partners*.
- Advanced the **application of Section 2 in digital markets**, explaining the role of data feedback loops, network effects, and cumulative impacts in creating anticompetitive harm in *FTC v. Amazon*, and explaining in amicus briefs how these factors should shape effective remedies in *Epic v. Google*.
- Advanced Section 2 as a method to **challenge right-to-repair restrictions** through *FTC v. Deere & Company*.
- **Standalone Section 5 of FTC Act (Unfair Methods of Competition)**
 - Issue the Policy Statement Regarding the Scope of Unfair Methods of Competition Under Section 5, which examines the text, structure, history of the FTC Act and reviews legal precedent to lay out a framework for faithful application of Section 5.
 - Reinvigorated the use of **Section 5 as a standalone claim independent of other antitrust laws**, including in *FTC v. Amazon*, *FTC v. U.S. Anesthesia Partners*, and *Syngenta/Corteva*, where the court recognized that unfair competition that does not fall under the prohibitions of other antitrust laws can be covered by Section 5.
 - Brought the agency’s **first standalone Section 5 merger challenge** in *EQT/Quantum* to address the potential for investment holdings and board appointments to facilitate the exchange of confidential and competitively significant information.
 - Advanced the role of **Section 5 in tackling interlocking directorates** in *Exxon/Pioneer*.
 - Established that **noncompete clauses are unfair methods of competition** that violate Section 5 in *ATS Tree Services* (E.D. Pa.).
 - Established in *Prudential* that **noncompete clauses that are coercive and exploitative** and tend to negatively affect competitive conditions violate Section 5.
 - Established in *Ardagh*, *O-I Glass*, and *Anchor* that **noncompete clauses that impede the entry and expansion of rivals** and tend to negatively affect competitive conditions violate Section 5.
 - Established in *Guardian* and *Planned Companies* that **no-hire clauses** can violate Section 5.
 - Brought a standalone Section 5 action against pharmacy benefit managers (PBMs) *Caremark Rx*, *Express Scripts, Inc.*, *OptumRx*, *et al.* for rebating practices that inflate drug costs, including for insulin.

- **Robinson-Patman Act**
 - Revived enforcement against illegal price discrimination under the Robinson-Patman Act in the FTC’s enforcement actions against *Southern Glazer’s Wine & Spirits*, where the Commission charges that the firm violated Section 2(a) of RPA.
 - Filed suit against *Pepsi* for violating Section 2(d) and 2(e) of RPA.
- **Hart-Scott-Rodino (HSR) Act**
 - Secured a record \$5.6 million civil penalty to settle allegations of illegal pre-merger coordination, or gun-jumping, in *USA v. XCL Resources Holding et al.*
- **Section 6(g) of the FTC Act**
 - Confirmed that Section 6(g) of the FTC Act confers substantive rulemaking authority in *ATS Tree Services* (E.D. Pa.) and *Properties of the Villages* (M.D. Fl.).
- **Section 5 of the FTC Act (Unfair and Deceptive Acts or Practices)**
 - Secured the first-ever decision **recognizing invasion of privacy as a cognizable injury** under Section 5 of the FTC Act, in a case involving data broker [Kochava](#).
 - First actions challenging the **collection, use, or sale of sensitive data or precise geolocation data as unfair**, in cases against data brokers [Kochava](#), [X-Mode](#), [InMarket](#), [Gravy Analytics](#), and [Mobilewalla](#).
 - First action challenging the **collection of consumer information from real-time bidding exchanges as unfair**, in a case against data broker [Mobilewalla](#).
 - First unfairness action targeting **unfair loot box practices**, in a case against game developer [Cognosphere](#), which publishes the popular kids game Genshin Impact.
 - First action challenging **online marketing of an online service to teens as unfair**, in a case against anonymous messaging app [NGL](#).
 - First actions challenging the **categorization of consumers based on sensitive characteristics for marketing purposes and selling these sensitive inferences as unfair**, in cases against [X-Mode](#), [Mobilewalla](#), and [Gravy Analytics](#).
 - Challenged **excessive data retention as unfair**, in a case involving [Amazon’s Alexa](#) voice assistant product.
 - Challenged **default settings as unfair**, in a case against Fortnite developer [Epic Games](#) for choosing default settings that resulted in harm to kids.
 - Challenged **unilateral modification of a privacy policy as unfair**, in a case against genetic testing company [Vitagene](#).
 - Challenged **imposing unenforceable contract terms as unfair**, in a case against timeshare exit scam operation [Square One](#).

- First action challenging **the sale of an AI tool that can be used to generate fake reviews as unfair**, in a case against AI testimonial and review service [Rytr](#).
 - First actions challenging **discrimination as unfair**, in cases [against auto dealers](#) and an online cash advance provider, [FloatMe](#).
 - First action challenging **discriminatory AI facial recognition as unfair**, in a case against [Rite Aid](#) for using facial recognition to detect shoplifters.
 - First actions alleging **unfair customer service practices**, in cases against tax filing firm [H&R Block](#) and online marketplace [GOAT](#).
 - First **recovery under Section 19 for consumers' lost time**, in a case alleging that [Credit Karma](#) deceptively marketed “pre-approved” credit offers to consumers who were not eligible and wasted consumers’ time.
 - First actions **challenging unsubstantiated AI claims, including AI safety claims**, in a case against anonymous messaging app [NGL](#).
 - First actions **challenging suppressing negative product reviews** in a case against online fashion retailer [Fashion Nova](#) and **challenging review hijacking** in a case against vitamin product marketer [The Bountiful Company](#).
- **Other authorities**
 - First actions under the **Health Breach Notification Rule**, in cases against telehealth and discount drug provider [GoodRx](#) and fertility tracking app [PreMom](#) for disclosing users’ sensitive health data with advertisers without their consent.
 - First action under the **Military Lending Act**, in a case against [Harris Jewelers](#) for cheating military families with illegal financing and sales practices.
 - First actions under the **Opioid Addiction Recovery Fraud Prevention Act**, in cases against [R360](#) for deceiving people seeking help for addiction, against alcohol addiction treatment service [Monument](#) for disclosing users’ sensitive health data to third-party advertising platforms, and others.
 - Finalized the **Made in USA Rule** and took the FTC’s first actions under the rule, in cases against battery maker [Lithionics](#) and others.
 - First action challenging the **use of income share agreements (ISAs) without Holder Notices**, in a case against for-profit school [Sollers College](#).
 - Challenged **conditioning children’s participation in an online service by requiring the disclosure of more personal information than is reasonably necessary to participate** in violation of **Section 312.7 of the COPPA Rule**, in the FTC’s complaint against [TikTok](#).
 - First actions applying the **Restore Online Shoppers’ Confidence Act (ROSCA) to a gig platform**, in cases against gig platforms [Arise](#), [Care.com](#), [Grubhub](#), and others.

- **Largest-ever recovery under the Gramm-Leach-Bliley Act** requiring rental housing landlord [Invitation Homes](#) to pay \$48 million to consumers, and **largest-ever recover under ROSCA** requiring phone service provider [Vonage](#) to pay \$100 million to consumers.
- After issuing notices of penalty offense (NPO) using the FTC’s authority under Section 5(m)(1)(B) of the FTC Act, secured the **largest-ever civil penalty under an NPO** in our case against [Walmart](#)’s misleading environmental claims, and secured the **first civil penalty under an NPO against a gig platform** in our case against [Lyft](#)’s misleading earnings claims.
- First action **enforcing the FTC’s new Impersonator Rule**, in a case against a [fraudulent student loan debt relief scheme](#).
- First action **applying the Business Opportunity Rule to a gig platform** in a case against gig company [Arise](#).

The FTC Exercised Its Full Suite of Authorities

- **Rulemaking Authorities**

- For the first time in decades, proposed and finalized four Mag-Moss **trade regulation rules** under **Section 18 of the FTC Act**: a rule prohibiting **junk fees** in the live-event ticketing and short-term lodging industries, a rule prohibiting the sale or purchase of **fake reviews**, a rule prohibiting government and business **impersonation**, and a rule prohibiting **subscription traps**.
- Reactivated authority under **Section 6(g) of the FTC Act** to issue a final rule banning most **noncompete clauses**.

- **Competition Authorities**

- Took the first FTC enforcement action under the **Robinson-Patman Act** in decades by suing Southern Glazer’s, the largest U.S. distributor of wine and spirits, for charging small businesses drastically higher prices than large chain stores, and followed up with an enforcement action against Pepsi.
- **Revived standalone Section 5 enforcement** after issuing a policy statement outlining how the FTC will enforce Section 5’s prohibition on unfair methods of competition. Vindicated standalone Section 5 through the court’s decisions in *FTC v. U.S. Anesthesia Partners*, *FTC v. Amazon* and *Syngenta/Corteva*, as well as through actions in *EQT/Quantum*, *Exxon/Pioneer*, *Prudential*, *Ardagh*, *O-I Glass*, *Anchor*, *Guardian*, *Planned Companies*, and *Caremark Rx*, *Express Scripts, Inc.*, *OptumRx*, *et al.*.
- Enforced the prohibition on unlawful tying and exclusive dealing arrangements found in **Section 3 of the Clayton Act** in the FTC’s lawsuit against *Syngenta/Corteva*’s loyalty rebate practices.
- Ordered energy companies EQT and Quantum to eliminate interlocking directorates, the first time in 40 years the FTC has enforced **Section 8 of the Clayton Act**, which prohibits such arrangements. Subsequently banned the CEO of Pioneer from sitting on the board of Exxon in another oil and gas deal, using our Section 5 authority.
- Took the FTC’s first action under the **Durbin Amendment to the 2010 Dodd-Frank Act**, along with its implementing Rule, Regulation II, charging Mastercard with illegally prohibiting merchants from using competing payment networks.
- Revived the agency’s longstanding practice of requiring merging parties to seek **prior approval** before closing future transactions, after issuing a policy statement outlining the Commission’s use of the tool. Obtained prior approval provisions in numerous matters, including *Amgen/Horizon*, *Intercontinental Exchange/Black Knight*, *EQT/Quantum*, and others.

- **Consumer Protection Authorities**

- Reactivated **Penalty Offense Authority under Section 5(m)(1)(B) of the FTC Act**, allowing the FTC to seek civil penalties if a company knew that conduct was unfair or deceptive in violation of the FTC Act. Issued penalty offense notices concerning endorsements, moneymaking opportunities, substantiation, and misuse of information collected in confidential contexts.
- Took the FTC’s first action under the **Military Lending Act** by suing Harris Jewelers for cheating military families with illegal financing and sales practices.
- Took the FTC’s first action under the **Opioid Addiction Recovery Fraud Prevention Act** against R360 for deceiving people seeking help for addiction, and followed up with an action against alcohol addiction treatment service Monument for disclosing users’ sensitive health data to third-party advertising platforms.
- Took the first-ever enforcement action under the **Health Breach Notification Rule**, alleging that telehealth and prescription drug provider GoodRx had illegally shared consumers’ sensitive health information for advertising purposes.
- Finalized the Commission’s **Made in the USA Rule** after originally being authorized by Congress to issue such a rule in 1994, and took numerous enforcement actions to go after businesses that falsely claim their products are made in the USA, a practice that not only deceives consumers but also distorts competition and hurts honest businesses.

The FTC Strengthened Institutional Capabilities

- Significantly **expanded the agency’s engagement with the public**, including by:
 - Holding [first-ever](#) regular **open Commission meetings**, where any member of the public can address the Commission;
 - Holding a [series of listening sessions](#) to inform the **merger guidelines revisions**, held jointly with the Department of Justice’s Antitrust Division;
 - Opened **comment dockets** for the public to share their experiences with the FTC, and increasing public comments to the FTC from just 13,000 five years ago to over 100,000 in the last year.
 - Launched a portal for members of the public to [submit comments](#) on **proposed mergers and acquisitions** that may be before the FTC for review.
- Launched the agency’s first-ever [Office of Technology \(OT\)](#) to bring AI and technological expertise in-house, including software and privacy engineers, user experience researchers, data scientists, investigative journalists, and other experts. Efforts detailed in [staff report](#) on the evolution of the agency’s technological expertise.
- Finalized [changes to the merger filing form](#), which will improve the ability of the FTC and the Department of Justice’s Antitrust Division to detect illegal mergers and acquisitions prior to consummation. The new rules better reflect changes in corporate structure and deal-making, as well as market realities in the ways businesses compete, that have created gaps in the information that the antitrust agencies receive..
- Entered into a [Memorandum of Understanding with the U.S. Department of Labor](#) to bolster the FTC’s efforts to protect workers by promoting competitive U.S. labor markets and stopping unfair, deceptive, and anticompetitive practices.
- Entered into a [Memorandum of Understanding with the National Labor Relations Board](#) to strengthen the two agencies’ collaboration and ensure that unlawful business practices aren’t depriving workers of the pay, benefits, conditions, and dignity that they deserve.
- Created a **Western Competition Group**, a collaboration between competition staff in the Northwest Region (Seattle) and Western Region San Francisco. This group leads investigations and litigations involving illegal mergers and unlawful conduct.
- Established a new **Anticompetitive Practices II** unit within the Bureau of Competition to expand FTC’s capacity to investigate and challenge anticompetitive conduct.
- Approved [new omnibus resolutions](#) to streamline enforcement investigations and eliminate the need for FTC staff to seek compulsory process in each related case, promoting efficiency.

