



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Division of
Advertising Practices

December 22, 2025

10 Stars Property Management LLC
4921 71st Avenue North
Pinellas Park, FL 33781

VIA FED EX

WARNING LETTER

To Whom It May Concern:

As you know, the Federal Trade Commission has issued Trade Regulation Rule on the Use of Consumer Reviews and Testimonials (the “Consumer Review Rule” or “the Rule”), 16 C.F.R. § 465 (see Attachment A), which became fully effective on October 21, 2024 and has the full force and effect of federal law.

The Consumer Review Rule specifically prohibits certain review-related conduct and authorizes the FTC to seek civil penalties for Rule non-compliance, including for the following:

- **Fake or False Consumer Reviews, Consumer Testimonials, and Celebrity Testimonials** — the Consumer Review Rule prohibits reviews and testimonials that misrepresent: (1) the reviewer’s experience with the product or service (i.e., whether the experience was positive or negative); or (2) whether or to what extent the reviewer used the product or service. The Rule prohibits businesses from creating or selling such reviews or testimonials, buying such reviews, procuring them from company insiders, or disseminating them, when the business knew or should have known that the reviews or testimonials were fake or false.
- **Buying Positive or Negative Reviews** — the Consumer Review Rule prohibits providing compensation or other incentives—either expressly or implicitly—conditioned on the writing of consumer reviews expressing a particular sentiment, either positive or negative (e.g., giving a gift cards or discounts only for 5-star reviews).
- **Insider Reviews and Consumer Testimonials** — the Consumer Review Rule bars company insiders, including officers or managers, from writing reviews and testimonials that fail to clearly and conspicuously disclose the writer’s material connection to the business. The Rule also bars businesses from disseminating a testimonial from an officer,

manager, employee, or agent, without a disclosure where the business should have known the source of the testimonial and the relationship was not clear to the audience. Furthermore, clear and conspicuous disclosure of a business connection is required when officers or managers solicit consumer reviews from their own immediate relatives or from employees or agents, or when they tell employees or agents to solicit reviews from relatives, and such solicitations result in reviews by immediate relatives of the employees or agents.

- **Company-Controlled Review Websites** — the Consumer Review Rule prohibits a business from misrepresenting that a website or entity it controls provides independent reviews or opinions about a category of products or services that includes its own products or services. For example, a website claiming to rate or rank a type of product must clearly and conspicuously disclose if the site is controlled by a manufacturer or seller of the product (*see, e.g.*, FTC Stops False Advertising, Phony Reviews by Online Trampoline Sellers, <https://www.ftc.gov/news-events/news/press-releases/2017/05/ftc-stops-false-advertising-phony-reviews-online-trampoline-sellers>, in which the FTC brought an action against sellers of trampolines who also ran review sites claiming to offer independent unbiased ratings and certifications of trampolines¹).
- **Review Suppression** — the Consumer Review Rule prohibits a business from using unfounded or groundless legal threats, physical threats, intimidation, or certain false public accusations to prevent or remove a negative consumer review. The Rule also bars a business from misrepresenting that the reviews on a review portion of its website represent all or most of the reviews submitted when certain reviews have been excluded based upon their ratings or negative sentiment (sometimes referred to as “gatekeeping”). This applies whether the business itself is performing the gatekeeping or whether the business has contracted with a third-party to handle its reviews and exclude some based upon their ratings or negative sentiment.
- **Misuse of Fake Social Media Indicators** — the Consumer Review Rule prohibits anyone from selling or buying fake indicators of social media influence, such as followers or views generated by a bot or hijacked account. This prohibition is limited to situations in which the buyer knew or should have known that the indicators were fake and misrepresent the buyer’s influence or importance for a commercial purpose.

Based on information staff has reviewed, it has reason to believe that your company is violating or has violated the Consumer Review Rule. Staff believes your company has engaged in prohibited practices, including providing lease fee discounts to prospective and current tenants in exchange for their publishing a 5-star Google review.

