



2024 FTC Annual Report on Refunds to Consumers

Office of Claims and Refunds, Bureau of Consumer Protection

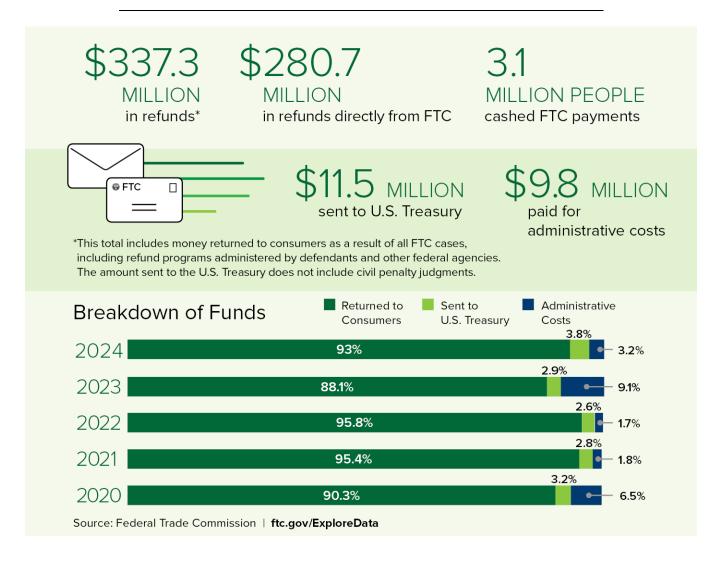
FTC Refunds to Consumers

The goal of FTC law enforcement actions is to stop illegal practices, and when possible, get refunds to people who lost money.

Once an FTC lawsuit or settlement is final and the defendants have paid the money ordered by the court, the FTC's Office of Claims and Refunds develops a plan for returning that money to the right people. Most FTC court orders require that if there is any money left over after the refund program is complete or if there is not enough money to provide meaningful refund amounts, then the money is sent to the U.S. Treasury, where it is deposited into the General Fund.

Data about FTC refunds are available in interactive online dashboards at www.ftc.gov/ExploreData. Users can explore refund data by case or by year to learn about where refunds were sent, the dollar amounts refunded, and the number of people who benefited from FTC refund programs.

FTC Refunds to Consumers Snapshot January 1, 2024 – December 31, 2024



Consumers Nationwide Benefit from FTC Refund Programs

FTC Refunds Mailed to States in 2024¹

State	\$\$ Mailed in 2024		State	\$\$ Mailed in 2024	
AK	\$361,436		NC	\$12,275,309	
AL	\$4,255,958		ND	\$506,089	
AR	\$1,547,708	ı	NE	\$1,342,213	1
AZ	\$16,069,876		NH	\$563,562	I
CA	\$24,919,399		NJ	\$3,525,628	
СО	\$6,140,578		NM	\$1,608,019	
СТ	\$1,660,950		NV	\$5,235,481	
DC	\$366,433		NY	\$5,888,585	
DE	\$766,253		ОН	\$8,037,240	
FL	\$26,479,790		ОК	\$3,267,492	
GA	\$16,531,543		OR	\$3,066,071	
HI	\$856,958	1	PA	\$8,784,459	
IA	\$1,613,031		PR	\$304,039	
ID	\$1,095,949	1	RI	\$559,714	
IL	\$9,166,894		SC	\$4,919,242	
IN	\$5,087,590		SD	\$574,693	I
KS	\$1,287,265	1	TN	\$7,003,758	
KY	\$3,443,071		TX	\$41,585,361	
LA	\$3,810,452		UT	\$1,674,505	
MA	\$2,044,543		VA	\$7,243,000	
MD	\$2,552,965		VT	\$178,870	
ME	\$352,045		WA	\$4,036,201	
MI	\$3,754,995		WI	\$4,655,641	
MN	\$3,569,103		WV	\$1,198,277	
МО	\$5,289,771		WY	\$553,882	I
MS	\$2,613,354		Military Bases	\$107,314	
MT	\$467,607				

International Payments
Electronic Payments (no geographic data)
Total Sent:

\$1,967,782 \$48,411,598 \$325,179,539

¹ The FTC publishes additional state level refund data on our <u>interactive online dashboards</u>.