Enforcement Matter Index

- **Competition**
 - **Challenging Illegal Mergers and Acquisitions**
 - **Chevron/Hess** ([consent order](#), Sept. 2024): after uncovering communications between Hess CEO and OPEC, prohibited Hess CEO from sitting on Chevron’s board.
 - **WillScot/McGrath** ([abandoned during investigation](#), Sept. 2024): parties abandoned transaction during the FTC’s investigation, preserving competition for business-to-business storage rental solutions.
 - [NON-PUBLIC] (abandoned during investigation, Sept. 2024)
 - [NON-PUBLIC] (abandoned during investigation, Aug. 2024)
 - **Tempur Sealy/Mattress Firm** ([complaint](#), July 2024): sued to stop a vertical merger seeking to combine world’s largest mattress supplier with the largest U.S. mattress retailer, which could cut off rivals’ access to Mattress Firm as a retail channel and lead to higher prices for mattresses.
 - **Altus/Situs** ([abandoned during investigation](#), July 2024): parties abandoned transaction following FTC investigation, preserving competition for realtime commercial real estate valuation services.
 - **Exxon/Pioneer** ([consent order](#), May 2024): after uncovering evidence that Pioneer CEO Scott Sheffield attempt to collude with OPEC to raise prices at the pump, prohibited Sheffield from sitting on Exxon’s board.
 - [NON-PUBLIC] (abandoned during investigation, Apr. 2024)
 - [NON-PUBLIC] (abandoned during investigation, Apr. 2024)
 - **Tapestry/Capri** ([complaint](#), Apr. 2024; preliminary injunction granted Nov. 2024; [parties abandoned](#), Nov. 2024): blocked merger that would have eliminated competition in the “accessible luxury” handbag market and raised prices for millions of Americans purchasing handbags.
 - **Global Partners/Gulf Oil** ([parties abandoned Maine terminal](#) to resolve antitrust concerns, Apr. 2024): parties abandoned anticompetitive acquisition of Maine terminal following FTC and Maine AG investigation, preserving competition for heating oil and diesel fuel in the Portland area.
 - **Qualcomm/Autotalks** ([abandoned during investigation](#), Mar. 2024): parties abandoned transaction during the FTC’s investigation, preserving competition and innovation in the market for connected auto chips.

- **Choice Hotels/Wyndham** ([abandoned during investigation](#), Mar. 2024): parties abandoned transaction during the FTC’s investigation, preserving competition in the lodging industry.
- **[NON-PUBLIC]** (abandoned during investigation, Feb. 2024)
- **Kroger/Albertsons** ([complaint](#), Feb. 2024; [preliminary injunction granted](#), Dec. 2024): blocked what would have been the largest supermarket merger in U.S. history, alleging that it would raise prices for millions of Americans, lead to store closures, and reduce compensation for hundreds of thousands of unionized workers.
- **Amazon/iRobot** ([abandoned during investigation](#), Jan. 2024): Amazon abandoned its investigation of home robotics company iRobot during the FTC’s investigation, which had revealed concerns about the transaction’s potential competitive effects.
- **Novant/Community Health** ([complaint](#), Jan. 2024; preliminary injunction granted on appeal, July 2024; [parties abandoned](#), July 2024): blocked a hospital merger in North Carolina.
- **Bodycote/Stack** ([abandoned during investigation](#), Jan. 2024): following FTC investigation, a heat treatment and thermal processing company abandoned its acquisition of a metallurgy company.
- **Sanofi/Maze** ([complaint](#), Dec. 2023; [parties abandoned](#), Dec. 2023): sued to block an acquisition that would have allowed pharma giant Sanofi to extend its monopoly for treatment of the rare Pompe disease.
- **John Muir/Tenet** ([complaint](#), Nov. 2023; [parties abandoned](#), Dec. 2023): stopped a California hospital merger that would drive up costs for critical services like heart surgery, spinal survey, and maternity care.
- **[NON-PUBLIC]** (abandoned during investigation, Oct. 2023)
- **[NON-PUBLIC]** (abandoned during investigation, Oct. 2023)
- **EQT/Quantum** ([consent and divestiture](#), Aug. 2023): prohibited Quantum from occupying an EQT board seat, the first time in 40 years the FTC has enforced Section 8 of the Clayton Act, which prohibits interlocking directorates. Also secured groundbreaking relief to preserve competition in the natural gas sector by preventing anticompetitive information exchange and unwinds an anticompetitive joint venture.
- **CooperCompanies/Cook Medical** ([abandoned during investigation](#), Aug. 2023): following FTC investigation, medical device company abandoned its acquisition of Cook Medical’s reproductive health business.
- **IQVIA/Propel Media** ([complaint](#), Jul. 2023; [preliminary injunction granted](#), Jan. 2024; parties abandoned, Jan. 2024): blocked an acquisition that would have raised prices for patients and doctors by giving IQVIA a

leading position for healthcare programmatic advertising products, which drug manufacturers use to target their products to health providers.

- **Boston Scientific/M.I. Tech** ([abandoned during investigation](#), May 2023): following FTC investigation, medical device manufacturer abandoned its acquisition of a non-vascular stent manufacturer.
- **Amgen/Horizon** ([complaint](#), May 2023; [consent](#), Sept. 2023): prohibited Amgen from leveraging its portfolio of blockbuster drugs to favor Horizon’s two monopoly drugs that treat rare diseases or to disadvantage rivals.
- [NON-PUBLIC] (abandoned during investigation, Apr. 2023)
- [NON-PUBLIC] (abandoned during investigation, Apr. 2023)
- **CalPortland/Martin Marietta** ([abandoned during investigation](#), Apr. 2023): merger would have further reduced competition for cement suppliers in Southern California.
- **Intercontinental Exchange/Black Knight** ([complaint](#), Apr. 2023; [consent and divestiture](#), Aug. 2023): order includes structural relief to protect competition in a merger of the two top mortgage technology providers, which would otherwise raise costs for lenders and homebuyers.
- **Infineum/Entegris** ([abandoned during investigation](#), Feb. 2023): merger would have seen chemicals company Infineum acquire Entegris’ pipeline and industrial materials business.
- **SUNY Upstate/Crouse** ([abandoned during investigation](#), Feb. 2023): stopped a upstate New York hospital merger after the FTC investigated and filed a comment opposing the parties’ application for a certificate of public advantage (COPA).
- **Microsoft/Activision** ([complaint](#), Dec. 2022; litigation ongoing, on appeal): sued to block Xbox maker from gaining control of Activision’s top video game franchises, potentially foreclosing competitor consoles and gaming subscription services from accessing popular games.
- [NON-PUBLIC] (abandoned during investigation, Dec. 2022)
- [NON-PUBLIC] (abandoned during investigation, Nov. 2022)
- [NON-PUBLIC] (abandoned during investigation, Oct. 2022)
- **Tractor Supply/Orscheln** ([consent and divestiture](#), Oct. 2022): protected competition in farm supply stores by ordering divestitures of stores and distribution center.
- [NON-PUBLIC] (abandoned during investigation, July 2022)
- **Meta/Within** ([complaint](#), Jul. 2022; withdrawn following preliminary injunction denial): sued to block Meta from entrenching its position in the

virtual reality space through acquiring a popular virtual reality fitness app; secured decision that affirmed viability of potential competition theory of competitive harm.

- **JAB/Ethos** ([consent and divestiture](#), June 2022): protected competition in veterinary markets by ordering divestiture of clinics.
- **ARKO/Corrigan** ([consent and divestiture](#), June 2022): ordered parties to drop anticompetitive noncompete provisions and to divest locations in a retail fuel merger.
- **JAB/Sage** ([consent and divestiture](#), June 2022): protected competition in veterinary markets by ordering divestiture of California and Texas clinics, and imposes prior notice and prior approval requirements if private equity firm JAB pursues future veterinary acquisitions.
- **Buckeye/Magellan** ([consent and divestiture](#), June 2022): protected competition in gasoline fuel markets in South Carolina and Alabama in a deal involving petroleum terminals.
- **HCA/Steward** ([complaint](#), June 2022; [parties abandoned](#) June 2022): stopped a Utah hospital merger.
- **RWJBarnabas/St. Peter’s** ([complaint](#), June 2022; [parties abandoned](#) June 2022): stopped a New Jersey hospital merger.
- **[NON-PUBLIC]** (abandoned during investigation, May 2022)
- **Medtronic/Intersect** ([consent and divestiture](#), May 2022): preserved competition and protected patients relying on medical instruments used in sinus procedures.
- **Prince/Ferro** ([consent and divestiture](#), Apr. 2022): preserved competition in markets for several industrial inputs used in appliances and other applications.
- **Hikma/Custopharm** ([consent](#), Apr. 2022): preserved competition for development and marketing of injectable steroid drug.
- **EnCap/EP Energy** ([consent and divestiture](#), Mar. 2022): ordered divestiture in a merger of waxy crude oil producers, which could have increased costs for Utah consumers.
- **Lifespan/Care New England** ([complaint](#), Feb. 2022; [parties abandoned](#) Mar. 2022): stopped a Rhode Island hospital merger.
- **Lockheed Martin/Aerojet Rocketdyne** ([complaint](#), Jan. 2022; [parties abandoned](#), Feb. 2022): blocked the world’s largest defense contractor from eliminating the last independent U.S. missile propulsion provider, which would have raised prices for the U.S. government and reduced innovation.

- **Clean Harbors/Vertex Energy** ([abandoned during investigation](#), Jan. 2022): environmental and industrial services firm sought to purchase used motor oil collection and re-refinery assets.
- **Global Partners/Fuel** ([consent and divestiture](#), Dec. 2021): preserved retail fuel competition in Connecticut.
- **Nvidia/Arm** ([complaint](#), Dec. 2021; [parties abandoned](#) Feb. 2022): blocked a vertical semiconductor merger between Nvidia, a chip supplier, and Arm, a chip design provider, which could stifle innovative next-generation technologies like artificial intelligence.
- **Great American Outdoors Group/Sportsman’s Warehouse Holdings** ([abandoned during investigation](#), Dec. 2021): merger would have combined two close retail competitors selling outdoor sporting goods and reduced competition in dozens of local markets.
- **ANI/Novitium** ([consent and divestiture](#), Nov. 2021): ordered generic drug marketers ANI and Novitium to divest rights and assets to two generic products, one used to treat common infections and the other used to treat inflammation.
- **Price Chopper/Tops** ([consent and divestiture](#), Nov. 2021): preserved competition in upstate New York and Vermont grocery merger.
- [NON-PUBLIC] (abandoned during investigation, Oct. 2021)
- **DaVita/Total Renal Care** ([consent and divestiture](#), Oct. 2021): ordered dialysis service provider to divest Utah clinics and imposed strict limits on future acquisitions.
- **Berkshire Hathaway/Dominion** ([abandoned during investigation](#), July 2021): merger would have raised natural gas prices for Utah customers.
- **7-Eleven/Marathon** ([consent and divestiture](#), June 2021): ordered divestiture of stores to protect competition in retail gasoline markets; order prohibits 7-Eleven from enforcing noncompete provisions for franchisees.
- **Illumina/GRAIL** (complaint, Mar. 2021; [parties abandoned following Fifth Circuit decision](#), Dec. 2023): stopped an acquisition which would have reduced competition and hindered innovation in the nascent market for cancer detection tests.
- **Hackensack Meridian/Englewood** (complaint, Dec. 2020; [Third Circuit decision affirming district court opinion](#), Mar. 2022; parties abandoned, Apr. 2022): stopped a New Jersey hospital merger.
- **Altria/Juul** (complaint filed Apr. 2020; [Commission vacated ALJ decision after parties exited transaction](#), June 2023): Commission clarified matters of law after parties exited a transaction that saw Altria purchase a 35 percent stake in Juul Labs.

○ **Challenging Illegal Conduct**

- **Pepsi** ([complaint](#), Jan. 2025): sued Pepsi for favoring larger retailers when providing promotions and services, leading to increased prices on Pepsi products for consumers and competitors.
- **John Deere** ([complaint](#), Jan. 2025): sued the farm equipment company for illegally restricting farmers’ ability to repair their own equipment and to use independent repair providers.
- **Planned Companies** ([complaint and consent](#), Jan. 2025): ordered a building services contractor to drop no-hire agreements that restrained low-wage workers from seeking jobs with higher pay and better benefits.
- **XCL Resources Holdings, Verdun Oil, and EP Energy** ([complaint and consent](#), Jan. 2025): fined crude oil producers \$5.6 million over illegal pre-merger coordination, or gun jumping, in violation of the HSR Act.
- **Guardian** ([complaint and consent](#), Dec. 2024): ordered a building services contractor to stop enforcing no-hire agreements that prohibit building owners and managers from hiring Guardian’s employees.
- **Southern Glazers Wine & Spirits** ([complaint](#), Dec. 2024): sued the largest U.S. distributor of wine and spirits for charging small businesses drastically higher prices than large chain stores, the first FTC enforcement action under the Robinson-Patman Act in decades.
- **Insulin** ([complaint](#), Sept. 2024): sued the three largest PBMs alleging that they inflated the prices patients pay for insulin and other lifesaving drugs through a rebate system.
- **Amazon** ([complaint](#), Sep. 2023; party’s motion to dismiss denied Sep. 2024): sued Amazon for charging fees for hundreds of thousands of businesses that rely on the platform to reach consumers—forcing many businesses to pay Amazon close to 50 percent of their total revenues.
- **U.S. Anesthesia Partners** ([complaint](#), Sep. 2023; parties’ motion to dismiss denied, May 2024; [consent with private equity firm](#), Jan. 2025): sued a large anesthesiology provider for illegally monopolizing the Texas anesthesiology market through a series of roll-ups, raising prices for patients and payors.
- **Anchor Glass** ([complaint and consent](#), Mar. 2023): ordered glass manufacturing company to drop noncompete restrictions on its workers.
- **Prudential Security** ([complaint and consent](#), Jan. 2023): ordered security guard firm to drop noncompetes on its low-wage workers.
- **Ardagh Glass** ([complaint and consent](#), Jan. 2023): ordered glass manufacturing company to drop noncompete restrictions on its workers.

