

Working Together to Protect Consumers

A Study and Recommendations on FTC Collaboration with the State Attorneys General

A Report to Congress

April 10, 2024



FEDERAL TRADE COMMISSION

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Executive Summary

The Federal Trade Commission (“FTC” or “Commission”) respectfully submits this report as directed by the FTC Collaboration Act of 2021 (the “Collaboration Act”).¹

For decades, the FTC has collaborated closely with State Attorneys General to protect consumers from fraud, deception, and other unlawful business practices.² The FTC and State Attorneys General have brought trailblazing law enforcement actions, shared resources and expertise, and raised awareness among consumers about how to detect and avoid scams. This remains a vital and important partnership, and the FTC is committed to working closely with state partners to maximize our collective efficacy in combatting unlawful business practices and protecting Americans.

The Collaboration Act required the FTC to “conduct a study on facilitating and refining existing efforts with State Attorneys General to prevent, publicize, and penalize frauds and scams being perpetrated on individuals in the United States.”³ The Collaboration Act further directed the FTC to report the results of this study to Congress, together with recommended best practices to enhance collaboration between the Commission and State Attorneys General with respect to preventing, publicizing, and penalizing fraud and scams; quantifiable metrics by which enhanced collaboration can be measured; and legislative recommendations, if any, to enhance collaboration efforts.⁴

In conducting the study required by the Collaboration Act, the FTC was directed to “provide opportunity for public comment and advice relevant to the production of the study,” and to consult with certain relevant organizations and entities.⁵ Accordingly, on June 13, 2023, the Commission published in the Federal Register a request for information concerning the subject matter specified by the Collaboration

¹ Public Law No. 117–187, 136 Stat. 2201 (2022), available at <https://www.congress.gov/117/plaws/publ187/PLAW-117publ187.pdf>.

² The National Association of Attorneys General (NAAG) writes that Attorneys General “serve[] as the chief legal officer in their jurisdiction, counsel[] its government agencies and legislatures, and [are] representative[s] of the public interest.” NAAG, *Attorneys General* (last visited March 20, 2024), <https://www.naag.org/attorneys-general/>. All 50 U.S. states, as well as the District of Columbia and the territories of American Samoa, Guam, the Northern Mariana Islands, Puerto Rico, and the U.S. Virgin Islands, are served by Attorneys General. *See id.* This Report uses the shorthand “State Attorneys General” to refer to the chief legal officers who serve U.S. states, territories, and the District of Columbia. The findings and recommendations herein apply with equal force to collaboration with the Attorneys General of the District of Columbia and U.S. territories, with whose offices the FTC works closely.

³ *Id.* § 2(a)(1), at 136 Stat. 2201.

⁴ *Id.* § 2(b), at 136 Stat. 2201–02.

⁵ *Id.* § 2(a)(3), at 136 Stat. 2201 (directing the Commission to consult with the National Association of State Attorneys General, public interest organizations dedicated to consumer protection, relevant private sector entities, and any other Federal or State agency that the Federal Trade Commission considers necessary).

Act.⁶ Fourteen organizations and three individuals submitted public comments in response.⁷ The FTC is grateful for this public input, which has helped inform the following discussion. In addition, the FTC study undertook to catalogue the law enforcement actions the FTC has brought together with State Attorneys General, and delved into an examination of the tools and information sharing that fuel collaboration. Of critical importance, the report also examines public communication strategies to prevent consumer harm.

This report addresses the FTC’s efforts with State Attorneys General to prevent, publicize, and penalize frauds and scams being perpetrated on individuals in the United States, as follows:

- **Part I** discusses the FTC’s existing collaborative efforts with State Attorneys General to prevent, publicize, and penalize frauds and scams.
 - **Section I.A** provides an overview of the respective roles and responsibilities of the FTC and State Attorneys General as they relate to consumer protection law enforcement, and consumer education and outreach.
 - **Section I.B** describes program areas within the FTC that implement policies and procedures to enhance the agency’s ability to cooperate and communicate with State Attorneys General in furtherance of the FTC’s consumer protection mission.
- **Part II** discusses recommended best practices to improve collaboration between the FTC and State Attorneys General, together with how resources should be dedicated to achieve this goal, and quantifiable metrics and accountability mechanisms to monitor success.
 - **Section II.A** discusses how to maintain and strengthen information-sharing practices between the FTC and State Attorneys General.
 - **Section II.B** discusses law enforcement cooperation and coordination between the FTC and State Attorneys General, as well as other relevant state and local actors.
 - **Section II.C** discusses additional areas to expand the sharing of expertise and technical resources with State Attorneys General.

⁶ 88 Fed. Reg. 38,510 (June 13, 2023).

⁷ The organizational commenters were: (1) The Attorneys General of Connecticut, Illinois, New Hampshire, Tennessee, and 25 other States; (2) BBB National Programs; (3) National Consumer Law Center (on behalf of its low-income clients), Consumer Reports, Consumer Federation of America, National Community Reinvestment Coalition, National Consumers League, and Student Borrower Protection Center (hereafter, “National Consumer Law Center *et al.*”); (4) Consumers for Auto Reliability and Safety (CARS); (5) Consumers’ Research; (6) the District Attorney’s Offices of Los Angeles County and San Diego County, California (7) the Fair Deal NY Coalition; (8) former State Assistant Attorneys General Paul Singer, Abigail Stempson, and Beth Chun of Kelley Drye & Warren LLP; (9) the National Association of State Charity Officials (NASCO); (10) the National Automobile Dealers Association (NADA); (11) the Retail Industry Leaders Association (RILA); (12) the Student Borrower Protection Center (SBPC); (13) Truth in Advertising; and (14) the U.S. Chamber of Commerce.

- **Part III** recommends legislation to enhance collaborative efforts between the FTC and State Attorneys General.
 - **Section III.A** recommends restoring the FTC’s authority to obtain equitable monetary relief following the U.S. Supreme Court’s decision in *AMG Capital Management v. FTC*, 141 S. Ct. 1341 (2021), which reversed four decades of unanimous circuit court precedent and severely curtailed the FTC’s authority under Section 13(b) of the FTC Act to obtain redress for defrauded consumers.
 - **Section III.B** recommends providing the FTC with independent authority to seek civil penalties against wrongdoers, in order to multiply the number of enforcers available to bring such cases.

Section III.C recommends providing the FTC with clear legal authority to pursue action against those who knowingly or recklessly assist and facilitate scammers and others who violate the FTC Act. This would better enable the FTC to work with its law enforcement partners to challenge sophisticated, multi-party frauds and scams.⁸

⁸ Some commenters suggested a number of legislative changes other than those listed above, including the following:

- Expanding or otherwise modifying state consumer protection laws, *e.g.*, Comment of Fair Deal NY Coalition, Doc. No. FTC-2023-0038-0015, at 1–2; Comment of National Consumer Law Center *et al.*, Doc. No. FTC-2023-0038-0013, at 8–9;
- Conversely, deeming certain state consumer protection laws preempted by federal law, *see* Comment of Consumers’ Research, Doc. No. FTC-2023-0038-0016, at 15–16;
- Expanding private rights of action and dedicating resources to support private consumer litigation, *e.g.*, Comment of Student Borrower Protection Center, Doc. No. FTC-2023-0038-0007, at 6–7; Comment of National Consumer Law Center *et al.* Doc. No. FTC-2023-0038-0013, at 10–11;
- Conversely, limiting private rights of action under state consumer protection law to injunctive relief only, *see* Comment of U.S. Chamber of Commerce, Doc. No. FTC-2023-0038-0010, at 5.

While the Commission ultimately considers recommendations regarding state law and enforcement by private parties to be beyond the scope of this report on collaboration with State Attorneys General, and does not address these in the following discussion, we thank the commenters for sharing their perspectives on these issues.

I. The FTC’s Existing Collaborative Efforts with State Attorneys General to Prevent, Publicize, and Penalize Frauds and Scams

A. The Roles and Responsibilities of the Commission and State Attorneys General in Protecting Consumers from Frauds and Scams

The Commission and State Attorneys General serve complementary roles in protecting consumers from frauds and scams.

1. Overview of the Law Enforcement Authority of the FTC and State Attorneys General

As an independent agency within the federal government, the Commission enforces the FTC Act, 15 U.S.C. §§ 45 *et seq.*, trade regulation rules promulgated pursuant to the FTC Act, and numerous federal consumer protection statutes for which the FTC has enforcement authority. The FTC has enforcement or administrative responsibilities under more than 80 of these laws,⁹ affecting broad sectors of the economy.

State Attorneys General, as the principal law enforcement officials of their respective States, are responsible for enforcing the consumer protection laws of those States, as well as certain federal statutes and rules. All fifty states have enacted statutes that prohibit unfair or deceptive acts or practices (“UDAP” laws), which are in some ways analogous to Section 5 of the FTC Act.¹⁰ Variations between states’ UDAP laws are sometimes significant: for example, as the State Attorney General commenters have noted, “there are instances where a state’s laws do not reach certain deceptive or unfair conduct.”¹¹

2. Collaboration Between the FTC and State Attorneys General on Law Enforcement Matters

The FTC and State Attorneys General exercise their law enforcement authority by investigating potential law violations and initiating civil law enforcement actions. Depending on the needs and circumstances of each individual case, the FTC and State Attorneys General may conduct an

⁹ See FTC Legal Library: Statutes, available at <https://www.ftc.gov/legal-library/browse/statutes>.

¹⁰ 15 U.S.C. § 45.

¹¹ Comment by the Attorneys General of Connecticut, Illinois, New Hampshire, Tennessee, and 25 Other States, Doc. No. at 3. Additionally, some commenters have stated that there may be differences in the rate at which consumer protection laws are enforced across jurisdictions, and that FTC enforcement may be comparatively more impactful in some jurisdictions as a result. Comment by National Consumer Law Center *et al.*, Doc. No. FTC-2023-0038-0013, at 9.

investigation or bring a law enforcement action jointly or independently. In addition, the FTC and State Attorneys General will share information and expertise in these matters as appropriate.

FTC and State Attorneys General regularly make use of a number of important tools and procedures to share information and expertise to advance their shared and respective law enforcement priorities, including the Consumer Sentinel Network (“CSN” or “Sentinel”), formal information-sharing agreements, and informal channels for information exchange. When investigations culminate in law enforcement actions brought by the FTC and State Attorneys General, they may collaborate by jointly settling or prosecuting these actions, or in some instances by participating in joint federal and state enforcement initiatives known as “sweeps” in which a number of agencies bring cases focused on law violations in particular industries or subject matter areas.

Notably, State Attorneys General are not alone in exercising law enforcement and investigative authority on behalf of constituents in their respective states. In addition to Attorneys General, a number of states have increasingly delegated consumer protection law enforcement authority to local or specialized agencies. For example, the comment of the District Attorneys’ Offices of San Diego and Los Angeles Counties observes that California’s local prosecutors share concurrent enforcement authority with the California Attorney General’s Office to seek statewide relief under California’s consumer protection laws, and that many local prosecutors in other states hold consumer protection law enforcement authority of some kind.¹² Several states, such as Hawaii, Wisconsin, and Florida, have agencies or units outside of their Attorneys General Offices dedicated to consumer protection.¹³ And in recent years, some states have established specialized regulators focused on particular industries or areas of consumer protection law, such as California’s Privacy Protection Agency,¹⁴ which regulates consumer privacy and data security under state law, and California’s Department of Financial Protection and Innovation¹⁵ and New York’s Department of Financial Services,¹⁶ which regulate financial services. The FTC likewise collaborates with these important state and local partners in connection with law enforcement matters.¹⁷

a. Joint and Parallel Law Enforcement Actions

The FTC and State Attorneys General have long worked together in bringing law enforcement actions. In some instances, they have jointly prosecuted these cases in the same civil action in federal district

¹² Comment by the District Attorneys of the Counties of Los Angeles and San Diego Counties, California, at 1–2, 3–4 (on file with the FTC).

¹³ See, e.g., Hawaii Department of Commerce and Consumer Affairs, <https://cca.hawaii.gov/>; Wisconsin Department of Agriculture, Trade and Consumer Protection, https://datcp.wi.gov/Pages/Programs_Services/ConsumerProtection.aspx; Florida Division of Consumer Services, <https://www.fdacs.gov/Divisions-Offices/Consumer-Services>.

¹⁴ See California Privacy Protection Agency, <https://cppa.ca.gov/>.

¹⁵ See California Department of Financial Protection & Innovation, <https://dfpi.ca.gov/>.

¹⁶ See New York Department of Financial Services, <https://www.dfs.ny.gov/>.

¹⁷ A number of these cases are listed in Appendix A to this Report.

court. In other instances, they have pursued “sweeps,” in which a number of law enforcement agencies bring separate actions focused on law violations in a particular industry or sector.

Sweeps have an important force multiplier effect for law enforcement in that these joint efforts not only target more scams: they also raise consumer awareness, while helping to level the playing field for law-abiding businesses and providing the marketplace with compliance guidance. For example, in June 2023, the FTC and more than 100 federal and state law enforcement partners nationwide, including the Attorneys General from all 50 states and the District of Columbia, announced “Operation Stop Scam Calls,” a sweep targeting illegal telemarketing calls, in which law enforcement brought more than 180 actions against operations responsible for billions of calls to U.S. consumers.¹⁸ In addition to targeting the telemarketers themselves, this sweep also included actions against lead generators who deceptively collect and provide consumers’ telephone numbers to robocallers and others, as well as Voice over Internet Protocol (VoIP) service providers who facilitate illegal robocalls every year, which often originate overseas.¹⁹

Along with the direct benefit of bringing these law enforcement actions and providing relief for affected consumers, sweeps also serve to raise consumer awareness about how to detect and avoid frauds, scams, and other unlawful business practices, such as illegal telemarketing schemes in the case of “Operation Stop Scam Calls.”

Other examples of recent consumer protection law enforcement actions involving collaboration between the FTC and State Attorneys General include:

- ***Operation Income Illusion:*** In 2020, the FTC, along with 19 federal, state, and local law enforcement partners, brought more than 50 enforcement actions cracking down on scams that targeted consumers with fake promises of income and financial independence that have no basis in reality.²⁰ Many of these scams sought to prey on consumers’ financial instability in the wake of the COVID-19 pandemic, and targets included the operators of work-from-home and employment scams, pyramid schemes, investment scams, bogus coaching courses, and other schemes that can end up costing consumers thousands of dollars.²¹
- ***Operation Donate with Honor:*** In 2018, the FTC, 54 Attorneys General from all 50 states, the District of Columbia, American Samoa, Guam, and Puerto Rico, and 16 additional state agencies that oversee charities brought dozens of actions against fraudulent charitable solicitation scams

¹⁸ Press Release, FTC, *FTC, Law Enforcers Nationwide Announce Enforcement Sweep to Stem the Tide of Illegal Telemarketing Calls to U.S. Consumers* (Jul. 19, 2023), available at <https://www.ftc.gov/news-events/news/press-releases/2023/07/ftc-law-enforcers-nationwide-announce-enforcement-sweep-stem-tide-illegal-telemarketing-calls-us>.

¹⁹ *Id.*

²⁰ Press Release, FTC, *As Scammers Leverage Pandemic Fears, FTC and Law Enforcement Partners Crack Down on Deceptive Income Schemes Nationwide* (Dec. 14, 2020), available at <https://www.ftc.gov/news-events/news/press-releases/2020/12/scammers-leverage-pandemic-fears-ftc-law-enforcement-partners-crack-down-deceptive-income-schemes>.

²¹ *Id.*

falsely claiming to benefit veterans.²² As the National Association of State Charity Officials (NASCO) notes in its comment, this sweep exemplified the commitment of FTC and State Attorneys General to jointly pursuing sweeps against deceptive fundraisers and scam charities.²³ And the enforcers' coordinated actions were not just limited to the courtroom: they put forward videos for consumers, tips for giving while avoiding sham charities, an example of an illegal robocall, eye-catching infographics, guidance for businesses hosting online giving portals, and tips for retailers reviewing charity requests. With this full court press, the partners amplified the message in the media, providing everything needed for broad and robust coverage of this pernicious problem.

- ***Joint Enforcement Action with 38 States and D.C. Against Associated Community Services:*** In 2021, the FTC, Attorneys General, and agencies from 38 states and the District of Columbia brought a joint federal court action alleging that a massive telefunding operation bombarded 67 million consumers with 1.3 billion deceptive charitable fundraising calls, most of which were illegal robocalls.²⁴ The defendants collected more than \$110 million using their deceptive solicitations. Through this joint enforcement action, the FTC and its co-plaintiffs obtained a stipulated court order under which the defendants were permanently prohibited from conducting or consulting on any fundraising activities and from conducting telemarketing of any kind to sell goods or services; using any existing donor lists and from further violations of state charitable giving laws; and misrepresenting products or services, in addition to being subject to monetary judgments.
- ***Joint Enforcement Action with 18 States Against Harris Jewelry:*** In 2022, the FTC and a coalition of 18 states jointly brought an enforcement action in federal court against national jewelry retailer Harris Jewelry, alleging that the company cheated military families with illegal financing and sales practices.²⁵ As a result of this joint enforcement action, the defendants entered into a stipulated settlement agreeing to stop collection of millions in debt, refund approximately \$10.9 million for purchased protection plans, provide refunds for overpayments, and assist with the deletion of any negative credit entries pertaining to debt in consumers' credit reporting files. The company was also required to complete its shutdown of operations and to dissolve pursuant to applicable state laws, once it met the obligations of the order.

²² See FTC, *Operation Donate with Honor: List of Enforcement Actions* (July 19, 2018), available at https://www.ftc.gov/system/files/attachments/press-releases/ftc-states-combat-fraudulent-charities-falsely-claim-help-veterans-servicemembers/dwh_list-enforcement-actions_1.pdf.

