The Federal Trade Commission, having reason to believe that Practice Fusion, Inc. ("Respondent") has violated the provisions of the Federal Trade Commission Act, and it appearing to02 Tw650 Townsend Street, Suite 500, San Francisco, California 94103.

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

- section or elsewhere in its privacy policy that it would publicly post reviews by patients of their providers.
- 7. Consumers who clicked on the stars in the email message were taken to the survey form, which among other things included

8. Consumers were required to check the box next to the phrase, "I agree to the terms of the Patient Authorization," in order to submit their feedback, but were not required to *view* the Patient Authorization. Consumers who clicked through to the Patient Authorization would have seen

PRACTICE FUSION'S DECEPTIVE FAILURE TO DISCLOSE

- 15. As described in Paragraphs 5-9, from April 5, 2012 through April 8, 2013, Respondent represented, directly or indirectly, expressly or by implication, that responses to a healthcare provider satisfaction survey would be communicated to the consumer's healthcare provider.
- 16. Respondent failed to disclose adequately