- **O-I Glass** ([complaint and consent](#), Jan. 2023): ordered glass manufacturing company to drop noncompete restrictions on its workers.
 - **Mastercard** ([complaint and consent](#), Dec. 2022): ordered the payment network to stop illegally blocking merchants from routing debit card payments through its payment network, raising costs for businesses.
 - **Syngenta/Corteva** ([complaint](#), Sep. 2022; parties’ motion to dismiss denied Jan. 2024): sued the two largest pesticide manufacturers for preventing farmers from buying cheaper generic products, costing them billions of dollars.
 - **Alabama Board of Dental Examiners** ([complaint and consent](#), Sept. 2021): ordered dental licensing administrator to stop anticompetitive conduct that unreasonable excluded competing teeth alignment product and service providers.
 - **Broadcom** ([complaint and consent](#), July 2021): ordered semiconductor components market to stop requiring its customers to source components from Broadcom on an exclusive or near exclusive basis.
 - **Meta** (complaint, Dec. 2020; [amended complaint](#), Aug. 2021): defeated Meta’s summary judgment motion in the agency’s lawsuit alleging Meta engaged in a series of acquisitions and anticompetitive tactics, including Instagram and WhatsApp, to illegally maintain its monopoly.
 - **Daraprim** (complaint, Jan. 2020; [Second Circuit affirmed](#), Jan. 2024): Banned “Pharma Bro” Martin Shkreli from ever doing business in the pharmaceutical industry after Shkreli hiked the price of Daraprim from \$17.50 to \$750 per tablet.
 - **Surescripts** (complaint, Apr. 2019; [consent](#), July 2023): stopped health information technology company from illegally monopolizing two e-prescription drug markets.
- **Consumer Protection**
 - **Limiting Commercial Surveillance**
 - **General Motors** ([complaint and order](#), Jan. 2025): Banned carmaker from sharing drivers’ precise geolocation data without their consent for five years, in the FTC’s first privacy action concerning connected cars.
 - **Gravy Analytics** ([complaint and order](#), Dec. 2024): banned data broker from illegally selling location data, including selling sensitive inferences drawn from users’ data, like political activities and religious viewpoints.
 - **Mobilewalla** ([complaint and order](#), Dec. 2024): banned data broker from selling sensitive location data, and banned it from collecting data from online real-time-bidding auctions for purposes other than participating in those auctions.

- **Avast** ([complaint and order](#), May 2024): banned browser antivirus software Avast from selling users’ web browsing data for advertising purposes, and ordered it to pay \$16.5 million in redress for consumers.
 - **Monument** ([complaint and order](#), Apr. 2024): banned alcohol addiction treatment service from sharing consumers’ sensitive health data to third parties for advertising.
 - **Cerebral** ([complaint and order](#), Apr. 2024): banned telehealth firm from using any health information for most advertising purposes after it deceived users about substance use disorder treatment services.
 - **InMarket Media** ([complaint and order](#), Jan. 2024): banned data broker from selling users’ precise location data.
 - **X-Mode** ([complaint and order](#), Jan. 2024): prohibited data broker from selling consumers’ sensitive location data.
 - **Premom** ([complaint and order](#), May 2023): sued ovulation tracking app for violating the Health Breach Notification Rule and sharing health data with third parties, including two China-based firms, for advertising.
 - **BetterHelp** ([complaint and order](#), Mar. 2023): sued online counseling service for sharing sensitive data about consumers’ mental health with third parties for advertising.
 - **GoodRx** ([complaint and order](#), Feb. 2023): sued telehealth and prescription drug discount provider for violating the Health Breach Notification Rule and disclosing consumers’ personal health information to Facebook, Google, and other third parties for advertising.
 - **Kochava** ([complaint](#), Aug. 2022; FTC defeated motion to dismiss, Feb. 2024): sued data broker for selling users’ geolocation data, revealing information about people’s visits to doctors, including reproductive health clinics and addiction recovery facilities.
- **Curbing Lax Data Security Practices**
- **GoDaddy** ([complaint and order](#), Jan. 2025): ordered web hosting company to implement a robust data security company after its poor security practices exposed consumers and small businesses’ data to hackers.
 - **Marriott International** ([complaint and order](#), Oct. 2024): ordered hotel chains to implement a robust data security program after three large data breaches impacting more than 344 million customers worldwide.
 - **Verkada** ([complaint and order](#), Aug. 2024): ordered security camera firm to pay \$2.95 million fine and improve its data security practices after it inundated prospective customers with spam emails and failed to protect users’ personal data from being accessed by a hacker.

- **Blackbaud** ([complaint and order](#), Feb. 2024): ordered data services firm to delete unnecessary data and implement improved security practices after its poor security practices left users’ data exposed to hackers.
 - **Global Tel*Link** ([complaint and order](#), Nov. 2023): ordered prison communications provider to notify customers of any future security breaches after it failed to adequately secure users’ data from hackers.
 - **Vitagene/1Health.io** ([complaint and order](#), June 2023): ordered genetic testing company to strengthen protections for genetic data and direct labs to promptly destroy genetic samples after the company failed to protect privacy of DNA data and unfairly changed its privacy policies.
 - **Ring** ([complaint and order](#), May 2023): ordered home security company to pay \$5.8 million in consumer refunds after the company allowed any employee or contractor to access consumers’ private videos and failed to secure consumers’ cameras and videos from hackers.
 - **Drizly** ([complaint and order](#), Oct. 2022): ordered online alcohol marketplace to destroy unnecessary data and restrict future data collection after the company’s poor security practices left 2.5 million consumers’ personal data exposed in a data breach.
 - **Chegg** ([complaint and order](#), Oct. 2022): ordered educational technology company to improve security practices after its careless security practices exposed customers’ personal data.
 - **Twitter** ([order](#)) May 2022: charged Twitter for violating a 2011 consent order with the FTC by selling users’ account data for targeted advertising.
 - **CaféPress** ([complaint and order](#), Mar. 2022): ordered online merchandising platform to pay half a million dollars to compensate small businesses whose data were exposed in a major breach, and to implement stronger security practices.
 - **SpyFone** ([complaint and order](#), Sept. 2021): ordered stalkerware app to delete all secretly stolen data and banned the company and its CEO from the surveillance business after the company secretly harvested and shared data on people’s physical movements and online activities.
 - **MoviePass** ([complaint and order](#), June 2021): took action against movie subscription service for failing to secure its users’ data and misrepresenting the terms of the subscription service.
- **Protecting Kids and Teens Online**
 - **Cognosphere** ([complaint and order](#), Jan. 2025): banned game developer from using in-game loot box practices that led to kids and teens paying hundreds of dollars for prizes they were unlikely to win in the popular kids’ video game Genshin Impact.

- **TikTok** ([complaint](#), Aug. 2024): sued shortform video app for allegedly violating COPPA by collecting and using personal information from children under 13 without parental consent.
 - **NGL Labs** ([complaint and order](#), July 2024): banned anonymous messaging app from marketing its service to kids under 18 after its unfair practices exposed kids to cyberbullying and harassment.
 - **Microsoft Xbox** ([complaint and order](#), June 2023): fined Microsoft \$20 million for illegally collecting kids’ data on its Xbox service without their parents’ consent.
 - **Facebook** ([order](#), May 2023): held social media giant accountable for violating its privacy promises in a previous FTC consent order and proposed a blanket ban on monetizing children’s data.
 - **Amazon Alexa** ([complaint and order](#), May 2023): fined Amazon \$25 million for promising parents that they could delete their kids’ Alexa voice recording and geolocation data, but then retaining it for years.
 - **Edmodo** ([complaint and order](#), May 2023): prohibited online educational software from collecting more personal data from students than necessary after it illegally used kids’ data for advertising and outsourced COPPA compliance to school districts.
 - **Epic Games** ([complaint and order](#), Dec. 2022): fined the maker of Fortnite \$275 million—the largest COPPA penalty ever obtained—for collecting kids’ personal information without their parents’ consent and for using default settings that exposed kids and teens to bullying and harassment.
 - **Weight Watchers/Kurbo** ([complaint and order](#), Mar. 2022): ordered Weight Watchers to delete personal information it illegally collected from kids as young as eight and to destroy any algorithms it trained on that data.
 - **OpenX** ([complaint and order](#), Dec. 2021): ordered real-time bidding platform to pay \$2 million for collecting personal information from children without parental consent and for collecting precise geolocation data even from users who asked not to be tracked.
 - **Recolor Oy** ([complaint and order](#), July 2021): ordered online coloring book service to delete ill-gotten data after it collected children’s personal data without their parents’ consent.
- **Scrutinizing Emerging AI Products**
 - **accessiBe** ([complaint and order](#), Jan. 2025): ordered the company to stop misrepresenting that its AI-powered web accessibility tool could make any website compliant with accessibility guidelines.
 - **IntelliVision Technologies** ([complaint and order](#), Dec. 2024): ordered IntelliVision, which sells facial recognition software used in home security

systems, to stop making false or unsubstantiated claims that its facial recognition software was free of gender and racial bias.

- **Evolv Technologies** ([complaint and order](#), Nov. 2024) stopped security screening technology company from making unsupported claims that its products could detect weapons using AI.
 - **DoNotPay** ([complaint and order](#), Sept. 2024): prohibited an AI service that claimed to offer “the world’s first robot lawyer” from making unsubstantiated claims.
 - **Ascend Ecom** ([complaint and TRO](#), Sept. 2024): halted a bogus business opportunity scheme that claimed its “cutting edge” AI-powered tools could help consumers start online storefronts and quickly earn thousands of dollars each month in passive income.
 - **Ecommerce Empire Builders** ([complaint and TRO](#), Sept. 2024): halted a bogus business opportunity scheme that falsely claimed its AI-powered training programs and online storefronts could earn consumers money.
 - **Rytr** ([complaint and order](#), Sept. 2024): stopped an AI-enabled review generation service from offering a service for customers to generate fake consumer reviews or testimonials.
 - **FBA Machine** ([complaint and TRO](#), June 2024): halted a bogus business opportunity scheme that falsely promised consumers they could make guaranteed passive income using AI-powered online storefronts.
 - **NGL Labs** ([complaint and order](#), July 2024): banned anonymous messaging app from marketing its service to kids under 18 and ordering it to stop making unsubstantiated AI claims, including AI safety claims.
 - **Rite Aid** ([complaint and order](#), Dec. 2023): banned retail pharmacy chain from using facial recognition technologies when it wrongly accused innocent people, including children, of shoplifting.
 - **Automators** ([complaint](#), Aug. 2023; [order](#), Feb. 2024): banned bogus moneymaking scheme that claimed to use AI to boost earnings for consumers’ e-commerce storefronts from offering business opportunities.
 - **Amazon Alexa** ([complaint and order](#), May 2023): for the first time, banned Amazon from indefinitely retaining users’ data for training AI.
- **Combating Junk Fees**
- **Greystar** ([complaint](#), Jan. 2025): sued the largest operator of rental apartments for charging consumers unavoidable junk fees and hiding the true cost of rental apartments.
 - **GrubHub** ([complaint and order](#), Dec. 2024): ordered food delivery platform to end junk fees for consumers, honestly advertise pay to drivers,

and list restaurants on its platform only with their consent, and returning \$25 million to consumers who were harmed.

- **Dave** ([complaint](#), Nov. 2024; [amended complaint](#), Dec. 2024): sued online cash advance app for deceptive claims about cash advances and charging consumers junk fees, including hiding a \$1 monthly “membership fee” and making it difficult to cancel the service.
 - **Invitation Homes** ([complaint and order](#), Sept. 2024): sued the largest corporate landlord of single-family homes for saddling renters with junk fees, unjustly withholding security deposits, and unfairly evicting people, and securing \$48 million to be refunded to renters who were harmed.
 - **Vonage** ([complaint and order](#), Nov. 2022): ordered internet phone service provider Vonage to refund \$100 million to consumers, end junk fees, and provide easy cancellation mechanisms after finding that the company used dark patterns to make it difficult for consumers to cancel.
 - **Benefytt Technologies** ([complaint and order](#), Aug. 2022): secured \$100 million in refunds after Benefytt lied to consumers about sham insurance plans and charged junk fees for unwanted add-on products.
 - **Simple Health** (complaint, Nov. 2018; [court granted FTC’s summary judgment motion](#), Feb. 2024): obtained \$195 million judgement against a bogus health insurance plan that didn’t provide the promised coverage and left consumers on the hook for thousands of dollars in medical bills.
- **Challenging Dark Patterns and Subscription Traps**
- **Grubhub** ([complaint and order](#), Dec. 2024): required food delivery platform to offer a simple cancellation mechanism for its Grubhub+ subscription, in addition to ending junk fees for consumers.
 - **Dave** ([complaint](#), Nov. 2024; [amended complaint](#), Dec. 2024): sued online cash advance app for deceptive claims about cash advances and charging consumers junk fees, including hiding a \$1 monthly “membership fee” and making it difficult to cancel the service.
 - **Care.com** ([complaint and order](#), Aug. 2024): ordered the child and older adult care gig platform to refund consumers \$8.5 million after using inflated job numbers and earnings claims to attract caregivers, while locking consumers into hard-to-cancel subscriptions.
 - **Adobe** ([complained](#), June 2024): sued Adobe for hiding early termination fees for its subscription software and making it difficult for consumers to cancel their subscriptions.
 - **Doxo** ([complaint and order](#), Apr. 2024): took action against online bill payment service Doxo for using misleading search ads to trick consumers into paying their bills to Doxo rather than the biller, and for intercepting

users’ payments that lead to their utilities being shut off, their car and health insurance lapsing, and being charged late fees and fines.