²³ Comment by NASCO, Doc. No. FTC-2023-0038-0011, at 2.

²⁴ *FTC et al. v. Assoc. Community Servs., Inc. et al.*, Case No. 2:21-cv-10174-DML-CI (E.D. Mich., filed Jan. 26, 2021), available at <https://www.ftc.gov/news-events/news/press-releases/2021/03/ftc-38-states-dc-act-shut-down-massive-charity-fraud-telefunding-operation>.

²⁵ *FTC et al. v. Harris Original of NY, Inc. et al.*, Case No. 22-cv-4260 (E.D.N.Y., filed Jul. 20, 2022), available at <https://www.ftc.gov/news-events/news/press-releases/2022/07/ftc-18-states-sue-stop-harris-jewelry-cheating-military-families-illegal-financing-sales-tactics>.

- Parallel Enforcement Actions with Seven States Against Google and iHeartMedia:*** In 2022, the FTC and the Attorneys General of Arizona, California, Georgia, Illinois, Massachusetts, New York, and Texas brought coordinated law enforcement actions against technology company Google, LLC and radio station owner iHeartMedia for airing nearly 29,000 allegedly deceptive endorsements by radio personalities promoting their use of and experience with Google’s Pixel 4 phone in 2019 and 2020. The FTC and its state partners alleged that Google and iHeartMedia paid influencers to misleadingly promote products they never used, in violation of consumer protection laws. As a result of these parallel enforcement actions, Google and iHeartMedia were prohibited from misrepresenting that endorsers had owned, used, or had certain experiences with products, and they were also required to pay \$9.4 million in penalties to the state plaintiffs.²⁶ According to BBB National Programs, this enforcement action raised industry awareness about deceptive influencer marketing, due to the media coverage it received and law firm advisories to businesses that engage in influencer marketing.²⁷ BBB National Programs also reports that this action may have influenced businesses to bring challenges through BBB’s National Advertising Division self-regulatory program against competitors’ allegedly similar and misleading practices.²⁸
- Joint Enforcement Action with Arkansas Against Blessings in No Time:*** In 2021, the FTC and the State of Arkansas jointly brought this action charging that the operators of an illegal pyramid scheme targeted African Americans and people struggling financially during the COVID-19 pandemic, bilking tens of millions of dollars from thousands of customers.²⁹ In 2023, as a result of this joint enforcement action, the FTC and Arkansas successfully obtained a court order banning the defendants from any chain referral scheme, and requiring them to pay into a fund administered by the State of Texas to provide refunds to affected consumers.³⁰
- Joint Enforcement Action with Florida Against Grant Bae:*** In 2022, the FTC and the State of Florida brought an enforcement action against the operators of a scheme that allegedly targeted minority-owned businesses and scammed them out of money, sometimes thousands of dollars each, with false promises of “guaranteed” grant funding and COVID-19 economic benefits that

²⁶ *In the Matter of Google LLC and iHeartMedia, Inc.*, FTC Dkt. No. C-4784, available at <https://www.ftc.gov/news-events/news/press-releases/2022/11/ftc-states-sue-google-iheartmedia-deceptive-ads-promoting-pixel-4-smartphone>.

²⁷ Comment of BBB National Programs, Doc. No. FTC-2023-0038-0008, at 4.

²⁸ *Id.*

²⁹ *FTC and State of Arkansas v. BINT Operations LLC et al.*, Case No. 4:21-cv-00518-KGB (E.D. Ark., filed June 16, 2021), available at <https://www.ftc.gov/news-events/news/press-releases/2023/07/operators-blessing-loom-scheme-banned-multi-level-marketing-result-pyramid-scheme-charges-brought>.

³⁰ The BBB National Programs noted in its comment that this enforcement action helped its Direct Selling Self-Regulatory Council “send a powerful message to the direct selling industry.” Comment of BBB National Programs, Doc. No. FTC-2023-0038-0008, at 4.

did not materialize.³¹ As a result of this collaboration, the FTC and Florida obtained a stipulated court order in 2022 in which the defendants agreed to stop grant-related services and business consulting, stop deceiving consumers, and turn over property to a court-appointed receiver to raise money to provide refunds to businesses harmed by the alleged grant scheme.

- ***Joint Enforcement Action with Six States Against Roomster:*** In 2022, the FTC and the Attorneys General of New York, California, Colorado, Florida, Illinois, and Massachusetts brought a joint federal court action alleging that rental listing platform Roomster and its owners duped consumers seeking affordable housing by paying for fake reviews, and then charging for access to phony listings.³² As a result of this action, the FTC and its state partners obtained a stipulated court order in which Roomster and its owners were banned from paying or otherwise providing incentives for consumer reviews, from using or disseminating reviews where they have a relationship with the reviewer that might affect the review’s weight or credibility, and from making additional misrepresentations to consumers. In addition, the court order required Roomster to pay \$1.6 million to the six states and imposed a partially suspended monetary judgment of \$36.2 million and civil penalties totaling \$10.9 million.

Additional information on recent joint law enforcement actions between the FTC and State Attorneys General is set forth in **Appendix A** to this Report.

b. Breaking Down Information Silos with the Consumer Sentinel Network

Hearing from consumers about fraud, deception, and other unlawful business practices they experience in the marketplace is the lifeblood of law enforcement investigations, litigation, and strategic planning. Consumers can report these experiences to the FTC directly on its websites, ReportFraud.ftc.gov, IdentityTheft.gov, and DoNotCall.gov. All of the reports received are stored in a secure online database known as Consumer Sentinel. State Attorneys General similarly collect reports about consumer protection problems in their states, and 24 are data contributors to Sentinel. Sentinel contributors include not only federal, state, local, and international law enforcement agencies, but also private businesses and nonprofit organizations such as the International Association of Better Business Bureaus.³³

The FTC provides access to these reports to law enforcement agencies who become members of the Consumer Sentinel Network. Through Sentinel, the FTC provides nearly 3,000 federal, state, local, and international law enforcement users with access to more than 50 million consumer fraud, identity theft,

³¹ *FTC and State of Florida v. Treashonna P. Graham et al.*, Case No. 3:22-cv-655-MMH-JBT (M.D. Fla., filed June 13, 2022), available at <https://www.ftc.gov/news-events/news/press-releases/2022/06/ftc-florida-act-shut-down-grant-bae-scam-preying-minority-owned-businesses-seeking-pandemic-relief>.

³² *FTC et al. v. Roomster Corp. et al.*, Case No. 1:22-cv-7389 (S.D.N.Y., filed Aug. 30, 2022), available at <https://www.ftc.gov/news-events/news/press-releases/2023/08/ftc-state-partners-secure-proposed-order-banning-roomster-owners-using-deceptive-reviews>.

³³ For lists of organizations that have contributed consumer reports to Consumer Sentinel, see FTC, *Consumer Sentinel Network Annual Data Book 2023* (Feb. 2024), https://www.ftc.gov/system/files/ftc_gov/pdf/CSN-Annual-Data-Book-2023.pdf, at 77–80.

financial, and Do Not Call Registry reports collected during the past five years, including 5.4 million reports submitted in 2023 alone.

The Consumer Sentinel Network is a valuable resource for the collaborative law enforcement work of the FTC and participating state and local agencies. All fifty states and the District of Columbia have access to the Consumer Sentinel Network. The FTC and participating state and local agencies may use the Sentinel data to identify subjects of investigation; to advance existing investigations and collaborative efforts; or to develop consumer educational materials regarding trending scams or other areas of consumer concern.³⁴

Consumer Sentinel offers a suite of analytic tools that benefit law enforcement users. Its search function allows users to sort or filter consumer reports using a number of different criteria, including the businesses or individuals that are the subject of the report; various characteristics that complaining consumers may have provided about themselves, including their geographic locations, ages, or monetary loss amounts; and the industry, dates, subject matter, and searchable text associated with individual reports.³⁵ The reporting consumers can also opt to submit their contact information, which may allow State Attorneys General Offices and other law enforcement agencies to identify potential witnesses at every stage of an investigation. Consumer Sentinel also provides interactive data visualization tools, including a report heat map and comment word cloud, which may assist users in identifying trends of concerning conduct in the marketplace.

State Attorneys General Offices and other participating law enforcement agencies also benefit from the ability to use Sentinel to alert each other to existing investigations, which may aid them in sharing information and avoiding the duplication of work.

While many State Attorneys General have their own systems in place for intake and organizing reports from consumers within their respective states, there are a number of benefits from collecting consumer reports into a single comprehensive source, the Consumer Sentinel Network. The FTC's Consumer Response Center, which handles consumer reports and inquiries, now offers expanded language access services, allowing non-English speaking consumers to report frauds, scams, and deceptive practices to the FTC in their preferred language.³⁶ Law enforcers can use a broader scope of data in their cases, alert others to their investigations, and use the extensive analytic tools built into Sentinel throughout investigations, enforcement actions, and consumer education and outreach efforts. For this reason, the

³⁴ See Comment by the Attorneys General of Connecticut, Illinois, New Hampshire, Tennessee, and 25 Other States, Doc. No. FTC-2023-0038-0014, at 4; Comment by the District Attorneys of the Counties of Los Angeles and San Diego Counties, California, at 6 (on file with the FTC).

³⁵ For a list of Sentinel report categories, trends in reports within these categories, and the breakdown of fraud reports and reported loss amounts within each State, see FTC, *Consumer Sentinel Network Annual Data Book 2023* (Feb. 2024), https://www.ftc.gov/system/files/ftc_gov/pdf/CSN-Annual-Data-Book-2023.pdf, at 81–90.

³⁶ Press Release, FTC, *FTC Adds Support for Consumers in Multiple Languages for Fraud and ID Theft Reporting; Offers Multi-lingual Resources on How to Spot, Avoid, and Report Fraud* (Nov. 8, 2023), <https://www.ftc.gov/news-events/news/press-releases/2023/11/ftc-adds-support-consumers-multiple-languages-fraud-id-theft-reporting-offers-multi-lingual>. Supported languages include Mandarin, Tagalog, Vietnamese, French, Arabic, Russian, Korean, Portuguese and Polish, and consumers speaking English and Spanish can file reports directly online. *Id.*

FTC has consistently urged all states to contribute data to Consumer Sentinel, and the FTC makes Sentinel training and other resources available to interested states.³⁷

Consumer Sentinel data provided by the FTC’s robust network of contributors also serves an important function in informing the public, including the constituencies served by State Attorneys General. While sensitive law enforcement information is not publicly disclosed, the FTC publicly reports and shares visualizations and machine-readable aggregate data concerning consumer reports it has received through the Consumer Sentinel Network, which are made available at <https://www.ftc.gov/news-events/data-visualizations/explore-data>. For example, interested members of the public can access aggregate data reported in their state, county, and metropolitan areas about top frauds, dollars lost to fraud, types of identity theft, and other statistics specific to their state. These statistics similarly help inform policymakers about law enforcement and consumer outreach priorities.

c. Sharing Information and Expertise

The FTC and State Attorneys General collaborate by sharing information and expertise in the context of law enforcement investigations as well as trainings. During the course of law enforcement investigations, the FTC and State Attorneys General may share investigative information and materials using procedures designed to protect the confidentiality of investigations and the security of investigative materials. This type of sharing maximizes efficiencies by ensuring that partner agencies get the benefit of investigative discoveries and avoid duplicating work. For example, State Attorneys General Offices or other law enforcement agencies enforcing state or federal law may request nonpublic materials collected in the course of FTC investigations, and the FTC may similarly request information from state partners.³⁸ In order to share information in this manner, the receiving agency must generally commit to maintain confidentiality and restrict use of materials to official law enforcement purposes. Similarly, in order to access the Consumer Sentinel Network, law enforcement members must enter confidentiality and data security agreements with the FTC.³⁹ When states and the FTC share investigative information in this manner, this allows them to conserve time and resources that might otherwise be spent duplicating investigative steps already taken by another agency.

The FTC and State Attorneys General also exchange information and expertise through a number of other important channels outside the context of ongoing law enforcement investigations. The FTC regularly collaborates with the National Association of Attorneys General (NAAG), assists in training and educating state law enforcement personnel through NAAG’s training and research arm, the National Attorneys General Training & Research Institute (NAGTRI), and participates in a number of working groups and meetings with staff from Attorneys General Offices.

³⁷ In 2023, the FTC held 28 Consumer Sentinel Network training events, reaching a total of 570 law enforcement personnel. The FTC also hosts a regular monthly training session in which state law enforcement personnel frequently participate.

³⁸ See 15 U.S.C. §§ 46(f) & 57b2(b)(6); 16 C.F.R. § 4.11(c).

³⁹ Consumer Sentinel Confidentiality and Data Security Agreement, *available at* <https://register.consumersentinel.gov/Content/ca.pdf>.

For instance, in 2023, FTC representatives, including the Director of the Bureau of Consumer Protection, presented on consumer protection issues at the NAAG Fall Consumer Protection Conference and NAAG’s Capital Forum. The events included opportunities for Q&A and engagement between the FTC and NAAG members. The FTC also provided an informational webinar to NAAG members on enhancements to Consumer Sentinel Network, including the FTC’s ability to take reports in multiple languages and provide auto-translated reports to CSN members, and previewed the FTC’s Combating Auto Retail Scams Trade Regulation Rule (CARS Rule) with NAAG’s Veterans and Military Working Group.

Since 2010, the FTC, through its eight regional offices, has also assumed a leadership role in convening a series of “Common Ground” conferences, frequently co-hosted with State Attorneys General Offices, to discuss consumer protection issues.⁴⁰ In addition to gathering law enforcement and regulators tasked with enforcing the law, Common Ground conferences have also served as forums to educate policymakers and service providers about prevalent consumer protection issues, from mortgage and credit repair scams in the wake of the financial crisis during the early years of the Common Ground program, to topics including cybersecurity and financial security awareness in more recent years.

In addition, the FTC’s eight regional offices maintain these formal and informal communication channels. The regional offices often play leading roles in running joint or parallel investigations and law enforcement actions with the State Attorneys General Offices of their respective regions, and in organizing and hosting regional meetings and conferences. In these ways, the regional offices frequently serve as significant FTC points of contact for state and local law enforcement, as well as for community partners.

3. Consumer Education and Outreach

Both the FTC and State Attorneys General play critical roles in educating consumers about how to spot and avoid unlawful practices, including by raising awareness of prevalent frauds, and in educating the business community about compliance with the law, as well as about scams that target them.

Most FTC law enforcement initiatives include consumer and business education components aimed at helping people avoid injury from unlawful business practices and mitigating financial losses. Announcements of law enforcement actions enable the FTC and State Attorneys General to leverage news coverage to amplify consumer education messaging about how to spot, avoid, and report similar scams or unlawful business practices. Similarly, coordinated announcements of nationwide law enforcement sweeps offer tremendous opportunities for outreach collaboration between the FTC and State Attorneys General. Since 2019, the FTC and its state, local, and federal partners have joined forces to announce coordinated law enforcement actions on topics ranging from unsubstantiated health claims and phantom debt collection to abusive debt collection practices, fraudulent money-making schemes, and illegal robocalls. As part of these sweeps, State Attorneys General and other partners frequently join the FTC’s outreach efforts to disseminate specially created educational materials in their local communities. These educational materials have included videos, infographics, social media posts, articles, and more — most available in both English and in Spanish. Often, State Attorneys General co-

⁴⁰ A list of agendas and speakers at past Common Ground conferences is available at <https://consumer.gov/content/common-ground-events-calendar>.

brand and customize these resources, so their constituents benefit from the messaging and are provided with local consumer protection contacts they can reach out to for help.

The FTC frequently collaborates with partner organizations and agencies, including offices of State Attorneys General, to disseminate FTC information to their constituents in those target communities. It is common to find staff of the FTC and offices of State Attorneys General participating together in seminars, panels, and other outreach events for consumers and businesses.⁴¹ Events including in-person Common Ground Conferences,⁴² Legal Services Collaboration meetings and listening sessions,⁴³ and virtual Consumer Protection State Conversation webinars,⁴⁴ have brought together representatives from the FTC and offices of State Attorneys General, along with other local and federal law enforcement and community advocates, to discuss the consumer protection issues those communities face, as well as ways to address them.

Representatives from several offices of State Attorneys General have also participated in the FTC's Ethnic Media and Community Briefings.⁴⁵ These events bring together federal, state, and local law enforcement; legal services professionals; journalists and community representatives; and other stakeholders to discuss scams and illegal business practices affecting local communities. The goal, always, is to identify ways to work together to raise fraud awareness, facilitate communication, and build mutual trust. State Attorneys General and their representatives have also participated in "Green Lights & Red Flags: FTC Rules of the Road for Business," the agency's in-person workshops designed

⁴¹ For example, the FTC frequently convenes conferences and workshops through which experts and other knowledgeable parties identify emerging consumer protection issues and discuss ways to address those issues, and at which representatives of State Attorneys General Offices have often spoken. In recent years, representatives of Attorneys General Offices served as panelists or moderators in, among other programs, the FTC's May 2023 workshop on recyclable claims and the Green Guides, <https://www.ftc.gov/news-events/events/2023/05/talking-trash-ftc-recyclable-claims-green-guides>; an April 2021 workshop on manipulated user interface designs known as "dark patterns," <https://www.ftc.gov/news-events/events/2021/04/bringing-dark-patterns-light-ftc-workshop>; and a November 2020 workshop on franchise regulation and financial performance representations, <https://www.ftc.gov/news-events/events/2020/11/reviewing-franchise-rule-ftc-workshop>.

⁴² See the list of Common Ground Conferences at <https://www.consumer.gov/commonground>.

