

**PREPARED STATEMENT OF THE
FEDERAL TRADE COMMISSION**

Before the

COMMITTEE ON APPROPRIATIONS

SUBCOMMITTEE ON FINANCIAL SERVICES AND GENERAL GOVERNMENT

UNITED STATES SENATE

WASHINGTON, DC

MAY 7, 2019

I. INTRODUCTION

Chairman Kennedy, Ranking Member Coons, and members of the Subcommittee, I am Joe Simons, Chairman of the Federal Trade Commission (“FTC” or “Commission”), and I am pleased to appear before you today to testify about the Commission’s FY 2020 appropriations request and its work to protect consumers and promote competition.¹

The FTC is an independent agency with three main bureaus: the Bureau of Consumer Protection (“BCP”); the Bureau of Competition (“BC”); and the Bureau of Economics (“BE”), which supports both BCP and BC. The FTC is the only federal agency with a broad mission to both protect consumers and maintain competition in most sectors of the economy. Its jurisdiction includes privacy and data security, consumer fraud, mergers and acquisitions, and anticompetitive tactics by pharmaceutical and other companies. We enforce the law across a range of sectors, including health care, high technology, and emerging industries. The FTC has a long history of bipartisanship and cooperation, and we work hard to maintain it.

The FTC has broad law enforcement responsibilities under the Federal Trade Commission Act,² and enforces a wide variety of other laws, ranging from the Clayton Act to the Fair Credit Reporting Act. In total, the Commission has enforcement or other responsibilities under more than 75 laws.³ The Commission pursues a vigorous and effective law enforcement program, and the impact of its work is significant. Its competition enforcement program is critically important to maintaining competitive markets across the country: vigorous competition results in lower prices, higher quality goods and services, and innovative and beneficial new products and services.

¹ This written statement presents the views of the Federal Trade Commission. My oral statement and responses to questions are my own and do not necessarily reflect the views of the Commission or any other Commissioner.

² 15 U.S.C. § 41 *et seq.*

³ See <https://www.ftc.gov/enforcement/statutes>.

The FTC also investigates and prosecutes those engaging in unfair or deceptive acts or practices, and seeks to do so without impeding lawful business activity. The agency has a varied toolkit to advance its mission. For example, the Commission collects consumer complaints from the public and maintains one of the most extensive consumer protection complaint databases, Consumer Sentinel. The FTC and other federal, state, and local law enforcement agencies use these complaints in their law enforcement and policy efforts. The FTC also has rulemaking authority. In addition to the FTC's Magnuson-Moss rulemaking authority, Congress has given the agency discrete rulemaking authority under the Administrative Procedure Act ("APA") over specific topics. The agency regularly analyzes its rules, including seeking public feedback, to ensure their continued efficacy. The FTC also educates consumers and businesses to encourage informed consumer choices, compliance with the law, and public understanding of the competitive process.

To complement these enforcement and public education efforts, the FTC pursues a consumer protection and competition policy and research agenda to improve agency decision-making, and engages in advocacy and education initiatives. Last fall, the Commission began its *Hearings on Competition and Consumer Protection in the 21st Century*.⁴ This extensive series of public hearings is exploring whether broad-based changes in the economy, evolving business practices, new technologies, or international developments might require adjustments to competition and consumer protection law, enforcement priorities, and policy. To date, we have heard from more than 350 panelists and received more than 850 public comments. The formal hearings will conclude shortly, and we will be accepting public comments through at least the end

⁴ FTC, *Hearings on Competition and Consumer Protection in the 21st Century*, <https://www.ftc.gov/policy/hearings-competition-consumer-protection>

of June. These hearings underscore the unique role that the FTC plays in the development of sound competition and consumer protection policy.

This testimony provides a brief overview of the FTC's budget and resources. It also discusses the FTC's work to protect U.S. consumers and competition, including highlights of some of the agency's major recent activities and initiatives.

funding to update the Commission's portfolio of direct mission applications, as outlined in the agency's Information Resources Management ("IRM") Strategic Plan.⁵ These applications support operations that are necessary for the successful execution of the FTC's mission, such as the Hart-Scott-Rodino ("HSR") Premerger Filing Program and the collection and management of consumer redress funds. The requested funding would support the development of a roadmap for modernization of all direct mission applications and the initial migration of those currently managed in FTC's on-premise data center to cloud platforms. The funding would also be used to improve productivity through process reengineering and increased integration with other technology and systems used by FTC staff and the public.

