

Concurring Statement of Commissioner Christine S. Wilson
FTC v. RevenueWire, Inc.
File No. 162-3087

April 20, 2020

Today's settlement resolves the FTC's allegations that payment processor RevenueWire, Inc. (RevenueWire) and its Chief Executive Officer Roberta Leach violated Section 5 of the FTC Act, among other allegations, when the company laundered charges for telemarketers engaged in tech support scams. I support the complaint and stipulated order but write separately to highlight my understanding of the FTC's unfairness allegation. I voted for this complaint with the understanding that this case does not signal a shift on the part of the FTC to a strict liability standard for payment processors. Merely processing payments for merchants that subsequently were found to have made