How the FTC Provides Refunds

Success in getting refunds to people depends principally on whether the FTC has a reliable list of customers, including their contact information and the amount of money they spent. In most of our cases, the FTC has this information, and it mails checks out to a list of known customers. In other cases, there is no list of known customers or there is insufficient contact information, and the agency must use a claims process to identify people who are eligible for a refund. There are at least six steps involved in every refund program:

- 1. Identify who is eligible for a refund.
- 2. Determine how the money will be divided.
- 3. Send refunds.
- 4. Update contact information and resend payments, as needed.
- 5. Consider whether an additional distribution is feasible.
- 6. Send any remaining money to the U.S. Treasury.

Identifying who is eligible for a refund

FTC court orders typically require the defendants to provide a list of customers, their contact information, and how much each customer paid. If the agency obtains a reliable list of eligible recipients, then the agency mails checks or sends electronic payments directly to them. During calendar year 2024, the FTC used defendant data to send checks and electronic payments in 26 cases. To date, 59% of eligible consumers have cashed their payment,² and consumers are still cashing payments. The FTC expects the average participation rate to exceed 70% once all distribution activity is complete. In fact, the FTC completed first distribution activity for 17 cases in 2024, and the average participation rate for these cases is 81%. Once first distribution activity is complete, the refund programs are closed or moved into a second distribution.

If the agency doesn't have all the data it needs to send payments to eligible consumers, a claims process may be necessary. In such cases, the people affected must apply for a refund. The agency might conduct a media campaign and use paid advertisements to let people know that refund money is available and encourage them to visit our website to apply. A claims process typically increases the administrative costs of the refund program. Generally, the FTC receives claims from 5% to 50% of potential claimants. In 2024, the FTC completed a claims process and sent payments in 7 cases. To date, 81% of these consumers have cashed their payments. ³

The agency's Consumer Sentinel Network database may be used to find eligible recipients, either as a supplement to data from other sources, or occasionally, as the only source of data. Consumer Sentinel data contains millions of complaints from people who have contacted the FTC, the Better Business Bureau, or other federal, state, and local law enforcement offices. The FTC may search for complaints

-

² As of December 31, 2024.

³ As of December 31, 2024.

related to the defendants and use the contact information in those complaints to create a list of potential refund recipients. The FTC used Consumer Sentinel complaints as the primary source of data for one case in 2024. To date, nearly 70% of eligible consumers have cashed their checks in that case. ⁴

Determining how the money will be divided

In cases where the court order does not specify the parameters of the refund program, FTC staff determines the eligibility criteria and the formula for calculating payments to eligible recipients. In cases where the settlement fund is not large enough to provide full refunds to every customer, the FTC analyzes the data to determine how best to distribute refunds. When making these decisions, FTC staff considers the administrative costs that must be paid for by the fund, the type of harm, the size of the refund to each recipient, how much variation there is between the lowest and highest loss amounts, and other details about the case. In most FTC cases, the money is distributed on a pro rata basis, meaning that each recipient receives an equal percentage of their total loss.

Sending refunds

The FTC has many mechanisms in place to verify the accuracy of our distributions and to confirm that only the approved recipients receive payment. First, unique identifiers are assigned to each potential claimant at the beginning of the case. FTC staff independently reviews each distribution, checks the proposed list of recipients against the master list, and investigates any discrepancies before approving a distribution. The agency also conducts payment audits to verify that only the rightful recipients received payments. In a claims process, we may ask for supporting documents or other information, and we apply analytical tools to identify and remove fraudulent or duplicate claims.

Once payments have been sent, the FTC carefully tracks which payments make it into the hands of affected consumers, and the agency uses that information for continuous improvement of our refund processes. In 2024, the FTC sent first round payments in 33 different cases, totaling nearly \$315 million.

_

⁴ As of December 31, 2024.