In addition to the technology benefits, these additional resources would dramatically improve our business operations. Notably, many of the agency's processes still involve manual paperwork and employee intervention to complete an activity. For example, the current HSR premerger filing process requires a significant amount of time-consuming manual input from the public, FTC employees, and other federal agencies. The HSR premerger filing process starts when a merging party submits a hard copy of the HSR form, called an HSR filing, to the FTC and Department of Justice ("DOJ"). The entire filing, including attachments, often runs to hundreds of pages. After receiving the HSR filing, FTC staff must manually enter the information provided in the filing into the premerger software. After all this information is inputted manually, the software tracks the status of the filing through the review process. A modernized version of the premerger F2.[(F0)-(a)1as

other federal agencies. Projects such as the digitalization of the HSR Premerger Filing would also directly support FTC's compliance with the recently enacted 21st Century IDEA Act.

marketplace.

The Commission's primary source of legal authority in the privacy and data security space is Section 5 of the FTC Act, which prohibits deceptive or unfair commercial practices.¹⁰ Under Section 5 and other authorities granted by Congress, the FTC has aggressively pursued privacy and data security cases in myriad areas, including children's privacy, financial privacy, health privacy, and the Internet of Things.¹¹ To date, the Commission has brought more than 65 cases alleging that companies failed to implement reasonable data security safeguards, and more than 60 general privacy cases.¹²

Section 5, however, is not without its limitations. For example, Section 5 does not allow the Commission to seek civil penalties for the first offense

security.²⁰ The Commission also announced its fourth PrivacyCon, which will take place on June 27, an annual event that explores evolving privacy and data security research.²¹

The Commission also is empowered to conduct industry studies related to privacy and data security under Section 6(b) of the FTC Act.²² In March, we issued 6(b) orders to several internet service providers to evaluate their privacy practices.²³ As we have done in the past, we will use the information we learn from this study to better inform our policy and enforcement work.

The Commission continues to work closely with our law enforcement partners in the European Union (“EU”) and its member states to ensure the success of the EU-U.S. Privacy Shield framework. Under the EU’s General Data Protection Regulation (“GDPR”), companies are required to meet certain data protection requirements in order to transfer consumer data from the EU to other jurisdictions. Privacy Shield—a voluntary mechanism that companies can use to comply with the GDPR when transferring data from Europe to the United States and which facilitates billions of dollars in transatlantic data flows—is enforced by the Federal Trade Commission.

second annual review of the Privacy Shield framework, culminating in a European Commission recommendation for continued FTC enforcement in the Privacy Shield area.²⁶ Our Privacy Shield approach is built on four pillars: referrals from the Department of Commerce; priority consideration of referrals from the European Union; checking for Privacy Shield violations as part of every privacy investigation; and proactive monitoring of Privacy Shield participants.

Finally, many of the FTC's privacy and data security investigations and cases involve complex facts and technologies and well-financed defendants, often requiring outside experts, which can be costly. It is critical that the FTC have sufficient resources to support its investigative and litigation needs, including expert work, particularly as demands for enforcement in this area continue to grow.

B. Protecting Consumers from Fraud

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In response to the rise in imposter complaints, the FTC has filed multiple cases against defendants who deceptively pose as the government or well-known tech companies. For example, the FTC recently brought two actions against defendants for falsely claiming affiliations with the federal government. The Commission charged Sunkey Publishing with using copycat military recruitment websites to trick consumers seeking military careers into providing their personal information; according to the complaint, Sunkey then sold the information to post-secondary schools as part of its lead generation business.²⁸ The Commission's action against American Immigration Center stopped an alleged scheme using deceptive websites and advertising that falsely implied an affiliation with the U.S. Citizenship and Immigration Services to dupe legal residents trying to renew their green cards or apply for naturalization.²⁹

The Commission also helps older Americans protect themselves from fraud. Last month, the FTC joined federal, state, and international law enforcement partners in announcing a nationwide and international crackdown on elder fraud schemes with a particular focus on technical support scams. Technical support scams dupe consumers into believing their computers are infected with viruses and malware, and then charge them hundreds of dollars for unnecessary repairs. As part of that initiative, the FTC filed suit against technical support operator Elite IT Partners,³⁰ developed new consumer education materials to help consumers avoid falling victim to these scams,³¹ and

