PROTECTING OLDER CONSUMERS

2018-2019

A Report of the Federal Trade Commission

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I. Introduction

DFWLRQV RYHU WKH SUHFHGLQJ \HDU ,Q DGGLWLRQ WR WKH
the agency s efforts to protect older consumers, including its research and strategic initiatives, its
ODZ HQIRUFHPHQW DFWLRQV WKDW QRWHG DQ LPSDFW RQ R
and outreach.

II. D . E c.. Sa .Rs c O d G s s

The FTC conducts research and analysis, publishes information about patterns and trends, and
HQJDJHV LQ FRRUGLQDWHG HIIRUWV WR SURWHFW ROGHU DG
consumer issues such as identity theft protection. The agency is able to spot patterns and trends
WKURXJK LWV GDWD DQDO\VLV DQG UHVHDUFK DQG LW ZRUN
issues concerning older adults. The FTC can then use its limited resources strategically to respond
to the needs of older consumers through enforcement, policy, education, and other initiatives.

A. R ac ad Daa Aa s

The FTC collects and analyzes consumer report information through its Consumer Sentinel
1HWZRUN [3] 6HQWLQHO´ WR LQIRUP LWV FRQVXPHU SURWHFW
SURYLGHV IHGHUDO VWDWH DQG ORFDO ODZ HQIRUFHPHQW
RQ D ZLGH YDULHW\ RI IUDXG UHODWHG WRSLFV[7] /DZ HQIRUF
FRQWULEXWH FRQVXPHU UHSRUWV WR WKH GDWDEDVH ZKLF
fraud and the name, address, and telephone number of the reported entity. Using Sentinel, the FTC
DQG LWV ODZ HQIRUFHPHQW SDUWQHUV FDQ DQDO\]H UHSRU
trends, identify problematic business practices and enforcement targets, and develop cases against
targets under investigation.

1. G s S . R s O d Ad s

During 2018, Sentinel took in nearly 3.1 million reports from consumers directly and through
its data contributors (Fraud: 1.5 million; Identity theft: 444,383; Other: 1.2 million).[8] Consumers
UHSRUWHG ORVLQJ QHDUO\ ELOOLRQ WR IUDXG $ERXW
FRQVXPHU DJH LQIRUPDWLRQ &RQVXPHUV ZKR VDLG WKH\ ZI
IUDXG UHSRUWV ZLWK UHSRUWHG ORVVHV RI QHDUO\ PLO

.H\ ¿QGLQJV IURP WKH GDWD DUH

,Q ROGHU DGXOWV ZHUH VWLOO WKH OHDVW OLNHO\ R
but their individual median dollar losses remained higher than for younger adults.

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[7] A list of Sentinel data contributors, including the U.S. Senate Special Committee on Aging and the AARP Fraud
:DWFK 1HWZRUN KWWSV RFDZZHGWFJRY HQIRUFHPHQW FRQVXPHU VHQWL

[8] See generally FTC, FTC Consumer Sentinel Netwo(July 29, 2019), available at
KWWSV SXEOLF WDEOHDX FRP SUR¿OH IHGHUDO WUDGH FRPPLVVLRQ

7KH JURZWK LQ PHGLDQ ORVVHV DPRQJ FRQVXPHUV DQG R
GLIIHUHQFHV LQ WKH W\SHV RI IUDXG ROGHU DGXOWV UHSRU
)RU H[DPSOH PHGLDQ LQGLYLGXDO ORVVHV RQ UHDO HVWDV
are far more likely to harm older adults, are among the highest reported in Sentinel.[12] In contrast,
PHGLDQ LQGLYLGXDO ORVVHV WR RQOLQH VKRSSLQJ IUDXGV
FRQVXPHUV DUH DPRQJ WKH ORZHVW UHSRUWHG +RZHYHU
compared across all frauds, older adults reported higher median losses for the vast majority of frauds tracked in Sentinel.

DGXOWV ¿OHG ORVV UHSRUWV RQ WHFK VXSSRUW VFDPV PRUH
PRUH OLNHO\ WR UHSRUW ORVLQJ PRQH\ RQ WKHVH VFDPV
DPRXQW ROGHU FRQVXPHUV UHSRUWHG ORVLQJ RQ WHFK VXS
DGXOWV ZHUH DOVR IDU PRUH OLNHO\ WR UHSRUW D ORVV RQ
DQG IULHQG LPSRVWHU VFDPV EXW ZHUH QRWDEO\ OHVV OLN
money to online shopping frauds, government imposter scams, and fake check scams.