While this letter does not reflect a formal determination that you have violated the Consumer Review Rule, you are advised to immediately cease and desist any conduct that does

¹ This case was brought under Section 5 of the FTC Act prior to issuance of the Consumer Review Rule, but the conduct is now covered by the Rule, and violators would now be subject to civil penalties.

not comply with the Consumer Review Rule, and, if necessary, take remedial action (such as by removing potentially problematic reviews and testimonials from websites under your control, and making your best effort to have them removed from third-party websites). Should the FTC receive additional reports of non-compliance following this notification, it could result in further legal action, including the filing of a federal lawsuit, in which a court could impose civil penalties of up to \$53,088 per violation.

You should immediately review the Consumer Review Rule and, if necessary, revise your practices to ensure compliance with the Rule's requirements.

If you are part of a multi-office practice group or corporate chain, please deliver this warning letter to the person or entity in charge of policies and practices pertaining to compliance with the Consumer Review Rule for your office and any related offices. If such policies and practices are managed by a centralized entity or contracted party that oversees multiple offices, please notify that entity or party that this notice applies to all offices under its supervision.

Within 5 business days of receipt of this letter, send an electronic mail to kwilliams2@ftc.gov, identifying the person or entity in charge of relevant policies and practices for your office and any related offices, confirming you've delivered this letter to such person or entity, and describing the specific action(s) planned to ensure compliance with the Consumer Review Rule. For any questions, please contact Kristin Williams (kwilliams2@ftc.gov, (202) 326-2619).

Thank you for your prompt attention to this matter.

Very truly yours,



Janice L. Kopec
Acting Associate Director
Division of Advertising Practices



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Division of
Advertising Practices

December 22, 2025

Emerson Straw PL
1101 Dr. Martin Luther King Jr. St. N
St. Petersburg, FL 33701

VIA FED EX

WARNING LETTER

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manager, employee, or agent, without a disclosure where the business should have known the source of the testimonial and the relationship was not clear to the audience. Furthermore, clear and conspicuous disclosure of a business connection is required when officers or managers solicit consumer reviews from their own immediate relatives or from employees or agents, or when they tell employees or agents to solicit reviews from relatives, and such solicitations result in reviews by immediate relatives of the employees or agents.

- **Company-Controlled Review Websites** — the Consumer Review Rule prohibits a business from misrepresenting that a website or entity it controls provides independent reviews or opinions about a category of products or services that includes its own products or services. For example, a website claiming to rate or rank a type of product must clearly and conspicuously disclose if the site is controlled by a manufacturer or seller of the product (*see, e.g.*, FTC Stops False Advertising, Phony Reviews by Online Trampoline Sellers, <https://www.ftc.gov/news-events/news/press-releases/2017/05/ftc-stops-false-advertising-phony-reviews-online-trampoline-sellers>, in which the FTC brought an action against sellers of trampolines who also ran review sites claiming to offer independent unbiased ratings and certifications of trampolines¹).
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Based on information staff has reviewed, it has reason to believe that your company is violating or has violated the Consumer Review Rule. Staff believes your law firm has engaged in prohibited practices, including providing a \$50 gift card incentive to your employees in exchange for each 5-star review of the law firm the employee obtained from family or friends who were not clients of the firm and could not base their reviews on actual experiences with the firm.

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Thank you for your prompt attention to this matter.

Very truly yours,



Janice L. Kopec
Acting Associate Director
Division of Advertising Practices



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Division of
Advertising Practices

December 22, 2025

Glasheen, Valles & Inderman, LLP
1302 Texas Avenue
Lubbock, TX 79401

VIA FED EX

WARNING LETTER

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December 22, 2025

Page 3

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Very truly yours,



Janice L. Kopec
Acting Associate Director
Division of Advertising Practices



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Division of
Advertising Practices

December 22, 2025

Hortensine Properties, LLC,
also d/b/a Lincolnshire Apartments
3913 Western Ave.
Mattoon, IL 61938

VIA FED EX

WARNING LETTER

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Based on information staff has reviewed, it has reason to believe that your company is violating or has violated the Consumer Review Rule. Staff believes your company has engaged in prohibited practices, including providing a \$15 lease credit to tenants in exchange for the tenant posting a 5-star Google review of the apartment complex.

