



Office of the Director
Bureau of Consumer Protection

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, DC 20580

A Record of Results for American Consumers

Remarks of Samuel Levine at the National Advertising Division Annual Conference

September 16, 2024

It's great being back at the National Advertising Division, which has been a critical partner to the FTC in our shared mission to ensure honest advertising.¹ This is my fourth year leading our Bureau of Consumer Protection under Chair Lina Khan, and today I want to reflect on what we've accomplished to date, and what you can expect in the years ahead.

I'll focus on four areas where we are taking ambitious steps to make Americans' lives better. First, I'll discuss how our pro-consumer, pro-competition agenda is saving consumers billions of dollars and thousands of hours in wasted money and time. I'll then talk about all the progress we've made in our work to advance safety and privacy online, especially for kids and teens. Next, I'll discuss how we have championed workers and entrepreneurs, who are facing many of the same frauds and predatory conduct as other consumers. Finally, no talk would be complete without discussing AI, and I'll discuss our focus on making sure this technology works for people, and not just tech giants.

But before I get to the fun stuff, I have some sadder news to share. After nearly four decades at the FTC, the incomparable Lesley Fair is departing the FTC this year. And you might have seen that this morning, in a possible violation of the nondelegation doctrine, I declared September 16 to be Lesley Fair Day at the FTC.² You should read my full post on what made Lesley such an extraordinary public servant, but for now, I just want to thank her for her outstanding stewardship of our award-winning business blog, her deep knowledge and passion for all things FTC, and her sage counsel to countless lawyers, Steiger Fellows, and yes, Bureau Directors. I'll miss her a lot.

I. Saving Consumers Time and Money

Lesley would want us to keep the yada-yada-yada to a minimum, so let's discuss our work to save consumers time and money. We all know that Americans are fed up with high prices. And I believe strongly that the work we're doing at the FTC is a key part of the solution.

In my view, the best way to keep prices down is to make sure firms compete honestly for consumers' time and money. Of course, that means aggressively fighting illegal mergers and anticompetitive practices – a hallmark of this FTC. But it also means attacking the daily struggles consumers face to shop around for the best price, to cancel unwanted subscriptions, and to avoid being cheated by shady marketing. I'll

¹ I wish to thank James Evans for his substantial assistance in preparing these remarks. The views expressed here are my own and do not necessarily represent the views of the Federal Trade Commission or any Commissioner.

² Sam Levine, [Fair...well, farewell](#) (Sept. 16, 2024).

discuss each issue in turn, and I'll also address how we're targeting abuses we're seeing around vehicles, schools, and housing – some of the biggest pain points facing consumers.

A. Combatting Junk Fees and Subscription Traps

Let's start by talking junk fees. Too many firms are concealing price increases by keeping sticker prices static and tacking on mandatory fees at the end.³ This dynamic can distort competition in serious ways, and it's why the FTC has been fighting for upfront pricing for decades. We've brought major cases,⁴ issued reports,⁵ and held workshops.⁶ But the problem has not gone away. In fact, we see it growing.⁷ That's why last year, we proposed a junk fee ban that would require firms to post prices upfront, rather than burying or misrepresenting mandatory fees.⁸ We think this rule would help honest businesses compete, and would help consumers shop around.

It's not only junk fees where we've launched ambitious efforts to crack down on long-festering problems. Consider subscription plans. We know how these have grown in popularity, and we see businesses large and small turning increasingly to subscription models. These models offer consumer many benefits, but too often, they come with a downside – firms can lie about the terms, and make it difficult for consumers to cancel.

You've probably noticed how active we've been on the enforcement front. Over the last three years we have brought actions against Adobe, Amazon, Brigit, Care.com, Vonage and more, alleging that they made subscriptions difficult to cancel.⁹ You probably also noticed some the groundbreaking remedies

³ Stacey Vanek Smith, NPR, [What my \\$30 hamburger reveals about fees and how companies use them to jack up prices](#) (July 27, 2023).

⁴ E.g., Press Release, [FTC Takes Action Against Bill Payment Company Doxo for Misleading Consumers, Tacking on Millions in Junk Fees](#) (Apr. 25, 2024); Press Release, [FTC Action Leads to Permanent Ban for Scammers Who Charged Students Seeking Debt Relief with Junk Fees](#) (Feb. 6, 2024); Press Release, [FTC Action Leads to \\$18 Million in Refunds for Brigit Consumers Harmed by Deceptive Promises About Cash Advances, Hidden Fees, and Blocked Cancellation](#) (Nov. 2, 2023); Press Release, [FTC Takes Action Against Multistate Auto Dealer Napleton for Sneaking Illegal Junk Fees onto Bills and Discriminating Against Black Consumers](#) (Apr. 1, 2022); Press Release, [LendingClub Agrees to Pay \\$18 Million to Settle FTC Charges](#) (July 14, 2021). A particularly pernicious area in which we have brought cases are companies advertising that something is “free” when it isn't for most consumers. See Press Release, [FTC Takes Action Against Tax Prep Company H&R Block For Wiping Consumers' Data, Deceptively Marketing 'Free' Online Filing](#) (Feb. 23, 2024); Press Release, [FTC Issues Opinion Finding that TurboTax Maker Intuit Inc. Engaged in Deceptive Practices](#) (Jan. 22, 2024).