An analysis of total dollars lost on these frauds presents a slightly different picture. For the frauds
OLVWHG LQ)LJXUH WKH KLJKHVW DJJUHJDWH GROODU ORVV
ZLWK ROGHU FRQVXPHUV UHSRUWLQJ [14]D 3UHHJDWHZHHSVWDNHV
and lottery scams are next, claiming $52 million from older consumers in that time period. The
JRYHUQPHQW LPSRVWHU FDWHJRU\ IROORZV DV D FORVH WKLU
reported. The losses on government imposter scams are an exemplar of the broader theme observed
at the opening of this section older consumers are less likely to report losing money to government
imposter scams than younger consumers[15] are. WKQ WKH\ GR ORVH PRQH\ KRZHYHU
lose a lot more than younger consumers.

d) Phone Scams Were Most Lucrative Against Older Consumers

Phone scams continue to be a tremendous problem for consumers of all ages. Older adults reported
WKDW D SKRQH FDOO ZDV WKH LQLWLDO FRQWDFW PHWKRG L
PHWKRGV FRPELQHG VHH)LJXUH 7KLV KLJKOLJKWV D SKRQ

[14] See ″9

reported calls from government imposters, particularly Social Security Administration imposters.[16]
+RZHYHU DV WKH WHDO EDUV VKRZ LQ)LJXUH ZKHQ UHS
WKH GLVSDULW\ LQ UHSRUWLQJ OHYHOV EHWZHHQ SKRQH D

&RQVXPHUV DQG RYHU ¿OHG PRUH ORVV UHSRUWV DERXW
RWKHU SKRQH IUDXGV ZKLOH FRQVXPHUV DJHV PRVW RI
IURP WHFK VXSSRUW VFDPPHUV 7HFK VXSSRUW VFDPV ZKLF
PHVVDJH UDWKHU WKDQ D SKRQH FDOO ZHUH DOVR WKH WR

e) Gift Cards Are Becoming Payment Method of Choice for Scammers, but Wire Transfers Persist in the Top Spot for Total Dollars Paid

&RQVXPHUV UHSRUWLQJ IUDXG IUHTXHQWO\ LQGLFDWH ZKDW
information helps the FTC identify opportunities for enforcement and consumer education. The
¿UVW FROXPQ LQ)LJXUH VKRZV WKDW ROGHU DGXOWV PRV
FUHGLW FDUG JLIW RU UHORDG FDUG RU ZLUH WUDQVIHU L
DJJUHJDWH GROODU ORVVHV WKDW ROGHU DGXOWV UHSRU
FRXUVH RI WKH QXPEHU RI ROGHU DGXOWV ZKR VDLG W

[16] See FTC Consumer Protection Data Spotlight, Growing Wave of Social Security Imposters Overtakes IRS Scam (Apr. 12, 2019), available at KWWSV ZZZ IWF JRY QHZV HYHQWV EORJV GDWD VSRW cial-security- imposters-overtakes-irs-scam.

The FTC monitors Sentinel data for these and other important trends to inform its strategies for

grandchildren.[22] The Spotlight QRWHG WKDW SHRSOH DQG ROGHU ZKR V
scammers, reported median individual losses of $9,000. And the Spotlight highlighted the vastly
disproportionate harm Sentinel data suggest tech support scams are causing older adults.[23] As
stated in the Spotlight LQ SHRSOH DQG ROGHU ZHUH DERXW ¿Y
losing money to tech support scams than younger people. The data stories and consumer tips
highlighted in the Spotlight have reached millions of consumers through coverage by both local
DQG QDWLRQDO QHZV SURJUDPV QHWZRUN PRUQLQJ VKRZV
DJHQF\¶V RZQ RXWUHDFK FKDQQHOV

3. How Do Older Adults Report to the FTC?

,PSRVWHU VFDPV ZHUH WKH WRS W\SH RI VFDPPHU UHSRUWHG
about scammers impersonating the government (often the Internal Revenue Service or the Social Security Administration) have risen to the top of the list. The FTC has also been impersonated through the years[24].