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While this letter does not reflect a formal determination that you have violated the Consumer Review Rule, you are advised to immediately cease and desist any conduct that does not comply with the Consumer Review Rule, and, if necessary, take remedial action (such as by removing potentially problematic reviews and testimonials from websites under your control, and making your best effort to have them removed from third-party websites). Should the FTC receive additional reports of non-compliance following this notification, it could result in further legal action, including the filing of a federal lawsuit, in which a court could impose civil penalties of up to \$53,088 per violation.

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Acting Associate Director
Division of Advertising Practices



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Division of
Advertising Practices

December 22, 2025

Somerset Apartment Management, LLC,
also d/b/a Sandhurst Apartment Management
6525 Carnegie Blvd., Ste. 400
Charlotte, NC 28211

VIA FED EX

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Based on information staff has reviewed, it has reason to believe that your company is violating or has violated the Consumer Review Rule. Staff believes your company has engaged in prohibited practices, including conditioning entry into a raffle for a 50-inch TV on a tenant’s submission of a 5-star review of the apartment complex, and allowing unlimited raffle entries per tenant for each positive review they wrote.

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Janice L. Kopec
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Division of Advertising Practices



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Division of
Advertising Practices

December 22, 2025

Allview Real Estate
1501 Westcliffe Dr., Suite 270
Newport Beach, CA 92660

VIA FED EX

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Based on information staff has reviewed, it has reason to believe that your company is violating or has violated the Consumer Review Rule. Staff believes your company has engaged in prohibited practices, including providing \$10 Starbucks gift cards to tenants in exchange for their publishing 5-star Google or Yelp reviews.

While this letter does not reflect a formal determination that you have violated the Consumer Review Rule, you are advised to immediately cease and desist any conduct that does

¹ This case was brought under Section 5 of the FTC Act prior to issuance of the Consumer Review Rule, but the conduct is now covered by the Rule, and violators would now be subject to civil penalties.

not comply with the Consumer Review Rule, and, if necessary, take remedial action (such as by removing potentially problematic reviews and testimonials from websites under your control, and making your best effort to have them removed from third-party websites). Should the FTC receive additional reports of non-compliance following this notification, it could result in further legal action, including the filing of a federal lawsuit, in which a court could impose civil penalties of up to \$53,088 per violation.

You should immediately review the Consumer Review Rule and, if necessary, revise your practices to ensure compliance with the Rule's requirements.

If you are part of a multi-office practice group or corporate chain, please deliver this warning letter to the person or entity in charge of policies and practices pertaining to compliance with the Consumer Review Rule for your office and any related offices. If such policies and practices are managed by a centralized entity or contracted party that oversees multiple offices, please notify that entity or party that this notice applies to all offices under its supervision.

Within 5 business days of receipt of this letter, send an electronic mail to kwilliams2@ftc.gov, identifying the person or entity in charge of relevant policies and practices for your office and any related offices, confirming you've delivered this letter to such person or entity, and describing the specific action(s) planned to ensure compliance with the Consumer Review Rule. For any questions, please contact Kristin Williams (kwilliams2@ftc.gov, (202) 326-2619).

Thank you for your prompt attention to this matter.

Very truly yours,



Janice L. Kopec
Acting Associate Director
Division of Advertising Practices



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Division of
Advertising Practices

December 22, 2025

Craig Swapp and Associates
9980 S. 300 W.
Suite 400
Sandy, UT 84070

VIA FED EX

WARNING LETTER

To Whom It May Concern:

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The Consumer Review Rule specifically prohibits certain review-related conduct and authorizes the FTC to seek civil penalties for Rule non-compliance, including for the following:

- **Fake or False Consumer Reviews, Consumer Testimonials, and Celebrity Testimonials** — the Consumer Review Rule prohibits reviews and testimonials that misrepresent: (1) the reviewer's experience with the product or service (i.e., whether the experience was positive or negative); or (2) whether or to what extent the reviewer used the product or service. The Rule prohibits businesses from creating or selling such reviews or testimonials, buying such reviews, procuring them from company insiders, or disseminating them, when the business knew or should have known that the reviews or testimonials were fake or false.
- **Buying Positive or Negative Reviews** — the Consumer Review Rule prohibits providing compensation or other incentives—either expressly or implicitly—conditioned on the writing of consumer reviews expressing a particular sentiment, either positive or negative (e.g., giving a gift cards or discounts only for 5-star reviews).
- **Insider Reviews and Consumer Testimonials** — the Consumer Review Rule bars company insiders, including officers or managers, from writing reviews and testimonials that fail to clearly and conspicuously disclose the writer's material connection to the

