

TABLE OF CONTENTS

I. OVERVIEW/RESUMEN	1
A. Background/Antecedentes	1
B. The Hispanic Work-at-Home Surf/Monitoreo de Anuncios de Oportunidades de Trabajo en Casa	3
II. DATA COLLECTION METHODOLOGY	4
III. ADVERTISEMENT REVIEW AND FINDINGS	5
A. Overall Findings	5
B. Incidence and Types of Advertisements with Indicia of Fraud	8
C. Advertisements Offering Types of Opportunities Not Categorized as Having Indicia of Fraud	12
D. Other Advertising Techniques	13
IV. CONCLUSION	14
ENDNOTES	15

I. OVERVIEW

The Federal Trade Commission (FTC) staff and its partners conducted the Hispanic Work-at-Home Surf on January 21 and January 24, 2007 to investigate the incidence of potential deception in Spanish-language work-at-home advertisements on the Internet and in print publications. This report summarizes the findings of this project.

A. Background

The FTC launched its Hispanic Law Enforcement and Outreach Initiative (Initiative) in 2004 to address growing concerns about fraud in the Hispanic community. As part of this Initiative, the FTC continues to bring law enforcement actions against marketers defrauding Spanish-speaking consumers; conduct extensive outreach to Hispanic consumers; and provide guidance to media outlets and businesses servicing Hispanics. To further our media and business outreach goals, FTC staff, in April 2006, led the Hispanic Multi-Media Surf (Multi-Media Surf) with 60 organizations across the United States and Latin America. Surfers reviewed Spanish-language media on the same day to identify advertisements making potentially deceptive claims in the areas of health, credit, and financial livelihood.¹ Based on the Multi-Media Surf results, we sent letters to 166 businesses to alert them that their advertisements may violate the law and to urge them to

I. RESUMEN

El 21 y el 24 de enero de 2007, el personal de la Comisión Federal de Comercio (*Federal Trade Commission*, FTC), junto con sus colegas y asociados, realizó un proyecto llamado Monitoreo de Anuncios de Oportunidades de Trabajo en Casa Dirigidos a Hispanos (Hispanic Work-at-Home Surf). El propósito fue investigar la incidencia de engaño en los anuncios de oportunidades de trabajo en casa difundidos en Internet y en publicaciones impresas en idioma español. Este informe contiene los resultados y conclusiones de este proyecto.

A. Antecedentes

En el año 2004, la FTC lanzó la Iniciativa de Cumplimiento de Ley y Asistencia Comunitaria para Hispanos (la Iniciativa) con el fin de ocuparse de las crecientes preocupaciones surgidas por el fraude que afecta a la comunidad hispana. La FTC continúa entablando acciones de cumplimiento de ley dirigidas contra comerciantes que defraudan a los consumidores hispanohablantes; realiza una amplia tarea de educación comunitaria para consumidores hispanos y brinda orientación a los medios de comunicación y negocios que prestan servicio a los hispanos. En abril de 2006, para ampliar nuestros objetivos de alcance en el ámbito de negocios y medios de comunicación, el personal de la FTC dirigió el proyecto Monitoreo de Medios de Comunicación Hispanos junto a 60 organizaciones de Estados Unidos y Latinoamérica. Los participantes examinaron los medios de comunicación en español durante

review their practices. We also contacted 77 media outlets that ran the advertisements to provide them with guidance in identifying and rejecting advertisements with facially suspicious claims.

The Multi-Media Surf results indicated that potentially deceptive work-at-home advertisements were highly prevalent — comprising 29 percent of the advertisements collected during the Multi-Media Surf. These advertisements touted an ideal work situation in which consumers could make a lot of money while working from home and/or offered the kinds of schemes, such as craft assembly and envelope stuffing, that have been the subject of past FTC law enforcement actions.² Through these actions, the FTC has found that many work-at-home advertisements promote scams that take consumers' money up-front and fail to deliver on their promises, frequently victimizing consumers with limited income who can least afford to lose money, time, and effort.

Moreover, consumer complaints and feedback received from attendees at Hispanic fraud prevention workshops, hosted by the FTC and the U.S. Postal Inspection Service across the country, indicate that Hispanics may be particularly vulnerable to work-at-home scams.³

el mismo día para identificar las declaraciones publicitarias potencialmente engañosas que estaban relacionadas a la salud, el crédito y el sustento económico.¹ Basado en los resultados del proyecto enviamos cartas a 166 negocios alertándolos de que sus anuncios podrían estar violando la ley e instándolos a revisar sus prácticas. También nos comunicamos con 77 medios de comunicación que publicaron o difundieron estos anuncios para brindarles la orientación necesaria para que puedan identificar y rechazar los anuncios que contienen declaraciones publicitarias con indicios presuntamente sospechosos.

Los resultados del proyecto de Monitoreo de Medios de Comunicación Hispanos indicaron una alta predominancia de anuncios potencialmente engañosos de oportunidades de trabajo en casa — abarcando el 29 por ciento de los anuncios recolectados. Estos anuncios proclamaban una situación laboral ideal que les permitiría ganar mucho dinero a los consumidores trabajando desde sus hogares y/o que ofrecían los tipos de esquemas que ya habían sido sujetos a acciones de cumplimiento de ley previamente entabladas por la FTC, como por ejemplo, oportunidades de trabajos manuales de ensamblado y relleno de sobres.² En estos casos la FTC ha encontrado que estos tipos de anuncios promocionan estafas donde toman el dinero de los consumidores pero incumplen sus promesas, lo cual, frecuentemente perjudica a consumidores con ingresos limitados y que están en peores condiciones de afrontar la pérdida de su dinero, tiempo y esfuerzo.