7R EHWWHU XQGHUVWDQG LPSRVWHU VFDPV WKLV \HDU W
ZKR UHSRUWHG ORVLQJ PRQH\ WR VFDPPHUV SUHWHQGLQJ
June 30, 2019, more than 100 consumers aged 60+ reported to the FTC that they lost more than $1,000 to FTC impersonators. Most of these people reported that the scammers told them they KDG ZRQ SUL]HV PRQH\ RU JUDQWV DQG WKH)7& ZR^•

:KLOH WKH HFRQRPLF LPSDFW RI ORVLQJ ODUJH DPRXQWV
devastating, the consumers reported feeling a sense of embarrassment and shame at having been
VFDPPHG 0DQ\ UHSRUWHG IHHOLQJ D ORVV WR WKHLU VHOI
RI H[SHULHQFH WKDW ZRXOG KHOS WKHP DYRLG EHLQJ IRRO
WKH\ ZHUH QRZ WRR ROG WR EH KDQGOLQJ WKHLU RZQ PRQH
numerous consumers, and independent of the monetary loss they also suffered.

The special outreach to this group of older consumers has not only helped the agency deliver
FRQVXPHU HGXFDWLRQ PRUH GLUHFWO\ LW KDV DOVR LPSUI
XQIROG 7KH LQVLJKWV JDLQHG IURP WKHVH FRQYHUVDWLRQ

of relevant activities.[26])7& VWDII VHUYH RQ WKH &RXQFLO¶V ZRUNLQJ J
DOVR SUHVHQWHG LQIRUPDWLRQ DERXW WKH)7&¶V ZRUN
Rural and Tribal Elder Justice Summit.[27] 'HV 0RLQHV ,RZD LQ 0DUFK
FRQQHFWV WKH DJHQF\ ZLWK RWKHU IHGHUDO JRYHUQPHQ
abuse and facilitates information sharing and coordination.

III. FTC Efc Ac... As c . O G s s

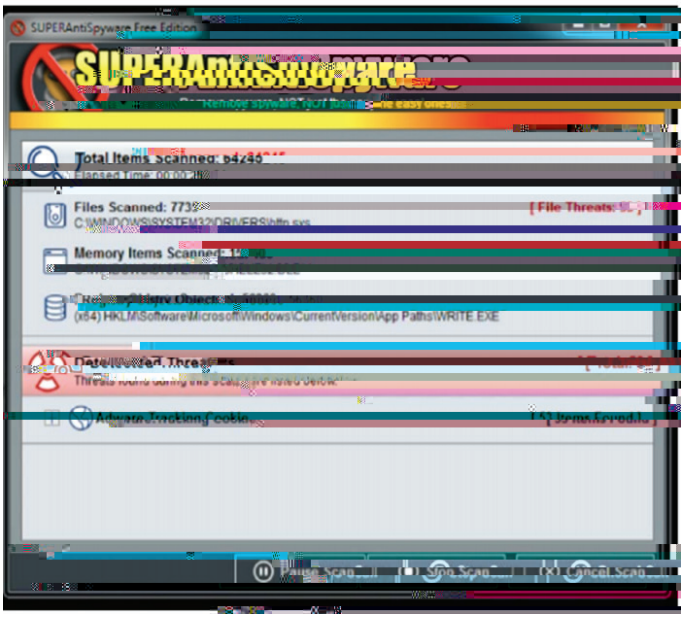
$JJUHVVLYH ODZ HQIRUFHPHQW LV D NH\ FRPSRQHQW LQ
consumers.[28] &RQJUHVV KDV GLUHFWHG WKH)7& WR OLVW HDFK
YLFWLP ZDV DQ HOGHU RU WKDW LQYROYHG D ¿QDQFLDO
GLUHFWO\ WRZDUG RU [29] Most FTC enforcement actions involve numerous
FRQVXPHUV RI DOO DJHV)XUWKHU WKH DJHV RI FRQVXP
7KHUHIRUH $SSHQGL[$ WR WKLV UHSRUW OLVWV DOO QH
E\ WKH '2- RQ WKH)7&¶V EHKDOI EHWZHHQ 2FWREHU
XSRQ RXU ODZ HQIRUFHPHQW H[SHULHQFH WKH &RPPLVVL
or older are in the groups of affected consumers in almost every consumer protection case
¿OHG 7KH FDVHV OLVWHG LQ $SSHQGL[$ LQYROYH D ZL
business opportunity and money-making schemes, deceptive health product advertising claims, deceptive negative option schemes, data security and privacy violations, charity frauds, scams

action by other agencies relating to FTC matters that affected older consumers. These actions illustrate some of the key consumer issues that disproportionately affect older adults.