- **FloatMe** ([complaint and order](#), Jan. 2024): ordered online cash advance provider to provide \$3 million refunds for falsely promising quick and free cash advances, making it difficult to cancel subscriptions, and for discriminating against consumers who receive public assistance.
 - **Brigit** ([complaint and order](#), Nov. 2023): ordered personal finance app to pay \$18 million in consumer refunds after it used deceptive promises of “instant” \$250 cash advances to lock consumers into a hard-to-cancel monthly membership.
 - **CRI Genetics** ([complaint and order](#), Nov. 2023): ordered genetic testing firm to stop deceiving user about the accuracy of its DNA reports, including by falsely claiming that it patented a proprietary algorithm for genetic matching; also ordered the company to stop using fake reviews and dark patterns that trapped users in its online billing.
 - **Publishers Clearing House** ([complaint and order](#), June 2023): ordered sweepstakes company to refund consumers \$18.5 million and stop using dark patterns to deceive consumers about how to enter its sweepstakes drawings, leading them to waste time and money.
 - **Amazon** ([complaint](#), May 2023): sued Amazon for enrolling consumers into Amazon Prime without their consent and making it difficult for them to cancel their subscriptions.
 - **Epic Games** ([complaint and order](#), Dec. 2022): secured \$245 million in consumer redress from Epic Games for using dark patterns to trick players into making unwanted purchases.
 - **Vonage** ([complaint and order](#), Nov. 2022): ordered internet phone service provider Vonage to refund \$100 million to consumers, end junk fees, and provide easy cancellation mechanisms after finding that the company used dark patterns to make it difficult for consumers to cancel.
 - **Credit Karma** ([complaint and order](#), Aug. 2022): ordered credit services company to return \$2.5 million to consumers who were tricked into applying for “pre-approved” credit offers they were not qualified for, denied credit, and saw their credit scores drop.
 - **F9 Advertising** (complaint, 2019; [order](#), Oct. 2023): shut down online skin cream marketer for charging consumers millions of dollars in undisclosed recurring subscription fees.
- **Challenging Deceptive Advertising**
- **H&R Block** ([complaint](#), Feb. 2024; [order](#), Nov. 2024): ordered H&R Block to make it easier to downgrade to a cheaper H&R Block product and stop making deceptive claims about “free” tax filing.

- **CRI Genetics** ([complaint and order](#), Nov. 2023): ordered genetic testing firm to stop deceiving user about the accuracy of its DNA reports, including by falsely claiming that it patented a proprietary algorithm for genetic matching; also ordered the company to stop using fake reviews and dark patterns that trapped users in its online billing.
- **LasikPlus** ([complaint and order](#), Jan. 2023): ordered laser eye surgery provider to refund \$1.25 million for luring consumers in with low promotional prices for which very few consumers were eligible.
- **Google/iHeartMedia** ([complaint and order](#), Nov. 2022): halted ads that promoted Google’s Pixel 4 phone using false and deceptive endorsements by radio personalities.
- **Opendoor** ([complaint and order](#), Aug. 2022): ordered online home buying firm to pay \$62 million and stop deceptive claims that tricked consumers into thinking that they could make more money selling their home to Opendoor than on the open market.
- **SPM Thermo-Shield** ([complaint and order](#), June 2022): ordered building wall coating maker to stop making deceptive energy efficiency claims.
- **Frontier Communications** ([complaint and order](#), May 2022): stopped internet service provider from lying to consumers and charging them for high-speed internet that it failed to deliver, and order the company to refund \$250,000 to consumers.
- **Walmart** ([complaint and order](#), Apr. 2022): fined retailer \$3 million for falsely marketing dozens of rayon textile products as bamboo, and touting that the “bamboo” products were environmentally friendly.
- **Kohl’s** ([complaint and order](#), Apr. 2022): fined retailer \$2.5 million for falsely marketing dozens of rayon textile products as bamboo, and touting that the “bamboo” products were environmentally friendly.
- **Intuit** ([complaint](#), Mar. 2022; [final opinion and order](#), Jan. 2024): issued a Commission opinion finding that the tax prep software company deceptively marketed its product as “free” and stop making deceptive claims about “free” tax filing.
- **Health Research Laboratories** (complaint, Nov. 2020; [order](#), Mar. 2022): banned companies from advertising or selling dietary supplements that claim to treat and cure disease.
- **Superior Products** (complaint, July 2020; [court order secured](#), Nov. 2022): ordered building exterior coating company to stop making deceptive energy efficiency claims in violation of the FTC’s R-Value rule, which concerns labeling and advertising of home insulation.
- **FGI** (complaint, July 2020; [court order secured](#), Oct. 2022): stopped paint maker from making deceptive insulin claims.

- **Redwood Scientific** (complaint, Oct. 2018; [court order secured](#), Mar. 2022): stopped marketers who falsely claimed that their dissolvable oral strips could assist in smoking cessation and weight loss.
 - **Protecting Gig Workers**
 - **Handy** ([complaint and order](#), Jan. 2025): ordered home services gig work platform to stop making deceptive claims about how much money workers could earn, and secured \$2.95 million in refunds to workers.
 - **GrubHub** ([complaint and order](#), Dec. 2024): ordered food delivery platform to end junk fees for consumers, honestly advertise pay to drivers, and list restaurants on its platform only with their consent, and returning \$25 million to consumers who were harmed.
 - **Lyft** ([complaint and order](#), Oct. 2024): ordered rideshare platform to stop making deceptive claims about how much money drivers could earn hourly and through special incentives.
 - **Care.com** ([complaint and order](#), Aug. 2024): ordered the child and older adult care gig platform to refund consumers \$8.5 million after using inflated job numbers and earnings claims to attract caregivers, while locking consumers into hard-to-cancel subscriptions.
 - **Arise** ([complaint and order](#), July 2024): ordered customer service gig platform to stop making misleading claims about what consumers could earn for gig work, and secured \$7 million to refund to consumers.
 - **HomeAdvisor** ([complaint](#), Mar. 2022; [order](#), Jan. 2023): ordered home improvement gig platform to stop false and deceptive claims about the quality and source of the leads on its platform.
 - **Protecting Auto Buyers**
 - **Lindsay Auto** ([complaint](#), Dec. 2024): sued a Maryland auto dealer for charging consumers for unwanted junk fees and add-ons.
 - **Leader Auto** ([complaint and order](#), Dec. 2024): reached \$20 million settlement with car dealerships allegedly deceiving consumers with bait-and-switch tactics and fake reviews.
 - **Asbury Auto** ([complaint](#), Aug. 2024): sued a Texas auto dealer group alleging that it charged consumers for unwanted add-ons and discriminated against Black and Latino consumers by targeting them with unwanted and higher-priced add-ons.
 - **Coulter Motor Company** ([complaint and order](#), Aug. 2024): secured \$2.35 million in consumer redress from an Arizona auto dealer group for deceptive pricing, charging for unwanted add-ons, and discriminating against Latino customers.

- **CarShield** ([complaint and order](#), July 2024): ordered a vehicle service contract administrator to stop deceiving customers about which repairs were covered under the service plans.
 - **Vroom** ([complaint and order](#), July 2024): secured \$1 million in consumer refunds from online used car dealer for falsely claiming that it examined all vehicles before listing them for sale and failing to deliver cars on time.
 - **Manchester City Nissan** ([complaint and order](#), Jan. 2024): sued a Connecticut auto dealer for deceiving consumers about the price of used cars, add-ons, and government fees.
 - **Rhineland Auto** ([complaint and order](#), Oct. 2023): secured \$1.1 million for consumer refunds after a Wisconsin auto dealer group charged customers illegal junk fees and discriminated against American Indian customers by charging them higher financing costs and fees.
 - **Passport Auto** ([complaint and order](#), Oct. 2022): secured \$3.3 million in consumer redress from an auto dealer group for charging consumers for unwanted add-ons and discriminating against Black and Latino consumers by targeting them with higher financing costs and fees.
 - **Napleton Auto** ([complaint and order](#), Apr. 2022): reached \$10 million settlement with Illinois auto group for charging customers illegal junk fees and for discriminating against Black customers by charging them higher financing costs.
- **Championing American Manufacturing**
- **Williams-Sonoma** ([complaint and order](#), Apr. 2024): ordered home products company to pay a record \$3.175 million fine for falsely claiming its products were made in America, in violation of a 2020 FTC order.
 - **Kubota** ([complaint and order](#), Jan. 2024): ordered tractor maker to pay \$2 million penalty for falsely labeling replacement parts as “Made in USA.”
 - **Old Southern Brass** ([complaint and order](#), Dec. 2023): ordered giftware company to stop falsely claiming its products were made in America and that the company was veteran-owned and donates 10% of its sales to military service charities.
 - **Chaucer & Bates Accessories** ([complaint and order](#), June 2023): stopped clothing accessories companies from falsely claiming that certain products were “Made in USA”, and returned \$140,000 to consumers.
 - **Cycra** ([complaint and order](#), Apr. 2023): ordered a motocross and ATV parts maker Cycra to stop making claims that its products were manufactured in the U.S., and secured \$180,000 in refunds to consumers.
 - **Instant Brands (Pyrex)** ([complaint and order](#), Jan. 2023): ordered home and kitchen product maker to stop making false claims that its glass

measuring cups were made in America when they were made in China, resulting in \$88,000 in refunds to consumers.

- **ALG Health** ([complaint and order](#), Aug. 2022): stopped personal protective equipment maker from falsely claiming that its mask and other products were “Made in USA” and that because they were Made in USA, they could provide superior protection from COVID-19.
 - **Electrowarmth** ([complaint and order](#), Aug. 2022): ordered heated mattress pad maker to stop making false “Made in USA” claims.
 - **Lions Not Sheep** ([complaint and order](#), May 2022): ordered apparel company to stop claiming its clothing was made in America when they were made in China and to pay a \$200,000 fine.
 - **Lithionics** ([complaint](#), Apr. 2022): took action against battery maker that falsely claimed its products were “Made in USA.”
 - **Resident Home (Nectar Sleep)** ([complaint and order](#), Oct. 2021): ordered mattress company to stop making false “Made in USA” claims after it violated a 2018 FTC order over similar law violations.
- **Protecting Small Businesses and Franchisees**
- **Seek Capital** ([complaint](#), Nov. 2024): sued a bogus business finance scheme that falsely promised businesses access to cash.
 - **Qargo Coffee** ([complaint and order](#), Oct. 2024): ordered coffee franchise to disclose to franchisees critical information required by the Franchise Rule, leaving prospective franchisees in the dark about whether to invest.
 - **Womply** ([complaint and order](#), Mar. 2024): ordered Womply to pay \$36 million after it made false promises to small businesses that it could help them receive emergency pandemic loans, when most applications never resulted in any funding.
 - **Biz2Credit** ([complaint and order](#), Mar. 2024): ordered Biz2Credit to pay \$33 million after it made false promises to small businesses about how long their emergency pandemic loan applications would take to process.
 - **Grant Bae** ([complaint and order](#), Dec. 2022): shut down grant-writing and business consulting scam that targeted minority-owned small businesses seeking help to survive the pandemic.
 - **First American Payment Systems** ([complaint and order](#), July 2022): ordered a payment processor to return \$4.9 million to businesses after it lured small businesses with promises of low fees, trapped them with hidden terms and surprise exit fees, and withdrew funds from their accounts without their consent.

- **BurgerIM** ([complaint](#), Feb. 2022): sued fast-food franchise company for allegedly making false promises to more than 1,500 consumers, some of whom were veterans, to induce them to purchase franchises.
 - **Dun & Bradstreet** ([complaint and order](#), Jan. 2022): ordered a business credit report provider to enact better processes for businesses to correct errors after it deceived businesses about the value of its products and failed to correct errors on businesses’ credit reports.
 - **Richmond Capital Group** (complaint, June 2020; [settlement with corporate defendants](#), June 2022; [jury issued summary judgment in trial against individual defendant Jonathan Braun](#), Oct. 2023): won a jury trial and a \$20 million judgment against a small business financing operation for preying on small businesses with unfair lending and collection practices, and a permanent ban against owner Jonathan Braun from the merchant cash advance and debt collection industries.
- **Protecting Americans’ Right to Repair**
 - **Weber** ([complaint and order](#), June 2022): ordered grill maker to stop illegally restricting customers’ right to repair their purchased products and to remove illegal terms in its warranty.
 - **Harley-Davidson** ([complaint and order](#), June 2022): ordered motorcycle maker to stop illegally restricting customers’ right to repair their purchased products and to ensure that dealers compete fairly with independent third-parties.
 - **Westinghouse** ([complaint and order](#), June 2022): ordered outdoor generator maker to stop illegally restricting customers’ right to repair their products and to ensure that dealers compete fairly with independent third-parties.
 - **Addressing Fake Reviews**
 - **Sitejabber** ([complaint and order](#), Nov. 2024): ordered an AI-enabled online review platform to stop misrepresenting ratings and reviews.
 - **Rytr** ([complaint and order](#), Sept. 2024): stopped an AI-enabled review generation service from offering a service for customers to generate fake consumer reviews or testimonials.
 - **Hey Dude Shoes** ([complaint and order](#), Sept. 2023): fined online shoe seller \$1.95 million for suppressing negative reviews and not shipping merchandise on time.
 - **Roomster** ([complaint](#), Aug. 2022; [order](#), Aug. 2023): banned a rental listing platform and its owners from buying consumer reviews after they flooded the internet with thousands of fake 4- and 5- star reviews for listings that turned out to be fake.