Además, por otra parte, las quejas de consumidores y comentarios recibidos de parte de las personas que concurrieron a los talleres

B. The Hispanic Work-at-Home Surf

To learn more about the nature and extent of work-at-home opportunities promoted to Spanish-speaking consumers, FTC staff and its partners conducted the Hispanic Work-at-Home Surf (Work-at-Home Surf or Surf) in January 2007. The Work-at-Home Surf provides a sample of work-at-home advertisements aimed at the Hispanic community as captured by participants throughout the country on January 21 and 24, 2007. Fifteen organizations across the United States participated in the Work-at-Home Surf by reviewing print publications and/or surfing the Internet.⁴ Surf participants submitted 314 non-duplicative work-at-home opportunity advertisements. As discussed below, 68 percent of the advertisements had facial indicia of fraud.⁵ Print media had a slightly higher percentage of potentially deceptive advertisements than the Internet.

de prevención del fraude dirigido contra los consumidores hispanos realizados por la FTC y el Servicio de Inspección Postal de EE.UU. (*U.S. Postal Inspection Service*) en todo el país, indican que los consumidores hispanos pueden ser particularmente vulnerables a las estafas de oportunidades de trabajo en casa.³

B. Monitoreo de Anuncios de Oportunidades de Trabajo en Casa

En enero de 2007, para aprender más sobre los anuncios de oportunidades de trabajo en casa dirigidos a consumidores hispanohablantes, el personal de la FTC, junto a sus colegas y asociados, realizó el proyecto Monitoreo de Anuncios de Oportunidades de Trabajo en Casa Dirigidos a Hispanos (*Hispanic Work-at-Home Surf*). Estas jornadas de monitoreo de anuncios publicados y difundidos en idioma español dieron como resultado una muestra de anuncios de oportunidades de trabajo en casa dirigidos a la comunidad hispana que fueron capturados por los participantes de todo el país el 21 y el 24 de enero de 2007. Quince organizaciones de todo el país participaron en este proyecto revisando publicaciones impresas y/o navegando en Internet.⁴ Los participantes presentaron 314 anuncios (no duplicados) que promocionaban oportunidades de trabajo en casa. Tal como se explica en el informe completo, el 68 por ciento de los anuncios tenía indicios que, a primera vista, señalaban una sospecha de fraude.⁵ Según se indica en el informe, los medios impresos contabilizaban un porcentaje levemente mayor de anuncios que a primera vista resultaban engañosos comparado con anuncios difundidos en Internet. El informe completo se encuentra a continuación, en inglés solamente.

II. DATA COLLECTION METHODOLOGY

This section describes the methodology used by Surf participants for advertisement collection and review.

The Surf focused on print publications and the Internet because most of the work-at-home advertisements collected in the Multi-Media Surf were found in these media. Participants collected Spanish-language print and/or Internet advertisements offering work-at-home opportunities, regardless of whether such advertisements appeared to be deceptive. Most participants reviewed Spanish-language advertisements in local print publications, including local newspapers, magazines, and classified publications. In order to minimize duplication, a smaller group of participants also surfed the Internet.⁶

We instructed participants to ensure that each advertisement offered home-based employment rather than an investment or non-home-based business opportunity such as an opportunity to buy a vending machine or a franchise. We also advised participants to collect only advertisements actually offering opportunities, rather than those selling advice on how to obtain home-based work, i.e., selling books or tapes that provide information on working from home.

Participants reviewed the advertisements they collected to identify the source of the advertisement (i.e., the name of the print publication or the web address); whether the advertisement made a specific earnings claim, and if so, for how much and for what time period; and the type of work the advertisement offered, such as craft assembly, envelope stuffing, or medical billing. Participants also determined whether the advertisement specified that an up-front investment was required or whether the advertisement contained claims that no risk was involved or that no experience, background, or knowledge of the English language was necessary. Finally, participants entered their results into an online database and sent a copy of each print advertisement and website to FTC staff.

After collecting the advertisements, we reviewed them to determine which, if any, had indicia of fraud. Our analysis of these advertisements is discussed below.