⁵ E.g., Press Release, [FTC Staff Perspective Recaps Online Event Tickets Workshop](#) (May 7, 2020); Mary W. Sullivan, FTC, [Economic Analysis of Hotel Resort Fees](#) (Jan. 2017).

⁶ E.g., Press Release, [FTC Staff Perspective Recaps Online Event Tickets Workshop](#) (May 7, 2020); [The Economics of Drip Pricing](#) (May 21, 2012).

⁷ FTC, [Trade Regulation Rule on Unfair or Deceptive Fees \(NPRM\)](#), 88 Fed. Reg. 77420, 77421–38 (Nov. 9, 2023).

⁸ 88 Fed. Reg. at 77483–84.

⁹ Press Release, [FTC Takes Action Against Adobe and Executives for Hiding Fees, Preventing Consumers from Easily Cancelling Software Subscriptions](#) (June 17, 2024); Press Release, [FTC Takes Action Against Amazon for Enrolling Consumers in Amazon Prime Without Consent and Sabotaging Their Attempts to Cancel](#) (June 21, 2023); Press Release, [FTC Adds Senior Executives Who Played Key Roles in Prime Enrollment Scheme to Case Against Amazon](#) (Sept. 20, 2023); Press Release, [FTC Action Leads to \\$18 Million in Refunds for Brigit Consumers Harmed by Deceptive Promises About Cash Advances, Hidden](#)

we've obtained, including our largest-ever ROSCA judgment,¹⁰ requirements to preserve A/B testing,¹¹ and provisions to guarantee simple cancellation.¹²

In spite of our enforcement track record, problems in this market persist. That's why last year, we proposed our click-to-cancel rule – requiring that firms be honest in their marketing, and make subscriptions as easy to cancel as they are to enroll in.¹³ As with junk fees, we believe this would level the playing field for businesses that market subscriptions honestly, while saving consumers time and money.

I know many of you may be wondering when and if we'll be finalizing our click-to-cancel and junk fee rules. But rather than making news, I'll tell you something you should already know. Hiding fees and trapping consumers in subscriptions is already unlawful, not only under the FTC Act but under other laws we enforce, like ROSCA. We sued Vonage, Amazon and others under our existing authority, and companies should heed the call to follow the law *now* rather than waiting for a final rule.

B. Cracking Down on Illegal Telemarketing

Speaking of calls, during this talk, I'm sure some of you will be hit with a robocall. This problem is so widespread that it might at times feel hopeless. But over the last four years, we've led the most aggressive crackdown on illegal telemarketing since the creation of the Do Not Call List. Our multifaceted strategy includes enforcement, rulemaking, and leveraging American innovation.

On the enforcement front, we announced last year the largest crackdown on unwanted calls in U.S. history, with more than 100 enforcers bringing more than 180 actions. We challenged telemarketers themselves, such as those who are looking to exploit struggling student borrowers. We also sued their enablers, particularly VoIP providers and "consent" farms – including Fluent, a publicly-traded firm that sold hundreds of millions of leads to telemarketers.¹⁴ All told our actions targeted *billions* of illegal calls, halting frauds and saving consumers countless hours.

Our strategy is working. While the prevalence of illegal calls remains unacceptably high, the number of Do Not Call complaints to the FTC is less than half of what it was in 2021 – marking significant progress.¹⁵

[Fees, and Blocked Cancellation](#) (Nov. 2, 2023); Press Release, [FTC Takes Action Against Care.com for Deceiving Caregivers About Wages and Availability of Jobs on its Site, Impeding Cancellation Process](#) (Aug. 26, 2024); Press Release, [FTC Action Against Vonage Results in \\$100 Million to Customers Trapped by Illegal Dark Patterns and Junk Fees When Trying to Cancel Service](#) (Nov. 3, 2022).

¹⁰ Press Release, [FTC Action Against Vonage Results in \\$100 Million to Customers Trapped by Illegal Dark Patterns and Junk Fees When Trying to Cancel Service](#) (Nov. 3, 2022).

¹¹ Press Release, [FTC Takes Action to Stop Credit Karma From Tricking Consumers With Allegedly False "Pre-Approved" Credit Offers](#) (Sept. 1, 2022).

¹² E.g., Stipulated Order for Permanent Injunction, Monetary Judgment, and Other Relief § IV, [FTC v. Care.com, Inc.](#), No. 1:24-cv-00987 (W.D. Tex. Aug. 30, 2024), ECF No. 7.

¹³ Press Release, [Federal Trade Commission Proposes Rule Provision Making it Easier for Consumers to "Click to Cancel" Recurring Subscriptions and Memberships](#) (Mar. 23, 2023).

¹⁴ Press Release, [FTC, Law Enforcers Nationwide Announce Enforcement Sweep to Stem the Tide of Illegal Telemarketing Calls to U.S. Consumers](#) (July 18, 2023).