²⁸ FTC Press Release, FTC, *FTC Takes Action against the Operators of Copycat Military Websites*

released new complaint data that illustrates the disproportionate effect these scams have on older adults.³²

Over the last year, the FTC has targeted business opportunity scams, filing numerous actions against defendants who promise consumers a legitimate opportunity to earn money if consumers will pay for defendants' "coaching" services. In reality, the "coaching" services provide no value to consumers and are typically nothing more than a handful of training videos and documents with generic information. In Digital Altitude, the Commission brought an action against defendants who allegedly defrauded consumers out of millions of dollars—some paying more than \$50,000—by promising of individualized coaching on how to run an online business.³³ The Commission also brought separate actions against defendants in FBA Stores³⁴ and, with the Attorney General of Minnesota, against defendants in Sellers Playbook³⁵ based on allegations that the defendants falsely claimed they could teach consumers "the secrets for making money on Amazon." The Commission's actions shut down three large operations that resulted in over \$100 million in losses to consumers.

The Commission's fraud

Sanctuary Belize, a massive land sale scam that allegedly bilked over \$100 million from consumers, largely retirees. According to the complaint, recidivist Andris Pukke perpetrated an international scheme selling lots in a development in remote southern Belize with promises that he never intended to keep. The FTC shut down the enterprise by obtaining a temporary restraining order and preliminary injunction, and continues to litigate the matter.³⁷

The FTC frequently works with other law enforcement agencies to tackle widespread fraud. In July 2018, the FTC launched “Operation Donate with Honor,” a coordinated effort to target fraudulent and deceptive fundraising for military and veterans’ causes that has resulted in over 100 law enforcement actions.³⁸ As part of that initiative, the FTC has announced four cases with several state Attorneys General to shut down sham charity operations that were using consumers’ generous donations for private benefits and spent very little of the donated funds on the charitable programs.³⁹

The FTC strives to stay ahead of scammers by analyzing Sentinel complaints to help raise public awareness about fraud. In October 2018, the FTC launched its *Consumer Protection Data Spotlight* series to alert law enforcers, industry, and the public about growing threats and important patterns identified in Sentinel data. The *Spotlight* explores data over time, showing how scammers

scheme.

³⁷ FTC Press Release, *At FTC’s Request, Court Halts Massive “Sanctuary Belize” Real Estate Investment Scam* (Nov. 8, 2018), <https://www.ftc.gov/news-events/press-releases/2018/11/ftcs-request-court-halts-massive-sanctuary-belize-real-estate>.

³⁸ FTC Press Release, *Operation Donate with Honor: Law Enforcers Unite to Challenge Deceptive Fundraising* (Jul. 19, 2018), <https://www.ftc.gov/news-events/blogs/business-blog/2018/07/operation->

change tactics and catch consumers off guard.⁴⁰ In addition, the FTC is making Sentinel data more

ad agencies who allegedly used native advertising—commercial advertising masquerading as editorial content—to deceptively sell health products such as mosquito repellants during the Zika virus outbreak and cognitive improvement supplements.⁴⁴ The Commission also has sued companies that claimed, allegedly without scientific evidence, that using their products could alleviate the symptoms of opioid withdrawal and increase the likelihood of overcoming opioid dependency.⁴⁵ The Commission obtained an order barring a marketer from making deceptive claims about its products’ ability to mitigate the side effects of cancer treatments.⁴⁶ And we have issued joint warning letters with the Food and Drug Administration to mark5 (s)1 (2b4-0.004 Tl k Tw [(w)-2 8 (o)2 (o -

recidivist robocaller and his partners for allegedly running a Google rankings scam that used robocalls to reach their victims and bombarded individuals who did not own businesses with the same robocalls.⁵⁴ In April, a court granted the FTC’s motion for summary judgment, banning him and one of his co-defendants from all telemarketing and imposing a \$3.3 million judgment.

Despite the FTC’s vigorous law enforcement program, technological advances continue to permit bad actors to place millions or even billions of calls, often from abroad, at very low cost, and in ways that are difficult to trace. This phenomenon continues to infuriate consumers and challenge enforcers. Recognizing that law enforcement, while critical, is not enough to solve the problem of illegal calls, the FTC has taken steps to spur the marketplace to develop technological solutions. For instance, from 2013 to 2015, the FTC led four public challenges to incentivize innovators to help tackle the unlawful robocalls that plague consumers.⁵⁵ The FTC’s challenges contributed to a shift in the development and availability of technological solutions in this area, particularly call-blocking and call-filtering products. Consumers can access information about potential solutions available to them on the FTC’s website.⁵⁶ The telecommunications industry has also developed a new framework, SHAKEN/STIR, which is designed to limit illegitimate number spoofing and reduce illegal robocalls.

