

information (*e.g.*, location information) or sensitive device functionality (*e.g.*, the ability to take

Respondents to force-install apps onto users' mobile devices. The force-installed apps on users' mobile devices also repeatedly reappeared after users attempted to remove them. These actions seriously interfered with the consumers' use of their desktop computers and mobile devices. In addition, any apps force-installed on users' mobile devices could have provided Respondents and the app developer with access to private, sensitive information stored on the users' mobile devices, including user's address book, photos, location, persistent device identifiers

E. *Weekly Android Apps* did not have more than 2,300 reviews and an average rating of 4.5 out of 5 stars. The vast majority of these ratings were from *Running Fred* users, not *Weekly Android Apps* users.

22. Therefore, the representations set forth in Paragraph 20 were, and are, false and misleading.

Violations of Section 5

23. The acts and practices of Respondents as alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this ____ day of _____, has issued this complaint against Respondents.