Cases with First Distributions in 2024

Case Name	Date Sent \$\$ Sent		Eligible Consumers	Consumers Who Cashed a Payment to Date	% of Consumers Who Cashed a Payment to Date	
American Vehicle Protection	10/10/2024	\$449,255.55	18,255	8,248	45.2%	
Apex Capital Group	09/30/2024	\$2,824,799.00	153,940	71,983	46.8%	
AT&T	04/11/2024	\$6,291,749.00	267,734	228,820	85.5%	
Benefytt Technologies	03/18/2024	\$99,307,988.46	463,629	321,640	69.4%	
Brigit (Bridge It)	11/18/2024	\$17,043,374.10	1,818,930	1,041,261	57.2%	
CafePress	09/18/2024	\$370,644.32	20,044	17,899	89.3%	
Chaucer/Bates Accessories	11/20/2024	\$143,064.55	4,061	2,241	55.2%	
Consumer Defense LLC (Preferred Law)	01/09/2024	\$1,260,589.74	6,261	4,423	70.6%	
Credit Karma	10/31/2024	\$2,547,660.24	50,994	42,838	84.0%	
Cycra	05/13/2024	\$181,994.40	886	766	86.5%	
DK Automation	03/28/2024	\$2,809,962.72	890	771	86.6%	
FloatMe	09/23/2024	\$2,691,570.56	449,344	253,210	56.4%	
Fortnite (Epic Games)	12/09/2024	\$72,003,286.94	629,344	496,187	78.8%	
Hey Dude Shoes	08/06/2024	\$1,894,041.10	36,757	24,718	67.2%	
Instant Brands (Pyrex)	10/01/2024	\$88,067.29	10,259	4,465	43.5%	
Lanier Law	08/26/2024	\$222,149.30	322	302	93.8%	
LCA-Vision (LasikPlus)	10/03/2024	\$1,102,509.33	12,077	11,236	93.0%	
Lurn	06/06/2024	\$2,476,473.99	1,922	1,532	79.7%	
Mission Hills Federal	03/13/2024	\$4,150,896.78	27,584	18,251	66.2%	
MyScore LLC	11/21/2024	\$1,899,890.31	42,849	18,881	44.1%	
National Landmark Logistics	12/10/2024	\$543,367.50	1,625	1,133	69.7%	
Nexway SASU	02/08/2024	\$618,485.72	6,490	4,528	69.8%	
Opendoor	04/03/2024	\$61,749,423.94	54,689	48,890	89.4%	
Rejuvica (Sobrenix)	11/07/2024	\$536,816.42	56,686	25,085	44.3%	
Response Marketing Group (Nudge)	03/21/2024	\$10,154,439.50	4,670	3,683	78.9%	
Rhinelander Auto Center	10/29/2024	\$1,065,862.21	7,531	5,451	72.4%	
Ring LLC	04/23/2024	\$5,667,294.00	117,044	80,168	68.5%	
SuperGoodDeals.com	12/04/2024	\$114,743.57	4,583	2,523	55.1%	
The Bountiful Company	03/14/2024	\$527,345.29	32,689	19,783	60.5%	
Vitagene (1Health.io)	09/09/2024	\$49,539.84	2,432	1,283	52.8%	
Vivint Smart Home	12/05/2024	\$496,546.74	470	374	79.6%	
WealthPress Holdings	04/09/2024	\$1,201,047.60	19,857	14,061	70.8%	
Zurixx LLC	07/31/2024	\$12,352,681.90	25,563	17,378	68.0%	
Total		\$314,837,561.91	4,350,411	2,794,012	64.2%	

Updating contact information and resending payments

Finding current contact information for eligible recipients is a challenge. Court cases sometimes take years to resolve, so the FTC uses several tools for updating addresses.

Before mailing checks, we check every distribution list against the National Change of Address system, which records change-of-address notices submitted to the U.S. Post Office. When a check is returned as undeliverable or remains uncashed after its void date, the agency conducts an address search to determine if there is a more recent address for the consumer, and then reissues a new check to the updated address.

The agency also uses different payment methods to reach additional consumers. For example, the agency sometimes sends electronic payments to consumers after uncashed checks go void. In 2024, the FTC used Zelle payments to reach additional Amazon Flex drivers who were owed a payment from the FTC's 2021 settlement with Amazon. This was the agency first time using Zelle to send payments. The distribution resulted in 2,806 successful payments, increasing participation from 90.3% to 92.3% of eligible drivers. To date, 130,952 Amazon Flex drivers have received full compensation totaling more than \$58.5 million. ⁵

Considering whether an additional distribution is feasible

After updating addresses and reissuing payments, as necessary, the FTC considers whether the remaining money can be used to send a second round of payments. For example, recipients might get 50% of their money back with the first payment and an additional 10% of their money back with the second payment. In very rare circumstances, such as when the agency recovers additional money from the defendants, we may send a third or fourth round of payments.

Usually, if there are sufficient funds to provide a meaningful refund amount to recipients and to pay for the related costs, the FTC sends a second round of payments. Generally, to be eligible for an additional payment, the consumer must have cashed their previous payment. In addition, the FTC sometimes imposes a minimum check amount that excludes some consumers who otherwise would have been eligible. In general, the FTC does not mail checks of less than \$10.

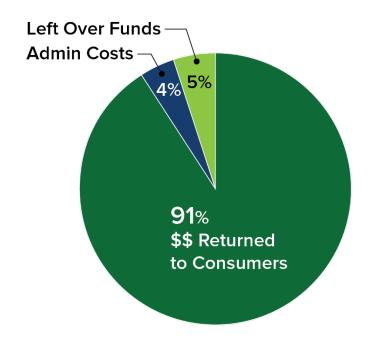
In 2024, the FTC sent additional payments in 22 different FTC cases, totaling more than \$10 million dollars.

-

⁵ As of December 31, 2024.

Cases with Additional Distributions in 2024

Case Name	Date of Most Recent Distribution	# of Consumers in Most Recent Distribution	\$\$ Sent in Most Recent Distribution	\$\$ Returned to Consumers in Previous Distributions	# of Consumers Who Have Cashed At Least One Payment
8 Figure Dream Lifestyle	11/05/2024	1,353	\$84,713	\$1,113,493	1,990
AH Media Group	12/03/2024	25,427	\$954,817	\$4,384,488	140,627
Brookstone Law (Damian Kutzner)	09/11/2024	1,563	\$18,582	\$118,978	1,563
Career Education Corp	04/23/2024	4,296	\$721,471	\$29,176,476	5,585
DK Automation	11/12/2024	771	\$282,979	\$2,519,113	771
Harvest Moon (Lead Express)	03/13/2024	8,877	\$224,721	\$691,880	18,029
HomeAdvisor	10/17/2024	18,848	\$1,130,692	\$1,798,510	77,043
Life Management Services	11/19/2024	2,633	\$152,010	\$365,114	2,927
Lift International	03/07/2024	3,022	\$116,729	\$7,269,034	6,686
MOBE	10/31/2024	6,083	\$456,278	\$23,474,739	25,478
Office Depot	10/22/2024	8,005	\$353,663	\$33,426,959	469,383
RagingBull.com, LLC	04/16/2024	6,999	\$627,440	\$1,727,932	7,000
Resident Home	07/18/2024	6,991	\$597,951	\$44,570	6,540
Saint James School of Medicine	03/14/2024	1,190	\$70,771	\$742,732	1,190
Student Advocates Team	09/17/2024	5,015	\$107,985	\$671,755	11,794
Student Debt Doctor	07/16/2024	14,067	\$581,220	\$1,457,820	15,137
Tate's Auto Center	01/25/2024	2,444	\$78,797	\$288,830	2,444
Teami, LLC	06/18/2024	11,545	\$184,531	\$671,956	14,493
Vantage Point Services	02/15/2024	1,474	\$79,575	\$148,507	3,142
Warrior Trading	11/21/2024	17,121	\$410,599	\$2,468,727	17,121
Yellowstone Capital	08/12/2024	4,981	\$3,309,280	\$6,404,871	4,982
YF Solutions (GDP Network)	08/27/2024	500	\$88,024	\$457,317	500
Totals		153,205	\$10,632,827	\$119,423,801.81	834,425



Sending any remaining money to the U.S. Treasury

Whenever possible, the FTC uses the money it collects from defendants to provide refunds to injured consumers and pay the related administrative costs. When a refund program is not feasible or there is money left over after the refund program is complete, the FTC sends unused funds to the U.S. Treasury or to co-plaintiffs as required by the court and applicable law.

The agency generally closes a refund program and sends the remaining money to the U.S. Treasury when there is not enough money for another round of payments, or when affected consumers have received full refunds. On average, the money sent to the U.S. Treasury accounts for less than five percent of the total funds collected. In fact, over the last five years (2020-2024), the agency returned \$2 billion to consumers, while sending less than \$42 million to the U.S. Treasury.

In 2024, the FTC closed refund programs for 25 different cases that together resulted in more than \$148 million returned to consumers. In these cases, the FTC returned an average of \$127.58 per person, and spent an average of \$5.79 per person.