⁵³ *FTC v. Pointbreak Media LLC et al.*, No. 18-cv-61017 (S.D. Fla. May 23, 2018), <https://www.ftc.gov/enforcement/cases-proceedings/172-3182/pointbreak-media-llc-0>.

⁵⁴ Previously, in 2017, the FTC settled claims with Ramsey for illegal robocalls and calls to numbers listed on the National Do Not Call Registry. *See FTC v. Ramsey et al.*, No. 9:17-cv-80032 (S.D. Fla. Jan. 13, 2017), <https://www.ftc.gov/enforcement/cases-proceedings/132-3254/justin-ramsey>.

⁵⁵ The first challenge, in 2013, called upon the public to develop a consumer-facing solution to block illegal robocalls. One of the winners, “NomoRobo,” was on the market within 6 months after being selected by the FTC. NomoRobo, which reports blocking over 600 million calls to date, is being offered directly to consumers by a number of telecommunications providers and is available as an app on iPhones. *See* FTC Press Release, *FTC Announces Robocall Challenge Winners* (Apr. 2, 2013), <https://www.ftc.gov/news-events/press-releases/2013/04/ftc-announces-robocall-challenge-winners>; *see also* FTC Press Release, *FTC Awards \$25,000 Top Cash Prize for Contest-Winning Mobile App That Blocks Illegal Robocalls* (Aug. 17, 2015), <https://www.ftc.gov/news-events/press-releases/2015/08/ftc-awards-25000-top-cash-prize-contest-winning-mobile-app-blocks>; FTC Press Release, *FTC Announces Winners of “Zapping Rachel” Robocall Contest* (Aug. 28, 2014), <https://www.ftc.gov/news-events/press-releases/2014/08/ftc-announces-winners-of-zapping-rachel-robocall-contest>.

The FTC continues to engage with industry stakeholders and supports the industry initiative to authenticate caller ID numbers. The FTC also regularly works with its state, federal, and international partners to combat illegal robocalls.⁵⁷

For many years, the Commission has recommended eliminating the common carrier exemption. The exemption is outdated and no longer makes sense in today's marketplace where the lines between telecommunications and other services are increasingly blurred. It impedes the FTC's work tackling illegal robocalls and more broadly circumscribes other enforcement initiatives. For example, a carrier that places, or assists and facilitates, illegal telemarketing might argue that it is beyond the Commission's reach because of the common carrier exemption. Likewise, the exemption may frustrate the Commission's ability to obtain complete relief for consumers when there are multiple parties, some of whom are common carriers. It also may pose difficulties when a company engages in deceptive or unfair practices involving a mix of common carrier and non-common carrier activities. Finally, litigation has been complicated by entities that attempt to use their purported status as common carriers to shield themselves from FTC enforcement.⁵⁸

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each year through the FTC’s website, the media, and partner organizations that disseminate consumer information on the agency’s behalf. The FTC delivers actionable, practical, plain-language guidance on dozens of issues, and updates its consumer education materials whenever it has new information to share.

The FTC disseminates these tips through articles, blog posts, infographics, videos, social media, and education campaigns. For example, in response to the enactment of the Economic Growth, Regulatory Relief, and Consumer Protection Act,⁵⁹ which allows consumers nationwide to freeze their credit and place year-long fraud alerts for free, the Commission helped consumers take advantage of the new protections by: updating IdentityTheft.gov; revising its identity theft publications; and providing blogs, webinars, and podcasts in collaboration with a wide range of partners.⁶⁰

The FTC also tailors its guidance to serve specific audiences, including older adults.⁶¹ A recent FTC report to Congress details how older adults experience scams,⁶² and a series of FTC Data Spotlights gives further details on scams that affect older adults⁶³ and helps educate consumers.⁶⁴

The Commission also works to provide companies with resources on a variety of issues that affect businesses. For example, our “Cybersecurity for Small Business” campaign, a joint effort with the National Institute of Standards and Technology, the Small Business Administration, and

⁵⁹ Pub. L. No: 115-174.