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Furthermore, clear and conspicuous disclosure of a business connection is required when officers or managers solicit consumer reviews from their own immediate relatives or from employees or agents, or when they tell employees or agents to solicit reviews from relatives, and such solicitations result in reviews by immediate relatives of the employees or agents.

- **Company-Controlled Review Websites** — the Consumer Review Rule prohibits a business from misrepresenting that a website or entity it controls provides independent reviews or opinions about a category of products or services that includes its own products or services. For example, a website claiming to rate or rank a type of product must clearly and conspicuously disclose if the site is controlled by a manufacturer or seller of the product (*see, e.g.*, *FTC Stops False Advertising, Phony Reviews by Online Trampoline Sellers*, <https://www.ftc.gov/news-events/news/press-releases/2017/05/ftc-stops-false-advertising-phony-reviews-online-trampoline-sellers>, in which the FTC brought an action against sellers of trampolines who also ran review sites claiming to offer independent unbiased ratings and certifications of trampolines¹).
- **Review Suppression** — the Consumer Review Rule prohibits a business from using unfounded or groundless legal threats, physical threats, intimidation, or certain false public accusations to prevent or remove a negative consumer review. The Rule also bars a business from misrepresenting that the reviews on a review portion of its website represent all or most of the reviews submitted when certain reviews have been excluded based upon their ratings or negative sentiment (sometimes referred to as “gatekeeping”). This applies whether the business itself is performing the gatekeeping or whether the business has contracted with a third-party to handle its reviews and exclude some based upon their ratings or negative sentiment.
- **Misuse of Fake Social Media Indicators** — the Consumer Review Rule prohibits anyone from selling or buying fake indicators of social media influence, such as followers or views generated by a bot or hijacked account. This prohibition is limited to situations in which the buyer knew or should have known that the indicators were fake and misrepresent the buyer’s influence or importance for a commercial purpose.

Based on information staff has reviewed, it has reason to believe that your company is violating or has violated the Consumer Review Rule. Staff believes your law firm has engaged in prohibited practices, including providing a \$50 bonus to your employees in exchange for each 5-star review of the law firm the employee obtained from family, friends, or former co-workers who were not clients of the firm and could not base their reviews on actual experiences with the

¹ This case was brought under Section 5 of the FTC Act prior to issuance of the Consumer Review Rule, but the conduct is now covered by the Rule, and violators would now be subject to civil penalties.

firm, and soliciting reviews at community social or charitable events from individuals who did not have actual experience with the firm's professional services.

While this letter does not reflect a formal determination that you have violated the Consumer Review Rule, you are advised to immediately cease and desist any conduct that does not comply with the Consumer Review Rule, and, if necessary, take remedial action (such as by removing potentially problematic reviews and testimonials from websites under your control, and making your best effort to have them removed from third-party websites). Should the FTC receive additional reports of non-compliance following this notification, it could result in further legal action, including the filing of a federal lawsuit, in which a court could impose civil penalties of up to \$53,088 per violation.

You should immediately review the Consumer Review Rule and, if necessary, revise your practices to ensure compliance with the Rule's requirements.

If you are part of a multi-office practice group or corporate chain, please deliver this warning letter to the person or entity in charge of policies and practices pertaining to compliance with the Consumer Review Rule for your office and any related offices. If such policies and practices are managed by a centralized entity or contracted party that oversees multiple offices, please notify that entity or party that this notice applies to all offices under its supervision.

Within 5 business days of receipt of this letter, send an electronic mail to kwilliams2@ftc.gov, identifying the person or entity in charge of relevant policies and practices for your office and any related offices, confirming you've delivered this letter to such person or entity, and describing the specific action(s) planned to ensure compliance with the Consumer Review Rule. For any questions, please contact Kristin Williams (kwilliams2@ftc.gov, (202) 326-2619).