¹⁵ [National Do Not Call Registry, All Complaints by Call Type, July 2020 to June 2024](#) (last visited Sept. 10, 2024).



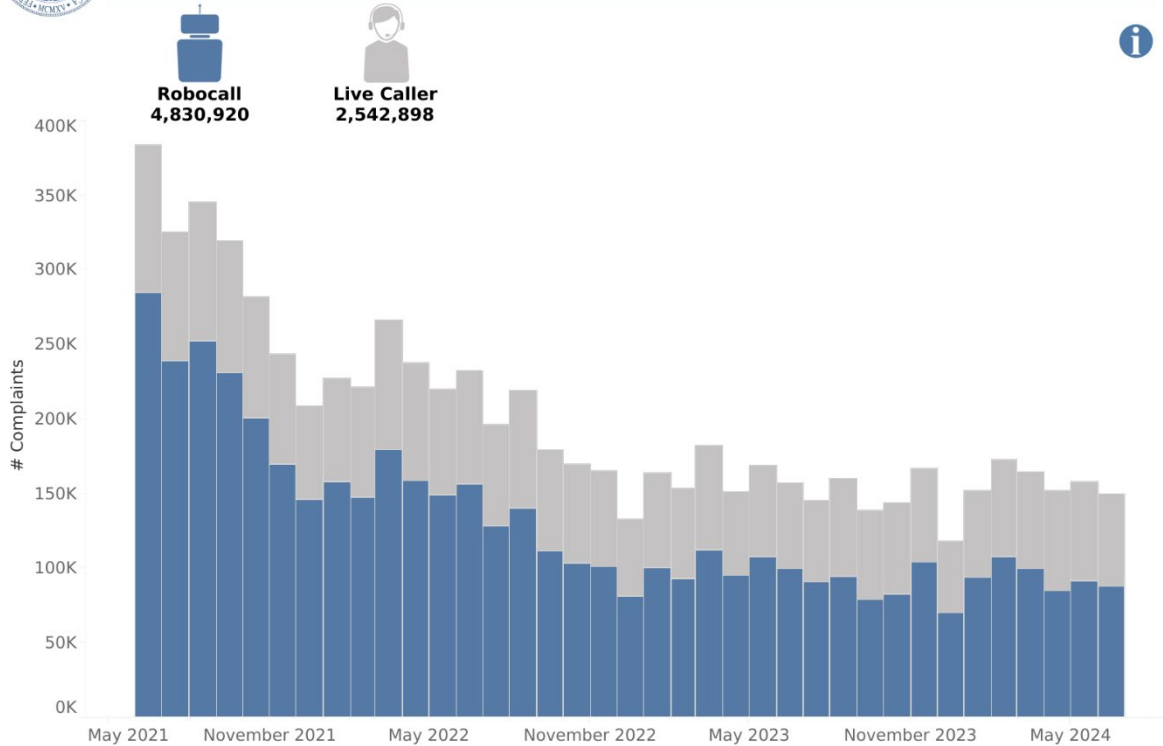
National Do Not Call Registry
All Complaints by Call Type
June 2021 to June 2024

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Complaints where the call type was not reported is relatively small every year and is not included.
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 (data as of June 30, 2024)

Our enforcement work played a big role in this success, but we are using other tools, too. I am particularly proud of work to strengthen the Telemarketing Sales Rule. Earlier this year, we extended telemarketing fraud protections to businesses and updated the rule’s recordkeeping requirements.¹⁶ And we also tapped American ingenuity to combat emerging forms of telemarketing fraud, launching a Voice Cloning Challenge that I’ll discuss later in my remarks. These actions make clear that the FTC will continue to combat unlawful telemarketing practices in every corner of the ecosystem.

C. Focusing on Cars, Education, and Housing

Let me now turn to what the FTC is doing in some specific markets where consumers face particularly large expenses – their cars, their schools, and their homes.

Cars

Let’s start with some Car Talk.¹⁷ Tom and Ray would weekly thank their Chief Legal Counsel: Hugh Louis Dewey of the firm Dewey, Cheetham, & Howe. Well, today the FTC is taking on the Dewey, Cheetham, & Howes of the auto realm – and we’re notching some wins.

¹⁶ Press Release, [FTC Implements New Protections for Businesses Against Telemarketing Fraud and Affirms Protections Against AI-enabled Scam Calls](#) (Mar. 7, 2024).

¹⁷ NPR, [The Best of Car Talk](#) (last visited Sept. 10, 2024).

As American consumers struggle with the high cost of cars,¹⁸ the FTC is taking decisive action to challenge deceptive pricing practices and save consumers time and money during the buying process and beyond. Since 2021, the FTC has brought six lawsuits against auto sellers engaged in unlawful practices, including sneaking in charges for add-ons and discriminating against Black, Latino, or Native American consumers.¹⁹ These efforts have halted unlawful practices and returned millions of dollars to consumers.

