

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Edith Ramirez, Chairwoman
Maureen K. Ohlhausen
Terrell McSweeney

In the Matter of

GENERAL WORKINGS INC., a corporation,
also d/b/a VULCUN, and

ALI MOIZ and MURTAZA HUSSAIN,
individually and as officers of
GENERAL WORKINGS, INC .

DOCKET NO. C-4573

COMPLAINT

The Federal Trade Commission, having reason to believe that General Workings Inc. corporation, and Ali Moiz and Murtaza Hussain individually and as officers of the corporation (collectively "Respondents"), have violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent General Workings Inc. also doing business as Vulcun ("Vulcun") is a Delaware corporation with its principal office or place of business at 424 Clay Street, San Francisco, California 94111.
2. Respondent Ali Moiz is a founder and officer of Vulcun. Individually or in concert with others, he controlled or had the authority to control, or participated in, the acts and practices of Vulcun, including the acts and practices alleged in this complaint. His principal office or place of business is the same as that of Vulcun.
3. Respondent Murtaza Hussain is a founder and officer of Vulcun. Individually or in concert with others, he controlled or had the authority to control, or participated in, the acts and practices of the Vulcun, including the acts and practices alleged in this complaint. His principal office or place of business is the same as that of Vulcun.
4. As described below, Respondents installed software, including Chrome browser extensions and mobile apps, on users' desktops and mobile devices without adequately disclosing to users that the software would be installed. Respondents' conduct had two parts

First, Respondents acquired a popular browser-based game called Running Fred and replaced it entirely with their own software program, called Weekly Android Apps, on users' desktops. Users of Running Fred were not informed that the game had been replaced. Secondly, Weekly Android Apps contained code that would install, again without adequate disclosure to users, apps on user's mobile devices.

5. The acts and practices of Respondents alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the Federal Trade Commission Act.

Desktop Computer Browser Extensions

6. Google Inc. ("Google") offers a web browser, Chrome, as a free download for desktop computer and mobile operating systems. The desktop computer version of Chrome allows users to install "extensions," which are software programs that can modify and extend Chrome's functionality. Extensions are created using web technologies like HTML, JavaScript, and Cascading Style Sheets. Extensions can perform minimal functions in the browser, like displaying the number of unread emails in a user's account. But they also operate as complete, independent programs. Among the available Chrome browser extensions are games, news readers, video streaming clients, project management applications, and many others. Chrome browser extensions currently run only in the desktop computer version of Chrome; the version of Chrome for mobile operating systems does not allow the use of extensions.

7. The Chrome Web Store is Google's portal for consumers to find and install extensions in their Chrome web browser. Similar to a mobile app store like the Google Play Store, the Chrome Web Store allows users to view information about extensions that are offered by developers and also to install those extensions. The Chrome Web Store displays, for example, user reviews and ratings of available Chrome browser extensions. The Chrome Web Store also displays the number of users who have installed each extension. When users comment or review an extension, it is possible for the developer of the extension to write a response to the review. These reviews and any responses are then visible to consumers browsing the Chrome Web Store.

Installation of Mobile Apps

8. The Google Play Store is Google's portal for consumers to find and install apps on devices running the Android mobile

photos with the device's camera, an app may access. The installation process allows users to decline to install an app if they do not wish to grant the app's requested permissions.

The Takeover of *Running Fred*

11. Chrome browser extensions are associated in the Chrome Web Store with particular developers or other entities. Dedalord, LLC, a game developer, offered a browser extension, Running Fred, in the Chrome Web Store. Running Fred became a popular Chrome extension game with a large number of users. Running Fred had more than 200,000 users and an average star rating of 4.5 stars (out of 5 possible stars) with approximately 2,300 reviews.

12. On or around September 9, 2014, Respondents acquired control of Running Fred. Shortly thereafter, Respondents replaced Running Fred on these users' browsers with another Chrome browser extension called Weekly Android Apps. The users of Running Fred were not notified that Running Fred had been replaced.

Respondents' Advertising of *Weekly Android Apps*

13. After replacing Running Fred with Weekly Android Apps, Respondents continued to advertise and distribute Chrome Extensions called Weekly Android Apps by Cindy to consumers via the Chrome Web Store. In the Chrome Web Store, Respondents stated that Weekly Android Apps offered consumers "the hottest mobile apps." Moreover, Respondents claimed the apps selected would be "hand picked" and not influenced by payments from developers. Exhibit A (screen shot from Chrome Web Store) in fact, Respondents did accept payments from at least one developer for apps that was included in Weekly Android Apps. Respondents also claimed inaccurately that their extension, which includes Weekly Android Apps, had been featured on prominent tech sites, such as MacRumors, Engadget, and hacker. Further, Respondents claimed again inaccurately that Apps by Cindy had been selected as "one of the best mobile blogs of 2013" by RunMobile.

14. Consumers often install extensions based on the popularity and star rating of Chrome browser extensions in the Chrome Web Store. After the takeover of Running Fred, the information page for Weekly Android Apps on the Chrome Web Store stated that it had more than 200,000 users, 2,300 reviews, and an average star rating. Exhibit B (screen shot from Chrome Web Store) This user count and star rating, however, primarily reflected the user count and star rating associated with Running Fred. Few, if any of, these users had ever rated or used Weekly Android Apps.

Disruption of Users' Experience on Mobile Devices and Desktop Computers

15. Once installed on users' desktop computers, Weekly Android Apps force-installed apps onto those users' mobile devices. Weekly Android Apps accomplished this by preventing users from reviewing the Android permissions associated with the apps that it installed onto users' mobile devices. These permissions would have shown the user what information or device functionality the apps could access. Code in Weekly Android Apps hid these permissions and

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 forios installed on users' mobile devices could have provided Respondents and the app developer with access to private information stored on the users' mobile devices, including user's address book, photos, location, persistentncl[02004 -2([0200w

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 App users.

22. Therefore, the representations set forth in Paragraph 20