- **The Bountiful Company** ([complaint and order](#), Feb. 2023): banned vitamin product marketer from review hijacking, or stealing or purposing reviews of another product, on Amazon.
 - **Fashion Nova** ([complaint and order](#), Jan. 2022): banned online fashion retailer from suppressing negative customer reviews.
 - **Vision Path** ([complaint and order](#), Jan. 2022): fined online contact lens seller \$3.5 million for using misleading reviews and for violating the FTC’s Contact Lens Rule.
- **Ensuring Fairness in Financial Products**
- **Dave** ([complaint](#), Nov. 2024; [amended complaint](#), Dec. 2024): sued online cash advance app for deceptive claims about cash advances and charging consumers junk fees.
 - **Aqua Finance** ([complaint and order](#), May 2024): ordered household water treatment funding company to provide \$20 in consumer refunds and \$23.6 million in debt forgiveness to consumers who were deceived by its dealers’ deceptive financing terms.
 - **FloatMe** ([complaint and order](#), Jan. 2024): ordered online cash advance provider to provide \$3 million refunds for falsely promising quick and free cash advances, making it difficult to cancel subscriptions, and for discriminating against consumers who receive public assistance.
 - **Chargebacks911** ([complaint](#), Apr. 2023; [order](#), Nov. 2023): banned chargeback mitigation company from using unfair techniques to prevent consumers from winning chargeback disputes and prohibited the company from working with certain subscription marketers.
 - **Brigit** ([complaint and order](#), Nov. 2023): ordered personal finance app to pay \$18 million in consumer refunds after it used deceptive promises of “instant” \$250 cash advances to lock consumers into a hard-to-cancel monthly membership.
 - **Voyager** ([complaint and order](#), Oct. 2023): sued the CEO of and settled with a bankrupt crypto company that falsely claimed consumers’ deposits were FDIC-insured, leading consumers to lose more than \$1 billion in cryptocurrency after the company collapsed.
 - **TransUnion** ([complaint and order](#), Oct. 2023): fined credit reporting agency \$15 million for including inaccurate and incomplete eviction records in consumers’ background screening reports, hampering their ability to obtain housing.
 - **TruthFinder** ([complaint and order](#), Sept. 2023): fined background report providers TruthFinder and Checkmate \$5.8 million for lying to users about the accuracy of their background reports and deceiving consumers about whether they had criminal records.

- **Experian** ([complaint and order](#), Aug. 2023): ordered Experian Consumer Services, which offers consumers access to their Experian credit reports, to pay \$650,000 for violating the CAN-SPAM Act by sending consumers unsolicited email without a way to opt out.
 - **Celsius** ([complaint and order](#), July 2023): banned crypto platform from handling consumers’ assets after it falsely promised that deposits would be safe and always available.
 - **Walmart** ([complaint](#), June 2022; [amended complaint](#), June 2023): sued Walmart for allowing its money transfer services to be used by fraudsters.
 - **The Credit Game** ([complaint](#), May 2022; [order](#), Dec. 2022): stopped a fraudulent scheme that falsely promised consumers it could repair their credit and for pitching to consumers a business opportunity to create their own bogus credit repair scheme.
 - **Ygrene Energy** ([complaint and order](#), Oct. 2022): ordered home improvement financing provider to stop deceiving consumers about its financing terms and placing liens on homes with their consent.
 - **Financial Education Services** ([complaint and order](#), May 2022): shut down a bogus credit repair scheme that lured in consumers with low credit scores and recruit them to join a pyramid scheme selling the same worthless credit repair services to others.
 - **MyLife** ([complaint and order](#), Dec. 2021): fined online background report provider \$21 million for tricking users with deceptive “teaser” background reports, trapping them in difficult-to-cancel subscriptions, and failing to meet its obligations as a consumer reporting agency, including maintaining reasonable procedures to ensure its reports were accurate.
- **Protecting Students from Deception and Fraud**
 - **Superior Servicing** ([complaint and TRO entered](#), Nov. 2024; [PI issued](#) Dec. 2024): secured TRO and PI to stop a fraudulent student loan debt scheme that falsely promised debt relief and forgiveness.
 - **USA Student Debt Relief** ([complaint and order](#), July 2024): stopped a student loan relief scheme that targeted financially strapped consumers, including Spanish-speaking consumers in Puerto Rico, with false promises of lower payments and loan forgiveness.
 - **Panda Benefit Services** ([complaint and order](#), June 2024): halted a fraudulent student loan debt relief scheme that took more than \$20.3 million from consumers seeking debt relief by presenting to be affiliated with the Department of Education.
 - **Grand Canyon University** ([complaint](#), Dec. 2023): sued for-profit school for lying to prospective doctoral students about the cost and requirements

of its programs and about its nonprofit status, and making illegal telemarketing calls to consumers.

- **Sollers College** ([complaint and order](#), Oct. 2023): ordered a for-profit college to cancel \$3.4 million in student debt after luring in students with false job-placement rates and utilized illegal income-share agreements that left out important borrower rights.
 - **Apex Processing Center** ([complaint](#), Aug. 2023; [order](#), Feb. 2024; [order with leader of the operation](#), Apr. 2024): shut down a student loan debt relief operator after it pretended to be affiliated with the Department of Education and pocketed \$8.8 million using false promises of loan forgiveness.
 - **BCO Consulting** ([complaint](#), May 2023; [order](#), Oct. 2023): stopped fraudulent student loan relief operation after it pretended to be affiliated with the Department of Education and bilked students using false promises of loan repayment or debt forgiveness programs.
 - **SL Finance** ([complaint](#), May 2023; [order](#), Oct. 2023): stopped fraudulent student loan relief operation after it pretended to be affiliated with the Department of Education and other government relief programs, and cheated students using false promises of loan repayment or debt forgiveness programs.
 - **Saint James School of Medicine** ([complaint and order](#), Apr. 2022): secured \$1.2 million in refunds from a for-profit medical school that misled students about the school’s medical license exam test pass rate and residency matches, saddling students with debt.
 - **Arete Financial Group** (complaint, Nov. 2019; [orders secured](#) Jan. 2022): banned operators of a student loan debt relief scheme from the industry that lured borrowers using fraudulent ads, pretended to be affiliated with the Department of Education, and falsely promised to reduce or eliminate students’ loans in exchange for hefty fees.
 - **Moneta Management** ([complaint and order](#), July 2021): ordered payment processor to shut down after it assisted a criminal student debt relief scam.
- **Protecting Older Americans**
- **Stem Cell Institute of America** ([complaint](#), Aug. 2021; [final orders](#) Jan. 2025): ordered company to stop falsely claiming that its stem cell therapy treatments were effective in treating arthritis and joint pain, and secured \$3.3 million to refund to consumers.
 - **Quincy Bioscience** ([court ruled in favor of FTC](#), Dec. 2024): court ruled in favor of the FTC after seven years of litigation, including a jury trial, ordering Quincy Bioscience to stop making deceptive claims about Prevagen that misled older Americans concerned about memory loss.

- **Care.com** ([complaint and order](#), Aug. 2024): ordered the child and older adult care gig platform to refund consumers \$8.5 million after trapping consumers into hard-to-cancel subscriptions and using inflated job numbers and earnings claims to attract caregivers.
 - **Restoro-Reimage** ([complaint and order](#), Mar. 2024): ordered tech support scam to pay \$26 million after it tricked consumers, particularly older consumers, into buying computer repair services.
 - **Square One** ([complaint](#), Nov. 2022): sued a fraudulent operation that promised to help older Americans get out of timeshare contracts and scammed consumers out of more than \$90 million.
 - **Home Matters USA** ([complaint](#), Sept. 2022; [order](#), Feb. 2024): shut down mortgage relief scam that falsely promised to reduce homeowners' mortgage payments and prevent foreclosures, particularly targeting older Americans and veterans.
 - **Gravity Defyer** ([complaint](#), June 2022): sued footwear company for making allegedly deceptive claims that its products could relieve arthritis, joint pain, and other medical conditions.
 - **ZyCal Bioceuticals** (complaint, Feb. 2020; [order](#), Feb. 2023): banned medical company from falsely claiming that their products could grow bone and cartilage and relieve joint pain.
- **Protecting Americans Seeking Substance Use Disorder Treatment**
- **Evoke Wellness** ([complaint](#), Jan. 2025): sued marketers who tricked consumers looking for substance use disorder treatment clinics into calling Evoke's fraudulent telemarketers, rather than treatment clinics.
 - **Monument** ([complaint and order](#), Apr. 2024): banned alcohol addiction treatment service from sharing consumers' sensitive health data to third parties for advertising.
 - **Cerebral** ([complaint and order](#), Apr. 2024): banned telehealth firm from using any health information for most advertising purposes after it deceived users about substance use disorder treatment services.
 - **Rejuvica** ([complaint and order](#), July 2023): fined maker of a supplement called Sobrenix for making false claims that the product could eliminate alcohol cravings and consumption.
 - **Smoke Away** ([complaint and order](#), June 2023): fined a company for falsely claiming that its products could eliminate consumers' nicotine addiction and enable them to quit smoking.
 - **AWAREmed** ([complaint and order](#), Mar. 2023): fined a medical clinic for making false or unsupported claims for addiction treatment services, cancer treatment services, and other treatments.

- **R360** ([complaint and order](#), May 2022): fined addiction treatment center network for preying on people seeking treatment for addiction; first FTC action brought under Opioid Addiction Recovery Fraud Prevention Act.
 - **Protecting Military Families**
 - **Career Step** ([complaint and order](#), July 2024): ordered online career training company to cancel \$27.8 million in debt and provide \$15.7 million in consumer refunds for luring in military families with deceptive ads that falsely inflated employment outcome and job placement claims
 - **FloatMe** ([complaint and order](#), Jan. 2024): ordered online cash advance provider to provide \$3 million refunds for falsely promising quick and free cash advances, making it difficult to cancel subscriptions, and for discriminating against consumers who receive public assistance, including military benefits.
 - **Old Southern Brass** ([complaint and order](#), Dec. 2023): ordered giftware company to stop falsely claiming its products were made in America and that the company was veteran-owned and donates 10% of its sales to military service charities.
 - **Harris Jewelers** ([complaint and order](#), July 2022): stopped a jewelry company from cheating military families with illegal financing and sales practices, in the FTC’s first action under the Military Lending Act.
 - **Halting Deceptive Earnings Claims**
 - **RivX** ([complaint and order](#), Aug. 2024): shut down a “trucking automation” company after it scammed consumers out of millions of dollars with false promises of trucking industry investment opportunities.
 - **Weblio** ([complaint and TRO](#), Dec. 2023; [consent orders](#) Aug. 2024 and Sept. 2024): stopped a fraudulent business opportunity scheme that sold consumers a “blueprint to wealth” that failed to deliver on its promises, raking in millions of dollars for its operators.
 - **Traffic and Funnels** ([complaint and order](#), Dec. 2023): secured \$1 million in consumer refunds from a fraudulent scheme promising consumers that they could make money by paying for telemarketing training programs.
 - **Lurn** ([complaint and order](#), Sept. 2023): secured \$2.5 million to refund consumers after it sold a business coaching product that falsely claimed consumers could make significant income.
 - **Ganadores** ([complaint](#), June 2023; [orders](#), Jan. 2024): stopped a business opportunity scam that targeted Spanish-speaking consumers with false pitches for online businesses and real estate investments
 - **Nudge** ([order](#), May 2023): shut down a fraudulent real estate investment coaching scheme and secured \$16.7 in civil penalties.

- **WealthPress** ([complaint and order](#), Jan. 2023): ordered investment advice company to refund consumers \$1.2 million for making false earnings claims, when many consumers in fact lost money.
 - **DK Automation** ([complaint and order](#), Nov. 2022): stopped fraudulent moneymaking scheme that made falsely promised big returns on cryptocurrency investment schemes and bogus business programs.
 - **Warrior Trading** ([complaint and order](#), Apr. 2022): cracked down on a day trading investment scheme that sold consumers online programs while falsely promising to consumers how much money they could earn, and secured \$3 million to return to consumers.
 - **Universal Guardian Acceptance** ([complaint and order](#), Oct. 2021): ordered the funder and servicer of payment plans that were used by consumers to pay for investment “training” courses to offer debt relief.
 - **Blessings in No Time** ([complaint](#), June 2021; [order secured](#) July 2023): sued an investment pyramid scheme that lured people into joining their programs by falsely promising 800% investment returns.
 - **RagingBull** ([complaint and order](#), Dec. 2020; [settlement](#), Mar. 2022; [individual settlement](#), Sept. 2023): ordered online stock trading site to stop making false claims about how much consumers could earn from trading and to provide an easy cancellation mechanism for its services
 - **Success by Health (James Noland)** (complaint, Jan. 2020; [order](#), May 2023): shut down a pyramid scheme that used deceptive earnings claims.
 - **Zurixx** (complaint, Dec. 2019; [order](#), Feb. 2022): shut down a real estate investment coaching scheme that sold live seminars that cost consumers thousands of dollars, while promising huge returns that never materialized; obtained \$12 million for consumer redress.
 - **Digital Income System** (complaint, Nov. 2020; [orders](#), July 2021): halted fraudulent work-from-home scam that promised consumers that could earn money by selling memberships to others.
- **Stopping Illegal Robocalls**
 - **Response Tree** ([complaint and order](#), Jan. 2024): banned lead generator from making or assisting others in making robocalls.
 - **MDK Media** ([orders](#), Nov. 2023): stopped cramming scheme that added \$100 million in bogus charges to consumers’ mobile phone bills.
 - **Viceroy Media Solutions** ([complaint and order](#), July 2023): stopped lead generator from assisting and facilitating millions of illegal robocalls.
 - **Fluent** ([complaint and order](#), July 2023): fined lead generator \$2.5 million civil penalty for using dark patterns to trick consumers into providing their

personal information and selling their information to robocallers and other telemarketers.