In spite of our enforcement success, deceptive auto sales remain a major problem, and we continue to receive thousands of complaints. That's a key reason why last year, we finalized our CARS Rule.²⁰ The rule is currently paused in light of ongoing litigation, but it is worth restating the significant benefits it would offer consumers and honest dealers. Among other key provisions, the CARS Rule requires dealers to disclose key facts – like the offering price – and prohibits them from sneaking add-ons into people's contracts. The CARS Rule is projected to save consumers billions of dollars every year, and 1-3 hours each transaction.²¹

Finally, it's not only sales we're looking at. Our action against Vroom made clear that delivery promises need to be kept.²² Our action against CarShield addressed the soaring cost of repair, returning \$10 million to consumers harmed by deceptive claims about vehicle service contracts.²³ And we warned automakers earlier this year against the surreptitious collection of geolocation data and other unlawful data practices that undermine privacy.²⁴

Education

Let's now turn to education financing, another pain point for consumers. Over the last decade, the FTC has challenged deceptive advertising by some of the biggest names in the field – from CEC to DeVry to

¹⁸ Autos are among the biggest expenses consumers face, and during COVID, auto prices were among the biggest drivers of overall inflation. Many Americans held on to older cars, but the costs of car repair surged, too. See Kejia Wu, Fed. Reserve Bank of Philadelphia, [Auto's Contribution to Core CPI: Pandemic Effects](#) (July 13, 2023); Robert Ferris, NBC, [Car repairs are getting more expensive. Here's why](#) (Feb. 11, 2024).

¹⁹ Press Release, [FTC Takes Action Against Auto Dealer Group Asbury Automotive for Discriminating Against Black and Latino Consumers and Charging for Unwanted Add-Ons](#) (Aug. 16, 2024); Press Release, [FTC, State of Arizona Take Action Against Coulter Motor Company for Deceptive Pricing and Discriminatory Practices](#) (Aug. 15, 2024); Press Release, [FTC, Connecticut Take Action Against Manchester City Nissan for Deceiving Consumers, Forcing Junk Fees](#) (Jan. 4, 2024); Press Release, [FTC and Wisconsin Take Action Against Rhineland Auto Center for Illegally Discriminating Against American Indian Customers and Charging Unlawful Junk Fees](#) (Oct. 24, 2023); Press Release, [Federal Trade Commission Takes Action Against Passport Automotive Group for Illegally Charging Junk Fees and Discriminating Against Black and Latino Customers](#) (Oct. 18, 2022); Press Release, [FTC Takes Action Against Multistate Auto Dealer Napleton for Sneaking Illegal Junk Fees onto Bills and Discriminating Against Black Consumers](#) (Apr. 1, 2022).

²⁰ Press Release, [FTC Announces CARS Rule to Fight Scams in Vehicle Shopping](#) (Dec. 12, 2023).

²¹ FTC, [Combating Auto Retail Scams Trade Regulation Rule \(File Rule\)](#), 89 Fed. Reg. 590, 674 (Jan. 4, 2024).

²² Press Release, [FTC Takes Action Against Online Used Car Dealer Vroom for Deceiving Customers, Failing to Deliver on Time and Provide Required Disclosures](#) (July 2, 2024).

²³ Press Release, [CarShield, Nationwide Seller of Vehicle Service Contracts, to Pay \\$10 Million to Resolve Federal Trade Commission Charges of Deceptive Advertising](#) (July 31, 2024).

²⁴ FTC Tech. Blog, [Cars & Consumer Data: On Unlawful Collection & Use](#) (May 14, 2024).

University of Phoenix.²⁵ That work continues with our lawsuits this year against GCU and Career Step.²⁶ We have also been active in addressing the fallout from the student debt crisis – especially the scourge of debt relief scammers. Over the last year alone we’ve brought three enforcement actions,²⁷ and we redoubled our education efforts to help borrowers avoid scammers.²⁸

But it’s not just scams that are resulting from our student debt crisis. We are also seeing new financial products emerge that purport to help students, but too often deprive them of key legal protections. For example, last year we took action against a for-profit school that offered “income share agreements” that did not include Holder Rule notices – a key borrower protection.²⁹ And the year before, our action against St. James School of Medicine reminded the industry that compliance with our Credit Practices Rule is not optional.³⁰

Housing

The final area I want to discuss is housing. Though housing is often seen as a local issue, we know firms are building nationwide real estate portfolios, and there are serious allegations of rent-fixing and other abuses. Today, housing is on the national agenda – and it’s certainly on the FTC’s. Over the last four years, we sued a major rental listing platforms for deceiving tenants,³¹ recovered more than \$60 million

²⁵ Press Release, [Operator of Colorado Technical University and American InterContinental University Will Pay \\$30 Million to Settle FTC Charges it Used Deceptive Lead Generators to Market its Schools](#) (Aug. 27, 2019); Press Release, [DeVry University Agrees to \\$100 Million Settlement with FTC](#) (Dec. 15, 2016); Press Release, [FTC Obtains Record \\$191 Million Settlement from University of Phoenix to Resolve FTC Charges It Used Deceptive Advertising to Attract Prospective Students](#) (Dec. 10, 2019).