⁴³ The FTC's Legal Services Collaboration is a longstanding initiative in which the FTC has solicited input from, and provided information to, community-based legal aid organizations throughout the nation about scams and other consumer protection problems affecting their respective communities. Recent Legal Services Collaboration events have covered topics including identity theft protection, debt collection practices, and the financial impact of COVID-19.

⁴⁴ See the list of Consumer Protection State Conversation webinars at <https://consumer.gov/statewebinars>.

⁴⁵ Since 2015, the FTC has hosted or co-hosted a series of roundtable discussions with ethnic and community media outlets, often with the participation and involvement of State Attorneys General Offices. These discussions, which are typically attended by dozens of representatives of media organizations, have served to bring together community and ethnic media outlets to highlight frauds and consumer issues, and to identify available resources, for dissemination to their communities. See the list of Ethnic Media and Community Briefings at <https://www.consumer.gov/commonground>.

for business owners, advertising professionals, attorneys, and others who need to know how established laws apply to today’s fast-moving marketplace.⁴⁶

Through regular communication with NAAG on areas of common interest and emerging trends, the FTC has strengthened its relationship with State Attorneys General throughout the country. During the COVID-19 pandemic, for example, the FTC regularly partnered with NAAG to raise awareness about pandemic-related scams and frauds, as well as the financial impact of the pandemic. Activities included radio tours, where interviews were placed with local radio outlets nationwide; several joint consumer alerts and social media graphics in English and Spanish; and a graphic on the pandemic-related shortage of baby formula. Another example of collaboration is the long-standing participation of numerous offices of State Attorneys General in National Consumer Protection Week (NCPW), a program the FTC organizes annually.⁴⁷

To strengthen its outreach and education-related opportunities with the offices of State Attorneys General and NAAG, in 2023, the FTC assigned a dedicated staff member to liaise with NAAG, facilitate communication and information sharing on law enforcement trends, and to coordinate meaningful training opportunities and other engagements. As a direct result, FTC representatives, including the Director of the FTC’s Bureau of Consumer Protection, have given presentations to, and engaged with, members at the NAAG Fall Consumer Protection Conference and NAAG’s Capital Forum.

Additional information on the FTC’s consumer education and outreach initiatives in collaboration with State Attorneys General Offices is set forth in **Appendix B** to this Report.

B. FTC Mechanisms to Facilitate Cooperation and Communication with State Attorneys General

The FTC’s work with State Attorneys General is advanced and facilitated by a number of specialized units within the FTC. These include: (1) the regional offices; (2) the Division of Consumer Response & Operations; (3) the Division of Consumer & Business Education; (4) the Office of International Affairs; and (5) the Criminal Liaison Unit.

1. Regional Offices

The FTC has eight regional offices—in Atlanta, Chicago, Cleveland, Dallas, Los Angeles, New York, San Francisco, and Seattle—which serve as the main FTC points of contact for the State Attorneys General, other state and local law enforcement, and the communities they serve.

⁴⁶ See details on the Green Lights & Red Flags: FTC Rules of the Road for Business event in Atlanta at <https://www.ftc.gov/news-events/events/2019/08/green-lights-red-flags-ftc-rules-road-business>, and in Cleveland at <https://www.ftc.gov/news-events/events/2020/10/green-lights-red-flags-ftc-rules-road-business>.

⁴⁷ See a list of NCPW partners at <https://consumer.ftc.gov/features/national-consumer-protection-week>.

The FTC’s regional offices fulfill the FTC’s consumer protection mission by bringing law enforcement actions to stop unfair, deceptive or fraudulent business practices,⁴⁸ as well as building and maintaining productive working relationships with the State Attorneys General and other state and local law enforcement.

The regional offices play a key role in receiving information from the State Attorneys General and others within their regions, as well as in disseminating information to them about FTC initiatives and resources.

The regional offices often work closely with State Attorneys General Offices in conducting law enforcement investigations and litigation. The regional offices have led many of the FTC’s multi-state sweeps, including Operation Stop Scam Calls (2023), Operation Income Illusion (2020), Operation Donate With Honor (2018), and Operation Tech Trap (2017). In addition, the Regional Offices were responsible for many of the FTC’s joint enforcement actions referenced in this Report, including the federal court actions against Blessings in No Time (2023), Roomster (2022), Harris Jewelry (2022), Associated Community Services (2021), and Next-Gen (2018). A list of FTC cases filed from 2020 through 2024 in collaboration with State Attorneys General and State and Local Law Enforcement Agencies is attached to this Report as **Appendix A**.

The regional offices have also taken the lead in organizing and hosting a number of conferences and outreach events for government and community organizations in their regions. These include the FTC’s Common Ground conferences,⁴⁹ Legal Services Collaboration meetings and listening sessions,⁵⁰ virtual Consumer Protection State Conversation webinars,⁵¹ and Ethnic Media and Community Briefings held throughout the country,⁵² which have brought together representatives from the FTC and Offices of State Attorneys General. A list that includes these and other FTC consumer education and outreach events conducted from 2020 through 2024 is attached to this Report as **Appendix B**.

2. Division of Consumer Response & Operations

The FTC’s Division of Consumer Response and Operations (DCRO) is responsible for several of the key public-facing programs that the FTC operates, and which further the FTC’s collaborative work with the states. Relevant DCRO responsibilities include:

- Managing all aspects of the **Consumer Sentinel Network**, discussed above. This includes training law enforcement agencies on how to access information on the platform and run analytics, and obtaining confidentiality and data security agreements from CSN users. DCRO seeks input from state users on Sentinel tools, and solicits their feedback on deploying new tools

⁴⁸ Three regional offices, in New York, San Francisco, and Seattle, also work to promote the agency’s competition mission.

⁴⁹ See <https://consumer.gov/content/common-ground-events-calendar> (listing past Common Ground events).

⁵⁰ See *supra* note 43 and accompanying text.

⁵¹ See <https://consumer.gov/statewebinars> (listing past Consumer Protection State Conversation webinars).

⁵² See <https://www.consumer.gov/commonground> (listing past Ethnic Media and Community Briefings).

to enhance the platform’s efficacy for investigations. DCRO also continuously works to bring in new data contributors. For example, DCRO has brought in the Federal Bureau of Investigation (FBI) Internet Crime Complaint Center (IC3) fraud complaint data into Sentinel and made it accessible to users with the requisite permissions.⁵³

- Managing the FTC’s **Office of Claims and Refunds**, which is responsible for distributing refunds obtained as a result of FTC lawsuits to consumers. In 2023, the FTC’s law enforcement actions resulted in more than \$324 million in refunds to defrauded consumers, including nearly \$138 million mailed directly by the FTC to 1.4 million people. The Office of Claims and Refunds also assists in administering consumer redress in cases brought jointly with State Attorneys General, allowing law enforcement to conserve resources and ensure that the money goes to affected consumers rather than to third-party administrative expenses.⁵⁴ Data about the FTC’s refund program is available on the FTC’s interactive dashboard,⁵⁵ including state-by-state and case-by-case breakdowns of the amount refunded to consumers. These resources provide State Attorneys General and other state partners with visibility into precisely how much redress is being provided to their residents in cases in which the Office of Claims and Refunds or settlement administrators engaged by the FTC mail redress checks.
- Managing the **National Do Not Call Registry**, which is the mechanism through which consumers can elect to avoid receiving telephone solicitations from telemarketers. The registry currently has over 250 million active telephone number registrations. The State Attorneys General, working alongside the FTC, have a long history of tackling illegal telemarketing using the Do Not Call Registry and other tools.⁵⁶ Through DCRO, the FTC ensures that state partners have full Registry access and technical support when performing their own investigations and cases.
- Managing the FTC’s **Consumer Response Center**, which handles consumer reports and inquiries through the FTC’s toll-free numbers, 877-FTC-HELP and 877-ID-THEFT, the FTC’s Internet report forms at <https://ReportFraud.FTC.gov>, and postal mail. The information from these reports is made available to state, local and federal law enforcers through the FTC’s

⁵³ The FTC also refers reports involving high dollar losses to the FBI’s IC3 Recovery Asset Team, whose stated goal is to “streamline communication with financial institutions and assist FBI field offices with the freezing of funds for victims who made transfers to domestic accounts under fraudulent pretenses.” Department of Justice Federal Bureau of Investigation, *Federal Bureau of Investigation Internet Crime Report 2022* at 9 (2022), available at https://www.ic3.gov/Media/PDF/AnnualReport/2022_IC3Report.pdf.

⁵⁴ Comment by the Attorneys General of Connecticut, Illinois, New Hampshire, Tennessee, and 25 Other States, Doc. No. FTC-2023-0038-0014, at 6.

⁵⁵ https://public.tableau.com/app/profile/federal.trade.commission/viz/Refunds_15797958402020/RefundsbyCase.

⁵⁶ See National Association of Attorneys General, *Consumer Protection 101: Robocalls*, available at <https://www.naag.org/issues/consumer-protection/consumer-protection-101/robocalls/>. See also, e.g., Press Release, FTC, *FTC, Law Enforcers Nationwide Announce Enforcement Sweep to Stem the Tide of Illegal Telemarketing Calls to U.S. Consumers* (Jul. 19, 2023), available at <https://www.ftc.gov/news-events/news/press-releases/2023/07/ftc-law-enforcers-nationwide-announce-enforcement-sweep-stem-tide-illegal-telemarketing-calls-us>, discussed *supra* Section I.A.2.a.

Consumer Sentinel Network. In addition to expanding access to non-English speaking consumers, this service provides state and local law enforcement Sentinel members with language translation so that they can easily access the information contained in consumer reports made in foreign languages.

3. Division of Consumer & Business Education

The FTC’s Division of Consumer & Business Education (DCBE) is responsible for creating consumer and business education materials and campaigns to educate consumers and businesses about their rights and responsibilities. DCBE creates print and online consumer and business education material available to the general public, all of which are in the public domain, and are made available to State Attorneys General nationwide to disseminate among their constituents. DCBE offers to provide FTC materials that the State Attorneys General Offices and others can re-brand and adapt to the needs of their own offices and constituents. In Fiscal Year 2022, more than 500 state agencies ordered approximately 70,000 consumer publications from the FTC. DCBE also participates in hundreds of outreach events—including webinars, trainings, and presentations—many in collaboration with staff from offices of State Attorneys General.

Working with national, state, and local partners, DCBE reaches a range of audiences, including older adults, ethnic media, housing organizations, small businesses, and higher education organizations. DCBE also leads the FTC’s ethnic media and other community outreach events at which State Attorneys General Offices commonly participate, as discussed in Section I.A.3 above. DCBE publishes hundreds of consumer and business alerts, many in English and Spanish, and regularly emails them to nearly 530,000 subscribers. It also manages the FTC’s bulk publication ordering website (<https://www.bulkorder.ftc.gov/>), through which an average of over 10,000 organizations a year order free material to distribute in their communities.

With the regional offices, DCBE maintains partnerships with State Attorneys General, as well as other law enforcement and consumer protection advocates who share FTC information with their constituents and communities.

4. Office of International Affairs

Protecting the public from fraud, deception, and other unlawful business practices often means crossing international borders to stop bad actors, get evidence, and compensate harmed consumers.⁵⁷ In international law enforcement matters, the FTC’s Office of International Affairs (OIA) can (1) help states obtain information and other practical assistance from foreign enforcement agencies, (2) coordinate actions among the FTC, states and foreign enforcement agencies, and (3) provide reciprocal assistance to foreign enforcement agencies through specialized international arrangements and the

⁵⁷ See generally *The U.S. SAFE WEB Act and the FTC’s Fight Against Cross-Border Fraud* (October 20, 2023), available at https://www.ftc.gov/system/files/ftc_gov/pdf/ftc_safe_web_congressional_report_oct_2023.pdf.

Undertaking Spam, Spyware, And Fraud Enforcement with Enforcers beyond Borders Act of 2006 (U.S. SAFE WEB Act).⁵⁸

Collaborations with both state and foreign partners enable the FTC to leverage its resources to vigorously pursue enforcement actions that harm the public, including harms that originate outside of the United States. For example, in 2022, in connection with the *Next-Gen* matter described below, the FTC partnered with enforcers in nearly fifty countries to provide refunds to injured consumers around the world, with the U.K. National Trading Standards Scams Team helping to deliver checks to consumers in the U.K.⁵⁹ With its partners' assistance, the FTC sent payments totaling nearly \$25 million to consumers in the United States and abroad.⁶⁰

State Attorneys General have cooperated with the FTC on important international efforts, with states often joining FTC litigations or bringing parallel proceedings, including those discussed below:

- The *AshleyMadison.com* matter involved a Canada-based dating website which in 2015 suffered a massive data breach that affected consumers in nearly 50 countries.⁶¹ The FTC, working with a coalition of 13 states – Alaska, Arkansas, Hawaii, Louisiana, Maryland, Mississippi, Nebraska, New York, North Dakota, Oregon, Rhode Island, Tennessee, and Vermont – and the District of Columbia, obtained a settlement with the defendants for allegedly deceiving consumers and failing to protect 36 million users' account and profile information. Through OIA, the FTC shared information with and received assistance from foreign law enforcement partners in Canada and Australia, who also reached their own settlements with the company. This state, federal, and international collaboration resulted in a strong outcome for consumers, for which the FTC and foreign law enforcement partners received a global data protection award.⁶²

⁵⁸ Pub. L. No. 109-455, 120 Stat. 3372 (2006) (codified in scattered sections of 15 U.S.C. and 12 U.S.C. § 3412(e)), available at <http://uscode.house.gov/statutes/pl/109/455.pdf>. The U.S. SAFE WEB Act authorizes the FTC, in appropriate circumstances, to share confidential and compelled information with foreign enforcers and provide investigative assistance on their behalf, including by issuing civil investigative demands. U.S. SAFE WEB Act Sections 4(a) – (b) and 6(a) codified in Sections 6(f) and 21(b)(6) of the FTC Act, 15 U.S.C. §§ 46(f) and (j), and 57b2(b)(6)).

⁵⁹ See Press Release, FTC, *U.S. Federal Trade Commission Returning Almost \$25 Million to Consumers Worldwide Who Were Defrauded by Next-Gen Sweepstakes Scheme* (July 19, 2022), available at <https://www.ftc.gov/news-events/news/press-releases/2022/07/us-federal-trade-commission-returning-almost-25-million-consumers-worldwide-who-were-defrauded-next>.

⁶⁰ *Id.*

⁶¹ See Press Release, FTC, *Operators of AshleyMadison.com Settle FTC, State Charges Resulting From 2015 Data Breach that Exposed 36 Million Users' Profile Information* (December 14, 2016), available at <https://www.ftc.gov/news-events/news/press-releases/2016/12/operators-ashleymadisoncom-settle-ftc-state-charges-resulting-2015-data-breach-exposed-36-million>. The settlement required the defendants to implement a comprehensive data-security program, including third-party assessments. In addition, the operators paid a total of \$1.6 million to settle FTC and state actions.

⁶² See Press Release, FTC, *FTC Earns Prestigious International Award for AshleyMadison.com Data Breach Investigation* (September 27, 2017), available at <https://www.ftc.gov/news-events/news/press-releases/2017/09/ftc-earns-prestigious-international-award-ashleymadisoncom-data-breach-investigation>.

- The *Next-Gen* matter involved an international prize-promotion scheme. The FTC and the State of Missouri charged two men and their sweepstakes operation with bilking tens of millions of dollars from people throughout the United States and other countries.⁶³ The Attorney General's Offices of Kansas and Utah provided assistance along with the U.S. Postal Inspection Service, and the Better Business Bureau of Greater Kansas City. Through OIA, the FTC also received assistance from the Canadian Anti-Fraud Centre and relied on the U.S. SAFE WEB Act to facilitate cooperation with the U.K. National Trading Standards Scams Team. Under the terms of the settlement, the operators of the scam forfeited a record \$30 million in cash and assets and were permanently banned from the prize promotion business.⁶⁴
- In the FTC's *Operation Tech Trap* sweep, the FTC, along with federal, state, and international law enforcement partners, pursued a nationwide and international crackdown on tech support scams that tricked consumers into believing their computers were infected with viruses and malware, and then charged them hundreds of dollars for unnecessary repairs.⁶⁵ The operation included 29 actions with state, federal, and international partners including criminal authorities from India that arrested tech support scammers, and state partners from Alabama, Connecticut, Florida, Ohio and Pennsylvania. Working with its state partners, the FTC announced settlements that included bans from marketing technical support services and payments of millions of dollars.⁶⁶

⁶³ See Press Release, FTC, *FTC Challenges Schemes That Target or Affect Senior Citizens* (February 22, 2018), available at <https://www.ftc.gov/news-events/news/press-releases/2018/02/ftc-challenges-schemes-target-or-affect-senior-citizens>.

⁶⁴ See Press Release, FTC, *Operators of Sweepstakes Scam Will Forfeit \$30 Million to Settle FTC Charges* (March 7, 2019), available at <https://www.ftc.gov/news-events/news/press-releases/2019/03/operators-sweepstakes-scam-will-forfeit-30-million-settle-ftc-charges>.

⁶⁵ See Press Release, FTC, *FTC and Federal, State and International Partners Announce Major Crackdown on Tech Support Scams* (May 12, 2017), available at <https://www.ftc.gov/news-events/news/press-releases/2017/05/ftc-federal-state-international-partners-announce-major-crackdown-tech-support-scams>.