- **Yodel Technologies** ([complaint and order](#), July 2023): fined telemarketer \$1 million for initiating 1.4 billion calls to consumers whose numbers were on the Do Not Call registry.
 - **Solar XChange** ([complaint and order](#), July 2023): stopped telemarketers from making unwanted calls selling solar panels.
 - **Hello Hello Miami** ([complaint](#), July 2023): sued a gateway VoIP provider for facilitating 37.8 million illegal robocalls by foreign telemarketers.
 - **XCast** ([complaint](#), May 2023; [order](#), Jan. 2024): ordered a Voice over Internet Protocol (VoIP) provider to stop supporting illegal telemarketing practices that were being funneled over its network.
 - **Stratics Networks** ([complaint and order](#), Feb. 2023): stopped Voice over Internet Protocol (VoIP) service providers that carried illegal bogus debt service robocalls to consumers.
 - **VoIP Terminator** ([complaint and order](#), Apr. 2022): ordered VoIP provider to stop assisting and facilitating illegal robocalls.
 - **Environmental Safety International** ([complaint and order](#), July 2021): banned septic tank cleaning company from making illegal robocalls.
 - **Grand Bahama Cruise Line** (partial settlement, Jan. 2020; [settlement with remaining defendants](#), Sept. 2021): stopped an operation that made or facilitated millions of illegal robocalls pitching free cruise vacations.
 - **EduTrek** ([complaint](#), Apr. 2019; [court ruled in favor of FTC](#), Oct. 2023; [final order](#), Jan. 2024): banned telemarketing operation that made millions of illegal calls about educational programs and secured \$28.7 in penalties.
- **Protecting Americans During the COVID-19 Pandemic**
- **Razer** ([complaint and order](#), Apr. 2024): secured \$1.1 million to refund consumers who purchased face masks that were falsely advertised as N95.
 - **1 Invisible Mask** ([complaint and order](#), Oct. 2023): stopped marketers from selling a neck badge that purportedly creates a three-foot barrier of protection against viruses and bacteria, including COVID-19.
 - **doTERRA distributors** ([complaints and orders](#), Mar. 2023): obtained settlements with three multi-level marketing distributors who falsely claimed that the company’s essential oils and dietary supplements could treat, prevent, or cure COVID-19.
 - **ACRO Services** ([complaint](#), Nov. 2022; [orders secured](#) May 2023): shut down bogus credit card debt relief scheme.

- **Precision Patient Outcomes** ([complaint](#), Nov. 2022; [order](#), Feb. 2024): banned company from marketing a COVID-19 treatment that contained nothing more than basic ingredients.
 - **B4B Corp.** ([complaint](#), Mar. 2022): sued manufacturer for making allegedly deceptive claims that an herbal tea could treat and prevent COVID-19.
 - **Xlear** ([complaint](#), Oct. 2021): sued a marketer of medical products for making allegedly false claims that its saline nasal sprays could prevent and treat COVID-19.
 - **Trend Deploy** ([complaint](#), June 2021; [order](#), June 2023): secured court order to ban defendant from selling protective goods and services after he attempted to sell personal protective equipment he could not actually deliver.
 - **American Screening** ([complaint and order](#), Aug. 2020; [court order secured](#), Aug. 2022): secured \$14 million from a company that failed to deliver personal protecting equipment as promised.
 - **Glowyy** ([complaint and order](#) Aug. 2020; [court order secured](#), Aug. 2022): secured \$3 million from a company that failed to deliver personal protecting equipment as promised.
 - **SuperGoodDeals** ([complaint](#), July 2020; [order](#) Feb. 2024): took action against seller of personal protective equipment who falsely promised “next day” shipping during the height of the pandemic.
- **Combatting Scams, Fraud, and Deception**
 - **GOAT** ([complaint and order](#), Dec. 2024): secured \$2 million in consumer redress for consumers who were harmed by the online marketplace’s poor customer service practices, in violation of the FTC’s Mail Order Rule.
 - **Consumer Impact Recovery** ([complaint and TRO](#), Nov. 2024): halted a bogus debt collection scheme that threatened consumers with jail time and harassing their family members.
 - **Legion Media** ([complaint](#), July 2024; [order](#), Sept. 2024): shut down a fraudulent operation that enrolled and charged consumers for personal health products they did not agree to buy.
 - **BlueSnap** ([complaint and order](#), May 2024): secured \$10 million for consumer refunds from a payment processor that knowingly processing payments for deceptive and fraudulent companies.
 - **Cancer Recovery Foundation** ([complaint](#), Mar. 2024): sued a sham charity for raising more than \$18 million from donors, only for just 1% to go toward the intended purpose of helping women battling cancer.

- **Nexway** ([complaint and order](#), Apr. 2023): ordered a payment processor to stop facilitating tech support scammers engaging in credit card laundering.
- **Home Matters USA** ([complaint](#), Sept. 2022; [court order secured](#) Feb. 2024): shut down mortgage relief scam that falsely promised to reduce homeowners’ mortgage payments and prevent foreclosures, particularly targeting older Americans and veterans.
- **Legacy Cremation Services** ([complaint](#), Apr. 2022; [order](#), Apr. 2023): sued a funeral and cremation services company for misleading consumers about prices, threatening and failing to return cremated remains to consumers, and failing to provide required disclosures under Funeral Rule.
- **Alex Miller Credit Repair** ([complaint and order](#), Mar. 2022): shut down a fraudulent credit repair operation that falsely claimed it would remove negative information from credit reports.
- **Electronic Payment Systems** ([complaint and order](#), Mar. 2022): stopped credit card processor for ignoring signs that it was offering services for fictitious companies on behalf of a business opportunity scam.
- **American Vehicle Protection Corp.** ([complaint](#), Feb. 2022; [orders secured](#) Mar. 2023 and June 2023): banned operators of an extended vehicle warranty scam from the industry after bilking consumers out of more than \$6 million.
- **ITMedia** ([complaint and order](#), Jan. 2022): took action against lead generation company that collected personal information from consumers purporting to connect them to lenders, but instead selling their information to fraudulent marketers and predatory debt relief providers.
- **Automatic Funds Transfer Services** ([complaint and order](#), Nov. 2021): banned payment processor from processing debt relief payments after it facilitated a fraudulent student loan debt relief scheme, and returned \$500,000 to consumers.
- **Inmate Magazine Service** (complaint, Mar. 2021; [order secured](#) Sept. 2021): stopped operation that scammed prisoners and their families for charging magazine subscriptions that showed up late or not at all.
- **Inmate Call** (complaint, Oct. 2020; [order secured](#) Oct. 2021): halted deceptive prison calling scheme that falsely promised unlimited minutes for inmate calling plans that did not provide a single minute of talk time.
- **Critical Resolution Mediation** (complaint, Oct. 2020; [order secured](#) Sept. 2021): stopped debt collection operation that tried to collect debts from consumers that they did not actually owe.
- **Traffic Jam Events** (complaint, Aug. 2020; [Commission order issued](#) Jan. 2022): banned marketing services company from misleading consumers to believe their websites were affiliated with a government stimulus program.

- **National Landmark** (complaint, July 2020; [order](#), Dec. 2021): stopped a group of phantom debt collectors from using robocalls to falsely threaten consumers with legal action for unpaid debts.
- **GDP Network** (complaint, July 2020; [order obtained](#) Feb. 2022): shut down credit card interest rate reduction scam.
- **American Future Systems** (complaint, May 2020; [secured order](#) Apr. 2023): shut down a fraudulent debt collection operation that charged businesses, nonprofits, and first responders for subscriptions they did not order, then threatened bogus debt collection.
- **On Point Global** (complaint, Dec. 2019; [secured order](#) Apr. 2022): secured \$102 million in consumer refunds from scammers who ran deceptive websites offering government services, like renewing drivers' licenses or public benefits eligibility, and collected detailed personal information that was given to telemarketers.
- **Hornbeam Special Situations** (complaint, Aug. 2017; [order approved](#) Mar. 2022): fined payment processor \$2.3 million for assisting a fraudulent operation that enrolled consumers seeking payday loans or cash advances in a bogus coupon subscription.
- **Credit Bureau Center** (complaint, Jan. 2017; [resolved](#) June 2024): secured \$5.2 million in consumer refund from a fraudulent operation that used fake rental ads to impersonate property owners, offered unauthorized property tours if consumers first obtained “free” credit reports, and enrolled them in a monthly credit monitoring service without their permission.
- **Mail Tree** (complaint, May 2015; [orders obtained](#) June 2024 and Aug. 2024): shut down bogus sweepstakes operation that tricked consumers into paying money to secure large cash sweepstakes that they had not in fact won.
- **Publisher Business Services** (complaint, 2008; [order](#), May 2022): shut down a telemarketing operation that lured in consumers with cheap magazine subscriptions, hit them with expensive bills, and made it difficult to cancel them.

Rulemaking Index

- **Final Rules**

- **COPPA Rule** ([notice of proposed rulemaking](#), Jan. 2024; [final rule](#), Jan. 2025): strengthened protections around the use of children’s personal information and requires parents to opt in to third-party targeted advertising toward their kids.
- **HSR Rule** ([notice of proposed rulemaking](#), June 2023; [final rule](#), Oct. 2024): finalized changes to the premerger notification form and the associated rules implementing the Hart-Scott-Rodino Act, improving the FTC and DOJ’s ability to detect illegal mergers and acquisitions.
- **Health Breach Notification Rule** ([notice of proposed rulemaking](#), May. 2023; [final rule](#), Apr. 2024): modernized the Rule by clarifying that the rule applies to health apps and similar technologies not covered by HIPAA.
- **Click-to-Cancel Rule** ([notice of proposed rulemaking](#), Mar. 2023; [final rule](#), Oct. 2024): required businesses to make it just as easy for customers to cancel subscriptions as it is to sign up for them.
- **Noncompete Rule** ([notice of proposed rulemaking](#), Jan. 2023; [final rule](#), Apr. 2024): banned most noncompete clauses from employment contracts.
- **Eyeglass Rule** ([notice of proposed rulemaking](#), Dec. 2022; [final rule](#), June 2024): requires prescribers to provide patients with a free copy of their prescription, allowing them to shop around.
- **Junk Fees Rule** ([advanced notice of proposed rulemaking](#), Oct. 2022; [notice of proposed rulemaking](#), Oct. 2023; [final rule](#), Dec. 2024): bans junk fees in the live-event ticketing and short-term lodging industries.
- **Fake Reviews Rule** ([advanced notice of proposed rulemaking](#), Oct. 2022; [notice of proposed rulemaking](#), June 2023; [final rule](#), Aug. 2024): banned businesses from creating and purchasing fake online reviews, which deceive consumers and undermine honest businesses.
- **Combatting Auto Retail Scams (CARS) Rule** ([notice of proposed rulemaking](#), June 2022; [final rule](#), Dec. 2023): finalized a rule to stop scams in the car-buying process, saving consumers \$3.5 billion a year and leveling the playing field for honest dealers.
- **Telemarketing Sales Rule** ([notice of proposed rulemaking](#), Apr. 2022; [final rule concerning business-to-business calls](#), Mar. 2024; [notice of proposed rulemaking covering tech support scams](#), Mar. 2024; [final rule covering tech support scams](#), Nov. 2024): extends TSR protections to business-to-business calls to better protect small businesses, and to cover tech support scams that target older Americans.
- **Impersonator Rule** ([advanced notice of proposed rulemaking](#), Dec. 2021; [notice of proposed rulemaking](#), Sept. 2022; [final rule concerning government and](#)

[business impersonation](#), Feb. 2024; [supplemental NPRM concerning impersonation of individuals](#), Feb. 2024): banned impersonation scams of government agencies and businesses, including scams turbocharged by AI.

- **Safeguards Rule** ([final rule](#), Oct. 2021; [final rule with amendment concerning non-bank institutions](#), Oct. 2023): strengthened security safeguards for consumer financial data after their data is breached, and required non-banking institutions to report certain data breaches and other security events to the FTC.
- **Made in USA Rule** ([final rule](#), July 2021): prohibits false “Made in USA” labels, which undermine U.S. independent farmers and small businesses.

- **In-Progress Rules**

- **Business Opportunity Rule** ([advanced notice of proposed rulemaking](#), Nov. 2022; [notice of proposed rulemaking](#), Jan. 2025): proposed expanding the Rule to cover moneymaking opportunities, such as business coaching and investment opportunities.
- **Funeral Rule** ([advanced notice of proposed rulemaking](#), Oct. 2022): sought comment on potential updates to modernize the rule for the digital age.
- **Energy Labeling Rule** ([notice of proposed rulemaking](#), Oct. 2022): sought comment on whether the rule should be modernized and expanded to help reduce energy costs and strengthen right to repair.
- **Commercial Surveillance and Data Security Rule** ([advanced notice of proposed rulemaking](#), Aug. 2022): sought comment on the harms stemming from commercial surveillance and whether new rules are needed to protect people’s digital privacy and information.
- **Earnings Claims Rule** ([advanced notice of proposed rulemaking](#), Feb. 2022; [notice of proposed rulemaking and advanced notice of proposed rulemaking](#), Jan. 2025): proposed protections to combat deceptive earnings claims in the multilevel marketing industry.

Policy Statement Index

- [Antitrust Guidelines for Business Activities Affecting Workers](#) (Jan. 2025): explains how the FTC and DOJ will assess whether business practices affecting workers violate the antitrust laws.
- [Labor Exemption Policy Statement](#) (Jan. 2025): clarified that independent contractors and gig workers are shielded from antitrust liability when collectively bargaining for better pay or conditions.
- [AI Competition Policy Statement](#) (July 2024): with DOJ and international antitrust enforcers, affirmed commitment to protecting competition across the AI ecosystem.
- [Policy Statement on Franchisor Contractual Provisions](#) (July 2024): issued guidance to protect franchisees’ right to report law violations to the government.
- [Staff Guidance on Junk Fees Imposed on Franchisees](#) (July 2024): warns that undisclosed fees imposed on franchisees are unlawful.
- [2023 Merger Guidelines](#) (Dec. 2023): describes factors and frameworks the agencies utilize when reviewing mergers and acquisitions.
- [Orange Book Policy Statement](#) (Sept. 2023): warned pharmaceutical companies that improper Orange Book listings that delay the entry of cheaper generic drugs may be an unfair method of competition.
- [Biometrics Policy Statement](#) (May 2023): warned that the increasing use of consumers’ biometric information raises significant consumer privacy and data security concerns, and creates the potential for bias and discrimination.
- [Gig Work Policy Statement](#) (Sept. 2022): outlined enforcement priorities to protect gig workers from deception about pay and hours, unfair contract terms, and anticompetitive wage fixing and coordination between gig companies.
- [Rebates Policy Statement](#) (June 2022): put drug companies and prescription drug middlemen on notice that paying rebates and fees to exclude competitors offering lower-cost drugs can violate competition and consumer protection laws.
- [Section 5 Policy Statement](#) (Oct. 2022): restored the agency’s policy of rigorously enforcing Section 5 of the FTC Act, which bans unfair methods of competition.
- [Educational Technology Policy Statement](#) (May 2022): made clear that it is against the law for companies to force parents and schools to surrender their children's privacy rights in order to do schoolwork online or attend class remotely.
- [Dark Patterns Policy Statement](#) (Oct. 2021): warns companies against deploying illegal dark patterns that trick or trap consumers into subscription services.

- [**Prior Approval Policy Statement**](#) (Oct. 2021): required merging parties subject to a Commission order to obtain prior approval from the FTC before closing future transactions that affect the relevant market for which a violation was alleged.
- [**Health Breach Notification Rule Policy Statement**](#) (Sept. 2021): affirms that covered companies that hold fertility, heart health, glucose levels and other health data must notify consumers in the event of a breach.
- [**Right to Repair Policy Statement**](#) (July 2021): voted to ramp up law enforcement against companies that make it extremely difficult for consumers to repair their products or use a repair shop of their choice.

Research, Policy, and Advocacy Index

- **6(b) Market Inquiries**
 - **Surveillance Pricing 6(b)** ([orders issued](#) July 2024; [initial findings issued](#) Jan. 2025): launched a 6(b) study into surveillance pricing tactics to examine how companies may exploit Americans' data to charge higher prices.
 - **AI Partnerships 6(b)** ([orders issued](#) Jan. 2024; [initial findings issued](#) Jan. 2025): launched a 6(b) study into how investments and partnerships between dominant AI developers and cloud service providers can impact competition.
 - **Social Media Advertising Fraud 6(b)** ([orders issued](#) Mar. 2023): launched inquiry to scrutinize the factors and incentives that allow fraud to spread on dominant social media and video streaming platforms.
 - **Small Business Credit Reporting 6(b)** ([orders issued](#) Mar. 2023): scrutinizing the opaque small business credit reporting industry, which can determine the terms on which small businesses obtain the financing they need to stay in operate.
 - **Pharmacy Benefit Managers 6(b)** ([orders issued](#) June 2022; study expanded to GPOs in [May 2023](#) and [June 2023](#); [first interim report issued](#) Jul. 2024; [second interim report issued](#) Jan. 2025): scrutinizing how prescription drug middlemen can raise prices for drugs and squeeze independent pharmacies. Published two interim reports: *Pharmacy Benefit Managers: The Powerful Middlemen Inflating Drug Costs and Squeezing Main Street Pharmacies* and *Specialty Generic Drugs: A Growing Profit Center for Vertically Integrated Pharmacy Benefit Managers*.
 - **Grocery Supply Chain 6(b)** ([orders issued](#) Nov. 2021; [report issued](#) Mar. 2024): found that large grocers took advantage of pandemic supply disruptions to raise grocery prices and gain an advantage over smaller competitors. Findings detailed in the staff report, *Feeding America in a Time of Crisis: FTC Staff Report on The United States Grocery Supply Chain and the COVID-19 Pandemic*.
 - **Social Media and Video Streaming Privacy 6(b)** ([orders issued](#) Dec. 2020; [report issued](#) Sept. 2024): found that major social media and video streaming services engaged in vast surveillance of consumers to monetize the personal information, while failing to protect users online, particularly kids and teens. Findings detailed in the staff report, *A Look Behind the Screens: Examining the Data Practices of Social Media and Video Streaming Services*.
 - **Technology Acquisitions 6(b)** (orders issued Feb. 2020; [report issued](#) Sept. 2021): study found that large technology companies undertook hundreds of mergers outside of the view of the antitrust enforcement agencies.
 - **Internet Service Provider Privacy 6(b)** ([orders issued](#) Aug. 2019; [report issued](#) Oct. 2021): found that ISPs collect extensive data and group consumers using sensitive characteristics, while providing few options for consumers to control

how their data is used. Detailed in staff report, *A Look at What ISPs Know About You: Examining the Privacy Practices of Six Major Internet Service Providers*.

- **Selected Research and Reports**

- **Serial Acquisitions and Roll-Up RFI** ([issued](#) May 2024): with DOJ, seeking public input into sectors and industries where serial acquisitions and roll-ups have led to consolidation and harmed competition.
- **Public portal to report anticompetitive practices in healthcare** ([launched](#) Apr. 2024): with DOJ and HHS, launched portal for consumers to report potentially unfair and anticompetitive healthcare practices.
- **Private Equity and Healthcare RFI** ([issued](#) Mar. 2024; [HHS issued report](#) Jan. 2025): with DOJ and HHS, studied the impact of private equity firms and other corporate owners on consolidation in the healthcare sector, patient outcomes, worker safety, and healthcare affordability.
- **Staff Report on Agency's Technology Expertise** ([issued](#) Mar. 2024): details the evolution of the agency's work to expand its technological expertise and how the agency's Office of Technology embeds subject matter expertise in the agency's enforcement and regulatory work.
- **Drug Shortage RFI** ([issued](#) Feb. 2024): with HHS, studying how two types of drug middlemen, group purchasing organizations (GPOs) and drug wholesalers, may contribute to chronic drug shortages of generic drugs.
- **Generative Artificial Intelligence and the Creative Economy Staff Report: Perspectives and Takeaways** ([roundtable held](#) Oct. 2023; [staff report issued](#) Dec. 2023): detailed key takeaways on how generative artificial intelligence tools are being used and affecting professionals in music, filmmaking, software development, and other creative fields.
- **Cloud Computing RFI** ([issued](#) Mar. 2023; [public panel](#), May 2023; [summary of conclusions](#), Nov. 2023): examined the cloud computing industry through the lenses of competition, single points of failure, security, and artificial intelligence.
- **Franchise RFI** ([issued](#) Mar. 2023; [issue spotlight issued](#) July 2024): sought comment on ways franchisors may exert control over franchisees and their workers, including contractual terms in franchise relationships.
- **Tenant Screening RFI** ([issued](#) Feb. 2023): with CFPB, studying how criminal and eviction records and algorithms affect tenant screening decisions and how they may drive discriminatory outcomes.
- **Protecting Kids from Stealth Advertising in Digital Media** ([workshop held](#) Oct. 2022; [staff paper issued](#) Sept. 2023): details potential harms to kids from blurred advertising, where advertising is not sufficiently distinguished from entertainment, educational, and other content.

- **Policy Paper on Certificates of Public Advantage** ([issued](#) Aug. 2022): details how COPAs, which purport to shield hospital mergers from antitrust laws in favor of state oversight, are often detrimental for patient costs, patient care, and healthcare worker wages.
- **Combatting Online Harms Through Innovation Report** ([issued](#) June 2022): report to Congress warned about using artificial intelligence to combat online harms like fraud, impersonation, fake reviews, bots, hate crimes, and harassment.
- **Infant Formula Crisis RFI** ([issued](#) May 2022; [report issued](#) Mar. 2024): details aspects of the U.S. infant formula market that rendered it vulnerable to supply disruptions in 2022.
- **Bringing Dark Patterns to Light** (workshop held Apr. 2021; [report issued](#) Sept. 2022): revealed how companies use sophisticated design practices, known as “dark patterns,” to trick consumers into buying unwanted products or services, or giving their privacy.
- **Federal Advocacy**
 - **Comment to the U.S. Department of Agriculture on the Fair and Competitive Livestock and Poultry Markets Proposed Rule** ([comment filed](#) Sept. 2024): supported the proposed rule and clarified the scope of what constitutes unfair practices under the Packers and Stockyards Act.
 - **Comment to the Food and Drug Administration regarding guidance on interchangeable biosimilar drugs** ([comment filed](#) Aug. 2024): stated that the proposed guidance would increase access to lower-cost prescription medications.
 - **Comment to the U.S. Patent and Trademark Office on Terminal Disclaimer Rule** ([comment filed](#) July 2024): stated that the proposed rule would limit patent abuse and help spur competition, including in pharmaceutical markets.
 - **Comment to the U.S. Patent and Trademark Office on disclosure of patent settlement agreements** ([comment filed](#) June 2024): supported proposed rule requiring disclosure of patent settlement agreements, allowing the FTC and DOJ to monitor these potentially anticompetitive agreements.
 - **Comment to the Federal Energy Regulatory Commission regarding common ownership in public utilities** ([comment filed](#) Apr. 2024): with DOJ, urged FERC to consider competitive risks of common ownership when assessing acquisitions involving less than a controlling interest in competing firms.
 - **Comment to the U.S. Copyright Office on Digital Millennium Copyright Act (DMCA) exemptions facilitating the right to repair** ([comment filed](#) Mar. 2024): with DOJ, urged U.S. Copyright Office to adopt regulations that would facilitate consumers’ and businesses’ right to repair their own products, a change that resulted in more easily fixable McDonald’s McFlurry machines.
 - **Comment to the National Institute of Standards and Technology regarding interagency guidance on Bayh-Dole march-in rights** ([comment filed](#) Feb.

2024): urged NIST to adopt an expansive and flexible approach to march-in rights as a check against high drug prices as it developed its interagency guidance regarding Bayh-Dole march-in rights.

- **Comment to the U.S. Copyright Office on artificial intelligence and copyright** ([comment filed](#) Nov. 2023): identifies how artificial intelligence may implicate competition and consumer protection policy.
 - **Comment to the U.S. Department of Education regarding protecting postsecondary students** ([comment filed](#) June 2023): supported proposed regulations that would protect students from misrepresentations and deceptive educational recruitment practices.
 - **Comment to the Departments of the Treasury, Labor, and Health and Human Services regarding substance abuse disorder enforcement** ([comment filed](#) Oct. 2023): supported proposed amendments to regulations implementing the Mental Health Parity and Addiction Equity Act and details FTC’s enforcement to fight substance use disorder treatment scams.
 - **Comment to the Federal Energy Regulatory Commission regarding incumbents’ right of first refusal** ([comment filed](#) Aug. 2022): urged FERC not to restore a right of first refusal that would enable incumbent electricity transmission owners to block competitors from bidding to design, construct, and own certain new interstate transmission facilities.
 - **Comment to the Food and Drug Administration regarding proposed rule on over-the-counter hearing aids** ([comment filed](#) Jan. 2022): supported the proposed rule establishing over-the-counter hearing aids and argued it would promote competition and innovation in the hearing aid market.
 - **Comment to the Federal Reserve Board on debit card interchange fees and routing** ([comment filed](#) Aug. 2021): urged the Fed to clarify and strengthen the implementation of debit card fee and routing reforms to the Electronic Fund Transfer Act made under Dodd-Frank in order to promote competition.
- **State and Local Advocacy**
 - **Letters to state legislatures considering noncompete legislation** (sent to [Connecticut](#) in Feb. 2023; sent to [New York](#) in Dec. 2023; sent to [Oregon](#) in Feb. 2024; sent to [Ohio](#), [Pennsylvania](#), and [Rhode Island](#) in June 2024; sent to [Connecticut](#), [Indiana](#), [Missouri House](#), [Missouri Senate](#), [New Hampshire](#), [South Carolina House](#), [South Carolina Senate](#), [Washington House](#), [Washington Senate](#), [Virginia](#), and [Wyoming](#) in Jan. 2025): highlighted the FTC’s rulemaking and enforcement efforts around noncompetes.
 - **Letters to state legislatures and officials considering junk fee legislation or other measures** (sent to [Pennsylvania](#) in Apr. 2023; sent to [Alaska](#), [Arizona](#), [Colorado](#), [Connecticut](#), [Hawaii](#), [Illinois](#), [Massachusetts](#), [Minnesota](#), [New York](#), [North Carolina](#), [Rhode Island](#), and [Virginia](#) in February and March 2024; sent to

