Analysis of Proposed Consent Order to Aid Public Comment In the Matter of Aleksandr Koganand Alexander Nix, individuals File Nos. 182 3106 and 182 3107

The Federal Trade Commission ("Commission") has accepted, subject to final approval, two agreement ontaining consent ordefrom Aleksandr Koganand Alexander Nix individuals.

The proposed consent ordenave been placed on the public record for thirty (30) days for receipt of comments by interested persons. Comments received during this period wll become part of the public record. After thirty (30) days, the Commissionvill again review the agreement the comments received, and will decide whether it should withdraw from the agreement take appropriate action or make final the agreements proposed order

Aleksandr Kogan, until September 2018, wasenior Research Associate and Lecturer at the Department of Psychology at the University of Cambridge in the United Kingdom. Kogan was also the developer of a Facebppkcationcalled the GSRApp sometimes publicly referred to as the issisyour digitallife app

Alexander Nix, until April 2018, was the Chief Executive Officer of Cambridge Analytica LLC and the head of SCL Elections Ltd.

The Commission's propose draplaint alleges that Kogan, together withle data analytics company Cambridge Analytica, LLC, and Chief Executive Officer, Alexander Nix used the GSRApp to harvest certain Facebook user profile data from approximately 250,000270,000 Facebook users who directly interded with the app ("App Users"), as well as 5065 million of the "friends" in those user acebook social network. The proposed complaint alleges that Respondents obtained the App Users'