A. Fa M d ca lac P a s

In Simple Health Plans, LLC,[21] the FTC alleged that the defendants falsely claimed to be selling a variety of comprehensive healthcare plans. The defendants falsely held themselves out as experts on and providers of government-sponsored health insurance policies, including 0HGLFDUH 7KH GHIHQGDQWV¶ OHDG JHQHUDWLRQ ZHEVLWH Your Needs and Budget, or Medicare Senior Health Insurance Options. The defendants also FODLPHG DI¿OLDWLRQ ZLWK $$53 ,Q UHDOLW\ WKH GHIHQG SODQV WKDW WKH\ PDUNHWHG DQG KDG QR DI¿OLDWLRQ ZL HQUROOHG FRQVXPHUV LQ OLPLWHG EHQH¿W SODQV RU H RI WKH SURPLVHG FRYHUDJH $W WKH)7&¶V UHTXHVW D IH halted their marketing efforts. This litigation is ongoing.

FIGURE B SCREENSHOT OF A PORTION OF A WEBSITE IN ELITE IT PARTNERS, INC.



The defendants representatives falsely told consumers that their computer problems most likely stemmed from a computer virus or infection. The telemarketers ran bogus diagnostic tests and used scare tactics and misrepresentations to sell additional service plans. The vast majority of consumers that the defendants contacted were referred by the FTC's request. The case was brought with other federal and state agencies to target tech support scams.[33]

C. Robocalls and Caller ID Spoofing

In First Choice Horizon LLC,[34] the FTC alleged that the defendants distributed and routed consumers' calls through a robocalling platform that blasted out millions of prerecorded calls nationwide. The robocalls claimed to be from credit card companies and urged consumers to lower the interest rates on their credit cards. The defendants' telemarketers then pitched consumers on debt relief services, saving them thousands of dollars on their credit card debt. In reality, the defendants applied for new credit cards with non-existent interest rates. The deceptive practices could lead to consumers paying substantial additional bank or transaction fees. In many instances, the FTC alleged that consumers did not agree to use the defendants' services or even know who they were. The FTC's request for an order that prohibited the defendants from engaging in telemarketing to offer any sort of debt relief product or service. This litigation is ongoing.

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[33] Press Release, FTC, FTC Halts Tech Support Scam as Part of Major Initiative Focused on Older Adults Hit Hardest by These Scams (Mar. 7, 2019), available at https://www.ftc.gov/news-events/press-releases/2019/03/ftc-halts-tech-support-scam-part-major-initiative-focused-older

[34] FTC v. First Choice Horizon LLC, No. 0:19-cv-60614 (S.D. Fla. filed Mar. 28, 2019), available at https://www.ftc.gov/enforcement/cases-proceedings/172-3167/first-choice-horizon-llc-et-al

D. B[illegible] Sc[illegible]

In 8 Figure Dream Lifestyle LLC,[35] the FTC alleged that the defendants consistently made false R U X Q V X E V W D Q W L D W H G F O D much consumers could earn through

F. R a Ea-sSca

In In re Sanctuary Belize Litigation,[38] the FTC alleged that the defendants bilked more than $100 million from consumers, largely retirees, in a massive land sale scam. According to the complaint, recidivist Andris Pukke perpetrated an international scheme selling lots in a GHYHORSPHQW LQ UHPRWH VRXWKHUQ %HOL]H WKH SURPL DOOHJHG VFKHPH WRRN LQ PRUH WKDQ PLOOLRQ PDUN EHFRPH D OX[XU\ GHYHORSPHQW LQ &HQWUDO $PHULFD NQ

WKH GHIHQGDQWV FKDUJHG FRQVXPHUV DURXQG IRU WKH VXEVFULSWLRQ SODQV ZLWK DGGLWLRQDO PRQWKO\ FKDUJH
injunction that stops the defendants from misleading consumers about supposedly free trial
RIIHUV HQUROOLQJ WKHP LQ XQZDQWHG FRQWLQXLW\ SODQ
making it nearly impossible for them to cancel or get their money back. The litigation is ongoing.

H. A-A ./H a Ca. s

In

FIGURE E ADVERTISEMENT IN GLOBAL COMMUNITY INNOVATIONS LLC

endorsements to deceptively claim the products ZHUH FOLQLFDOO\ SURYHQ WR LPS increase focus, increase IQ, and prevent memory ORVV 7R VHWWOH WKH)7&¶V FKDU of defendants agreed to injunctive and other HTXLWDEOH UHOLHI 7KH RUGHUV suspended judgments of $14,564,891 and $11,587,117 respectively.[45] The orders also prohibit the defendants from making, among other misrepresentations, the challenged health FODLPV ZLWKRXW FRPSHWHQW DQ clinical testing, other health-related claims unless VXSSRUWHG E\ FRPSHWHQW DQG U HYLGHQFH DQG IDOVH ODLPV RI[46]