- [Colorado](#) and [Bellingham, WA](#) in Jan. 2025): highlighted the FTC’s research, rulemaking, and enforcement efforts to address junk fees.
- **Letter to California legislature regarding negative option and subscription legislation** ([sent](#) June 2024): highlighted FTC efforts in the area as the state considers its own legislation.
 - **Letters to state legislatures considering right to repair legislation** (sent to [New York](#) in Aug. 2022; sent to [Oregon](#) in Feb. 2024; sent to [Minnesota](#) in Mar. 2024): highlighted FTC efforts to protect consumers’ right to repair.
 - **Letter to New York legislature and officials regarding unfairness** ([sent](#) Feb. 2024): highlighted the FTC’s unfairness authority as the state considered legislation that would add to existing laws prohibiting deceptive practices.
 - **Comment to the Indiana Department of Health regarding Union Health/Terre Haute hospital merger** ([comment filed](#) Sept. 2024; [parties chose to delay merger](#) Nov. 2024): opposed an Indiana hospital merger and urged the Indiana Department of Health not to approve the parties’ application for a Certificate of Public Advantage.
 - **Colorado right to repair bill testimony** ([testified](#) Feb. 2024): Commission testified in support of a right to repair bill; adopted by Colorado in May 2024.
 - **Comment to the North Carolina House Health Committee regarding S-743** ([comment filed](#) June 2023): opposed pending bill that would prevent antitrust authorities from challenging the University of North Carolina Health Care System when it engages in anticompetitive mergers and conduct.
 - **California right to repair bill testimony** ([testified](#) Apr. 2023): Commission testified in support of a right to repair bill.
 - **Comment to the New York State Department of Health regarding SUNY Upstate/Crouse hospital merger** ([comment filed](#) Oct. 2022; [parties abandoned merger](#), Feb. 2023): opposed New York hospital merger and urged the Department of Health to reject the hospitals’ request for a certificate of public advantage.
- **Selected Workshops and Convenings**
 - **[Competition Snuffed Out: How Predatory Pricing Harms Competition, Consumers, and Innovation](#)** (Dec. 2024): presented real-world evidence and economic scholarship regarding modern predatory pricing strategies, and examined how predatory pricing caselaw maps to these new economic realities.
 - **[Private Capital, Public Impact: An FTC Workshop on Private Equity in Health Care](#)** (Mar. 2024): explored impact of private equity in health care.
 - **[FTC Tech Summit](#)** (Jan. 2025): explored the state of AI technology across the layers of the technology stack, and impacts on consumers and competition.
 - **Public Workshops on FTC/DOJ Merger Guidelines** ([Sept. 2023](#), [Oct. 2023](#), and [Nov. 2023](#)): discussed issues related to the 2023 Draft Merger Guidelines.

- [**Creative Economy and Generative AI**](#) (Oct. 2023): explored how emerging generative artificial intelligence tools are reshaping various creative industries and how members of creative fields are responding to these changes.
- [**Cloud Computing: Taking Stock and Looking Ahead**](#) (May 2023): discussed business practices of cloud computing providers, including issues related to security, competition, and emerging technology.
- [**Protecting Kids from Stealth Advertising in Digital Media**](#) (Oct. 2022): explored potential harms to kids from blurred advertising, where advertising is not sufficiently distinguished from entertainment, educational, and other content.
- [**The Future of Pharmaceuticals: Examining the Analysis of Pharmaceutical Mergers**](#) (June 2022): explored approaches to enforcing the antitrust laws in the pharmaceutical industry, organized jointly with DOJ, state attorneys general, and international enforcement partners.
- [**Making Competition Work: Promoting Competition in Labor Markets**](#) (Dec. 2021): explored competition issues affecting labor markets and welfare of workers, including labor monopsony, restrictive contractual clauses in labor agreements, information sharing among competing employers, and how antitrust relates to collective bargaining efforts in the gig economy.

Amicus Brief Index

Case name **bolded**; *full case citation in italics*.

- **Musk v. Altman** ([filed](#) Jan. 2025): with DOJ, filed statement of interest to address the proper standards for analyzing interlocking board member arrangements under Section 8 of the Clayton Act. *Elon Musk v. Samuel Altman, No. 4:24-cv-04722-YGR (N.D. Cal. 2024)*.
- **Epic v. Google** ([filed](#) Jan. 2025): with DOJ, aimed to correct misrepresentations of law in Google’s opening brief to the Ninth Circuit. *Epic Games v. Google, Nos. 24-6256, 24-6274 (9th Cir. 2024)*.
- **United Healthcare v. Gilead Sciences** ([filed](#) Sept. 2024): explained the legal standards that govern reverse-payment claims and address errors by the district court. *United Healthcare Services v. Gilead Sciences, No. 24-1585 (9th Cir. 2024)*.
- **Teva v. Amneal** ([filed](#) Sept. 2024): explained that Teva has improperly listed patents in the Food and Drug Administration’s (FDA) Orange Book and urged the court to order those listings removed. *Teva v. Amneal, No. 24-1936 (Fed. Cir. 2024)*.
- **Shanahan v. IXL** ([filed](#) Aug. 2024): explained that COPPA can’t force parents into arbitration. *Shanahan v. IXL, No. 3:24-cv-02724 (N.D. Cal. 2024)*.
- **Epic v. Google** ([filed](#) Aug. 2024): outlines how the court should consider potential remedies when determining effective relief to restore competition after Google was found liable for illegal monopolization. *Epic Games v. Google, No. 3:20-cv-05671-JD (N.D. Cal. 2020)*.
- **Nelson v. Experian** ([filed](#) Mar. 2024): with CFPB, clarified the reasonable reinvestigation requirement for consumer reporting agencies under the Fair Credit Reporting Act. *Nelson v. Experian Information Solutions, No. 24-10147 (11th Cir. 2024)*.
- **Teva v. Amneal** ([filed](#) Mar. 2024): explained that Teva has improperly listed patents in the Food and Drug Administration’s (FDA) Orange Book and urged the court to order those listings removed. *Teva v. Amneal, No. 2:23-cv-20964 (D.N.J. 2023)*.
- **Cornish-Adebisi v. Caesars Entertainment** ([filed](#) Mar. 2024): with DOJ, filed statement of interest explaining that hotels cannot collude on room pricing and cannot use an algorithm to engage in practices that would be illegal if done by a real person. *Cornish-Adebisi v. Caesars Entertainment, No. 1:23-cv-02536-KMW-EAP (D.N.J. 2023)*.
- **U.S. Soccer Federation v. Relevant Sports** ([filed](#) Mar. 2024): with DOJ, urged Supreme Court to deny a petition for certiorari concerning the concerted action requirement of Section 1 of the Sherman Act. *United States Soccer Federation, Inc. v. Relevant Sports, LLC, No. 23-120 (U.S. 2023)*.
- **Duffy v. Yardi** ([filed](#) Mar. 2024): with DOJ, filed statement of interest in a case involving algorithmic collusion in the residential housing market, explaining that price fixing

through an algorithm is still price fixing. *Duffy v. Yardi Systems*, No. 2:23-cv-01391-RSL (W.D. Wash. 2023).

- **Glover v. Ocwen Loan Servicing** ([filed](#) Feb. 2024): with CFPB, clarifies a provision of the Fair Debt Collection Practices Act. *Glover v. Ocwen Loan Servicing*, No. 23-12578 (11th Cir. 2023).
- **Ritz v. Nissan-Infiniti LT** ([filed](#) Feb. 2024): with CFPB, clarifies requirements for furnishers under the Fair Credit Reporting Act. *Ritz v. Nissan-Infiniti LT*, No. 3:20-cv-13509 (3rd Cir. 2023).
- **CoStar Group v. Commercial Real Estate Exchange** ([filed](#) Jan. 2024): addressed legal errors in the district court’s opinion. *CoStar Group v. Commercial Real Estate Exchange*, No. 23-55662 (9th Cir. 2023).
- **Roberts v. Carter-Young** ([filed](#) Dec. 2023): with CFPB, clarifies requirements for furnishers under the Fair Credit Reporting Act. *Roberts v. Carter-Young*, No. 23-1911 (4th Cir. 2023).
- **Mylan v. Sanofi** ([filed](#) Nov. 2023): explains that improper Orange Book listings, such as those alleged in Mylan’s case, can cause significant harm to competition, including delaying consumer access to a lower-priced competing drug that would save patients money while also potentially offering better access and higher quality medications. *Mylan Pharmaceuticals v. Sanofi-Aventis*, No. 23-836-MRH (W.D. Pa. 2023).
- **Khalilah Suluki v. Credit One Bank, NA** ([filed](#) Sept. 2023): with CFPB, urged the Second Circuit to reverse a district court decision that overlooked FCRA’s requirement that a furnisher of credit information delete information when its accuracy cannot be verified. *Khalilah Suluki v. Credit One Bank, NA*, No. 21-cv-1156 (S.D.N.Y. 2023).
- **Applied Medical Resources v. Medtronic** ([filed](#) July 2023): clarified antitrust standards regarding exclusive dealing and bundling arrangements. *Applied Medical Resources Corp. v. Medtronic, Inc.*, No. 8:23-cv-00268-WLH-DFM (C.D. Cal. 2023).
- **In re Bystolic Antitrust Litigation** ([filed](#) June 2023): urged the appeals court to reverse a district court’s decision to dismiss a case involving the hypertension drug market and recognize that large reverse payments made to generic drug companies may violate the antitrust laws. *In re Bystolic Antitrust Litigation*, No. 23-410 (L) (2nd Cir. 2023).
- **CFPB v. Townstone Financial** ([filed](#) June 2023): urged reversal of a District Court opinion dismissing an action brought by the Consumer Financial Protection Bureau under the Equal Credit Opportunity Act. *CFPB v. Townstone Financial*, No. 23-1654 (7th Cir. 2023).
- **Jones v. Google** ([filed](#) May 2023): explained that COPPA does not preempt state privacy laws that are consistent with COPPA. *Jones v. Google*, No. 21-16281 (9th Cir. 2021).
- **Sage Chemical v. Supernus** ([filed](#) Mar. 2023): explains antitrust concerns raised by strategies used by branded pharmaceutical companies to block generic competition. *Sage Chemical v. Supernus Pharmaceuticals*, No. 1:22-cv-1302-CJB (D. Del. 2022).

- **Holden v. Holiday Inn Club Vacations** ([filed](#) Dec. 2022): with CFPB, clarifies requirements for furnishers under the Fair Credit Reporting Act. *Holden v. Holiday Inn Club Vacations*, No. 22-11734 (11th Cir. 2022).
- **Jazz v. Avadel** ([filed](#) Nov. 2022): explains how the FDA’s Orange Book listing process can be abused, emphasizing the harm to competition and consumers. *Jazz Pharmaceuticals v. Avadel CNS Pharmaceuticals*, No. 21-691-GBW (D. Del. 2022).
- **Louis v. Bluegreen Vacations Unlimited** (filed Nov. 2022): with CFPB, defended servicemembers’ right to sue under the Military Lending Act. *Louis v. Bluegreen Vacations Unlimited, Inc.*, No. 22-12217 (11th Cir. 2022).
- **Deslandes v. McDonald’s** ([filed](#) Nov. 2022): with DOJ, argued that the antitrust laws protection competition for workers. *Deslandes v. McDonald’s*, Nos. 22-2333, 22-2334 (7th Cir. 2022).
- **Ingram v. Experian** ([filed](#) Sept. 2022): with CFPB, asks the appeals court to overturn a lower court’s decision that could create an exception to the Fair Credit Reporting Act allowing furnishers of credit information to decline to investigate when consumers dispute inaccurate information in certain circumstances. *Ingram v. Experian*, No. 21-2430 (3rd Cir. 2021).
- **Regeneron v. Novartis** ([filed](#) June 2022): with DOJ, addressed errors in the district court’s analysis of whether the plaintiff’s antitrust complaint adequately pleaded a relevant product market. *Regeneron Pharmaceuticals v. Novartis Pharma*, No. 22-427 (2nd Cir. 2022).
- **Sessa v. TransUnion** ([filed](#) May 2022): with CFPB, asks the court to overturn a lower court decision, which held that TransUnion was not liable for failing to investigate a wrongfully reported debt because the inaccuracy was “legal” and not “factual.” *Sessa v. TransUnion*, No. 22-87 (S.D.N.Y. 2022).
- **Oxbow Carbon Minerals v. Union Pacific Railroad** ([filed](#) Dec. 2021): urges the court to affirm the district court, which correctly interpreted a provision of the Staggers Act of 1980 to allow admission of evidence of alleged collusion among rail carriers. *Oxbow Carbon Minerals v. Union Pacific Railroad Co.*, No. 21-7093 (D.C. Cir. 2021).
- **Fralish v. Bank of America** ([filed](#) Dec. 2021): with CFPB, DOJ, and Board of the Federal Reserve, that the term “applicant” as used in the Equal Credit Opportunity Act is best read to protect existing holders of credit as well as those who have sought, but not yet granted, credit from unlawful discrimination. *Fralish v. Bank of America*, No. 21-2846 (7th Cir. 2021).
- **Patel v. 7-Eleven** ([filed](#) Dec. 2021): advised the Supreme Judicial Court of Massachusetts that the FTC’s Franchise Rule does not address and cannot be used to determine whether franchisees governed by the FTC rule are employees under state law. *Patel v. 7-Eleven*, No. SJC-13166 (Mass. 2021).
- **Henderson v. The Source for Public Data** ([filed](#) Oct. 2021): with CFPB and North Carolina Department of Justice, argued that the lower court’s decision would undermine

the Fair Credit Reporting Act by granting immunity to consumer reporting agencies under Section 230 of the Communications Decency Act. *Henderson v. The Source for Public Data, L.P.*, No. 21-1678 (4th Cir. 2021).