⁶⁶ See also, e.g., Press Release, FTC, *FTC and Ohio Stop Rogue Payment Processor and a Credit Card Interest-Reduction Telemarketing Scheme that Allegedly Worked Together to Scam Consumers* (July 29, 2019), available at <https://www.ftc.gov/news-events/news/press-releases/2019/07/ftc-ohio-stop-rogue-payment-processor-credit-card-interest-reduction-telemarketing-scheme-allegedly> (FTC teams up with State of Ohio to stop schemes bilking millions from financially distressed people; defendants include Canada entities); Press Release, FTC, *FTC and Florida Halt Internet 'Yellow Pages' Scammers* (July 17, 2014), available at <https://www.ftc.gov/news-events/news/press-releases/2014/07/ftc-florida-halt-internet-yellow-pages-scammers> (partnering with Florida to halt Montreal-based "yellow pages" directory scams targeting small businesses, churches, non-profits and local government agencies); and Press Release, FTC, *FTC and Dozens of Law Enforcement Partners Halt Travel and Timeshare Resale Scams in Multinational Effort* (June 6, 2013), available at <https://www.ftc.gov/news-events/news/press-releases/2013/06/ftc-dozens-law-enforcement-partners-halt-travel-timeshare-resale-scams-multinational-effort> (federal and state, criminal and civil – joined forces to combat Florida-based fraud schemes victimizing timeshare unit owners across the country. These victims, many of them elderly or in financial distress, looked to sell their units to help make ends meet or pay other bills, paid hefty upfront fees but did not receive the promised services to sell their timeshares).

5. Criminal Liaison Unit

The FTC has a strong tradition of collaborating with law enforcement at all levels when FTC investigations uncover possible criminal conduct prohibited by federal or state law. These relationships include, but are not limited to, working with State Attorneys General and local District Attorneys' and other offices, at the state and local level, and with the U.S. Department of Justice, the Federal Bureau of Investigation, the U.S. Postal Inspection Service, and other federal criminal law enforcement authorities. In November 2021, the FTC reinforced its commitment to cooperating with criminal authorities by issuing a Policy Statement Regarding Criminal Referral and Partnership Process.⁶⁷ In this Policy Statement, the FTC committed to: (1) promptly referring criminal law violations to criminal enforcers, regardless of whether these violations involved smaller firms or larger corporations; (2) convening regular meetings with federal, state, and local criminal authorities to facilitate coordination among these partners across all enforcement areas; (3) offering training to all law enforcement partners to effectively utilize Consumer Sentinel, a source of key leads for potential criminal investigations; and (4) publicly reporting on the Commission's criminal referral efforts at regular intervals to strengthen public understanding of this important work.⁶⁸

The FTC's Criminal Liaison Unit (CLU) encourages criminal prosecution of those responsible for consumer fraud by identifying fraudulent activities, bringing them to the attention of criminal law enforcement authorities. CLU works closely with prosecutors, criminal investigative agents, and FTC staff to ensure the smooth progress of parallel prosecutions. In addition to identifying and referring specific fraudulent activity, CLU also educates criminal law enforcement authorities about the FTC and its mission, and provides legal and practical advice to FTC staff.

Over the five years preceding this Report, FTC staff actively worked on 772 new formal requests for cooperation from our criminal law enforcement partners, including 353 federal, 373 state, and 46 local requests. Prosecutors relied on FTC information and support to charge 113 new defendants and obtained 153 new pleas or convictions. During this period, 116 defendants received prison sentences totaling more than 764 years.

II. Recommended Best Practices to Enhance Collaboration

The collaborative work of the Commission and State Attorneys General is robust, and has developed over the course of a decades-long partnership. The Commission continues to seek additional opportunities to enhance this collaborative work, and has considered the public comments received and

⁶⁷ Press Release, FTC, *FTC to Expand Criminal Referral Program to Stop and Deter Corporate Crime* (Nov. 18, 2021), <https://www.ftc.gov/news-events/news/press-releases/2021/11/ftc-expand-criminal-referral-program-stop-deter-corporate-crime>.

⁶⁸ *Id.*; see FTC, *Commission Statement Regarding Criminal Referral and Partnership Process*, Commission File No. P094207 (Nov. 18, 2021), at 7, https://www.ftc.gov/system/files/documents/public_statements/1598439/commission_statement_regarding_criminal_referrals_and_partnership_process_updated_p094207.pdf.

the directives of the Collaboration Act, which requires the Commission to “[r]ecommend[] best practices to enhance collaboration between the Commission and State Attorneys General with respect to preventing, publicizing, and penalizing fraud and scams.”⁶⁹ In so doing, the Commission is directed to examine “[h]ow resources should be dedicated to best advance such collaboration and consumer protection” and “[t]he accountability mechanisms that should be implemented to promote collaboration and consumer protection”;⁷⁰ and to report “[q]uantifiable metrics by which enhanced collaboration can be measured.”⁷¹

The Commission recommends building upon its existing collaborative efforts with State Attorneys General in three areas: (1) sharing information related to consumer protection investigations and consumer education matters; (2) continuing to cooperate and coordinate in bringing law enforcement actions; and (3) sharing expertise and technical resources.

A. Maintain and Enhance Strong Information-Sharing Practices Between the FTC and State Attorneys General

Candid information exchange between the FTC and State Attorneys General has been a cornerstone of their partnership in bringing cases and investigations as well as in informing consumers.⁷² As a number of commenters have noted, the Consumer Sentinel Network remains a crucial vehicle for law enforcement to exchange information about emerging frauds and scams, and contact information for the consumers reporting these issues. Some commenters suggested raising greater awareness of the Consumer Sentinel Network in the law enforcement community as a possible area for improvement. Former State Assistant Attorneys General commented that “while many enforcers in the consumer protection arena are aware of the tool, there are other enforcers who could benefit but may be unaware of its existence or contents.”⁷³ Similarly, commenting District Attorneys stated that “additional training and familiarization with Consumer Sentinel and with similar state systems should be a priority, as some state and local officials remain unaware of these systems or do not fully utilize them.”⁷⁴

⁶⁹ Pub. L. No. 117-187, § 2(b)(2), at 136 Stat. 2202.

⁷⁰ *Id.* § 2(a)(2)(C)–(D), at 136 Stat. 2201.

⁷¹ *Id.* § 2(b)(3), at 136 Stat. 2202.

⁷² Some commenters urge the sharing of more granular Sentinel consumer report data with private industry. However, the FTC lacks legal authority to share these data, many of which contain consumers’ personally identifiable information, with non-law enforcement parties barring agreed-upon exceptions, such as Freedom of Information Act requests. *See* Section 6 (f) of the Federal Trade Commission Act, 15 U.S.C. § 46(f); Commission Rules of Practice 4.6, 4.10, and 4.11(c) and (d), 16 C.F.R. §§ 4.6, 4.10, and 4.11(c)–(d); and the Privacy Act of 1974, as amended, 5 U.S.C. § 552a.

⁷³ Comment by former State Assistant Attorneys General Paul Singer, Abigail Stempson, and Beth Chun of Kelley Drye & Warren LLP, Doc. No. FTC-2023-0038-0005, at 6.

⁷⁴ Comment by the District Attorneys of the Counties of Los Angeles and San Diego Counties, California, at 6 (on file with the FTC).

These comments indicate that the Commission is on the right track and should continue to work with states to expand their participation in the Consumer Sentinel Network and ensure that they have the training to use it effectively. The FTC will continue to encourage states that currently are not data contributors to the Consumer Sentinel Network to share, to the extent practicable, their consumer complaint data. This practice would not only enrich the database for all users, it would make it possible for individual states to deploy the analytical tools in Sentinel to their own data. The Commission welcomes any state or local law enforcement interested in receiving additional Sentinel training to reach out to the Consumer Sentinel program managers or the authors of this report for further information.

Accountability Mechanisms and Quantifiable Metrics: Pursuant to its Strategic Plan, the FTC tracks the percentage of the FTC’s consumer protection law enforcement actions that target the subject of consumer reports in the Consumer Sentinel Network.⁷⁵ In addition to continuing to track this metric, the FTC should continue to publicly report on data and trends concerning consumer reports stored in the Consumer Sentinel Network, and should aim to raise awareness about how to join and effectively use this platform among State Attorneys General and other law enforcement partners.⁷⁶

B. Cooperate and Coordinate Enforcement Action with Attorneys General and Other State and Local Agencies

The FTC has historically dedicated many of its resources to prosecuting law enforcement actions against wrongdoers in federal district court, including by bringing joint or parallel enforcement actions with State Attorneys General and other state and local law enforcers.

The importance of this collaborative work has grown since the Supreme Court’s 2021 decision in *AMG Capital Management v. FTC*,⁷⁷ which eliminated the FTC’s ability to obtain equitable monetary relief for consumers pursuant to Section 13(b) of the FTC Act.

Accountability Mechanisms and Quantifiable Metrics: The FTC tracks the number of investigations and cases in which it collaborates with State Attorneys General and other law enforcement agencies.⁷⁸

⁷⁵ See FTC, *Strategic Plan for Fiscal Years 2022 – 2026* (2022), at 7, available at https://www.ftc.gov/system/files/ftc_gov/pdf/fy-2022-2026-ftc-strategic-plan.pdf (stating that the FTC tracks, as “Performance Metric 1.1.6,” the “Percentage of the FTC’s consumer protection law enforcement actions that targeted the subject of consumer reports in the FTC’s Consumer Sentinel Network”).

⁷⁶ For example, in the FTC’s Annual Performance Report for Fiscal Year 2022 and Annual Performance Plan for Fiscal Years 2023 to 2024, available at https://www.ftc.gov/system/files/ftc_gov/pdf/p859900fy22apr_fy23-24app.pdf, the agency reported on the “number of outreach events,” including those targeting diverse audiences. See pp. 20, 29.

⁷⁷ 141 S. Ct. 1341 (2021).

⁷⁸ See FTC, *Annual Performance Report for Fiscal Year 2022 and Annual Performance Plan for Fiscal Years 2023 to 2024*, available at https://www.ftc.gov/system/files/ftc_gov/pdf/p859900fy22apr_fy23-24app.pdf, at 25 (discussing metric of “[n]umber of investigations or cases in which the FTC and other U.S. federal, state, and local government agencies shared evidence or information that contributed to FTC law enforcement actions or enhanced consumer protection”); see also *id.* at p. 50 (describing how in the antitrust domain, the FTC publicly reports the “[p]ercentage of full investigations in which the

The FTC should continue to report cases that it has filed in collaboration with State Attorneys General and other law enforcement agencies, and the outcomes of these cases. **Appendix A** to this Report sets forth additional information on recent joint law enforcement actions between the FTC and State Attorneys General. In addition, the FTC tracks the number of information sharing requests that have been granted to other law enforcement agencies. In the coming years, the FTC will additionally track in the consumer protection metric the number of law enforcement partners, including State Attorneys General, who have participated in law enforcement sweeps in partnership with the FTC.

C. Expand the Sharing of Expertise and Technical Resources Between the FTC and State Attorneys General

The FTC has expertise and technical resources that may aid State Attorneys General in carrying out their respective consumer protection missions. These include the FTC’s Bureau of Economics, which houses skilled consumer protection and antitrust economists, its Office of Technology, which provides subject-matter experts in numerous emerging specialized fields, and its Office of International Affairs, which cooperates routinely with foreign law enforcement on crucial consumer protection matters.

The FTC routinely shares its expertise and resources in the context of joint investigations or enforcement actions. For example, the commenting State Attorneys General highlight the *DISH Network* litigation⁷⁹ as a matter in which expert personnel from the FTC’s Bureau of Economics aided State partners in analyzing complex facts and data, leading ultimately to a settlement of over \$200 million and important conduct relief.⁸⁰ The FTC also benefits from the detailed local knowledge and community ties of State Attorneys General, both when investigating potential law violations and when conducting community education and outreach.

In addition to continuing to share expertise and resources in these established settings, the FTC will further explore other contexts in which it may be able to provide resources to, and seek input from, the States. State legislatures and policymakers have requested input from the FTC on a variety of consumer protection matters, including junk fees, the right to repair, and legislation to prohibit unfair practices affecting consumers, in response to which FTC officials have provided information and testimony.⁸¹

FTC and other U.S. federal, state, and local government agencies shared evidence or information that contributed to FTC law enforcement”).

⁷⁹ *United States et al. v. DISH Network, L.L.C.*, 256 F. Supp. 3d 810 (C.D. Ill. 2017), *aff’d in relevant part, United States v. Dish Network L.L.C.*, 954 F.3d 970 (7th Cir. 2020).

⁸⁰ Comment by the Attorneys General of Connecticut, Illinois, New Hampshire, Tennessee, and 25 Other States, at 2.

⁸¹ *See, e.g.*, Letter from Samuel Levine, Director, Bureau of Consumer Protection, to Minnesota Legislature on Junk Fees (Mar. 8, 2024), https://www.ftc.gov/system/files/ftc_gov/pdf/samuel-levine-ltr-minn_.pdf; Letter from Samuel Levine to Illinois Legislature on Junk Fees (Mar. 8, 2024), https://www.ftc.gov/system/files/ftc_gov/pdf/samuel-levine-ltr-il_.pdf; Letter from Samuel Levine to Virginia Legislature on Junk Fees (Feb. 29, 2024), https://www.ftc.gov/system/files/ftc_gov/pdf/samuel-levine-letter-virginia-legislature.pdf; Letter from Samuel Levine to New York State Senate on Junk Fees (Feb. 29, 2024), https://www.ftc.gov/system/files/ftc_gov/pdf/samuel-levine-letter-new-york.pdf; Letter from Samuel Levine and Hannah Garden-Monheit, Director, Office of Policy Planning, to Oregon State

The FTC makes its pertinent correspondence to government bodies regarding consumer protection and competition publicly available at <https://www.ftc.gov/legal-library/browse/advocacy-filings>.

Similarly, the FTC values the feedback of State Attorneys General and state and local organizations on a number of matters on which it seeks public comment, including proposed rules and requests for information. Among other matters, State Attorneys General, NAAG, and statewide consumer protection law enforcement authorities have submitted comments on:

- The rulemaking that resulted in the FTC’s Trade Regulation Rule on Impersonation of Government and Businesses;⁸²
- The rulemaking that resulted in the FTC’s Combating Auto Retail Scams Trade Regulation Rule (CARS Rule) concerning the sale, financing, and leasing of motor vehicles by motor vehicle dealers;⁸³
- The FTC’s advance notice of proposed rulemaking concerning commercial surveillance and data security;⁸⁴
- The FTC’s proposed amendments to the Commission’s Negative Option Rule, making it easier for people to “click to cancel” when they want to stop deliveries or subscriptions;⁸⁵

Legislature on Right to Repair (Feb. 26, 2024), https://www.ftc.gov/system/files/ftc_gov/pdf/24.02.26-SignedLetterreORSB1596A.pdf; Correspondence with New York Governor, State Senate, and State Assembly on Unfairness Legislation (Feb. 26, 2024), <https://www.ftc.gov/legal-library/browse/advocacy-filings/ny-unfairness-letters>; FTC Testifies Before California State Senate on Right to Repair (Apr. 11, 2023), <https://www.ftc.gov/news-events/news/press-releases/2023/04/ftc-testifies-california-state-senate-right-repair>.

⁸² See Comment of the National Association of Attorneys General, Impersonation ANPR, FTC File No. R207000 (Feb. 22, 2022).

⁸³ See Comments of 18 State AGs in Support of Implementation of the Motor Vehicle Dealers Trade Regulation Rule, FTC File No. P204800 (Sept. 15, 2022), available at <https://www.regulations.gov/comment/FTC-2022-0046-8062>. The Final Rule is available at <https://www.federalregister.gov/documents/2024/01/04/2023-27997/combating-auto-retail-scams-trade-regulation-rule>. The effective date of the CARS Rule is postponed pending judicial review. See 89 Fed. Reg. 3267 (Feb. 22, 2024), <https://www.federalregister.gov/documents/2024/02/22/2024-03559/combating-auto-retail-scams-trade-regulation-rule>.

⁸⁴ See Comment of the Massachusetts Office of the Attorney General and 32 Other Attorneys General Offices, Commercial Surveillance ANPR, FTC File No. R111004 (Nov. 16, 2022), available at <https://www.regulations.gov/comment/FTC-2022-0053-0764>; Comment of California Attorney General Rob Bonta, Commercial Surveillance ANPR, FTC File No. R111004 (Nov. 27, 2022), available at <https://www.regulations.gov/comment/FTC-2022-0053-0999>.

⁸⁵ See Comment of 26 State Attorneys General, Negative Option Rule, FTC Project No. P064202 (Apr. 24, 2023), available at <https://www.regulations.gov/comment/FTC-2023-0033-0886>.

- The FTC’s advance notice of proposed rulemaking concerning deceptive marketing using earnings claims;⁸⁶
- The FTC’s request for comment as part of its regulatory review of the Funeral Industry Practices Rule;⁸⁷ and
- The FTC’s request for comment as part of its regulatory review of the Telemarketing Sales Rule.⁸⁸

The FTC also regularly submits amicus briefs advocating positions in support of State Attorneys General and other parties bringing claims under federal and state consumer protection law.⁸⁹ For example, in a recent matter, the FTC submitted an amicus brief jointly with the North Carolina Department of Justice and the Consumer Financial Protection Bureau, addressing the implications of a consumer reporting agency’s argument that Section 230 of the Communications Decency Act shielded it from claims that it violated the Fair Credit Reporting Act (FCRA).⁹⁰ In another recent matter, the Court of Appeals for the Ninth Circuit requested that the FTC weigh in on whether the Children’s Online Privacy Protection Act (COPPA), which is enforced by the FTC, preempts stand-alone state causes of action involving data-collection activities: the FTC advocated that COPPA does not preempt state privacy laws that are consistent with COPPA.⁹¹ The FTC continues to seek new avenues for collaboration with State Attorneys General Offices and other interested state and local authorities outside of traditional joint law enforcement matters.