Thank you for your prompt attention to this matter.

Very truly yours,



Janice L. Kopec
Acting Associate Director
Division of Advertising Practices



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Division of
Advertising Practices

December 22, 2025

Provident CPAs PLC
6100 S. Yale Avenue
One Warren Place, Suite 1010
Tulsa, OK 74136

VIA FED EX

WARNING LETTER

To Whom It May Concern:

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- **Buying Positive or Negative Reviews** — the Consumer Review Rule prohibits providing compensation or other incentives—either expressly or implicitly—conditioned on the writing of consumer reviews expressing a particular sentiment, either positive or negative (e.g., giving a gift cards or discounts only for 5-star reviews).
- **Insider Reviews and Consumer Testimonials** — the Consumer Review Rule bars company insiders, including officers or managers, from writing reviews and testimonials that fail to clearly and conspicuously disclose the writer's material connection to the

business. The Rule also bars businesses from disseminating a testimonial from an officer, manager, employee, or agent, without a disclosure where the business should have known the source of the testimonial and the relationship was not clear to the audience.

Furthermore, clear and conspicuous disclosure of a business connection is required when officers or managers solicit consumer reviews from their own immediate relatives or from employees or agents, or when they tell employees or agents to solicit reviews from relatives, and such solicitations result in reviews by immediate relatives of the employees or agents.

- **Company-Controlled Review Websites** — the Consumer Review Rule prohibits a business from misrepresenting that a website or entity it controls provides independent reviews or opinions about a category of products or services that includes its own products or services. For example, a website claiming to rate or rank a type of product must clearly and conspicuously disclose if the site is controlled by a manufacturer or seller of the product (*see, e.g.*, FTC Stops False Advertising, Phony Reviews by Online Trampoline Sellers, <https://www.ftc.gov/news-events/news/press-releases/2017/05/ftc-stops-false-advertising-phony-reviews-online-trampoline-sellers>, in which the FTC brought an action against sellers of trampolines who also ran review sites claiming to offer independent unbiased ratings and certifications of trampolines¹).
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Based on information staff has reviewed, it has reason to believe that your company is violating or has violated the Consumer Review Rule. Staff believes your company has engaged in prohibited practices, including providing a \$100 fee discount to your customers in exchange for the customer posting a 5-star Google review.

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While this letter does not reflect a formal determination that you have violated the Consumer Review Rule, you are advised to immediately cease and desist any conduct that does not comply with the Consumer Review Rule, and, if necessary, take remedial action (such as by removing potentially problematic reviews and testimonials from websites under your control, and making your best effort to have them removed from third-party websites). Should the FTC receive additional reports of non-compliance following this notification, it could result in further legal action, including the filing of a federal lawsuit, in which a court could impose civil penalties of up to \$53,088 per violation.

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Janice L. Kopec
Acting Associate Director
Division of Advertising Practices



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Division of
Advertising Practices

December 22, 2025

Tec Management, L.C.
1105 E 5250 S
South Ogden, UT 84403

VIA FED EX

WARNING LETTER

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manager, employee, or agent, without a disclosure where the business should have known the source of the testimonial and the relationship was not clear to the audience. Furthermore, clear and conspicuous disclosure of a business connection is required when officers or managers solicit consumer reviews from their own immediate relatives or from employees or agents, or when they tell employees or agents to solicit reviews from relatives, and such solicitations result in reviews by immediate relatives of the employees or agents.

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Based on information staff has reviewed, it has reason to believe that your company is violating or has violated the Consumer Review Rule. Staff believes your company has engaged in prohibited practices, including conditioning a \$25 account credit and entry into a raffle for a \$300 gift card and 1-year Sam’s Club membership on a tenant’s submission of a 4- or 5-star review.

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Janice L. Kopec
Acting Associate Director
Division of Advertising Practices



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Division of
Advertising Practices

December 22, 2025

Weidner Property Management LLC
9757 NE Juanita Dr., Suite 300
Kirkland, WA 98034

VIA FED EX

WARNING LETTER

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