,Q -XQH WKH)7& DQG WKH)ORULGD $WWRUQH\ *HQHUDO
Lifewatch, Inc.[49] According to the complaint, the defendants bombarded primarily older
FRQVXPHUV ZLWK DW OHDVW D ELOOLRQ XQVROLFLWHG UREH

against companies for deceptively promoting, marketing, or selling health-related products, and

In All Us Marketing LLC,W K H)7& V H Q W P R U H W K D Q W R F R Q V X P H U V
Z R U W K O H V V F U H G L W F D U G L Q W H U H V W U D W H U H G X F W L R Q S U R J U
The complaint alleged that the defendant illegally called thousands of consumers, including many older adults, to convince them to provide their credit card information in this scheme.

In XXL Impressions LLC, the FTC sent refund checks totaling more than $113,000 to fully refund F R Q V X P H U V Z K R E R X J K W) O H [L 3 U L Q D G H F H Y L V L R Q P D U N H W H
E U R X J K W W K H + H D O W K 5 H V H D U F K / D E V D Q G ; ; / , P S U H V V L R Q F D

4. Case Updates

7 K H)7&¶V &U L P L Q D O / L D L V R Q 8 Q L W Z R U N V Z L W K I H G H U D O D
address consumer fraud. Many of these prosecutors have brought criminal cases that built on facts H [S R V H G D V W K H)7& G H Y H O R S H G H Y L G H Q F H L Q V X S S R U W R I
)R U H [D P S O H L Q 0 D U F K)7& and its co-counsel brought a civil
. O R X Y D W R V D Q G / H I N R W K H D . O R X Y D W R V Z H U H V H Q W H Q F H G
center that defrauded older adults by selling them bogus medical discount cards. Sabbi and his F R F R Q V S L U D W R U V Z H U H H [W U D G L W H G I U R P & D Q D G D D Q G S U

VZHHSVWDNHV VFDP ULQJ DQG HDFK KDV HLWKHU SOHG J
DZDLWLQJ VHQWHQFLQJ

The FTC has distributed more than 11.3 million Pass It On items since the campaign began, LQFOXGLQJ DOPRVW PLOOLRQ LWHPV LQ ¿VFDO \HDU W DGXOW SURWHFWLYH VHUYLFH RI¿FHV VWDWH DWWRUQH\V J

from a range of local consumer groups including aging service providers and senior organizations, UXUDO H[WHQVLRQ RI¿FHV OLEUDULHV PLOLWDU\ DQG YHW share data about the frauds affecting consumers in each state, describe resources to help consumers VSRW WKH PRVW FRPPRQ VFDPV LGHQWLI\ ZKHUH UHVLGHQW ODZ HQIRUFHPHQW $WWRUQH\V *HQHUDO RI¿FHV WKH %HWW DQG RWKHUV KDYH VSRNHQ RQ WKHVH ZHELQDUV VKDULQJ L UHVSHFWLYH VWDWHV 5HJLRQDO UHSUHVHQWDWLYHV IRU W VWDWH 6HQLRU 0HGLFDUH 3DWURO KDYH VKDUHG LQIRUPDW cards designed to prevent identity theft and deter Medicare scams. Staff completed seven more of WKHVH ZHELQDUV WKLV \HDU

7KH)7&¶V RXWUHDFK ZLWK JURXSV DQG FRPPXQLWLHV WKU share the agency s important prevention messages, but also opens up the communication lines so the Commission hears about the scams and other consumer protection problems affecting the SXEOLF 7KLV LQ WXUQ FDQ JHQHUDWH RSSRUWXQLWLHV QHZ FDVH OHDGV