²⁶ Press Release, [FTC Sues Grand Canyon University for Deceptive Advertising and Illegal Telemarketing](#) (Dec. 27, 2023); Press Release, [Career Step to Pay \\$43.5 Million in Cash and Debt Cancellation to Resolve Charges It Used Deceptive Advertising to Lure Servicemembers and Their Spouses](#) (July 30, 2024).

²⁷ Press Release, [FTC Acts to Stop Debt Relief Scheme Targeting Spanish-Speaking Student Loan Borrowers](#) (July 22, 2024); Press Release, [FTC Acts to Stop Student Loan Debt Relief Scheme that Took Millions from Consumers in First Case under the Impersonation Rule](#) (June 28, 2024); Press Release, [FTC Action Leads to Permanent Ban for Scammers Who Charged Students Seeking Debt Relief with Junk Fees](#) (Feb. 6, 2024). For other developments in student loan debt relief cases in the last year, see: Press Release, [FTC Sends More Than \\$4.1 Million in Refunds to People Who Lost Money to Student Loan Debt Relief Scheme](#) (Mar. 13, 2024); Press Release, [Student Loan Debt Relief Scammers Permanently Banned from Industry, Ordered to Turn Over Assets under Proposed Order](#) (Oct. 6, 2023); Press Release, [FTC and DOJ Send More Than \\$9 Million in Refunds to People Who Lost Money to a Student Loan Debt Relief Scheme](#) (Aug. 22, 2023).

²⁸ FTC Consumer Advice, [Student Loan and Education Scams](#) (last visited Sept. 10, 2024). We are fortunate to have a best-in-class consumer and business education team in our Division of Consumer and Business Education. And so are American consumers, who benefit from their timely, plain language advice on keeping themselves and their families safe from fraud.

²⁹ Press Release, [Sollers College to Cancel \\$3.4 Million in Student Debt to Resolve Charges It Used Deceptive Ads to Lure Prospective Students into Illegal Contracts](#) (Oct. 18, 2023).

³⁰ Press Release, [Federal Trade Commission Takes Action Against For-Profit Medical School for Using Deceptive Marketing to Lure Students](#) (Apr. 15, 2022).

³¹ Press Release, [FTC, States Sue Rental Listing Platform Roomster and its Owners for Duping Prospective Renters with Fake Reviews and Phony Listings](#) (Aug. 30, 2022).

from a housing start-up alleged to be cheating homeowners,³² and sued one of the largest providers of tenant screening services for faulty recommendations that shut people out of housing.³³

Our work in this area is just beginning. We launched a request for information last year on issues affecting tenants,³⁴ and this year we are holding listening sessions – including one in Dallas later this week – where we are hearing directly from renters, tenant organizers, and legal aid advocates on what they’re seeing in the rental market.³⁵ Already, it’s apparent that far too many landlords are burying fees and misleading renters about the cost of housing. Our proposed junk fee rule would do much to address this problem – banning mandatory fees from being hidden. But it is also an enforcement priority to ensure landlords can’t sneak rent increases onto consumers through the use of hidden fees.

* * *

Today I’ve focused on some key sectors, but our work is saving consumers time and money across the marketplace. We’ve recovered more than \$100 million from marketers of sham health plans.³⁶ Our cases against Intuit and H&R Block aim to ensure consumers don’t get cheated when filing their taxes.³⁷ We’re making it easier for consumers to repair their products through actions like *Harley Davidson* and *Westinghouse*, and we’re working with states to expand the right to repair.³⁸ Our jury trial win against Richmond Capital is just one of a host of recent victories for small businesses, including a record damages judgment in *Biz2Credit*.³⁹ And we are breaking new ground in using our Section 19 authority to

³² Press Release, [FTC Sends Nearly \\$62 Million in Refunds to Sellers Deceived by Online Real Estate Listing Service Opendoor Labs](#) (Apr. 3, 2024).

³³ Press Release, [FTC and CFPB Settlement to Require Trans Union to Pay \\$15 Million over Charges It Failed to Ensure Accuracy of Tenant Screening Reports](#) (Oct. 12, 2023).

³⁴ Press Release, [FTC and CFPB Seek Public Comment on How Background Screening May Shut Renters out of Housing](#) (Feb. 28, 2023).

³⁵ E.g., Brian Eason, Colo. Sun, [FTC chair, Colorado AG pledge to crack down on “abusive and predatory practices” of corporate landlords](#) (July 26, 2024); Doug Reardon, Atlanta News First, [FTC Chair: ‘No AI exemption to the laws’ when it comes to setting rent prices](#) (June 7, 2024).

³⁶ Press Release, [FTC Sends Nearly \\$100 Million in Refunds to Consumers Harmed by Benefytt Technologies’ Sham Health Plans](#) (Mar. 18, 2024); Press Release, [FTC Obtains \\$195 Million Judgment, Permanent Ban on Telemarketing and Selling Healthcare Products Against Simple Health Over Charges It Sold Sham Health Insurance](#) (Feb. 9, 2024).