⁶⁰ See, e.g., FTC Press Release, *Starting Today, New Federal Law Allows Consumers to Place Free Credit Freezes and Yearlong Fraud Alerts* (Sept. 21, 2018), <https://www.ftc.gov/news-events/press-releases/2018/09/starting-today-new-law-allows-consumers-place-free-credit-freezes>.

⁶¹ See www.ftc.gov/PassItOn and www.ftc.gov/Pasalo. The campaign has distributed more than 10.6 million print publications since its creation, including 1.1 million so far in fiscal year 2019.

⁶² FTC Report, *Protecting Older Consumers: 2017-2018* (Oct. 2018), <https://www.ftc.gov/reports/protecting-older-consumers-2017-2018-report-congress-federal->,

the Department of Homeland Security, includes a dozen need-to-know topics as well as fact shee

granted preliminary injunctions in two cases;⁶⁷ the parties abandoned their plans in the face of our court challenge in two cases;⁶⁸ and a ruling is currently pending in the fifth matter.⁶⁹

Over the past year, the Commission has continued its decades-long efforts to fight anti-competitive conduct in the pharmaceuticals and health care industries, where rising costs continue to burden American consumers. For over twenty years, the Commission has prioritized ending anticompetitive reverse payment patent agreements in which a brand-name drug firm pays its potential generic rival to delay entering the market with a lower cost generic product. Following the U.S. Supreme Court's 2013 decision in *FTC v. Actavis, Inc.*,⁷⁰ the Commission is in a much stronger position to protect consumers. Since that ruling, the FTC obtained a landmark \$1.2 billion settlement in its litigation involving the sleep disorder drug, Provigil,⁷¹ and other manufacturers, including the remaining *Actavis* defendants,⁷² have agreed to abandon the practice.⁷³ In administrative litigation, the Commission ruled in March of this year that Impax had engaged in an illegal reverse payment agreement designed to block consumers' access to a lower-cost generic

⁶⁷ See, *FTC v. Tronox Ltd.*, 332 F. Supp. 3d 187 (D.D.C 2018), (granting preliminary injunction); *FTC v. Wilh. Wilhelmsen Holding ASA*,

version of the branded drug, Opana ER.⁷⁴ In addition, the Commission has challenged other anticompetitive conduct by drug manufacturers. Last month, the Commission filed a complaint against the health information company Surescripts, alleging that it employed illegal vertical and horizontal restraints to maintain its monopolies over two electronic prescribing, or “e-prescribing,” markets (routing and eligibility).⁷⁵ Additionally, a federal court recently ruled that AbbVie Inc. used sham litigation illegally to maintain its monopoly over the testosterone replacement drug

The Commission also continues to focus its attention on high technology markets. In an effort to more closely monitor developments in the technology sector, the

V. INTERNATIONAL COOPERATION

The FTC also engages in significant international work to support its domestic enforcement programs. During the last fiscal year, the FTC cooperated in 43 investigations, cases, and enforcement projects with foreign consumer, privacy, and criminal enforcement agencies. To sustain this level of cooperation, the agency often works through global enforcement networks, such as the International Consumer Protection and Enforcement Network, the Global Privacy Enforcement Network, the Unsolicited Communications Enforcement Network, and the International Mass Marketing Fraud Working Group. The FTC also works directly with foreign counterparts on enforcement issues.⁸⁴

International enforcement cooperation also is critical for the FTC's competition program. With the expansion of global trade and the operation of many companies across national borders, the FTC and DOJ increasingly engage with foreign antitrust agencies to ensure close collaboration on cross-border cases and convergence toward sound competition policies and procedures.⁸⁵ The FTC effectively coordinates reviews of multijurisdictional mergers and continues to work with its international counterparts to achieve consistent outcomes in cases of possible anticompetitive conduct. The U.S. antitrust agencies facilitate dialogue and promote convergence through multiple channels, including through strong bilateral relations with foreign competition agencies and multilateral competition organization projects and initiatives. The FTC also works with other agencies within the U.S. government to advance consistent competition enforcement policies,

⁸⁴ For example, the FTC has conducted several trainings and roundtables in the United States and India to help develop

practices, and procedures in other parts of the world.⁸⁶

The U.S. SAFE WEB Act is key to much of the agency's international work, especially on consumer protection and privacy matters.⁸⁷ Passed in 2006 and renewed in 2012, the Act strengthens the FTC's ability to work on cases with an international dimension. It allows the FTC to share evidence and provide investigative assistance to foreign authorities in cases involving spam, spyware, misleading health and safety claims, privacy violations and data security breaches, and telemarketing fraud. In many cases, the foreign agencies investigated conduct that directly harmed U.S. consumers; in others, the FTC's action led to reciprocal assistance. The Act also has bolstered the agency's authority to engage in enhanced enforcement cooperation with foreign counterparts, including through memoranda of understanding, international agreements, staff exchanges, and other mechanisms.