Cases Closed in 2024

Case Name	Total Fund	\$\$ Returned to Consumers	Admin Costs	Left Over Funds	# of Consumers Sent a Payment	# of Consumers Who Cashed At Least One Payment	% of Consumers Who Cashed a Payment
A.S. Research	\$821,000.00	\$702,780.45	\$96,155.63	\$22,063.92	13,221	10,833	81.9%
Age of Learning (ABCmouse)	\$10,000,000.00	\$9,294,213.82	\$494,949.45	\$210,836.73	206,814	137,591	66.5%
Alliance Document Preparation (EZ Doc Preps)	\$5,652,048.24	\$5,264,069.41	\$189,412.16	\$198,566.67	39,734	32,452	81.7%
Avant Inc	\$3,850,000.00	\$3,736,989.88	\$112,343.82	\$666.30	17,367	15,872	91.4%
BlueHippo Funding	\$130,603.32	\$79,418.40	\$45,311.68	\$5,873.24	4,505	2,222	49.3%
Digital Income System	\$586,366.94	\$555,203.35	\$29,660.37	\$1,503.22	1,064	971	91.3%
Educare Centre Services	\$2,316,701.54	\$2,200,754.40	\$78,527.92	\$37,419.22	7,786	5,959	76.5%
Elite IT Partners	\$355,138.80	\$218,406.45	\$114,985.84	\$21,746.51	31,075	16,432	52.9%
Fortune Hi-Tech Marketing	\$5,260,903.56	\$4,474,225.17	\$632,213.97	\$154,464.42	285,369	137,670	48.2%
GAFS Group	\$585,687.50	\$557,103.04	\$28,584.46	\$0.00	1,966	1,062	54.0%
Health Formulas (Simple Pure)	\$10,021,971.06	\$9,562,156.48	\$376,095.87	\$83,718.71	227,764	164,458	72.2%
Hylan Asset Management	\$852,516.47	\$805,511.09	\$36,609.50	\$10,395.88	1,432	1,049	73.3%
Kushly	\$30,583.14	\$16,397.94	\$14,049.72	\$135.48	576	253	43.9%
LendingClub Corporation	\$18,000,000.00	\$17,543,112.63	\$454,879.70	\$2,007.67	77,738	69,966	90.0%
NetSpend	\$12,759,099.27	\$4,208,672.57	\$1,111,628.39	\$7,438,798.31	279,557	150,467	53.8%
Neurometrix	\$4,000,000.00	\$3,678,186.28	\$293,196.12	\$28,617.60	70,142	61,743	88.0%
OTA Franchise (Online Trading Academy)	\$5,597,579.35	\$5,367,397.34	\$205,502.40	\$24,679.61	31,160	25,831	82.9%
Physician's Technology, LLC (Willow Curve)	\$400,000.00	\$242,468.60	\$57,206.12	\$100,325.28	22,869	15,796	69.1%
Reckitt Benckiser/Indivior (Suboxone)	\$60,078,375.25	\$58,785,539.67	\$1,256,333.73	\$36,501.85	54,658	53,080	97.1%
Seed Consulting	\$2,100,000.00	\$1,999,591.80	\$84,741.02	\$15,667.18	8,956	8,115	90.6%
SLAC Inc.	\$350,000.00	\$271,120.50	\$63,073.09	\$15,806.41	10,689	6,083	56.9%
Strategic Student Solutions	\$3,170,568.84	\$2,974,476.50	\$162,605.18	\$33,487.16	20,989	16,389	78.1%
Triangle Media	\$9,077,194.87	\$8,455,466.93	\$436,641.21	\$185,086.73	187,425	151,691	80.9%
Vast Tech	\$7,220,000.11	\$6,931,182.47	\$274,127.65	\$14,689.99	127,129	48,155	37.9%
Wellco, Inc.	\$650,000.00	\$413,027.32	\$79,822.08	\$157,150.60	40,229	28,603	71.1%
Totals	\$163,866,338.26	\$148,337,472.49	\$6,728,657.08	\$8,800,208.69	1,770,214	1,162,743	65.7%

Refund Programs Administered by Third Parties

In rare circumstances, refunds resulting from FTC enforcement actions are provided by a third party administrator or by another federal agency. In many of these cases, to protect the interests of affected consumers, FTC staff provides consultation and support, including guidance about the proposed refund program and related communications to affected consumers. The FTC's Enforcement Division engages in close oversight and monitoring of the program to ensure it complies with the order. For example, in 2024, an FTC settlement with BetterHelp resulted in more than \$5 million returned to BetterHelp customers who had their personal health information used for advertising purposes.