V. Co -US/MCab /Sa /La -US/MCID 100 BDC BT003SEEH0COH0 PWLYHD00P0

STYLE OF CASE	Case Number	Court Name	Date	Case Type	Description	Outcome
Federal Trade Commission v. Match Group, Inc.	3:19-02281	Northern Distric of Texas	9/25/19	Dating website	Alleged the defendant used fake love interest advertisements to trick consumers into purchasing paid subscriptions.	Litigation Ongoing
Federal Trade Commission v. Truly Organic Inc.and Maxx Harley Appelman.	1:19-23832	Southern Distric of Florida	9/13/19	Environmental marketing	Alleged the defendants deceptively marketed personal care products as "100% organic" or "certified organic.	Settlement
Federal Trade Commission, Plaintiff v. Student Advocates Team, LLC	8:19-cv-01728	Central District of California	9/11/19	Student loan debt relief scheme	Alleged the defendants charged illegal upfront fees and falsely promised to lower or event eliminate consumers' loan payments or balances.	Settlement
Federal Trade Commission and State of Minnesota v. Manhatt Beach Venture, LLC,	2:19-cv-07849	Central District of California	9/11/19	Student loan debt relief scheme	Alleged the defendants charged illegal upfront fees and falsely promised to lower even eliminate consumers' loan payments balances.	or or Settlement
United States of America and People of the State of New Yo v. Google LLC and YouTube, LLC	1:19-cv-02642	District of Columbia	9/4/19	Children's privacy	Alleged the defendants illegally collected personal information from children without their parents' consent.	Settlement
In the Matter of 214 Technologies, Inc., alsdoing business as Trueface.ai	FTC Matter No. 1823193	FTC Administrative Matter	9/3/19	EU-U.S. Privacy Shield Program	Alleged the respondent falsely claimed that es2(o)-6.9 (n)5.1 (d)-6.9 (e)-3 ct	

In the Matter of LotaData, Inc.	FTC Matter No. 1823194	FTC Administrative Matter	9/3/19	EU-U.S. Privacy Shield Program	Alleged the respondent falsely claimed that it participated in the EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield frameworks.	Consent Agreement
In the Matter of DCR Workforce, Inc.	FTC Matter No. 1823188	FTC Administrative Matter	9/3/19	EU-U.S. Privacy Shield Program	Alleged the respondent falsely claimed that it participated in the EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield frameworks.	Consent Agreement
In the Matter of Thru, Inc.	FTC Matter No. 1823196	FTC Administrative Matter	9/3/19	EU-U.S. Privacy Shield Program	Alleged the respondent falsely claimed that it participated in the EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield frameworks.	Consent Agreement
Federal Trade Commission v.					Alleged the defendants used sales leads from lead generators that falsely told consumers	

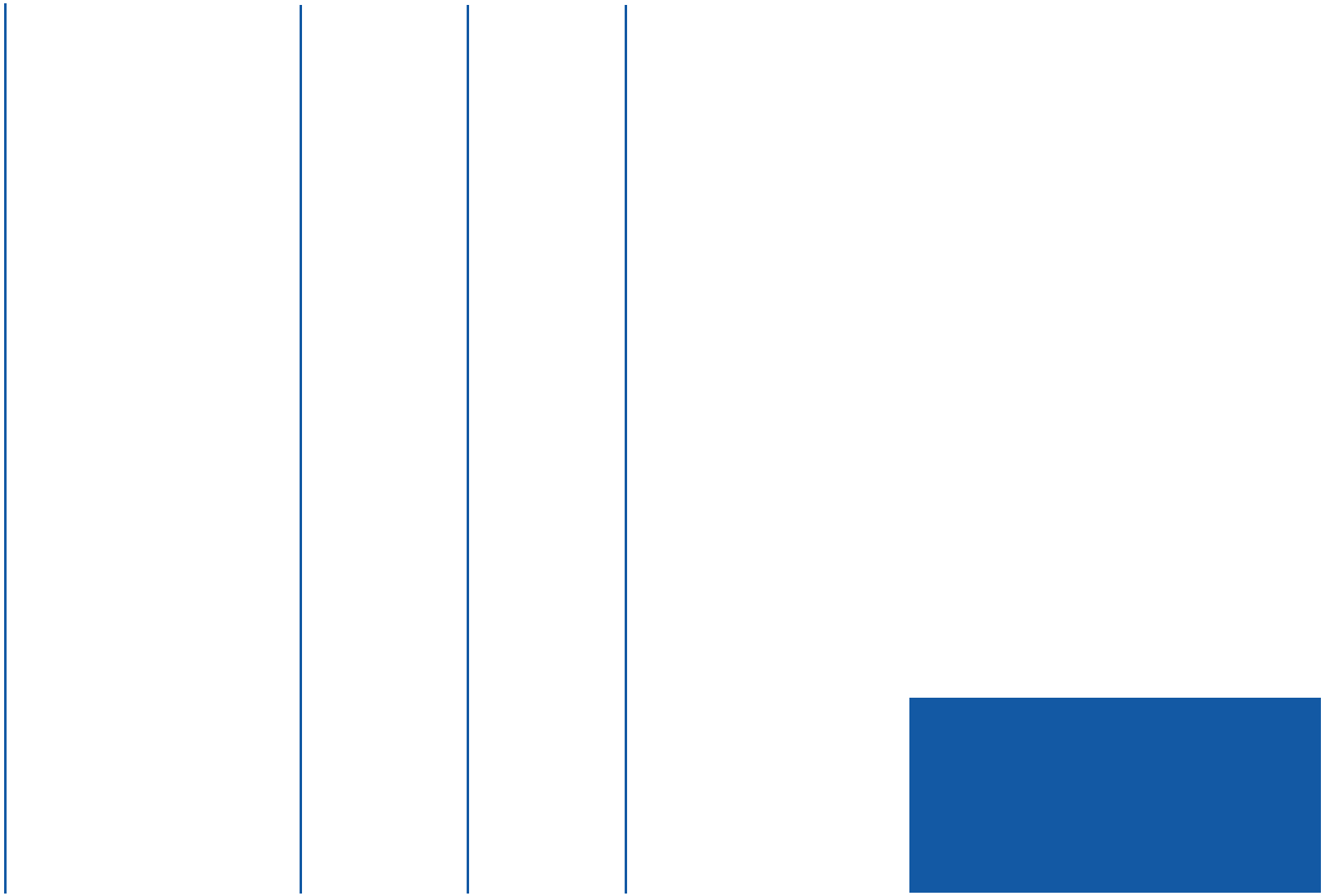
In the Matter of Cambridge Analytica, LLC,	FTC Matter Nos. 1823107 & 1823106	FTC Administrative Matter	7/24/19	Deceptive collection of consumer data	Alleged the respondent employed deceptive tactics to harvest personal information from Facebook users for voter profiling and targeting.	Litigation Ongoing
Federal Trade Commission v. Equifax Inc.	1:19-cv-3297	Northern District of Georgia	7/22/19	Data breach	Alleged the defendant failed to take reasonable steps to secure its network that led to a data breach in 2017 affecting approximately 147 million people.	Settlement
Federal Trade Commission and State of Ohio v. Educare Centre Services, Inc.	3:19-cv-196	Western District of Texas	7/18/19	Interest rate reduction services scheme	Alleged the defendants sold sham credit card interest rate reduction services to consumers through telemarketers.	Litigation Ongoing
Federal Trade Commission and State of Ohio v. Madera Merchant Services, LLC	3:19-cv-195	Western District of Texas	7/18/19	Payment processing	Alleged the defendants generated and processed remotely created payment orders or checks that allowed many unscrupulous merchants, including deceptive telemarketing schemes, to withdraw money from their victims' bank accounts.	Litigation Ongoing
Federal Trade Commission v. Elegant Solutions, Inc.	8:19-cv-1333	Central District of California	7/8/19	Student loan debt relief	Alleged the defendants lured consumers into paying illegal upfront fees with false promises to lower consumers' monthly student loan payments.	Litigation Ongoing

