

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

COMMISSIONERS: **Lina M. Khan, Chair**
 Rebecca Kelly Slaughter
 Alvaro M. Bedoya

COMPLAINT

The Federal Trade Commission, having reason to believe 6047 IntelliVision Technologies Corp., a corporation (“Respondent”), has violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public

1. Respondent, IntelliVision Technologies Corp. (“IntelliVision”), is a Delaware corporation with its principal office or place of business at 6203 San Ignacio Avenue, San Jose, California 95119.
2. Respondent has advertised, offered for sale, sold, and distributed an artificial intelligence-based facial recognition software product to original equipment manufacturers (“OEMs”), large integrators, and large end users.
3. Respondent’s facial recognition software has been incorporated into consumer products sold by its former parent corporation Nice North America, LLC.
4. For example, Respondent’s facial recognition software has been integrated into the 2GIG Edge, a home security system. The software allows consumers to register their face and then scan their face to gain access to the system.
5. Respondent’s facial recognition software also has been integrated into the Elan Intelligent Touch Panel. The software allows consumers to register their face and then scan their face to gain access to the smart home features of the touch panel.

6. The acts and practices of Respondent alleged in this complaint have been in or affecting commerce, as “commerce” is defined in Section 4 of the Federal Trade Commission Act.
7. From late 2018 through early 2024, Respondent has disseminated or has caused to be disseminated claims for its artificial intelligence-based facial recognition software on its website, intelli-vision.com, that include the following:
 - a. IntelliVision’s Face Recognition software is a fast, accurate, deep learning-based

11.

18. The representations set forth in Paragraph 17 are false or misleading, or were not substantiated at the time the representations were made.

Count III
False or Unsubstantiated Claims – Anti-Spoofing

19. In connection with the advertising, promotion, offering for sale, or sale of IntelliVision's facial recognition software, Respondent has represented, expressly or by implication, that its anti-