

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Joseph J. Simons, Chairman
Noah Joshua Phillips
Rohit Chopra
Rebecca Kelly Slaughter
Christine S. Wilson

In the Matter of

Aleksandr Kogan,
an individual, and

Alexander Nix, Individually and as Chief
Executive Officer of Cambridge Analytica,
LLC .

DOCKET NO. &
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COMPLAINT

The Federal Trade Commission, having reason to believe Aleksandr Kogan, an individual, and Alexander Nix, individually and at the relevant time, Chief Executive Officer of Cambridge Analytica, LLC, (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:

NATURE OF THE CASE

1. This action seeks to hold Respondents responsible for their deceptive acts and practices to harvest personal information from Facebook users for political and commercial targeted advertising purposes. Respondents, along with Cambridge Analytica, LLC, jointly and severally developed, operated, analyzed and used data obtained through an application on the Facebook platform called the "GSRApp" also sometimes referred to publicly as the "thisisyourdigitallife" app. Using the Graph application programming interface ("Graph API") Facebook made available to developers on its platform, the GSRApp harvested Facebook user profile data from approximately 250,000–270,000 Facebook users who directly interacted with the app, as well as 50–65 million of the "friends" in those users' social networks. Cambridge Analytica, LLC, Alexander Nix, and Aleksandr Kogan obtained the app users' consent to collect their Facebook profile data through false and

deceptive means. Specifically, they falsely represented that the GSRApp did not collect any identifiable information from Facebook users who authorized it.

RESPONDENTS

2. Respondent Aleksandr Kogan (“Kogan”) is an American citizen currently residing in New York. Until September 2018, Kogan was a Senior Research Associate at the Department of Psychology at the University of Cambridge in the United Kingdom, where he established and led the Cambridge Prosociality and Wellbeing Lab (“CPW Lab”). Kogan was also an owner and co-founder of the non-profit U.K. corporation, Global Science Trust. U.S. de-54 (4)(hea)6-0-ni Utica06 (.2l)--6 11ma

Facebook allowed this data collection even though the “friends” did not have any direct interaction with the app or website (“Affected Friends”). While Facebook had announced in April 2014 that it was introducing a new version of the Graph API—v.2—that would no longer allow developers to collect profile data from Affected Friends, only from the App Users themselves, existing apps had one year before these limitations went into effect, whereas new apps would automatically be limited. Kogan’s app was, thus, “grandfathered” into the more permissive data collection allowable under Graph API (v.1), making Kogan an appealing partner for ndT (g),8n(16.-2 ene ([T]-34).-2 (b1mw 6.)o(t)-2c2 1)10 ((A(cv(n))3)-20 (

22.

THEREFORE, the Federal Trade Commission this (L J K W d a y o f W R H P, 2019)
has issued this Complaint against Respondents.

By the Commission.

April J. Tabor
Acting Secretary

SEAL: