

deceptive statements, the respondent furnished the means and instrumentalities for its clients to engage in deceptive acts or practices.² In this case, although TRUSTe disclosed to clients its change in status, it continued to recertify privacy policies using language TRUSTe had itself supplied about its corporate status that was no longer true. TRUSTe's recertification of these inaccurate privacy policies is the conduct we take aim at – it provided a stamp of approval of a false representation which TRUSTe's clients then