III. ADVERTISEMENT REVIEW AND FINDINGS

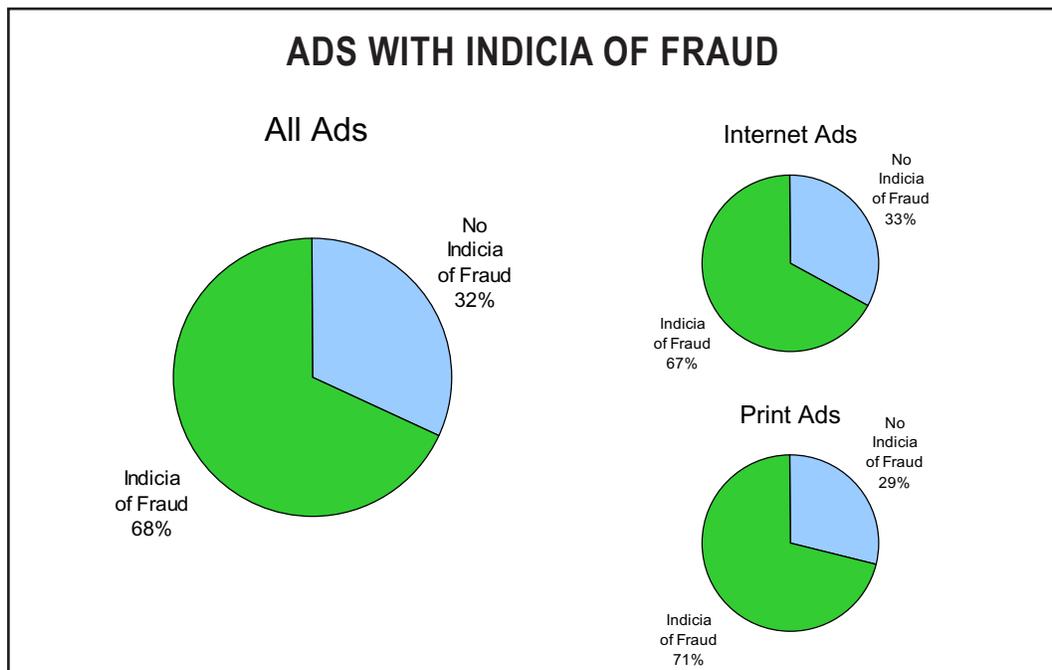
This section describes the results of FTC staff’s review of the collected advertisements. Section A provides an overview of the advertisements. Section B discusses the incidence and types of advertisements that contained indicia of fraud. Section C describes advertisements offering work-at-home opportunities not categorized as facially deceptive. Finally, Section D discusses the prevalence of advertising claims and techniques employed by work-at-home promoters targeting Spanish-speaking consumers.

A. Overall Findings

1. Total Collected Advertisements

Pursuant to the methodology described in Part II, Work-at-Home Surf participants submitted 314 non-duplicative advertisements to FTC staff, the vast majority of which (80.49 percent) were Spanish-language advertisements. English-language advertisements comprised 16.38 percent of the advertisements. Most of the English-language advertisements appeared in Spanish-language print publications.⁷ Advertisements in both Spanish and English comprised 3.14 percent of the advertisements.

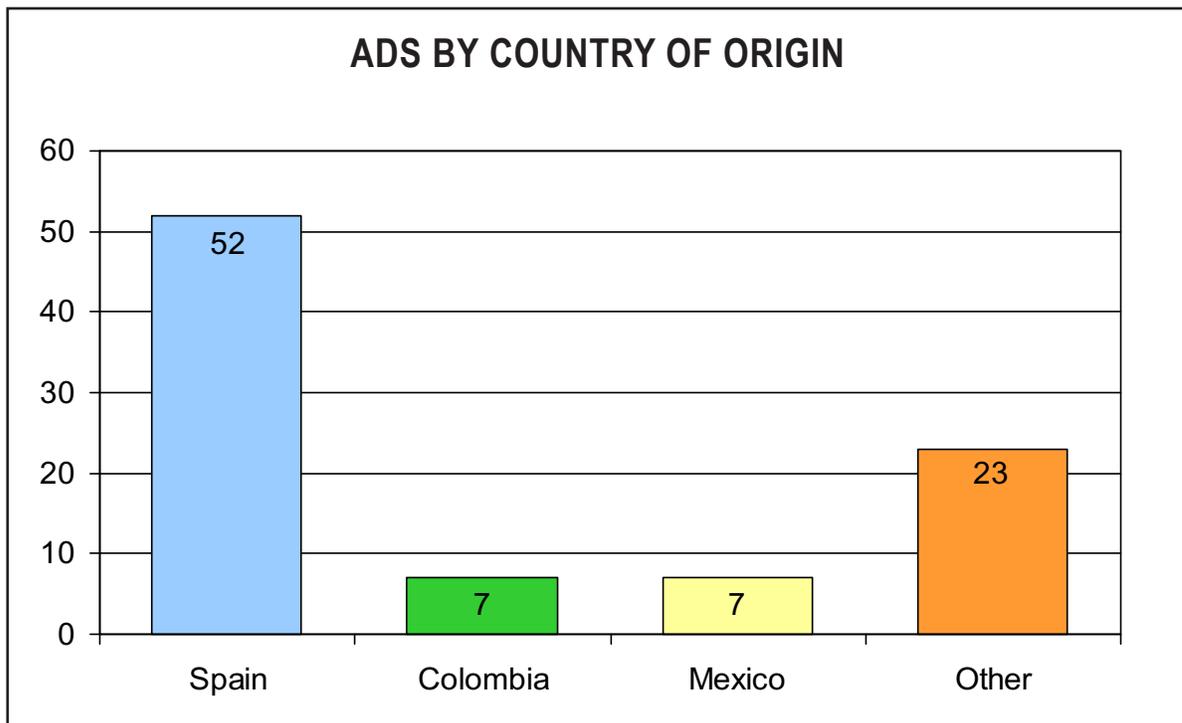
As discussed below, 68 percent of the analyzed advertisements (67 percent of the Internet advertisements and 71 percent of the print advertisements) bore facial indicia of fraud.



2. Advertisements by Media Type

a. Internet Advertisements

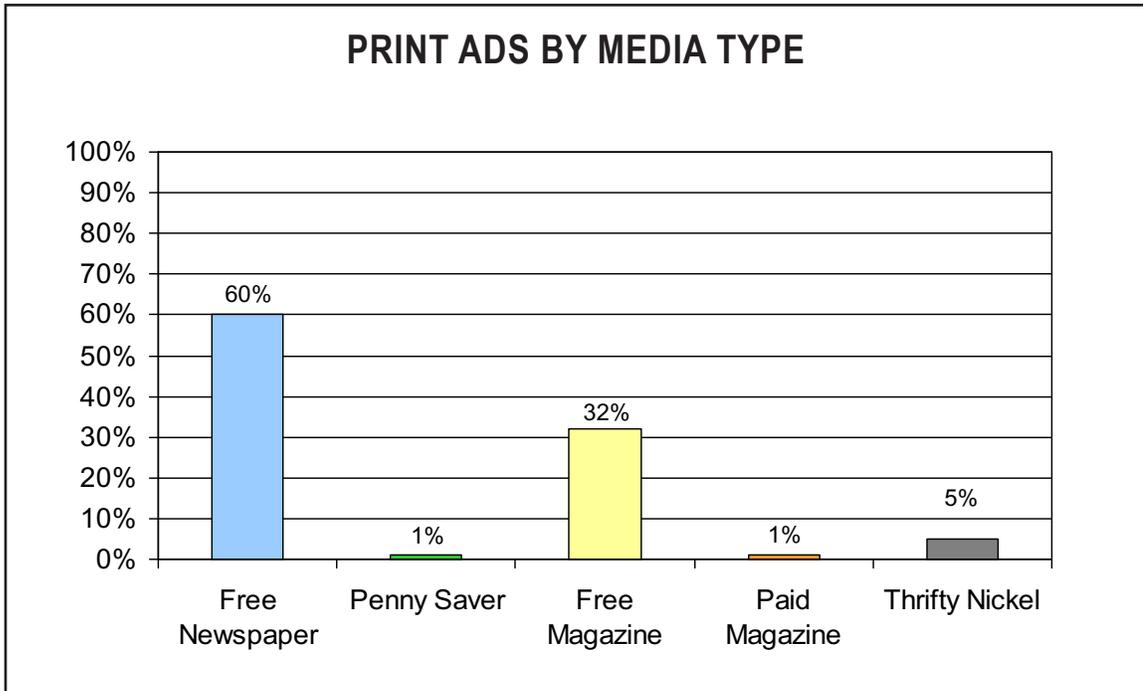
Internet advertisements comprised 69 percent of the total number of advertisements collected. Thirty percent of the Internet ads were from online classifieds appearing on websites of print publications (e.g., ElNuevoHerald.com). Forty-three percent of the Internet advertisements appeared on websites originating in a foreign country, with the majority originating in Spain. The following chart illustrates advertisements by country of origin.



Many of the Internet advertisements offered home-based self-employment, touting extra income and economic independence to those who are frustrated with, or unable to obtain, traditional employment. Typically, these advertisements featured testimonials of purportedly satisfied consumers throughout the world who claimed their lives were changed by the significant earnings they obtained through the offered work-at-home opportunities. Although many of the websites were several pages long, the majority of the advertisements were vague about the exact nature of the advertised home-based work.

b. Print Advertisements

Thirty-one percent of the submitted advertisements came from Spanish-language print publications, the vast majority of which were free local or regional newspapers and magazines.



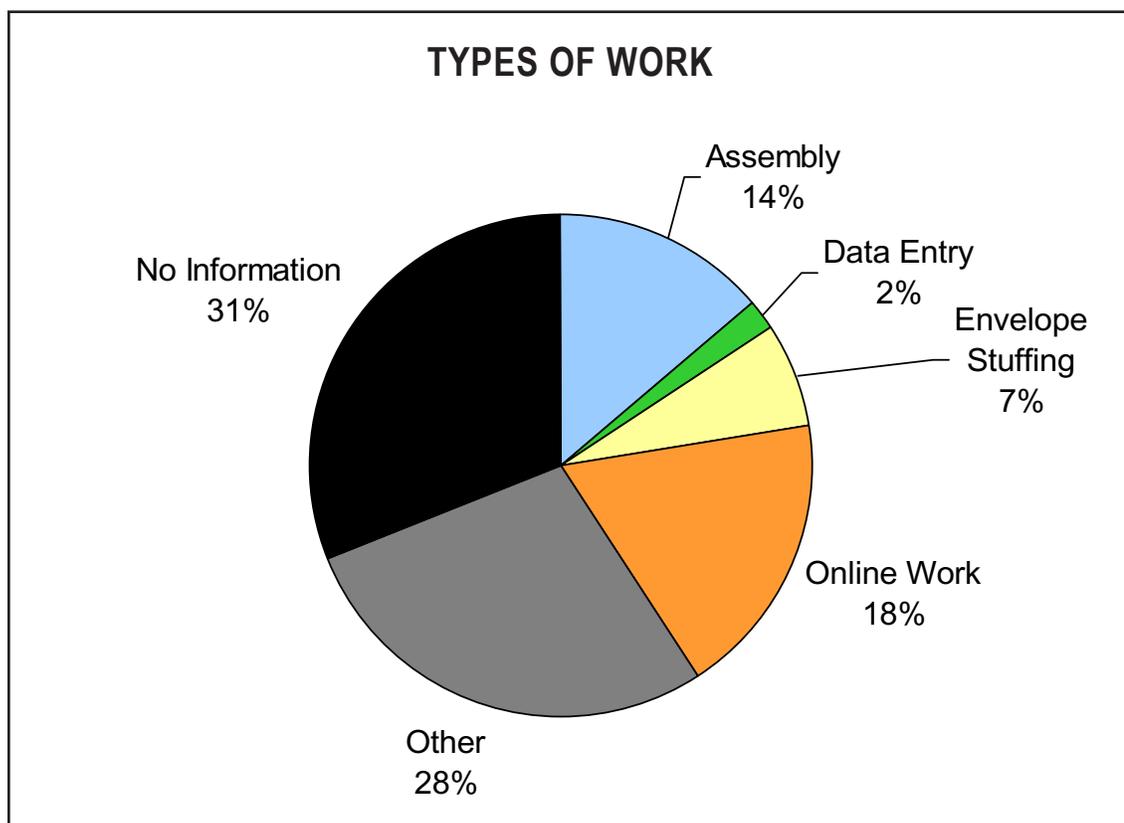
The print ads appeared primarily in the classified sections of publications, under the “Empleos” (Employment), “Trabajo en Casa” (Work at Home), “Venta de Negocios” (Sale of Businesses), or “Oportunidades de Negocio” (Business Opportunities) sections. Twenty-nine percent of the advertisements appeared verbatim in multiple print publications throughout the country.⁸ Participants collected print advertisements from 16 states (Arizona, California, Florida, Georgia, Illinois, Indiana, Maryland, Massachusetts, Kentucky, New York, North Carolina, Ohio, Oregon, Texas, Virginia, and Wisconsin), Puerto Rico, and Washington, D.C.

Most of the print advertisements consisted of five to six-line classified advertisements that contained little information about the type of work being advertised. A number of the advertisements warranted that the promoted opportunity was “free of fraud.” Most of the advertisements provided a telephone number to call to receive information about the opportunity. Although the Surf participants did not call these numbers, in our experience, consumers calling the advertised numbers typically hear additional claims about how much income

they will earn; how much assistance or training they will receive; and how much money they will need to spend to get started.

3. Advertisements by Type of Work-at-Home Opportunity

The most prevalent types of advertised work-at-home opportunities were “online work” such as email processing and online data entry (18 percent); assembly jobs (14 percent); and envelope stuffing (seven percent). Twenty-eight percent fell in the miscellaneous “other” category, including product sales and call center representation. The remaining 31 percent of the collected advertisements did not specify the type of work being offered.



B. Incidence and Types of Advertisements with Indicia of Fraud

Using expertise gleaned from past law enforcement actions, we identified specific categories of work-at-home advertisements with indicia of fraud. In particular, we looked for (1) advertisements with specific earnings claims; (2) advertisements representing that the opportunity is “no risk;” and (3) advertisements offering the types of work-at-home opportunities (craft assembly, envelope stuffing, and medical billing) that have been identified as

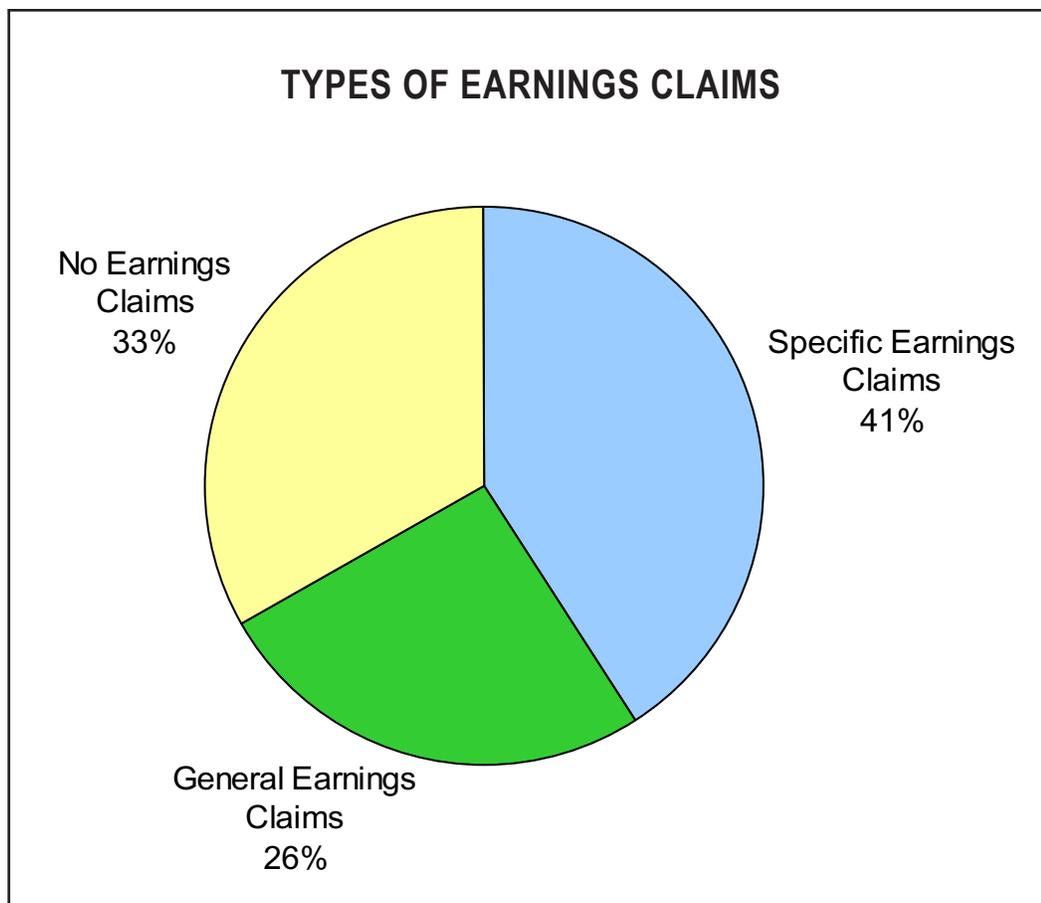
fraudulent in many past law enforcement cases. Applying these criteria, we found that 68 percent of the 314 advertisements collected during the Work-at-Home Surf had indicia of fraud. This section describes these specific categories of potentially deceptive representations and types of opportunities, and provides Surf results for each category.

1. Advertisements with Earnings Claims

Based on its law enforcement experience, the FTC has found that work-at-home advertisements including specific earning claims raise red flags. These advertisements usually state that consumers can earn very high amounts of money. Advertisers can rarely, if ever, support the specific earnings claims they make in their advertisements.⁹ Of the collected advertisements, 41 percent promised consumers that they would obtain specific earnings that ranged from \$125 to \$30,000 a week. The median earnings represented was \$1,000 a week.

Twenty-six percent of the advertisements included a general earnings claim. Advertisements with general earnings claims included phrases such as “Earn money working from home” or “Earn extra income,” but did not state that consumers could earn a specific amount of money. Because FTC law enforcement experience primarily has focused on marketers making specific earnings claims, we do not have a sufficient basis to categorize general earnings claims as facially deceptive. We cannot conclude, however, without further investigation, that advertisements including general earnings claims are legitimate offers. For example, marketers may make specific earnings claims or other potentially deceptive representations when consumers call. In addition, further investigation is necessary to determine if consumers actually earn any money from the opportunity.

Thirty-three percent of the advertisements did not mention earnings, but rather simply offered a work-at-home job, e.g., “Be your own boss — work from home!” without any earnings information. Because of the limited information in these advertisements, we cannot determine, based on the face of such advertisements alone, that they are potentially deceptive.



2. Advertisements with “No Risk” Claims

Four percent of the advertisements stated that the opportunity involved “no risk.” Based on FTC law enforcement experience, a statement that the opportunity is risk-free is a sign of deception. The FTC has found that many work-at-home opportunity promoters require consumers to pay money to obtain details about the opportunity and/or to begin working — money that few, if any, consumers ever get back. Of the advertisements claiming “no risk,” half fell within another category that we deemed to be potentially deceptive, e.g., they included a specific earnings claim or offered the type of work that frequently is a scam.

3. Advertisements Offering Craft Assembly and Envelope Stuffing Work

Twenty-one percent of the advertisements offered craft assembly or envelope stuffing, two kinds of work that the FTC has found generally to be scams in past law enforcement actions.¹⁰

a. Craft Assembly

Fourteen percent of the advertisements offered craft assembly work. According to the advertisements, consumers would earn money by making items such as key chains, CD cases, hair bows, decorative angels, and picture frames. Some of these advertisements advised consumers that they would not need to actually sell products that they have assembled because the products had already been sold to companies registered for the program. A few of the advertisements asked consumers to submit a fee to obtain the necessary materials.

These offers promote opportunities strikingly similar to those the FTC challenged in recent law enforcement actions.¹¹ For example, in one FTC case, the defendant's advertisements promised consumers \$600 to \$800 per week for assembling beaded greeting cards and decorative wooden churches.¹² After paying a \$100 materials fee, consumers learned that they had to submit sample finished crafts to the company for approval before they could assemble more products for money and receive a refund of their deposit. Defendant, however, did not send sufficient materials for consumers to assemble the required number of crafts to qualify for refund of their deposit. Moreover, the instructions defendant sent were incomplete and incomprehensible. In the rare instances in which consumers could assemble the products (usually after many hours of work) and submitted them for approval, the company rejected the samples and directed consumers to submit another sample. Thus, consumers not only never received the promised earnings, they lost \$100 and hours of their time.

b. Envelope Stuffing

Seven percent of the collected advertisements promoted envelope stuffing work. One such advertisement promised consumers that they would receive six dollars for every envelope, further illustrating that "1,000 envelopes x 6 = \$6,000."

The FTC has brought a number of legal actions against promoters offering similar schemes.¹³ In the FTC's experience, rather than offering actual employment, many envelope stuffing promoters are merely asking consumers to recruit others to send money. In a recent case, for example, a work-at-home promoter promised to pay consumers seven dollars for every envelope they stuffed. The promoter told consumers that for a \$40 "registration fee," consumers would get everything they needed to stuff envelopes and that this fee would be

refunded after the first 100 envelopes. Rather than obtaining actual employment, however, consumers merely received instructions on how to buy their own advertisements and to collect seven dollars from each person who responded to their advertisements.¹⁴

C. Advertisements Offering Types of Opportunities Not Categorized as Having Indicia of Fraud

In addition to craft assembly and envelope stuffing, the collected advertisements offered a wide variety of work-at-home opportunities, including online work, product sales, and jobs as telemarketers. Because we do not have the same law enforcement experience with these types of offers, we did not categorize these offers as potentially deceptive. This does not mean that the advertisers are legitimate. In fact, many of these advertisements included a specific earnings or “no risk” claim, and therefore, bore indicia of fraud. In other instances, additional investigation would be necessary to determine whether or not the offer was legitimate. Investigating individual advertisers’ claims was beyond the scope of the Surf.