³⁷ Press Release, [FTC Takes Action Against Tax Prep Company H&R Block For Wiping Consumers’ Data, Deceptively Marketing ‘Free’ Online Filing](#) (Feb. 23, 2024); Press Release, [FTC Issues Opinion Finding that TurboTax Maker Intuit Inc. Engaged in Deceptive Practices](#) (Jan. 22, 2024).

³⁸ Press Release, [FTC Takes Action Against Harley-Davidson and Westinghouse for Illegally Restricting Customers’ Right to Repair](#) (June 23, 2022); Press Release, [FTC Takes Action Against Weber for Illegally Restricting Customers’ Right to Repair](#) (July 7, 2022); Press Release, [FTC Warns Companies to Stop Warranty Practices That Harm Consumers’ Right to Repair](#) (July 3, 2024); [Letter from Samuel Levine & Hannah Garden-Monheit, Fed. Trade Comm’n, to Minnesota Legislators](#) (Mar. 22, 2024); Press Release, [FTC Testifies in Support of Colorado’s Right-to-Repair Law](#) (Feb. 29, 2024); Press Release, [FTC Testifies Before California State Senate on Right to Repair](#) (Apr. 11, 2023).

³⁹ Press Release, [Court Enters \\$20.3 Million Judgment in FTC Case Against Merchant Cash Advance Operator Jonathan Braun for Deceiving Small Businesses and Unlawfully Seizing Assets](#) (Feb. 14, 2024); Press Release, [FTC Takes Action to Stop Payment Processor First American from Trapping Small Businesses with Surprise Exit Fees and Zombie Charges](#) (July 29, 2022); Press Release, [Federal Trade Commission Finalizes Order Against Dun & Bradstreet for Deceiving Businesses and Failing to Update Errors on Business Credit Reports](#) (Apr. 7, 2022); Press Release, [FTC Issues Rule to Deter Rampant](#)

return money to consumers whose time was wasted.⁴⁰ I could not be prouder of our track record fighting for consumers using every tool we have.

II. Protecting Privacy and Safety Online

Let's turn now to how the FTC is making online services safer and more private. In 2022, I gave a speech criticizing the so-called notice-and-consent privacy regime, and making clear that we would be using all of our tools to seek substantive protections for people's data.⁴¹ I know some were skeptical whether the FTC could actually follow through on this agenda. Seeking actual restrictions on data use, rather than more disclosures, would constitute a significant paradigm shift.

But a paradigm shift is exactly what we've achieved. In 2022, we brought our first case ever that included data minimization requirements.⁴² In the two years since, we've brought 15 more.⁴³ Last year we brought our first case banning the sharing of sensitive health data for advertising.⁴⁴ Since then, we've secured similar relief against PreMom,⁴⁵ BetterHelp,⁴⁶ Cerebral,⁴⁷ and Monument,⁴⁸ and we finalized our updated Health Breach Notification Rule.⁴⁹

Protecting geolocation data has been another major success. Irresponsible data practices have made it far too easy for firms to track where we worship, what medical care we're seeking, and what political party we belong to. But the FTC is fighting back. In 2022, we took action against a major data broker for selling geolocation data from hundreds of millions of mobile devices that could be used to trace the

Made in USA Fraud (July 1, 2021); Press Release, [FTC Actions Against Companies Making Deceptive Pandemic Loan Promises Lead to Record \\$59 Million in Damages](#) (Mar. 18, 2024).

⁴⁰ See, e.g., Press Release, [FTC Takes Action Against Publishers Clearing House for Misleading Consumers About Sweepstakes Entries](#) (June 27, 2023); Press Release, [FTC Takes Action to Stop Credit Karma From Tricking Consumers With Allegedly False "Pre-Approved" Credit Offers](#) (Sept. 1, 2022).

⁴¹ Samuel Levine, [Keynote Remarks, Cleveland-Marshall College of Law, Cybersecurity and Privacy Protection Conference](#) (May 19, 2022).

⁴² Press Release, [FTC Takes Action Against CafePress for Data Breach Cover Up](#) (Mar. 15, 2022).

⁴³ These include proposed or final orders in actions the FTC has taken against [Blackbaud](#), [Avast Limited](#), [InMarket Media](#), [X-Mode Social](#), [Rite Aid](#), [Global Tel*Link](#), [BetterHelp](#), [Amazon](#), [Easy Healthcare](#), [Edmodo](#), [GoodRx Holdings](#), [Epic Games](#), [Chegg](#), [Drizly](#), [CafePress](#), and [Kurbo](#) (f/k/a Weight Watchers).

⁴⁴ Press Release, [FTC Enforcement Action to Bar GoodRx from Sharing Consumers' Sensitive Health Info for Advertising](#) (Feb. 1, 2023).

⁴⁵ Press Release, [Ovulation Tracking App Premom Will be Barred from Sharing Health Data for Advertising Under Proposed FTC Order](#) (May 17, 2023).

⁴⁶ Press Release, [FTC to Ban BetterHelp from Revealing Consumers' Data, Including Sensitive Mental Health Information, to Facebook and Others for Targeted Advertising](#) (Mar. 2, 2023).