⁸⁶ See Comment of the Attorneys General of Illinois, California, Colorado, Connecticut, Delaware, Hawaii, Idaho, Iowa, Maine, Maryland, Massachusetts, Michigan, Minnesota, Nevada, New Jersey, New Mexico, New York, North Carolina, Oregon, Pennsylvania, Rhode Island, Vermont, Washington, and Wisconsin, and the Hawaii Office of Consumer Protection, Earnings Claims ANPR, FTC File No. R111003 (May 10, 2022), available at <https://www.regulations.gov/comment/FTC-2022-0020-1345>.

⁸⁷ See Comment of the Attorneys General of the District of Columbia, Arizona, California, Colorado, Connecticut, Delaware, Hawaii, Iowa, Maine, Maryland, Michigan, Minnesota, Nevada, New Jersey, New Mexico, New York, North Carolina, Oregon, Pennsylvania, Rhode Island, Virginia, and Wisconsin, Funeral Rule Regulatory Review, 16 CFR part 453, FTC Project No. P034410 (Apr. 22, 2020), available at <https://www.regulations.gov/comment/FTC-2020-0014-0538>.

⁸⁸ See Comment of the National Association of Attorneys General on Behalf of 39 State Attorneys General, Telemarketing Sales Rule ANPR, FTC Project No. R411001 (Aug. 2, 2022), available at <https://www.regulations.gov/comment/FTC-2022-0033-0016>.

⁸⁹ See generally FTC Legal Library: Amicus Briefs, <https://www.ftc.gov/legal-library/browse/amicus-briefs>.

⁹⁰ *Henderson v. The Source for Public Data*, Case No. 21-1678, Brief for Amici Curiae Federal Trade Commission, Consumer Financial Protection Bureau, and North Carolina Supporting Reversal (4th Cir. Oct. 14, 2021), available at https://www.ftc.gov/system/files/documents/amicus_briefs/henderson-v-source-public-data-lp-et-al/p072104cfpbamicusbrief.pdf.

⁹¹ *FTC Files Brief in Jones v. Google in Support of Appeals Court Ruling that COPPA Does Not Preempt Plaintiffs’ State Privacy Claims* (May 22, 2023), <https://www.ftc.gov/news-events/news/press-releases/2023/05/ftc-files-brief-jones-v-google-support-appeals-court-ruling-coppa-does-not-preempt-plaintiffs-state>.

Further, the FTC is working to increase communication and collaboration between the FTC, State Attorneys General and law enforcement in other countries. The FTC participates in numerous international enforcement networks and partnerships, including the International Consumer Protection and Enforcement Network (ICPEN),⁹² Global Privacy Enforcement Network (GPEN),⁹³ Unsolicited Communications Enforcement Network (UCENet),⁹⁴ Global Anti-Fraud Enforcement Network, and Canadian regional partnerships. The FTC can facilitate cooperation between State Attorneys General and foreign enforcers through these networks as well as through international arrangements⁹⁵ such as the FTC’s memorandum of understanding with the U.K. Competition and Markets Authority, and the sharing of information and offering of investigative assistance through the U.S. SAFE WEB Act. In addition, as the 2024 – 2025 President of ICPEN, the FTC will invite state partners to participate directly with foreign counterparts in the sharing of best practices, including at events in Washington, D.C.

Accountability Mechanisms and Quantifiable Metrics: The FTC will continue to publicize its advocacy and amicus work in its yearly public performance and budget reports. The FTC will also continue to explore effective ways to share expertise and resources with state and local partners.

III. Legislative Recommendations to Enhance Collaboration Efforts

A. Restore the FTC’s Section 13(b) Authority to Seek Equitable Monetary Relief for Defrauded Consumers

In April 2021, the Supreme Court in *AMG Capital Management v. FTC* overturned four decades of circuit court precedent and eliminated the FTC’s authority under Section 13(b) of the FTC Act to obtain court orders requiring wrongdoers to pay equitable monetary relief.⁹⁶ Prior to the *AMG* decision, the Commission used equitable monetary relief obtained under Section 13(b) to provide billions of dollars in

⁹² International Consumer Protection and Enforcement Network, available at <https://icpen.org/>. ICPEN is composed of consumer protection authorities from over 70 countries, representing some 5 billion consumers.

⁹³ Global Privacy Enforcement Network, available at www.privacyenforcement.net. GPEN is an informal network of privacy enforcement authorities from around the world. Authorities from more than 50 countries participate in GPEN, including subnational authorities in Australia, Canada, and the United States. This includes the Attorney General for California and the California Privacy Protection Agency.

⁹⁴ Unsolicited Communications Enforcement Network, available at <https://www.ucenet.org/>. UCENet is a global network of agencies and organizations engaged in combatting illegal unsolicited communications.

⁹⁵ See International Cooperation Agreements, available at <https://www.ftc.gov/policy/international/international-cooperation-agreements>.

⁹⁶ *AMG Cap. Mgmt., LLC v. FTC*, 141 S. Ct. 1341, 1352 (2021).

refunds to harmed consumers.⁹⁷ The *AMG* decision has presented significant obstacles to the FTC’s ability to execute its consumer protection mission, and the FTC has urged Congress to enact a legislative fix that would restore the FTC’s ability to seek and obtain court orders under Section 13(b) requiring wrongdoers to pay refunds to harmed consumers or disgorge the unjust gains they earned by breaking the law.⁹⁸

The Commission reiterates its request that Congress restore district courts’ Section 13(b) authority to order defendants to pay refunds or disgorge their unjust gains.

Public comments underscore the critical need for prompt congressional action on Section 13(b). For example, the National Consumer Law Center and several other consumer advocacy organizations expressed concern that the FTC’s alternative statutory tools for obtaining consumer redress are limited in scope, and less flexible to address the growing variety of unfair or deceptive conduct facing consumers today.⁹⁹ Truth in Advertising opined that the *AMG* decision disrupted a number of pending cases and investigations, and the lack of a legislative fix in the more than two years following the decision may have emboldened wrongdoers who are now less fearful that they will be ordered to return money they unlawfully took from harmed consumers.¹⁰⁰

The *AMG* decision has had negative collateral effects beyond the direct impact on the FTC’s consumer protection work. Current State Attorneys General highlight in their comment three negative consequences that impact the States. First, without the FTC’s ability to obtain nationwide redress under Section 13(b), some consumers harmed by unlawful or deceptive acts or practices may be unable to receive refunds, based solely on where they live.¹⁰¹ This is because states must fill the gaps in the absence of the FTC, but not all states have the legal authority to provide nationwide redress, and what is

⁹⁷ See FTC, *Office of Claims and Refunds Annual Report 2017*, at 1 & n. 2, available at <https://www.ftc.gov/system/files/documents/reports/bureau-consumer-protection-office-claims-refunds-annual-report-2017-consumer-refunds-effected-july/redressreportformattedforweb122117.pdf> (stating that between July 2016 and June 2017 alone, “FTC cases resulted in more than \$6.4 billion in refunds for consumers,” \$6 billion of which was attributable to a landmark settlement with Volkswagen).

⁹⁸ See Prepared Statement of the Federal Trade Commission, Hearing on Oversight of the Federal Trade Commission Before the Comm. on the Judiciary, United States House of Representatives (July 13, 2023), at 37, available at https://www.ftc.gov/system/files/ftc_gov/pdf/p210100housejudiciarytestimony07132023.pdf; Prepared Statement of the Federal Trade Commission Before the United States Senate Committee on the Judiciary, Subcommittee on Antitrust, Competition Policy and Consumer Rights, “Oversight of the Enforcement of the Antitrust Laws” (Sept. 20, 2022), at 12, available at https://www.ftc.gov/system/files/ftc_gov/pdf/P210100SenateAntitrustTestimony09202022.pdf; Prepared Statement of the Federal Trade Commission: The Urgent Need To Fix Section 13(b) of the FTC Act, Before the Committee on Energy and Commerce, Subcommittee on Consumer Protection and Commerce, (Apr. 27, 2021), available at https://www.ftc.gov/system/files/documents/public_statements/1589400/p180500house13btestimony04272021.pdf.

⁹⁹ Comment of National Consumer Law Center *et al.*, Doc. No. FTC-2023-0038-0013, at 8.

¹⁰⁰ Comment by Truth in Advertising, Doc. No. FTC-2023-0038-0006, at 7–8.

¹⁰¹ Comment by the Attorneys General of Connecticut, Illinois, New Hampshire, Tennessee, and 25 Other States, Doc. No. FTC-2023-0038-0014, at 3.

left is a patchwork of state laws. Restoring the FTC’s Section 13(b) authority would restore uniformity, and with it, stronger consumer protections.

Second, the FTC’s loss of Section 13(b) authority to obtain equitable monetary relief has the effect of diverting scarce government resources, and making law enforcement less efficient. The FTC and State Attorneys General can collectively do more consumer protection work when they are able to “focus enforcement efforts on similar but different targets, thereby maximizing enforcement resources and protecting the maximum number of consumers.”¹⁰² But the *AMG* decision has had the opposite effect. In some cases, the FTC must instead combine its resources with a State Attorney General in order to get court orders requiring wrongdoers to provide redress or disgorge their unjust gains.

Third, many State Attorneys General Offices do not have full-time employees responsible for distributing redress.¹⁰³ In contrast, the FTC has a full time, dedicated Office of Claims and Refunds, which has decades of experience and expertise distributing refunds to harmed consumers. For example, in the 5 years pre-dating the *AMG* decision, the FTC’s Office of Claims and Refunds returned over a billion dollars to consumers.¹⁰⁴ But in cases brought jointly by the FTC and State Attorneys General, the FTC’s Office of Claims and Refunds cannot distribute funds that are solely payable to a state partner. In such cases, states must pay third parties to send refunds to consumers, which reduces the amount of money that can ultimately be distributed.¹⁰⁵

Thus, the *AMG* decision not only affects the FTC itself, but also has downstream effects that interfere with the agency’s collaboration with State Attorneys General and with the work of the offices of some State Attorneys General themselves, and which ultimately delay or entirely prevent some defrauded consumers from recovering money that was illegally taken from them.

The Commission respectfully reiterates its call for congressional action to restore the Commission’s authority under Section 13(b) of the FTC Act to provide monetary redress to consumers.

B. Enhance Collaboration and Conserve Federal Resources by Providing the FTC with Independent Authority to Seek Civil Penalties

The FTC respectfully requests that Congress provide the FTC with independent authority to file lawsuits seeking civil penalties from wrongdoers. This would increase the number of federal law enforcers performing this work, and would allow the FTC and the United States Department of Justice (DOJ) to

¹⁰² *Id.*

¹⁰³ *Id.*

¹⁰⁴ 2020 Annual FTC Report on Refunds to Consumers, at 6 https://www.ftc.gov/system/files/ftc_gov/pdf/2020%20Redress%20Report%20Final.pdf (stating that between fiscal years 2016 and 2020, the FTC “returned over \$1.1 billion to consumers,” a figure that does not include the Volkswagen settlement refunds referenced in footnote 97, *supra*).

¹⁰⁵ *Id.*

allocate scarce resources more efficiently. In turn, this would enhance the FTC's ability to conduct joint and parallel law enforcement investigations or actions alongside State Attorneys General by reducing delay and uncertainty.

Under existing law, before the FTC can file a case in federal court to seek civil penalties, the FTC must first provide the Attorney General of the United States with written notification, and consult with DOJ staff about whether the case should be prosecuted by the FTC or DOJ.¹⁰⁶ DOJ has 45 days to consider whether to prosecute the case in the name of the United States.¹⁰⁷ If DOJ declines to prosecute the case or otherwise fails to act within 45 days of the FTC's referral, the FTC may file the case. The statute mandates that this consultation between the FTC and DOJ occur in all cases in which the FTC is seeking civil penalties, even those cases where defendants have already agreed to enter into a settlement with the FTC.

The statutory requirement that the FTC refer civil penalty actions to DOJ comes with real costs for law enforcement and collaboration with State Attorneys General and other authorities.

The existing requirement that the FTC refer civil penalty cases to DOJ provides no benefits to consumers or the marketplace.¹⁰⁸ Yet it taxes the resources of both agencies, delays cases, and has the potential to disrupt coordinated investigations between the FTC and State Attorneys General. In a recent Congressional hearing on proposed legislation to provide the FTC with independent civil penalty litigating authority, David Vladeck, former Director of the FTC's Bureau of Consumer Protection, testified that the current system creates "an incredible waste of resources on both the FTC's part and the Department of Justice's part."¹⁰⁹ This is because, after FTC staff has investigated a case and developed the factual and legal basis to recommend enforcement action, sometimes working in parallel with a State Attorney General's Office over many months, DOJ staff must expend time and resources to review the entire case anew, and the FTC must similarly expend time and resources to bring DOJ up to speed on the investigation. This time and these resources are scarce, and could be much better spent by each agency on other consumer protection enforcement actions.

The mandatory civil penalty referral process also impacts the FTC's ability to collaborate with State Attorneys General on law enforcement actions. If a joint investigation gives rise to a claim for civil penalties, State Attorneys General must at a minimum wait for the federal referral process to play out in order to file a joint action with the FTC or DOJ. This presents State Attorneys General with a difficult

¹⁰⁶ See 15 U.S.C. § 56(a)(1).

¹⁰⁷ 15 U.S.C. § 56(a)(1)(B).

¹⁰⁸ Granting independent civil penalty litigating authority to the FTC would not, for instance, pose any heightened concern of government abuse or overreach. As in other government enforcement actions filed in federal court, defendants would be entitled to substantive and procedural protections, including independent judicial review of the FTC's claims, and the assessment of evidence by a neutral factfinder.

¹⁰⁹ Transforming the FTC: Legislation to Modernize Consumer Protection, Hearing Before the Subcomm. On Consumer Protection and Commerce of the H. Comm. on Energy and Commerce, 117th Cong. (Jul. 28, 2021), at 151 (statement of Prof. David Vladeck), available at <https://www.congress.gov/117/meeting/house/113972/documents/HHRG-117-IF17-Transcript-20210728.pdf>.

choice between going it alone and forgoing the benefits of a coordinated federal-state case,¹¹⁰ or delaying filing, often by an additional 45 days or more, in order to obtain those benefits. This delay may be prolonged even further in cases where DOJ ultimately accepts the referral, and so State Attorneys General Office staff who have worked alongside an FTC team over the course of an investigation must adapt to working with a new set of co-counsel, who are likely less familiar with the background of the case, at the critical juncture when the case is being filed.

This procedural red tape is unnecessary, and once again, it is consumers who pay the price. FTC and DOJ staff must duplicate efforts, delaying the filing of cases and expending scarce time and resources that could be used on other cases. When cases seek both civil penalties and injunctive prohibitions on unlawful practices, delays in filing could cause the unlawful conduct to continue longer than it otherwise would have if the Commission were empowered to go straight to court without a DOJ referral.

Congress has entrusted the FTC with independent authority to litigate cases on its own behalf in federal court to obtain injunctive relief under Section 13 of the FTC Act,¹¹¹ consumer redress under Section 19 of the FTC Act,¹¹² judicial review of FTC rules and cease and desist orders,¹¹³ and enforcement of FTC subpoenas and other compulsory process.¹¹⁴ The FTC is similarly fully capable of bringing federal cases seeking civil penalties without prior referral to DOJ, and yet under current law, it cannot do so. The FTC therefore recommends that Congress address this problem by providing the FTC with independent authority to litigate cases seeking civil penalties.

C. Provide the FTC Clear Authority to Pursue Legal Action Against Those Who Assist or Facilitate Unfair or Deceptive Acts or Practices

The FTC respectfully requests that Congress provide it with clear legal authority to challenge practices that assist or facilitate unfair or deceptive acts or practices that violate the FTC Act. The FTC and its state partners already make effective use of analogous authority provided by Congress in one domain – telemarketing – and extending this generally to FTC Act enforcement would better enable the FTC to work with state law enforcement partners to attack the infrastructure of sophisticated frauds and scams. Effective law enforcement often requires reaching not only those who directly participate in unfair or deceptive practices, but also those who substantially assist others in violating the law. While the FTC

¹¹⁰ See discussion *supra* Section I.A.2.a.

¹¹¹ 15 U.S.C. § 56(a)(2)(A).

¹¹² 15 U.S.C. § 56(a)(2)(B).

¹¹³ 15 U.S.C. § 56(a)(2)(C).

¹¹⁴ 15 U.S.C. § 56(a)(2)(D)–(E).

Act was traditionally understood to permit enforcement action against secondary actors,¹¹⁵ a Supreme Court decision construing the Securities Exchange Act of 1934 cast doubt on this authority.¹¹⁶ In that case, *Central Bank of Denver v. First Interstate Bank of Denver*, the Court observed that Congress has generally taken a “statute-by-statute approach to civil aiding and abetting liability.”¹¹⁷ Shortly after the *Central Bank of Denver* decision, Congress amended the Securities Exchange Act to provide the SEC with clear authority to pursue action against those who aid and abet violations of that statute.¹¹⁸ Congress has not similarly amended the FTC Act, leaving the extent of the FTC’s legal authority to bring action against those who aid and abet others’ law violations unclear. The FTC has previously recommended that Congress resolve this ambiguity,¹¹⁹ and renews this request.