United States of America v. Bartoli	6:19-cv-1160	Middle District of Florida	6/21/19	Robocalls - Do Not Call violations	Alleged the defendant sent millions of calls to numbers on the DNC registry and used fake caller ID information.	Settlement
United States of America v. Media Mix 365, LLC,	8:19-cv-1243	Central District of California	6/21/19	Robocalls - Do Not Call violations	Alleged the defendants called phone numbers on the DNC Registry and repeatedly or continuously called consumers with the intent of annoying, abusing, or harassing them.	Settlement
Federal Trade Commission v. Grand Teton Professionals, LLC	3:19-cv-933	District of Connecticut	6/17/19	Credit Repair	Alleged the defendants charged illegal upfront fees and falsely claimed to repair consumers' credit.	Litigation Ongoing
In the Matter of SecurTest, Inc.	FTC Matter No. 1823152	FTC Administrative Matter	6/14/19	EU-U.S. Privacy Shield Program	Alleged the respondent falsely claimed that it participated in the EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield frameworks.	Consent Agreement
Federal Trade Commission v. 8 Figure Dream Lifestyle LLC	8:19-cv-1165	Central District of California	6/12/19	Money-making scheme	Alleged the defendants marketed and sold fraudulent money-making opportunities.	Litigation Ongoing
Federal Trade Commission v.		Middle District		Credit card interest rate reduction	Alleged the defendants used illegal robocalls to offer bogus credit card interest rate	