⁴⁷ Press Release, [Proposed FTC Order will Prohibit Telehealth Firm Cerebral from Using or Disclosing Sensitive Data for Advertising Purposes, and Require it to Pay \\$7 Million](#) (Apr. 15, 2024).

⁴⁸ Press Release, [Alcohol Addiction Treatment Firm will be Banned from Disclosing Health Data for Advertising to Settle FTC Charges that It Shared Data Without Consent](#) (Apr. 11, 2024).

⁴⁹ Press Release, [FTC Finalizes Changes to the Health Breach Notification Rule](#) (Apr. 26, 2024).

movements of individuals to and from sensitive locations.⁵⁰ And this year, we’ve already announced two major actions banning the sale of sensitive geolocation data.⁵¹

We’re also taking bold action to protect kids and teens online. In December, we proposed strengthening the COPPA Rule by further limiting companies’ ability to monetize children’s data.⁵² And we have not let up on enforcement. In fact, our Epic Games suit was the largest COPPA action ever – and the first to challenge unfair practices targeting teens.⁵³ And this summer, we took action against NGL – an anonymous messaging app that targeted teens and bombarded them with provocative messages, like “are you straight?” Our groundbreaking order banned NGL from marketing its services to teens and earned a notable 5-0 vote at the Commission.⁵⁴

These successes are impactful, but they don’t tell the full story. Our ongoing work against unlawful dark patterns aims to make online interfaces better for consumers and worse for bad actors. Our data security work – including key actions like *Verkada*, *Ring*, and *Blackbaud*⁵⁵ – raises the bar on how we expect companies to protect Americans’ data. And we remain laser-focused on making sure companies are complying with our orders, as TikTok learned this summer.⁵⁶

III. Championing Workers and Entrepreneurs

Let me now turn to what we’re doing to advocate for workers and entrepreneurs. I’ll start by making clear why this is such a priority for us. When companies mislead consumers looking for work, the consequences can be devastating. Whether it’s gig platforms, multilevel marketers, or franchises, sellers of business opportunities are asking consumers to entrust them with their livelihoods. That’s a serious

⁵⁰ Press Release, [FTC Sues Kochava for Selling Data that Tracks People at Reproductive Health Clinics, Places of Worship, and Other Sensitive Locations](#) (Aug. 29, 2022). This year, the Court denied Kochava’s motion to dismiss the FTC’s First Amended Complaint, finding that invasion of privacy and an increased risk of secondary harms are harms cognizable in the test for unfairness under the FTC Act. *FTC v. Kochava, Inc.*, No. 2:22-cv-377, 2024 WL 449363, at *5 (D. Idaho Feb. 3, 2024).

⁵¹ Press Release, [FTC Order Will Ban InMarket from Selling Precise Consumer Location Data](#) (Jan. 18, 2024); Press Release, [FTC Order Prohibits Data Broker X-Mode Social and Outlogic from Selling Sensitive Location Data](#) (Jan. 9, 2024).

⁵² Press Release, [FTC Proposes Strengthening Children’s Privacy Rule to Further Limit Companies’ Ability to Monetize Children’s Data](#) (Dec. 20, 2023).

⁵³ Press Release, [Fortnite Video Game Maker Epic Games to Pay More Than Half a Billion Dollars over FTC Allegations of Privacy Violations and Unwanted Charges](#) (Dec. 19, 2022).

⁵⁴ Press Release, [FTC Order Will Ban NGL Labs and its Founders from Offering Anonymous Messaging Apps to Kids Under 18 and Halt Deceptive Claims Around AI Content Moderation](#) (July 9, 2024).

⁵⁵ Press Release, [FTC Takes Action Against Security Camera Firm Verkada over Charges it Failed to Secure Videos, Other Personal Data and Violated CAN-SPAM Act](#) (Aug. 30, 2024); Press Release, [FTC Says Ring Employees Illegally Surveilled Customers, Failed to Stop Hackers from Taking Control of Users’ Cameras](#) (May 31, 2023); Press Release, [FTC Order Will Require Blackbaud to Delete Unnecessary Data, Boost Safeguards to Settle Charges its Lax Security Practices Led to Data Breach](#) (Feb. 1, 2024).

⁵⁶ Press Release, [FTC Investigation Leads to Lawsuit Against TikTok and ByteDance for Flagrantly Violating Children’s Privacy Law](#) (Aug. 2, 2024); see also Press Release, [Rite Aid Banned from Using AI Facial Recognition After FTC Says Retailer Deployed Technology without Reasonable Safeguards](#) (Dec. 19, 2023); Press Release, [FTC Charges Twitter with Deceptively Using Account Security Data to Sell Targeted Ads](#) (May 25, 2022).

responsibility, and we expect them to be honest in the claims they are making. When they are not, we take action.⁵⁷

Consider our work around gig platforms.⁵⁸ Over the last four years, we have secured more than \$80 million in relief for gig workers who've been subject to a range of unlawful practices – from secretly withholding tips from drivers⁵⁹ to selling lousy leads to home improvement contractors⁶⁰ to misleading consumers about earnings and job opportunities.⁶¹ A number of these firms engaged in these practices in spite of receiving Notices of Penalty Offenses, and we are proud of our track record holding them accountable.⁶²