A promising template is provided by the Telemarketing and Consumer Fraud and Abuse Prevention Act.¹²⁰ When Congress enacted this statute, which is foundational to the work of the FTC and its state partners in combating telemarketing frauds and scams, Congress provided the Commission with clear statutory authority to prohibit deceptive and abusive telemarketing acts or practices perpetrated by those who assist or facilitate deceptive telemarketing,¹²¹ which the Commission made use of in promulgating

¹¹⁵ In some cases, the FTC may bring enforcement action against those who provide the “means and instrumentalities” for another party to violate the FTC Act. *See, e.g., FTC v. Magui Publishers, Inc.*, No. Civ. 89-3818RSWL(GX), 1991 WL 90895, at *14 (C.D. Cal. Mar. 28, 1991), *aff’d*, 9 F.3d 1551 (9th Cir. 1993) (“One who places in the hands of another a means or instrumentalities to be used by another to deceive the public in violation of the FTC Act is directly liable for violating the Act.”). “Means and instrumentalities” liability is a form of direct liability, and is distinct from assisting and facilitating liability, which is a form of secondary liability. *See generally* FTC Business Blog, Andrew Smith, Director, FTC Bureau of Consumer Protection, *Multi-Party Liability* (Jan. 29, 2021), <https://www.ftc.gov/business-guidance/blog/2021/01/multi-party-liability> (summarizing “a variety of legal theories to impose liability on companies where their customers, vendors, or business partners were also engaged in misconduct”).

¹¹⁶ *See* Prepared Statement of the Federal Trade Commission Before the S. Comm. on Commerce, Science, and Transportation, 110th Cong. (Apr. 8, 2008), at 22, *available at* https://www.ftc.gov/sites/default/files/documents/public_statements/prepared-statement-federal-trade-commission-commissions-work-protect-consumers-and-promote/p034101reauth.pdf (discussing the impact of the Supreme Court’s ruling in *Central Bank of Denver v. First Interstate Bank of Denver*, 511 U.S. 164 (1994), and recommending that Congress adopt proposed legislation expressly providing for “aiding and abetting” enforcement authority under the FTC Act).

¹¹⁷ 511 U.S. 164, 179 (1994).

¹¹⁸ *See* 15 U.S.C. § 78t(e) (stating, under the heading, “Prosecution of Persons Who Aid and Abet Violations,” that “For purposes of any action brought by the Commission under paragraph (1) or (3) of section 78u(d) of this title, any person that knowingly or recklessly provides substantial assistance to another person in violation of a provision of this chapter, or of any rule or regulation issued under this chapter, shall be deemed to be in violation of such provision to the same extent as the person to whom such assistance is provided”).

¹¹⁹ *See* Prepared Statement of the Federal Trade Commission Before the S. Comm. on Commerce, Science, and Transportation, 110th Cong. (Apr. 8, 2008), at 22–23, https://www.ftc.gov/sites/default/files/documents/public_statements/prepared-statement-federal-trade-commission-commissions-work-protect-consumers-and-promote/p034101reauth.pdf.

¹²⁰ 15 U.S.C. § 6101 *et seq.*

¹²¹ 15 U.S.C. § 6102(a)(2).

the Telemarketing Sales Rule.¹²² The Telemarketing Sales Rule contains important safeguards that protect innocent third parties from being swept into others’ wrongdoing: to be liable, they must provide “substantial assistance or support,” and “know[] or consciously avoid[] knowing” of the conduct that violates the Rule.¹²³

A similarly clear statutory prohibition on substantially assisting wrongdoers’ violations of the FTC Act would enhance the ability of the FTC to work with its state partners to protect consumers. This would also send a strong signal to the marketplace that businesses cannot outsource and knowingly profit from the illegal conduct of others.¹²⁴ For these reasons, the FTC recommends that Congress amend the FTC Act to prohibit assisting or facilitating unfair or deceptive acts or practices.

IV. Conclusion

The FTC’s collaborative relationship with the State Attorneys General and other state and local consumer protection authorities leverages their respective strengths and is important to the FTC’s ability to vigorously fight frauds, scams, and unlawful business practices, and to educate and reach out to consumers. Going forward, the FTC will preserve the core of its historic partnership with State Attorneys General and statewide authorities, and will seek opportunities to strengthen these ties to effectively confront the challenges of the future.

¹²² 16 C.F.R. § 310.3(b) (providing that “[i]t is a deceptive telemarketing act or practice and a violation of this Rule for a person to provide substantial assistance or support to any seller or telemarketer when that person knows or consciously avoids knowing that the seller or telemarketer is engaged in any act or practice that violates [certain provisions of the Rule]”).

¹²³ *Id.*

¹²⁴ See FTC Business Blog, Andrew Smith, Director, FTC Bureau of Consumer Protection, *Multi-Party Liability* (Jan. 29, 2021), <https://www.ftc.gov/business-guidance/blog/2021/01/multi-party-liability> (stating that companies should “engage in sensible vetting and monitoring of their vendors, customers and business partners”).

Acknowledgments

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Appendix A

Additional Details on FTC Cases Filed in Collaboration with State Attorneys General and State and Local Law Enforcement Agencies

(Cases filed or resolved between January 1, 2020, and March 26, 2024)

This list includes consumer protection law enforcement actions the FTC filed or resolved jointly or in parallel with State Attorneys General and consumer protection agencies with statewide enforcement authority between January 1, 2020, and March 26, 2024.¹

¹ This list does not include jointly prosecuted antitrust enforcement actions.

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
Through March 26, 2024					
1. <i>Federal Trade Commission and State of Georgia v. Steven D. Peyroux, et al.</i> , Case No. 1:21-cv-03329-AT (N.D. Ga.)	March 11, 2024: summary judgment on liability entered in favor of the FTC and Georgia August 16, 2021: complaint filed	Georgia Attorney General's Office	Allegedly false and unsubstantiated claims by the Stem Cell Institute of America, Physicians Business Solutions, Superior Healthcare, and the companies' founders, concerning the efficacy of stem cell therapy for the treatment of joint pain and other orthopedic conditions, providing others with the means to mislead consumers in violation of the FTC Act, and distribution of false or misleading information through the use of a computer or computer network and intentionally targeting elderly and disabled consumers, in violation of Georgia's Fair Business Practices Act.	Litigation is ongoing	https://www.ftc.gov/legal-library/browse/cases-proceedings/182-3125-stem-cell-institute-america-llc (case summary) https://www.ftc.gov/news-events/news/press-releases/2021/08/ftc-georgia-attorney-general-sue-stem-cell-institute-america-co-founders-deceptive-joint-pain-cure (initial press release)

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
2. <i>Federal Trade Commission and People of the State of New York v. Quincy Bioscience Holding Company, Inc., et al.</i> , Case No. 1:17-cv-00124-LLS (S.D.N.Y.)	March 11, 2024: jury verdict entered in favor of New York on certain claims January 9, 2017: complaint filed	New York Attorney General's Office	Marketers of Prevagen allegedly made false and unsubstantiated claims that the supplement improves memory, reduces memory problems associated with aging, provides cognitive benefits, and is “clinically shown” to work, in violation of the FTC Act and New York consumer protection law	Post-trial proceedings are ongoing	https://www.ftc.gov/legal-library/browse/cases-proceedings/152-3206-quincy-bioscience-holding-company (case summary) https://www.ftc.gov/news-events/news/press-releases/2017/01/ftc-new-york-state-charge-marketers-prevagen-making-deceptive-memory-cognitive-improvement-claims (initial press release)

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
<p>3. <i>Federal Trade Commission et al. v. Cancer Recovery Foundation International, Inc., et al.</i>, Case No. 4:24-cv-00881 (S.D. Tex.)</p>	<p>March 11, 2024: complaint filed</p>	<p>California, Florida, Maryland, Massachusetts, North Carolina, Oklahoma, Oregon, Texas, Virginia, and Wisconsin Attorneys General Offices, and the Secretary of State of Maryland and the Secretary of State of North Carolina</p>	<p>Allegedly operating sham charity that claimed it would use donated funds to help women undergoing treatment for cancer and their families pay for basic needs, when in reality, the vast majority of donations went to pay for-profit fundraisers and the operator of the alleged sham charity, in violation of the FTC Act, the Telemarketing Sales Rule, and applicable state law</p>	<p>Litigation is ongoing</p>	<p>https://www.ftc.gov/news-events/news/press-releases/2024/03/ftc-10-states-take-action-against-operator-sham-cancer-charity-deceiving-donors</p>

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
4. <i>Federal Trade Commission and California Department of Financial Protection and Innovation v. Green Equitable Solutions et al.</i> , Case No. 2:22-cv-06499-FLA-MAR (C.D. Cal.)	February 2, 2024: judgment entered against all defendants September 19, 2022: complaint filed	California Department of Financial Protection and Innovation	Mortgage assistance relief scam wherein the defendants promised consumers that they would lower interest rates and principal balances in exchange for large up-front fees in violation of the Mortgage Assistance Relief Services Rule, the Telemarketing Sales Rule, the COVID-19 Consumer Protection Act, the FTC Act, and the California Consumer Financial Protection Law	Approximately \$16 million awarded as a monetary judgment and approximately \$3 million awarded as civil penalties	https://www.ftc.gov/news-events/news/press-releases/2022/09/federal-trade-commission-california-take-action-shut-down-mortgage-relief-operation-preyed

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
5. <i>United States of America v. Burgerim Group USA, Inc. et al.</i> , Case No. 2:22-CV-825 (C.D. Cal.)	January 19, 2024: final order and default judgment entered against entity defendants November 20, 2023: final order entered as to individual defendant February 7, 2022: complaint filed	California Department of Financial Protection and Innovation and Maryland Attorney General's Office (provided assistance in the case)	In action brought by the U.S. Department of Justice on behalf of the FTC, defendants allegedly enticed prospective franchisees to purchase restaurant franchises by using false promises while withholding information, in violation of the FTC Act and the Franchise Rule.	Default judgment entered against entity defendants for over \$7.7 million in civil penalties and over \$48 million in consumer redress. Consent judgment entered against individual defendant for \$5 million in civil penalties and over \$38 million in consumer redress, which is suspended in substantial part due to the defendant's inability to pay the full amount	https://www.ftc.gov/legal-library/browse/cases-proceedings/2023057-burgerim-us-v (case summary) https://www.ftc.gov/news-events/news/press-releases/2022/02/ftc-sues-burger-franchise-company-targets-veterans-others-false-promises-misleading-documents (initial press release)

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
2023					
6. <i>Federal Trade Commission and State of Florida v. Global E-Trading, LLC d/b/a Chargebacks911</i> , Case No. 8:23-cv-796-MSS-CPT (M.D. Fla.)	November 29, 2023: stipulated settlement order entered by the Court April 12, 2023: case filed	Florida Attorney General's Office	Alleged use of unfair tactics to dispute chargebacks filed by consumers over fraudulent credit card charges, and alleged use of microtransactions to unfairly evade credit card fraud monitoring systems, in violation of the FTC Act and the Florida Deceptive and Unfair Trade Practices Act	\$150,000, paid to the State of Florida (\$100,000 in civil penalties, \$50,000 in legal costs)	https://www.ftc.gov/news-events/news/press-releases/2023/11/FTCFloridaLawsuitLeadsToRestrictionsonChargebacks911ProhibitsDeceptiveEffortstoStopConsumersFromReversingDisputedCharges

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
7. <i>Federal Trade Commission et al. v. Roomster Corp. et al.</i> , Case No. 1:22-cv-07389-CM-SN (S.D.N.Y.)	September 5, 2023: stipulated settlement order entered by the Court September 6, 2022: stipulated settlement order with alleged review seller entered by the Court August 30, 2022: complaint filed	California, Colorado, Florida, Illinois, Massachusetts, and New York Attorneys General Offices	Alleged use of fake reviews to entice consumers to pay for access to living arrangement listings misrepresented to be verified, authentic, and available, in violation of the FTC Act and applicable state UDAP law	\$36.2 million monetary judgment and civil penalties totaling \$10.9 million, payable to the states, partially suspended due to defendants' inability to pay full amount: \$1.6 million paid to states, and additional \$100,000 stipulated judgment against alleged review seller paid to states	https://www.ftc.gov/news-events/news/press-releases/2023/08/ftc-state-partners-secure-proposed-order-banning-roomster-owners-using-deceptive-reviews

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
8. <i>Federal Trade Commission and State of Arkansas v. BINT Operations LLC et al.</i> , Case No. 4:21-cv-00518-KGB (E.D. Ark.)	July 19, 2023: proposed settlement order filed June 21, 2021: complaint filed	Arkansas Attorney General's Office (as co-plaintiffs); Texas Attorney General's Office (related action)	Allegedly operating an illegal chain referral pyramid scheme, "Blessings in No Time," that used false promises of investment returns and targeted Black communities, in violation of the FTC Act, the Consumer Review Fairness Act, and the Arkansas Deceptive Trade Practices Act	At least \$450,000 used to provide refunds to affected consumers	https://www.ftc.gov/news-events/news/press-releases/2023/07/operators-blessing-loom-scheme-banned-multi-level-marketing-result-pyramid-scheme-charges-brought
9. Operation Stop Scam Calls (Sweep)	July 18, 2023: sweep announced	More than 100 federal and state law enforcement partners, involving more than 180 enforcement actions against illegal telemarketing brought by the FTC and the 100+ federal and state enforcement partners	Sweep targeting unlawful activity by telemarketers, the companies that employ them, lead generators, and Voice over Internet Protocol (VoIP) service providers	Numerous settlements involving consumer restitution, civil penalties, and/or injunction against debt collection and other relief	https://www.ftc.gov/news-events/news/press-releases/2023/07/ftc-law-enforcers-nationwide-announce-enforcement-sweep-stem-tide-illegal-telemarketing-calls-us

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
<p>10. <i>Federal Trade Commission v. Consumer Health Benefits Association et al.</i>, Case No. CV-10-3551 (E.D.N.Y.)</p>	<p>May 19, 2023: final default judgment against certain corporate defendants</p> <p>May 08, 2023; December 09, 2021: stipulated proposed settlement orders with certain individual and corporate defendants filed</p> <p>August 11, 2010: complaint filed</p>	<p>Arkansas, Florida, Illinois, Kansas, Massachusetts, Minnesota, Pennsylvania, and Washington State Attorneys General Offices (provided assistance by sharing evidence during the FTC’s investigation)</p>	<p>Company telemarketers allegedly targeted consumers who searched online for information on affordable health insurance plans and pitched these targets with false claims about the benefits of discount plans and misled consumers about the company’s refund policies, in violation of the FTC Act and the Telemarketing Sales Rule</p>	<p>\$7 million in consumer refunds</p>	<p>https://www.ftc.gov/news-events/news/press-releases/2023/11/ftc-sends-nearly-7-million-refunds-consumers-harmed-medical-discount-plans-sold-health-insurance</p>

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
11. <i>Federal Trade Commission and Utah Division of Consumer Protection v. Nudge, LLC et al.</i> , Case No. 2:19-cv-00867-DBB (D. Utah)	May 18, 2023: proposed settlement order filed November 5, 2019: complaint filed	Utah Division of Consumer Protection	Allegedly using false promises to sell expensive real estate investment training programs, in violation of the FTC Act, the Telemarketing Sales Rule, Utah’s Business Opportunity Disclosure Act, and other Utah laws	\$16.7 million monetary judgment	https://www.ftc.gov/news-events/news/press-releases/2023/05/ftc-suit-leads-167-million-judgment-against-principals-celebrity-endorsers-real-estate-investment
12. <i>United States v. Easy Healthcare Corp.</i> , Case No. 1:23-cv-3107 (N.D. Ill.)	May 17, 2023: complaint and proposed settlement order filed	Connecticut, District of Columbia, and Oregon Attorney General Offices – parallel action	In action brought by the U.S. Department of Justice on behalf of the FTC, defendant allegedly engaged in unauthorized sharing of Premom app users’ sensitive personal and health information with third parties and failure to notify users of this sharing, in violation of FTC Act and Health Breach Notification Rule	\$200,000 (\$100,000 to United States, \$100,000 to Connecticut, D.C., and Oregon)	https://www.ftc.gov/news-events/news/press-releases/2023/05/ovulation-tracking-app-premom-will-be-barred-sharing-health-data-advertising-under-proposed-ftc

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
13. <i>Federal Trade Commission v. American Future Systems, Inc.</i> , Case No. 2:20-cv-02266 (E.D. Pa.)	March 23, 2023: order granting settlement with certain defendants January 21, 2021: amended complaint filed adding Pennsylvania as co-plaintiff May 13, 2020: complaint filed	Pennsylvania Attorney General's Office	Telemarketing scheme allegedly collecting debts it claimed organizations owed for book and newsletter subscriptions they did not order, in violation of the FTC Act and the Pennsylvania Unfair Trade Practices and Consumer Protection Law	Awaiting decision by trial court after completion of bench trial in October 2023 and closing arguments in December 2023; certain defendants have agreed a settlement permanently banning them from the debt collection industry	https://www.ftc.gov/news-events/news/press-releases/2023/04/action-ftc-pennsylvania-leads-permanent-ban-debt-collectors-targeted-businesses-non-profits-first

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
14. <i>In the Matter of Google LLC and iHeartMedia, Inc.</i> (FTC Docket Nos. C-4783 and C-4784)	February 09, 2023: FTC administrative order finalized	Arizona, California, Georgia, Illinois, Massachusetts, New York Attorneys General Offices and (for iHeartMedia settlement only) Texas Attorney General's Office (related actions)	Allegedly produced and aired nearly 29,000 deceptive first-person endorsements by radio personalities promoting the personalities' use of and experience with Google's Pixel 4 phone, where the personalities did not own or regularly use the phones, in violation of the FTC Act	Injunctive relief barring Defendants from similar misrepresentations and separate state judgements requiring them to pay \$9.4 million in penalties	https://www.ftc.gov/news-events/news/press-releases/2023/02/ftc-approves-final-orders-against-google-iheartmedia-deceptive-air-endorsements-google-pixel-4