In the Matter of Shore to Please Vacations LLC	FTC Matter No. 1823088	FTC Administrative Matter	5/22/19	Consumer reviews	Alleged the respondent illegally used non-disparagement provisions in consumer form contracts in the course of renting vacation homes.	Consent Agreement
In the Matter of Staffordshire Property Management, LLC	FTC Matter No. 1823084	FTC Administrative Matter	5/22/19	Consumer reviews	Alleged the respondent illegally used non-disparagement provisions in consumer form contracts in the course of processing rental applications.	Consent Agreement
Federal Trade Commission v. Alliedwallet, Inc.	2:19-cv-4355	Central District of California	5/20/19	Payment processing	Alleged the defendants knowingly processed payments for merchants that were engaged in fraud.	Settlement
In the Matter of A. Waldron HVAC, LLC d/b/a Waldron Electric Heating and Cooling, LLC	FTC Matter No. 1823077	FTC Administrative Matter	5/8/19	Consumer reviews	Alleged the respondent included non-disparagement text in form contracts offered to prospective customers.	Consent Agreement
In the Matter of National Floors Direct, Inc.	FTC Matter No.1823085	FTC Administrative Matter	5/8/19	Consumer reviews	Alleged the respondent included non-disparagement text in form contracts it offered to consumers.	Consent Agreement
In the Matter of LVTR LLC d/b/a/ Las Vegas Trail Riding and Tomi A. Truax	FTC Matter No. 1823098	FTC Administrative Matter	5/8/19	Consumer reviews	Alleged the respondents included non-disparagement text in form contracts they offered consumers.	Consent Agreement

Federal Trade Commission v. ibackpack of Texas LLC	3:19-cv-160	Southern District of Texas	5/6/19	Deceptive crowdfunding scheme	Alleged the defendants told consumers they were raising money to develop a high-tech backpack and other products, but failed to deliver any of the products and instead used much of the funds for the individual defendant.	Litigation Ongoing
United States of America v. Unixiz, Inc.	5:19-cv-2222	Northern District of California	4/24/19	Children's privacy	Alleged the defendants failed to obtain parental consent before collecting personal information from children and failed to provide reasonable security for the data collected.	Settlement
In the Matter of James V. Grago, Jr., d/b/a ClixSense.com	FTC Matter No. 1723003	FTC Administrative Matter	4/24/19			

Federal Trade Commission v. Interbill, Ltd.	2:06-cv-1644	District of Nevada	4/10/19			



Federal Trade Commission v. Nobetes Corporation	2:18-cv-10068	Central District of California	12/3/18	Deceptive diabetes treatment claims	Alleged the defendants made unsubstantiated health claims, misled consumers about the terms of "free trial" offers, billed consumers without their consent, and employed other practices related to the use of endorsements and consumer testimonials.	Settlement
Federal Trade Commission v. Apex Capital Group, LLC	2:18-cv-9573	Central District of California	11/14/18	Deceptive negative option scheme	Alleged the defendants marketed supposedly "free trial" offers for personal care products and dietary supplements online, but then charged consumers the full price of the products and enrolled them in negative option continuity plans without their consent.	Partial settlement
Federal Trade Commission v. Moneygram International, Inc.	1:09-cv-6576	Northern District of Illinois	11/8/18	Order violation	Alleged the defendant failed to take steps required under a 2009 FTC order to crack down on fraudulent money transfers that cost U.S. consumers millions of dollars.	Settlement
Federal Trade Commission v. Impetus Enterprise, Inc.	8:18-cv-1987	Central District of California	11/6/18	Student loan debt relief	Alleged the defendants tricked consumers into paying illegal upfront fees in hopes of reducing or eliminating their student loan debt.	Litigation Ongoing
In the Matter of Creaxion Corporation,	FTC Matter Nos. 1723066 and 1723067	FTC Administrative Matter	11/5/18	Deceptive endorsements	Alleged the respondents misrepresented that paid endorsements were independent consumer opinions and that commercial advertising was independent journalistic content.	Consent Agreement

Federal Trade Commission v. Ecological Fox, LLC	1:18-cv-3309	District of Maryland	10/31/18	Real estate scheme	Alleged the defendants duped consumers into buying Sanctuary Belize lots by falsely promising that the development would include luxury amenities and be completed soon, and that the value of the lots would rapidly appreciate.	Litigation Ongoing
Federal Trade Commission v. Simple Health Plans, LLC	0:18-cv-62593	Southern District of Florida	10/29/18	Deceptive health insurance claims	Alleged the defendants deceptively sold medical plans.	Litigation Ongoing
In the Matter of Social Finance, Inc.	FTC Matter No. 1623197					

Federal Trade Commission v. Regenerative Medical Group, Inc.	8:18-cv-1838	Central District of California	
Federal Trade Commission v. Jason Cardiff			Deceptive health claims and unauthorized billing
Federal Trade Commission v. Passport Imports, Inc.	8:18-cv-3118		Deceptive recall notices