1. Advertisements Offering Online Work

Eighteen percent of the advertisements stated that they were offering Internet-based work-at-home programs. Many of these advertisers provide little information about the exact nature of the work. Those advertisements that provided some detail promoted a range of “opportunities,” including filling out online surveys; selling vacations online; entering data online; putting links or banners on websites; directing Internet traffic to certain websites; and “processing” emails. Sixty percent of these advertisements bore indicia of fraud by making a specific earnings and/or “no risk” claim.¹⁵

2. Advertisements Offering Miscellaneous Work

Twenty-eight percent of the advertisements fell into the “Other” category. These advertisements promoted a wide variety of work, including telemarketing, call center representation, mortgage processing, magazine sales, jewelry sales, adult entertainment telephone “acting,” vacation sales, and sewing/embroidery work. Sixty-seven percent of these advertisements included a potentially deceptive specific earnings and/or “no risk” claim.

3. Advertisements with No Information Regarding Type of Work

The remaining 31 percent of the collected advertisements did not specify the type of work offered. The complete lack of information about the type of work may raise a red flag about the legitimacy of these offers. In fact, 69 percent of these advertisements included a potentially deceptive specific earnings and/or “no risk” claim.

D. Other Advertising Techniques

In addition to analyzing the advertisements for indicia of fraud, we reviewed the advertisements for the prevalence of other advertising claims. Unlike the representations discussed in Part III.B supra, these claims are not necessarily indicia of fraud. We report them here for the purpose of providing a better understanding of work-at-home advertising, including the marketers’ target audience.

1. Job Qualifications

A common feature of work-at-home advertisements is a reassurance that anyone can successfully work from home through the offered program. For example, 19 percent of the advertisements included a representation that a consumer can obtain a home-based job regardless of his or her experience or background. Four percent of the advertisements stated that the applicant need not speak English.

2. Disclosure of Up-front Fees

Our law enforcement experience indicates that consumers do not learn the nature of the advertised work-at-home opportunity until they call the telephone number provided in the advertisement. Upon calling, consumers frequently learn that they will have to pay a fee to get information about the work. Advertisers, however, rarely disclose in advertisements the fact that consumers will have to pay an up-front fee. The Surf confirmed that most advertisements do not include this information. Only six percent of the advertisements stated that consumers would have to pay a fee to avail themselves of the work-at-home opportunity.

3. Part-Time or Full-Time

Many work-at-home promoters advertise the flexibility of the offered opportunity. For example, 16 percent of the advertisements indicated that the offered work-at-home opportunity could be either part or full-time.

IV. CONCLUSION

This report, based on work-at-home advertisements collected on two days in January 2007, provides a thorough, albeit non-scientific, review of print and Internet work-at-home advertisements aimed at the Hispanic community. Reviewing the 314 collected advertisements, FTC staff found that 68 percent had indicia of fraud. Print media had a slightly higher percentage of potentially deceptive advertisements than the Internet. It is unlikely that these advertisements would deliver on their promises of quick and easy money. They may offer programs that do not actually exist or fail to disclose that consumers will have to work many hours without pay, frequently at significant personal cost. Moreover, many of the other collected advertisements, although not counted as bearing indicia of fraud, may be problematic, as they provide little or no detail about the nature of work being offered. The high incidence of potentially deceptive advertisements in this sample suggests that work-at-home scams are pervasive in Spanish-language media.

The FTC's experience with work-at-home scams has shown they are frequently perpetrated by small, fly-by-night operations who take money from those who can least afford it. In addition to aggressively pursuing these scams through law enforcement, the FTC provides consumers with materials to help them identify suspicious work-at-home ads and encourages them to complain to the FTC and other law enforcement agencies if they have fallen prey to a scam.¹⁶

We would like to thank our many Surf partners for their invaluable assistance and participation in this project.

ENDNOTES

1. Specifically, participants searched for potentially deceptive claims regarding health (serious diseases and weight loss); financial livelihood (work-at-home and business opportunities); and credit advertisements (credit repair and guaranteed credit cards and loans).

Específicamente, los participantes hicieron una búsqueda de declaraciones potencialmente engañosas relacionadas a la salud (enfermedades graves y pérdida de peso); medios de sustento económico (oportunidades de trabajo en casa y oportunidades de negocio) y anuncios de crédito (servicios de reparación de crédito y tarjetas de crédito y préstamos garantizados).

2. As part of “Project Biz Opp Flop” in 2005 and “Project FALSE HOPE\$” in 2006, for example, the FTC and its partners announced more than 300 law enforcement actions against promoters of business opportunity and work-at-home schemes. The Commission also has filed a number of actions against companies marketing bogus work-at-home opportunities to Spanish-speaking consumers. *See, e.g., FTC v. QTX* (2006); *FTC v. AG Intercraft* (2004); *FTC v. USS Elder Enterprises, Inc.* (2004); and *FTC v. Esteban Barrios Vega* (2004).