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
2022					
15. <i>Federal Trade Commission and the State of Florida v. Treashonna P. Graham et al.</i> , Case No. 3:22-cv-655-MMH-JBT (M.D. Fla.)	January 4, 2023: final settlement orders entered by the Court June 27, 2022: complaint filed	Florida Attorney General's Office	Treashonna Graham through her company Grant Bae ran a grant and business consulting scam that targeted minority-owned businesses and misrepresented "guaranteed" grant funding and COVID-19 economic benefits that did not materialize, in violation of the COVID-19 Consumer Protection Act, the Florida Deceptive and the Florida Deceptive Unfair Trade Practices Act	More than \$2 million, partially suspended due to an inability to pay: property turned over to court-appointed receiver with any remaining proceeds used to be used provide refunds	https://www.ftc.gov/news-events/news/press-releases/2022/12/ftc-state-florida-act-permanently-shut-down-grant-bae-business-grant-scam

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
16. <i>United States and State of Wisconsin v. Consumer Law Protection, LLC, et al.</i> , Case No. 4:22-cv-01243 (E.D. Mo.)	November 21, 2022: complaint filed	Wisconsin Attorney General's Office	In action brought by the U.S. Department of Justice on behalf of the FTC, defendants allegedly used unfair and deceptive tactics to entice consumers, many of whom were older adults, to pay for timeshare exit services not provided, in violation of the FTC Act, the Cooling-Off Rule, and Wisconsin law	Litigation is ongoing	https://www.ftc.gov/news-events/news/press-releases/2022/11/ftc-wisconsin-attorney-general-take-action-against-timeshare-exit-scammers-cheating-consumers-out-90
17. <i>Federal Trade Commission and the People of the State of California v. Ygrene Energy Fund Inc.</i> , Case No. 2:22-cv-07864-SB-SK (C.D. Cal.)	October 28, 2022: complaint and proposed settlement order filed	California Attorney General's Office	Alleged misrepresentations about potential financial impact of Property Assessed Clean Energy financing and unfair recording of liens on consumers' property without their consent, in violation of the FTC Act, the Mortgage Acts and Practices-Advertising Rule (Regulation N), and California law	\$22 million judgment, partially suspended due to defendant's inability to pay, with \$3,000,000 lien relief fund created to benefit consumers	https://www.ftc.gov/news-events/news/press-releases/2022/10/ftc-california-act-stop-ygrene-energy-fund-deceiving-consumers-about-pace-financing-placing-liens

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
18. <i>Federal Trade Commission et al. v. Harris Originals of NY, Inc. et al.</i> , Case No. 22-cv-4260 (E.D.N.Y.)	July 20, 2022: Complaint and proposed order filed	18 States: California, Connecticut, Delaware, Florida, Georgia, Idaho, Illinois, Iowa, Kansas, Louisiana, Maryland, Nevada, New York, North Carolina, Pennsylvania, Virginia, and Washington Attorneys General Offices, and the Hawaii Office of Consumer Protection	Alleged misrepresentations that financed jewelry purchases would raise servicemembers' credit scores, misrepresentations that protection plans were not optional or were required, and adding of protection plans to purchases without consumers' consent, in violation of FTC Act, Truth in Lending Act, Electronic Fund Transfer Act, Holder Rule, Military Lending Act, and applicable state law	\$10.9 million in refunds for protection plans, ceasing collection of millions of dollars in debt, and refunds for overpayments	https://www.ftc.gov/news-events/news/press-releases/2022/07/ftc-18-states-sue-stop-harris-jewelry-cheating-military-families-illegal-financing-sales-tactics

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
19. <i>Federal Trade Commission et al. v. Frontier Communications Corporation, et al.</i> Case No. 2:21-cv-4155 (C.D. Cal.)	May 05, 2022: proposed settlement order filed May 19, 2021: complaint filed	Arizona, Indiana, Michigan, North Carolina, Wisconsin Attorney General offices and Los Angeles and Riverside County District Attorneys' offices on behalf of the State of California	Allegedly violating the FTC Act and various state laws by misrepresenting the speeds of Internet service it would provide consumers and engaged in unfair billing practices for charging consumers for a more expensive level of Internet service than it actually provided, in violation of the FTC Act and state law.	\$8.5 million in civil penalties and costs to the Los Angeles and Riverside County District Attorneys' offices on behalf of California consumers; \$250,000 for Frontier California customer redress	https://www.ftc.gov/news-events/news/press-releases/2022/05/ftc-takes-action-against-frontier-lying-about-internet-speeds-ripping-customers-who-paid-high-speed
20. <i>Federal Trade Commission and People of the State of Illinois v. North American Automotive Services, Inc. et al.</i> , Case No. 1:22-cv-01690 (N.D. Ill.)	March 31, 2022: complaint and proposed settlement order filed	Illinois Attorney General's Office	Alleged illegal junk fees for unwanted "add-ons" were added onto auto dealership customers' bills and discrimination against Black consumers, in violation of the FTC Act, the Truth in Lending Act, the Equal Credit Opportunity Act, Regulations B and Z, and Illinois law	\$10 million; \$9.95 million to provide consumer redress and \$50,000 to the Illinois Attorney General Court Ordered and Voluntary Compliance Payment Projects Fund	https://www.ftc.gov/news-events/news/press-releases/2022/04/ftc-takes-action-against-multistate-auto-dealer-napleton-sneaking-illegal-junk-fees-bills

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
21. <i>Federal Trade Commission and Utah Division of Consumer Protection v. Zurixx, LLC et al.</i> , Case No. 2:19-cv-00713-DAK-DAO (D. Utah)	February 15, 2022: stipulated settlement order entered by the Court September 30, 2019: complaint filed	Utah Division of Consumer Protection	Allegedly operating a real estate coaching scheme using false earnings claims, in violation of the FTC Act, the Telemarketing Sales Rule, Utah’s Business Opportunity Disclosure Act, and other Utah laws	Monetary judgments of more than \$11 million, partially satisfied because several defendant corporations were defunct and under receivership	https://www.ftc.gov/news-events/news/press-releases/2022/02/operators-investment-coaching-scheme-banned-industry-ordered-pay-millions-redress-defrauded

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
22. <i>Federal Trade Commission and State of Florida v. GDP Network LLC, et al.</i> , Case No. 6:20-cv-01192-WWB-DCI (M.D. Fla.)	February 11, 2022: default judgment against corporate defendants entered November 24, 2021: settlement orders with individual defendants entered by the Court July 6, 2020: complaint filed	Florida Attorney General's Office	Operating an alleged sham credit card interest rate reduction scheme, in violation of the FTC Act, the Telemarketing Sales Rule, and the Florida Deceptive and Unfair Trade Practices Act	Monetary judgments of \$5.3 million, partially suspended due to the individual defendants' inability to pay	https://www.ftc.gov/news-events/news/press-releases/2022/02/operators-credit-card-interest-rate-reduction-scam-permanently-banned-debt-relief-business-under

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
2021					
23. <i>Federal Trade Commission and State of Florida v. Inmate Magazine Service, Inc. et al.</i> , Case No. 3:21-cv-00294-TKW-HTC (N.D. Fla.)	September 7, 2021: proposed settlement order filed February 16, 2021: complaint filed	Florida Attorney General's Office	Alleged misrepresentations that magazines would timely be delivered to prisoners, and failure to seek consent to shipping delays or provide prompt refunds, in violation of the FTC Act, Florida's Deceptive and Unfair Trade Practices Act, and the Mail, Internet, or Telephone Order Merchandise Rule	\$2.2 million, partially suspended based on inability to pay	https://www.ftc.gov/news-events/news/press-releases/2021/09/operator-businesses-scammed-prisoners-their-families-permanently-banned-magazine-sales-settlement
24. <i>Federal Trade Commission, et al. v. Associated Community Services, Inc.</i> , Case No. 2:21-cv-10174-DML-CI (E.D. Mich.)	January 26, 2021: complaint and proposed settlement order filed	Coalition of 46 Attorneys General Offices and other agencies from 38 states and the District of Columbia	The defendants allegedly perpetrated a massive telefunding operation that bombarded 67 million consumers with 1.3 billion deceptive charitable fundraising calls (mostly illegal robocalls), and violated the FTC Act, the Telemarketing Sales Rule, and applicable state consumer protection laws	Judgments entered of more than \$110 million, partially suspended due to defendants' inability to pay. Defendants subject to over \$500,000 in unsuspended judgments.	https://www.ftc.gov/news-events/news/press-releases/2021/03/ftc-38-states-dc-act-shut-down-massive-charity-fraud-telefunding-operation

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
2020					
25. Operation Income Illusion (sweep)	December 14, 2020: sweep announced	19 federal, state, and local law enforcement partners, involving more than 50 enforcement actions	Sweep targeting alleged scams that lure consumers with false promises of income and financial independence	Numerous settlements involving consumer restitution, civil penalties, and/or injunction against debt collection and other relief	https://www.ftc.gov/news-events/news/press-releases/2020/12/scammers-leverage-pandemic-fears-ftc-law-enforcement-partners-crack-down-deceptive-income-schemes

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
26. <i>United States et al. v. DISH Network LLC</i> , Case No. 3:09-cv-03073-SEM-TSH (C.D. Ill.)	December 7, 2020: settlement announced following appellate proceedings June 5, 2017: court order entered in favor of government plaintiffs March 25, 2009: case filed	California, Illinois, North Carolina, and Ohio Attorneys General Offices	In action brought by the U.S. Department of Justice on behalf of the FTC, defendants allegedly made millions of unlawful telemarketing calls to consumers and was responsible for millions more made by retailers that marketed DISH products and services, in violation of the Telemarketing Sales Rule, the Telephone Consumer Protection Act, and applicable state laws	\$210 million total settlement, with \$84 million paid to State plaintiffs	https://www.justice.gov/opa/pr/dish-network-pay-210-million-telemarketing-violations

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
27. Operation Corrupt Collector (Sweep)	September 29, 2020: sweep announced	More than 50 federal and state law enforcement partners, involving more than 50 enforcement actions against debt collectors brought by the FTC, three federal partners, and partners from 16 states	Sweep targeting phantom debt collection and abusive and threatening debt collection practices	Numerous settlements involving consumer restitution, civil penalties, and/or injunction against debt collection and other relief	https://www.ftc.gov/news-events/news/press-releases/2020/09/ftc-state-federal-law-enforcement-partners-announce-nationwide-crackdown-phantom-abusive-debt
28. <i>Federal Trade Commission and State of Ohio v. Educare Centre Services, Inc. et al.</i> , Case No. 3:19-cv-00196-KC (W.D. Tex.)	September 20, 2020: proposed settlement order filed July 19, 2019: complaint filed	Ohio Attorney General's Office	Defendants allegedly ran (Educare defendants) or facilitated (Globex defendant) a scheme that peddled bogus credit card interest rate relief, illegally charging consumers millions of dollars, in violation of the FTC Act, the Telemarketing Sales Rule, and Ohio consumer protection law	Over \$11 million partially suspended due to the defendants' inability to pay, with \$2 million unsuspended	https://www.ftc.gov/news-events/news/press-releases/2020/09/globex-telecom-associates-will-pay-21-million-settling-ftcs-first-consumer-protection-case-against

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
29. <i>Federal Trade Commission, et al. v. Outreach Calling Inc., et al.</i> , Case No. 1:20-cv-07505-MKV (S.D.N.Y.)	October 26, 2020: settlement orders entered by the Court September 15, 2020: complaint filed	Minnesota, New York, New Jersey, and Virginia Attorneys General Offices	Operating alleged sham charity fundraising operations, in violation of the FTC Act and applicable state laws	Monetary judgments of over \$58 million, partially suspended due to the defendants' inability to pay	https://www.ftc.gov/news-events/news/press-releases/2020/09/ftc-joins-four-states-action-shut-down-alleged-sham-charity-funding-operation-bilked-millions
30. <i>Federal Trade Commission v. First Choice Horizon LLC et al.</i> , Case No. 6:19-cv-01028-PGB-LRH (M.D. Fla.)	July 28, 2020: settlement order entered by the Court June 3, 2019: complaint filed	Florida Department of Agriculture and Consumer Services (provided assistance in FTC's investigation)	Allegedly defrauded financially vulnerable and often older adults with deceptive robocalls claiming the defendants could save them money by reducing the interest rates on their credit cards, in violation of the FTC Act and the Telemarketing Sales Rule	Monetary judgment of over \$13 million, partially suspended due to the defendants' inability to pay	https://www.ftc.gov/news-events/news/press-releases/2020/07/scammers-who-used-robocalls-target-cash-strapped-consumers-banned-selling-debt-relief-services

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
31. <i>Federal Trade Commission and State of Ohio v. Madera Merchant Services, LLC et al.</i> , Case No. 3:19-cv-00195-KC (W.D. Tex.)	June 4, 2020: stipulated settlement order entered by the Court July 19, 2019: complaint filed	Ohio Attorney General's Office	Defendants allegedly used remotely created payment orders and remotely created checks to facilitate payments for unscrupulous merchants, allowing them to draw money from consumer victims' bank accounts to pay for student debt reduction and credit card interest reduction telemarketing schemes, in violation of the FTC Act, the Telemarketing Sales Rule, and the Ohio Consumer Sales Practices Act	\$8,646,000, suspended in part due to the defendants' inability to pay the full amount	https://www.ftc.gov/news-events/news/press-releases/2020/06/rogue-payment-processor-helped-perpetuate-multiple-scams-banned-payment-processing-business-under

Case Caption	Date Filed or Resolved	State Partners	Subject Matter	Monetary Resolution	FTC Press Release
32. <i>Federal Trade Commission v. Liberty Chevrolet, Inc., et al.</i> , Case No. 20-CV-3945 (S.D.N.Y.)	May 22, 2020: proposed settlement orders filed May 21, 2020: complaint filed	Bronx District Attorney's Office (provided assistance in FTC's investigation)	Allegedly discriminated against Black and Latino car buyers by charging them higher financing markups and conducted illegal advertising and sales practices, in violation of the FTC Act, the Truth in Lending Act, and the Equal Credit Opportunity Act	\$1.5 million	https://www.ftc.gov/news-events/news/press-releases/2020/05/automobile-dealership-bronx-honda-general-manager-pay-15-million-settle-ftc-charges-they-discriminated
33. <i>Federal Trade Commission and People of the State of New York v. Campbell Capital, LLC et al.</i> , Case No. 1:18-cv-01163-LJV-MJR (W.D.N.Y.)	February 7, 2020: proposed settlement order filed October 23, 2018: complaint filed	New York Attorney General's Office	Allegedly operating an illegal debt collection scheme that pressured consumers to make payments by inflating their alleged balances and making false statements, such as pretending to be law enforcement, in violation of the FTC Act, the Fair Debt Collection Practices Act, and New York law	\$1.7 million, partially suspended due to the defendant's inability to pay	https://www.ftc.gov/news-events/news/press-releases/2020/02/operator-fraudulent-debt-collection-scheme-settles-ftc-new-york

Appendix B

Additional Details on Consumer and Business Outreach and Education Performed by the FTC in Collaboration with State Attorneys General

(Events between January 1, 2020, and March 26, 2024)

This list includes consumer and business outreach and educational events performed by the FTC in collaboration with State Attorneys General Offices and statewide consumer protection authorities between January 1, 2020 and March 26, 2024.

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
Through March 26, 2024					
1 Fighting Consumer Fraud & Identity Theft in South Carolina	March 26, 2024	South Carolina Department of Consumer Affairs	Consumer fraud and identity theft prevention and awareness	South Carolina consumers	
2 National Consumer Protection Week: Protecting Yourself and Your Finances Presentation	March 14, 2024	Ohio Attorney General's Office	Imposter scam prevention and awareness	Ohio consumers	
3 National Consumer Protection Week: Avoiding Scams and Frauds Presentation	March 8, 2024	Ohio Attorney General's Office	Scam and fraud prevention and awareness, and FTC resources available to help	Ohio consumers	
4 Ohio Attorney General's Consumer Resource Fair	March 5, 2024	Ohio Attorney General's Office	Consumer protection education and awareness, and FTC resources available	Ohio consumers	https://www.ohioattorneygeneral.gov/Individuals-and-Families/Consumers/National-Consumer-Protection-Week

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
2023					
5 CARS Rule Presentation	December 19, 2023	National Association of Attorneys General	CARS Rule information and awareness for servicemembers and civilians	NAAG Veterans and Military Working Group members	
6 Oregon Scam Jam	November 17, 2023	Oregon Department of Justice	Scam prevention and awareness	AARP members	
7 Fighting Consumer Fraud & Identity Theft in Montana	November 2, 2023	Montana Attorney General's Office	Consumer fraud and identity theft prevention and awareness	Montana consumers	https://consumer.gov/system/files/c%20Fraud%20and%20IDT%20FTC%20Power%20PointFINALSN.pptx [PowerPoint presentation]
8 FTC & NAAG Briefing: FTC Can Receive and Translate Reports into Multiple Languages	October 19, 2023	National Association of Attorneys General	Raising awareness about how consumers can report scams and frauds to the FTC	NAAG members	https://www.ftc.gov/news-events/news/press-releases/2023/11/ftc-adds-support-consumers-multiple-languages-fraud-id-theft-reporting-offers-multi-lingual

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
9 Fighting Consumer Fraud & Identity Theft in Kansas	September 21, 2023	Kansas Attorney General's Office	Consumer fraud and identity theft prevention and awareness	Kansas consumers	https://consumer.gov/system/files/c_onsumer_gov/documents/Kansas%20Fraud%20and%20IDT%20FTC%20Power%20Point090623SN.pptx [PowerPoint presentation]
10 Careers in Consumer Protection: Building Your Law School Resume	September 19, 2023	District of Columbia Attorney General's Office	Careers in consumer protection	Law students interested in consumer protection careers	
11 Reaching Your Audience	September 11, 2023	Massachusetts Attorney General's Office	Consumer education and outreach	State and local government agencies	
12 Fighting Consumer Fraud & Identity Theft in Arkansas	July 27, 2023	Arkansas Attorney General's Office	Consumer fraud and identity theft prevention and awareness	Arkansas consumers	https://consumer.gov/system/files/c_onsumer_gov/pdf/Arkansas%20Fraud%20and%20IDT%20FTC%20Power%20PointFINALFINAL072523NN.pdf
13 North Tulsa Roundtable	July 12, 2023	Oklahoma Attorney General's Office	Food insecurity in marginalized communities	African-American Consumers in Oklahoma	