The U.S. SAFE WEB Act has been a remarkable success. The Act enabled the FTC to respond to more than 130 SAFE WEB information sharing requests from more than 30 foreign enforcement agencies. It allowed the FTC to issue more than 115 civil investigative demands in more than 50 investigations on behalf of foreign agencies, both civil and criminal. The Commission has also used this authority to file suit in federal court to obtain judicial assistance for one of its closest law enforcement partners, the Canadian Competition Bureau.⁸⁸

The FTC's foreign law enforcement partners similarly have assisted FTC enforcement actions. For example, the FTC worked directly with U.K. and Canadian authorities to halt Next-

⁸⁶ For example, the Commission works through the U.S. government's interagency processes to ensure that competition-related issues that also implicate broader U.S. policy interests, such as the protection of intellectual

Gen Inc., a sweepstakes scam.⁸⁹ The FTC relied on key information sharing provisions of the U.S. SAFE WEB Act to facilitate cooperation with its U.K. partner and, last month, the defendants forfeited \$30 million in cash and assets to settle the FTC's charges. In the privacy arena, the FTC used key provisions of the U.S. SAFE WEB Act to collaborate successfully with the Office of the Privacy Commissioner of Canada in its COPPA case against V-Tech, the FTC's first case involving Internet-connected toys.⁹⁰ The FTC also brought several significant enforcement actions in the past year relying on the SAFE WEB Act's provisions that allow the FTC to reach foreign conduct that has a "reasonably foreseeable" effect on U.S. consumers, or that involves "material conduct" in the United States, as the basis for challenging practices involving foreign defendants.⁹¹

The Act also underpins the FTC's ability to participate in cross-border cooperation arrangements. This includes data transfer mechanisms such as the EU-U.S. Privacy Shield framework and the Swiss-U.S. Privacy Shield framework, as well as the APEC Cross-Border Privacy Rules System, designed to protect privacy and data flows in the Asia-Pacific region. Many U.S. companies use these mechanisms to carry out cross-border data flows consistent with strong privacy protections. The SAFE WEB Act also provides the FTC with key powers helping to carry out enhanced cooperation with important partners.⁹²

⁸⁹ FTC Press Release, *Operators of Sweepstakes Scam Will Forfeit \$30 Million to Settle FTC Charges* (Mar. 7, 2019), <https://www.ftc.gov/news-events/press-releases/2019/03/operators-sweepstakes-scam-will-forfeit-30-million-settle-ftc>.

⁹⁰ *U.S. v. VTech Electronics Ltd., et al.*, No. 1:18-cv-00114 (N.D. Ill. Jan. 8, 2018), <https://www.ftc.gov/enforcement/cases-proceedings/162-3032/vtech-electronics-limited>.

⁹¹ See, e.g., FTC Press Release, *Court Temporarily Halts International Operation that Allegedly Deceived Consumers through False Claims of "Free Trial" Offers and Imposed Unauthorized Continuity Plans* (Nov. 28, 2018), <https://www.ftc.gov/news-events/press-releases/2018/11/court-temporarily-halts-international-operation-allegedly>;

FTC Press Release, *At FTC's Request, Court Halts Massive "Sanctuary Belize" Real Estate Investment Scam* (Nov. 8, 2018), <https://www.ftc.gov/news-events/press-releases/2018/11/ftcs-request-court-halts-massive-sanctuary-belize-real-estate>; FTC Press Release, *FTC Halts Online Marketers' Responsibility* (Oct. 1, 2018), <https://www.ftc.gov/news-events/press-releases/2018/10/ftc-halts-online-marketers-responsibility>.

The SAFE WEB Act's provision authorizing staff exchanges also yields tremendous benefits. Using the Act, the FTC established an International Fellows program that has enabled the agency to host over 120 officials of foreign competition, consumer protection, and data privacy agencies to work alongside FTC staff on enforcement [wgsido8hee(n)-4 0af-5 (io hos)-1en 0 Td [(C)-7 (s)-5 (tn-