Por ejemplo, como parte del proyecto llamado “Biz Opp Flop” del año 2005 y el proyecto “FALSE HOPE\$” de 2006, la FTC y sus asociados y colegas anunciaron más de 300 acciones de cumplimiento de ley entabladas contra promotores de oportunidades de negocio y esquemas de trabajo en casa. La FTC también ha presentado una cantidad de acciones contra compañías que comercializan falsas oportunidades de trabajo en casa ofreciéndoselas a consumidores hispanohablantes. Véase como ejemplo: FTC vs. QTX (2006); FTC vs. AG Intercraft (2004); FTC vs. USS Elder Enterprises, Inc. (2004) y FTC vs. Esteban Barrios Vega (2004).

3. *See, e.g., Hispanic Outreach Forum and Law Enforcement Workshop, A Summary of the Proceedings*, October 2004, p. 9.

Véase como ejemplo: Hispanic Outreach Forum and Law Enforcement Workshop, A Summary of the Proceedings, October 2004, p. 9.

4. The following offices joined the FTC in the Work-at-Home Surf: United States Postal Inspection Service; Council of the Better Business Bureau (“CBBB”); Manos Latinas...Manos Amigas/Latin Hands, Friendly Hands/Kino Weed & Seed; BBB of Southern Arizona; BBB of San Diego and Imperial Counties; BBB of Denver; BBB of Atlanta; BBB of Central Indiana; Massachusetts Office of the Attorney General; Nebraska Attorney General’s Office; BBB of Eastern North Carolina; North Carolina Department of Justice; Oregon Attorney General’s Office; Puerto Rico Department of Consumer Affairs; and División Protección al Consumidor, Superintendencia de Industria y Comercio, Colombia.

Las oficinas que se listan a continuación se unieron a la FTC para participar del Monitoreo de Anuncios de Oportunidades de Trabajo en Casa Dirigidos a Hispanos: Servicio de Inspección Postal de Estados Unidos; Council of the Better Business Bureau (“CBBB”); Manos Latinas...Manos Amigas/Latin Hands, Friendly Hands/Kino Weed & Seed; BBB de la Región Sur de Arizona; BBB de San Diego e Imperial Counties; BBB de Denver; BBB de Atlanta; BBB de la Región Central de Indiana; Oficina del Fiscal General de Massachusetts; Oficina del Fiscal General de Nebraska; BBB de la Región Este de Carolina del Norte; Departamento de Justicia de Carolina del Norte; Oficina del Fiscal General de Oregon; Departamento de Asuntos de los Consumidores de Puerto Rico y la División de Protección al Consumidor; Superintendencia de Industria y Comercio de Colombia.

5. The indicia of fraud in any advertisement does not mean that the advertisement meets the legal standard of deception under the FTC Act or other federal or state laws; further investigation would be necessary to make such a determination.

Indicios de fraude en cualquier anuncio no significan que el anuncio cumple con los requerimientos legales de engaño bajo la ley de la FTC u otras leyes federales o estatales; una investigación mas profunda seria necesaria para llegar a esa determinación.

6. Staff asked participants searching for print advertisements to include all work-at-home advertisements appearing in Spanish-language periodicals, regardless of the language of the advertisements. We asked Internet surfers to use only Spanish-language terms to conduct searches but to include any English-language websites returned during their searches.
7. Twenty-nine percent of the print advertisements and nine percent of the Internet advertisements were in English.
8. We considered advertisements to be verbatim if they had identical advertiser names, contact information, and advertising text.
9. FTC law enforcement experience is confirmed by the Better Business Bureau's experience. Specifically, the BBB's website states that "[w]hile ads claim high earnings and short hours with little or no experience, the Bureau files nationwide indicate no evidence of anyone making the promised money." Accordingly, it suggests "extreme caution" when responding to an offer for a work-at-home job.
10. Interestingly, even other types of work-at-home promoters distinguished their offered work from craft assembly and envelope stuffing work. One advertisement, for example, promised consumers that "[t]his offer has nothing to do with earning money from home stuffing envelopes, sending brochures, assembling crafts or any similar activity." None of the collected advertisements indicated that they were offering medical billing work, another type of work-at-home offer that in the FTC's experience is frequently a scam. *See, e.g., FTC v. EDI Health Claims Network* (2006).
11. *See, e.g., FTC v. AG Intercraft* (2004); *FTC v. USS Elder Enterprises, Inc.* (2004); *FTC v. Esteban Barrios Vega* (2004); and *FTC v. QTX* (2006).
12. *FTC v. AG Intercraft* (2004).
13. *See, e.g., FTC v. HGB Publications* (2006); *FTC v. Wholesale Marketing Group* (2006); and *FTC v. Sun Ray Trading* (2006).
14. *FTC v. HGB Publications* (2006).
15. In October 2006, the FTC sued a company offering Internet-based work-at-home opportunities. The company touted its purported opportunities as "Top Twelve Money Making Programs," promising consumers that they could make significant earnings participating in online programs such as online surveys, email processing, and online data-entry. The FTC's complaint alleged that the company's programs did not exist or required payment of additional funds and/or expenditure of considerable time to attempt to build a business. *See FTC v. Eric G. Louie, et al.* (2006).
16. *See, e.g., FTC Facts for Consumer, Work at Home Schemes (Fraudes de Trabajo en el Hogar)*; and *FTC Consumer Alert, Take this Scheme and Stuff It: Avoiding Envelope Stuffing Rip Offs (No Llenez este Esquema: Evite ser Víctima de Estafas de Llenar Sobres)*.

FEDERAL TRADE COMMISSION

[ftc.gov](https://www.ftc.gov)

1-877-FTC-HELP

FOR THE CONSUMER