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
14 Oregon Scam Jam, Portland, Oregon	April 25, 2023	Oregon Department of Justice	Scam prevention and awareness	AARP members	https://dfr.oregon.gov/news/news2023/pages/20230421-scam-jam-2023.aspx
15 Consumer Protection Summit	March 14, 2023	Wisconsin Department of Agriculture, Trade and Consumer Protection	Topics in consumer protection	Community organizations and government officials	
16 Hawaii Department of Commerce and Consumer Affairs National Consumer Protection Week Fair	March 8, 2023	Hawaii Department of Commerce and Consumer Affairs	Prevention and awareness of frauds and scams	Hawaii consumers	https://www.ftc.gov/news-events/events/2023/03/ftc-table-department-commerce-consumer-affairs-ncpw-fair-2023
17 FTC, Nevada Consumer Affairs, Nevada AG and BBB Town Hall event - NCPW 2023	March 7, 2023	Nevada Attorney General's Office	Prevention and awareness of frauds and scams	Nevada consumers	https://www.ftc.gov/news-events/events/2023/03/ftc-nevada-consumer-affairs-nevada-ag-bbb-town-hall-event-ncpw-2023

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
18 FTC and Colorado Attorney General's Office of Financial Empowerment Virtual Workshop on Consumer Financial Protection Tools - NCPW 2023	March 6, 2023	Colorado Attorney General's Office	Consumer financial protection tools	Colorado consumers	https://www.ftc.gov/news-events/events/2023/03/ftc-colorado-attorney-generals-office-financial-empowerment-virtual-workshop-about-consumer
19 FTC, the Georgia Department of Law and AARP Georgia Discussion on Identity Theft and Scams - NCPW 2023	March 6, 2023	Georgia Attorney General's Office	Prevention and awareness of identity theft and scams	Georgia consumers and older adults	https://www.ftc.gov/news-events/events/2023/03/ftc-georgia-department-law-aarp-georgia-discussion-identity-theft-scams-ncpw-2023

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
2022					
20 Fighting Consumer Fraud & Identity Theft in Georgia	October 25, 2022	Georgia Attorney General's Office	Consumer fraud and identity theft prevention and awareness	Georgia consumers	https://consumer.gov/system/files/c_onsumer_gov/pdf/Georgia%20Fraud%20and%20IDT%20FTC%20Power%20Point%20102022FINAL%20N.pdf
21 Oregon Scam Jam: Eugene, Oregon	September 29, 2022	Oregon Department of Justice	Scam prevention and awareness	Older adults	
22 Idaho Scam Jam, Nampa Idaho	September 8, 2022	Idaho Attorney General's Office	Scam prevention and awareness	Older adults	
23 What to Know About Cryptocurrency Scams	July 20, 2022	Delaware Department of Justice	Cryptocurrency scam prevention and awareness	Service members, veterans, family members	
24 Fighting Consumer Fraud & Identity Theft in Tennessee	June 28, 2022	Tennessee Attorney General's Office	Consumer fraud and identity theft prevention and awareness	Tennessee consumers	https://consumer.gov/system/files/c_onsumer_gov/pdf/SansNotesTennessee%20Fraud%20and%20IDT%20FTC%20Power%20Point%200623%20FINAL.pdf

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
25 Fighting Consumer Fraud & Identity Theft in Oklahoma	June 27, 2022	Oklahoma Attorney General's Office	Consumer fraud and identity theft prevention and awareness	Oklahoma consumers	https://consumer.gov/system/files/consumer_gov/pdf/SansNotesOklahoma%20Fraud%20and%20IDT%20FTC%20Power%20-%20-%20%20Read-Only.pdf
26 Oregon Coast Scam Jam	June 23, 2022	Oregon Department of Justice	Scam prevention and awareness	Older adults	
27 What to Know Before Buying a Car	June 16, 2022	South Carolina Department of Consumer Affairs	Consumer protection issues involving auto purchases	South Carolina consumers	
28 UDAP Law Enforcement by State Attorneys General	June 15, 2022	Florida Attorney General's Office; ABA Antitrust Law Section Janet D. Steiger Fellowship Committee	UDAP law enforcement	Fellows spending the summer as interns in the consumer protection offices of State Attorneys General	

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
29 The ABCs of UDAP: The Basics of Consumer Protection Law	June 8, 2022	ABA Antitrust Law Section Janet D. Steiger Fellowship Committee	UDAP law enforcement	Fellows spending the summer as interns in the consumer protection offices of State Attorneys General	
30 Detecting and Avoiding Scams Impacting Minnesota's Diverse Communities	May 19, 2022	Minnesota Attorney General's Office	Prevention and awareness of scams targeting immigrants, communities of color, young people, and older Americans across Minnesota	Minnesota consumers of color, immigrants, young people, and older adults	https://consumer.gov/system/files/c_onsumer_gov/pdf/FTC%20Minnesota%205_19_22%20%282%29.pdf
31 Working Together to Protect Colorado Consumers: A Common Ground Conference	May 6, 2022	Colorado Attorney General's Office	Emerging consumer trends and opportunities for collaboration	Colorado consumers, advocates, and public servants	https://www.ftc.gov/news-events/events/2022/05/working-together-protect-colorado-consumers

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
32 Partnership to Address Adult Abuse Webinar Panel	May 5, 2022	North Carolina Department of Justice	Adult abuse prevention and awareness	Older adults	
33 How to Avoid Cryptocurrency Frauds and Scams	May 4, 2022	Ohio Attorney General's Office	Cryptocurrency scam prevention and awareness	Older adults	
34 Avoiding Cryptocurrency Scams	May 1, 2022	Ohio Attorney General's Office	Cryptocurrency scam prevention and awareness	Older adults	
35 Alabama Scam Jam	April 27, 2022	Alabama Attorney General's Office	Scam prevention and awareness	Older adults	
36 Fighting Consumer Fraud & Identity Theft in Utah	March 23, 2022	Utah Attorney General's Office	Consumer fraud and identity theft prevention and awareness	Utah consumers	https://consumer.gov/system/files/c_onsumer_gov/pdf/Utah%20Fraud%20and%20IDT%20FTC%20Power%20Point%20031822FINAL.%28SN%29%20%28002%29.pdf

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
37 Consumer Protection Phone Bank with 10-TV	March 10, 2022	Ohio Attorney General's Office	Scam prevention and awareness	Ohio consumers	https://www.10tv.com/article/syndication/10tvs-consumer-protection-phone-bank/530-edcfd0f2-dd89-4852-9101-bdc5aca174e8
38 How to Deal with Scams: Learn About Protecting Yourself from Scams and Where to Report Them If It Happens to You	March 8, 2022	Hawaii Department of Commerce and Consumer Affairs	Scam prevention and awareness	Older adults	
39 Tips for Spotting and Avoiding Scams: How to Protect Yourself from COVID 19, Online Shopping, and Work from Home Scams	March 8, 2022	Georgia Attorney General's Office	COVID-19, online shopping, and work-from-home scams	AARP members and older adults	

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
40 Romance Scam Panel at NAAG Event	February 17, 2022	The National Association of Attorneys General	Romance scams	NAAG members	
41 NAAG Webinar - Dark Practices 2.0	January 25, 2022	The National Association of Attorneys General and the Iowa Attorney General's Office	Dark patterns	NAAG members	
2021					
42 WatchDog Wednesday Webcast	December 8, 2021	Oregon Department of Justice	Scam prevention and awareness	Older adults	
43 Fighting Consumer Fraud and Identity Theft in Alaska	November 30, 2021	Alaska Attorney General's Office	Consumer fraud and identity theft prevention and awareness	Alaskan Consumers	https://consumer.gov/sites/www.consumer.gov/files/final2_alaska_fraud_and_idt_ftc_power_point_113021.pdf
44 Scams Targeting Military Personnel, Veterans, and Their Families	November 19, 2021	The National Association of Attorneys General	Scams targeting military personnel, veterans, and family members	Military personnel, veterans, and their families	

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
45 Notario Fraud Prevention Tele-Townhall hosted by Senator Cortez Masto	November 9, 2021	Nevada Attorney General's Office	Notario fraud awareness and prevention	Nevada immigrants and minority communities	
46 Fighting Consumer Fraud and Identity Theft in Arizona	November 9, 2021	Arizona Attorney General's Office	Consumer fraud and identity theft prevention and awareness	Arizona consumers	https://consumer.gov/sites/www.consumer.gov/files/arizona_fraud_and_idt_ftc_110221.pdf
47 Fighting Consumer Fraud & Identity Theft in Delaware	September 30, 2021	Delaware Attorney General's Office	Consumer fraud and identity theft prevention and awareness	Delaware consumers	https://consumer.gov/sites/www.consumer.gov/files/delaware_fraud_and_idt_ftc_093021.pdf
48 National Association of State Charity Officials (NASCO) Training	August 25, 2021	Maryland and Washington Attorneys General Offices	Sham political action committees (PACs)	NASCO members	

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
49 NAAAG's Consumer Complaint Specialists Working Group Presentation	July 9, 2021	The National Association of Attorneys General	Use of consumer complaints by law enforcement	NAAAG members	
50 Tele-Town Hall hosted by Representative Stephanie Bice	June 30, 2021	Oklahoma Attorney General's Office	Consumer scam prevention and awareness	Oklahoma community members	
51 Minnesota Attorney General Consumer Justice Summit	June 28, 2021	Minnesota Attorney General's Office	Pandemic-related frauds and FTC warning letters and enforcement actions directed to those frauds	Minnesota consumer protection advocates	
52 Tele-Town Hall hosted by Senator Reverend Warnock and the AARP	June 16, 2021	Georgia Attorney General's Office	Consumer issues affecting older adults	Older adults and AARP members	

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
53 Spotting and Preventing Pandemic Scams and Other Fraud in Chicago and the Midwest	May 26, 2021	Illinois Attorney General's Office	Scams preying on people struggling to cope with the COVID-19 pandemic and its economic fallout	Diverse communities in Chicago and the Midwest	https://consumer.gov/sites/www.consumer.gov/files/ftc_invite_chicago.pdf
54 Oregon "Jam the Scam" Webinar	April 30, 2021	Oregon Department of Justice	Scam prevention and awareness	Older adults and AARP members	
55 National Cyber Crime Conference	April 30, 2021	Massachusetts Attorney General's Office	Cyber crimes	Law enforcement and prosecutors	
56 Talking with the States about Online "Dark Patterns"	April 22, 2021	The National Association of Attorneys General and the State Center	Dark patterns	Attorneys General, investigators, and other staff	
57 FTC Shares Advice with Nevada Older Adults on Identity Theft	April 16, 2021	Nevada Attorney General's Office	Identity theft	Older adults / AARP members	

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
58 Dark Practices and UDAP: Addressing Online Deceptive and Unfair Practices	April 15, 2021	The District of Columbia Attorney General's Office and the State Center	The FTC's investigation and settlement of ABCmouse.com	States' Attorneys General Offices' staff	
59 Spotting and Preventing Pandemic-Related Scams and Other Fraud in Montana/the Mountain West	March 24, 2021	Montana Attorney General's Office	Scams preying on people struggling to cope with the COVID-19 pandemic and its economic fallout	Montana's communities, including tribal, rural, low-income, immigrant, and refugee communities	https://consumer.gov/sites/www.consumer.gov/files/ftc_invite_montana.pdf
60 Delaware Facebook Live Event	March 5, 2021	Delaware Department of Justice	Privacy, data, and cyber threat scams	Delaware community members	
61 Hispanic Solutions Group "Scams and Consumer Rights" Event	March 4, 2021	Minnesota Attorney General's Office	Scam and fraud awareness and prevention	Latino and Spanish-speaking consumers	

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
62 Wisconsin Consumer Protection Summit	March 3 – 4, 2021	Wisconsin Department of Agriculture, Trade and Consumer Protection	COVID-19 scam and robocall awareness and prevention	Wisconsin community members	
63 Consumer Protection Reports Panel	March 3, 2021	Ohio Attorney General's Office	Consumer protection issues most frequently reported to the FTC	Ohio community members	
64 National Consumer Protection Week: Presentation on COVID-19 Scams	March 2, 2021	Georgia Attorney General's Office	COVID-19 scam awareness and prevention	Older adults	https://www.ftc.gov/news-events/news/press-releases/2021/02/national-consumer-protection-week-2021-begins-sunday-february-28
65 Frauds Affecting Small Businesses	February 23, 2021	Georgia Attorney General's Office	Frauds affecting small businesses	Small business owners	

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
66 The Financial Impact of COVID-19: A Virtual Listening and Learning Session	January 12, 2021	Utah Attorney General's Office	COVID-19 scam awareness and prevention	Utah community members	
2020					
67 Fighting Consumer Fraud & Identity Theft in Pennsylvania	November 18, 2020	Pennsylvania Attorney General's Office	Consumer fraud and identity theft prevention and awareness	Pennsylvania consumers	https://consumer.gov/sites/www.consumer.gov/files/111820_pa_fraud_and_idt_web.final.pdf
68 VA Stronger Together: Mitigating and Protecting Against Elder Financial Exploitation	November 18, 2020	Ohio Attorney General's Office	Mitigating and protecting against elder financial exploitation	Cleveland Veterans Affairs personnel	

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
69 Green Lights & Red Flags: FTC Rules of the Road for Advertisers	October 29, 2020	Ohio Attorney General's Office	Truth-in-advertising law, social media marketing, data security, business-to-business fraud, and other business basics	Business owners, advertising professionals, attorneys, and others	https://www.ftc.gov/news-events/events/2020/10/green-lights-red-flags-ftc-rules-road-business
70 Spotting and Preventing Pandemic Scams in the Inland Empire	September 24, 2020	California Attorney General's Office	COVID-19 scam awareness and prevention	Ethnic and community media and community leaders	https://consumer.gov/sites/www.consumer.gov/files/ftc_inland_empire_invite.pdf
71 Spotting and Avoiding Scams Targeting Diverse Communities in Indianapolis + Indiana	June 25, 2020	Indiana Attorney General's Office	COVID-19 scam awareness and prevention	Public officials, legal aid providers, community advocates, and consumers who have experienced fraud	https://consumer.gov/sites/www.consumer.gov/files/ftc_indianapolis_invite.pdf
72 COVID Scam Virtual Town Hall Hosted by ABC7 Chicago	May 27, 2020	Illinois Attorney General's Office	COVID-19 scam awareness and prevention	Illinois community members	

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
73 COVID Scams Webinar Hosted by the Office of Representative Jason Crow	May 26, 2020	Colorado Attorney General's Office	COVID-19 scam awareness and prevention	Colorado community members	
74 Illinois COVID Scams Webinar Hosted by the Office of Representative Sean Casten	May 21, 2020	Illinois Attorney General's Office	COVID-19 scam awareness and prevention	Illinois community members	
75 Coronavirus Webinar for Small Businesses in Northern Nevada	May 20, 2020	Nevada Attorney General's Office	COVID-19 scam awareness and prevention	Nevada community members	
76 COVID Tele-Town Hall with Congressman Bryan Steil	May 6, 2020	Wisconsin Department of Agriculture, Trade and Consumer Protection	COVID-19 scam awareness and prevention	Wisconsin community members	

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
77 Kentucky COVID Webinar	April 29, 2020	Kentucky Attorney General's Office	COVID-19 scam awareness and prevention	Kentucky community members	
78 COVID Webinar for Wisconsin	April 16, 2020	Wisconsin Department of Agriculture, Trade and Consumer Protection	COVID-19 scam awareness and prevention	Wisconsin community members	
79 FTC Initiatives to Combat Coronavirus Scams	March 30, 2020	The National Attorneys General Training & Research Institute Center for Consumer Protection	COVID-19 scam awareness and prevention	Attorney General Office contacts	
80 NAAG Webinar on FTC Initiatives to Combat Coronavirus Scams	March 30, 2020	The National Association of Attorneys General	COVID-19 scam awareness and prevention	NAAG members	

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
81 Consumer Sentinel Network 2020 Data Book Event	March 18, 2020	The National Attorneys General Training & Research Institute Center for Consumer Protection	Consumer Sentinel data trends	Attorney General Office contacts	
82 Working Together to Protect Heartland Consumers: A Common Ground Conference	March 9 – 10, 2020	Arkansas, Kansas, Louisiana, Mississippi, Missouri, Oklahoma, Tennessee, and Texas Attorneys General Offices	Consumer protection issues affecting the American Heartland, including senior and elder fraud, protecting underserved communities, effective outreach strategies, unlawful robocalls, and working together effectively to protect consumers	Law enforcers, advocates, regulators, social service providers, and others	https://www.ftc.gov/news-events/events/2020/03/heartland-common-ground-conference

Title / Topic of Event	Event Date	Participating Attorneys General Offices and State Consumer Protection Authorities	Subject Matter	Community Reached	Event Webpage, If Available
83 Cybersecurity and Privacy: Convergence in a World of Increasing Cyber Attacks and Data Breaches	March 5, 2020	Illinois Attorney General's Office	Cybersecurity and data privacy	Private sector attorneys, small businesses, cybersecurity professionals	
84 Elder Justice Summit	Feb. 4, 2020	Minnesota Attorney General's Office	Fraud impacting older adults	Consumer protection advocates, organizations that work with older adults	