Franchising is another area where we want to make sure entrepreneurs have a real chance to succeed. In 2022, we sued BurgerIM for making false promises to franchisees and leaving them buried in debt.⁶³ And in July, we announced three important initiatives: First, the Commission made clear that franchisors cannot use non-disparagement clauses to prohibit franchisees from reporting law violations to the government. Second, we released staff guidance making clear that franchisors can't impose fees on franchisees that were not previously disclosed. And finally, working with our Office of Policy Planning, we released a report summarizing the top concerns we've been hearing from franchisees.⁶⁴

Multilevel marketing is another area where we are proceeding on multiple fronts. Last month, after two years of litigation, we secured an order shutting down a credit repair pyramid scheme and returning more than \$12 million to consumers.⁶⁵ And earlier this month, BCP staff issued a report examining income disclosure statements from 70 MLMs.⁶⁶ The results were disappointing. Far too many of these disclosures

⁵⁷ Our concern with these practices is what led the agency, in 5-0 vote, to issue Notices of Penalty Offenses concerning money-making opportunities. Press Release, [FTC Puts Businesses on Notice that False Money-Making Claims Could Lead to Big Penalties](#) (Oct. 26, 2021). Since then, the Commission has taken action against six recipients of this notice – [Lurn](#), [DKAutomation](#), [Traffic and Funnels](#), [WealthPress](#), [Arise](#), and [Care.com](#).

⁵⁸ The FTC's 2022 Policy Statement on Enforcement Related to Gig Work described the market for these workers as one characterized by corporate control of workers without taking responsibility for their rights, risks, and expenses; diminished bargaining power of workers; and concentrated markets without robust competition for workers. Press Release, [FTC to Crack Down on Companies Taking Advantage of Gig Workers](#) (Sept. 15, 2022).

⁵⁹ Press Release, [Amazon To Pay \\$61.7 Million to Settle FTC Charges It Withheld Some Customer Tips from Amazon Flex Drivers](#) (Feb. 2, 2021) (the largest of these actions; brought under Acting Chair Rebecca Kelly Slaughter).

⁶⁰ Press Release, [FTC Order Requires HomeAdvisor to Pay Up To \\$7.2 Million and Stop Deceptively Marketing its Leads for Home Improvement Projects](#) (Jan. 23, 2023).

⁶¹ Press Release, [FTC Takes Action Against Care.com for Deceiving Caregivers About Wages and Availability of Jobs on its Site, Impeding Cancellation Process](#) (Aug. 26, 2024); Press Release, [FTC Takes Action Against Gig Work Company Arise Virtual Solutions for Deceiving Consumers About Pay in Marketing Its Business Opportunity](#) (July 2, 2024).

⁶² We are also proud that each of these cases was led by one of our outstanding regional offices.

⁶³ Press Release, [FTC Sues Burger Franchise Company That Targets Veterans and Others With False Promises and Misleading Documents](#) (Feb. 8, 2022).

⁶⁴ Press Release, [FTC Takes Action to Ensure Franchisees' Complaints are Heard and to Protect Against Illegal Fees](#) (July 12, 2024).

⁶⁵ Press Release, [FTC Action Leads to Permanent Bans for Scammers Behind Sprawling Credit Repair Pyramid Scheme](#) (Aug. 5, 2024).

⁶⁶ Press Release, [FTC Staff Issue Report on Multi-Level Marketing Income Disclosures](#) (Sept. 4, 2024).

omitted key information that would help prospective participants decide whether to commit to the opportunity. I encourage all marketers to not only read the report but also read our updated MLM business guidance, released in April.⁶⁷

Finally, far too many fraudsters are aggressively targeting Americans looking to support their families with work-at-home opportunities. And we are being aggressive in fighting back. We've brought a host of actions challenging bogus "passive income" and other moneymaking schemes. For example, we sued an outfit falsely promising consumers could become a "Stay-At-Home Millionaire" and earn \$11,454 per month.⁶⁸ And we're making sure firms can't AI-wash phony opportunities, challenging marketers who claim "artificial intelligence"⁶⁹ or proprietary algorithms will make consumers rich.⁷⁰ Those cases bring me to the final topic I want to cover – AI.

IV. Ensuring AI Works for People

When I addressed NAD last year, I made clear that the FTC would not be creating a regulatory sandbox around AI, or otherwise relying on tech companies to police themselves.⁷¹ FTC leadership tried that approach at the dawn of Web 2.0,⁷² expressing confidence that tech companies would take privacy seriously,⁷³ but that did not happen.⁷⁴ This time around, we won't repeat that mistake. Instead, we are taking a proactive approach to addressing AI-related harms.

One harm we are already witnessing is AI-fueled fraud, and here too, we are learning from history. In recent years we've seen an astounding rise in fraud that begins on social media,⁷⁵ with losses surging 18-

⁶⁷ [Business Guidance Concerning Multi-Level Marketing](#) (Apr. 2024).

⁶⁸ Press Release, [FTC Acts to Stop Online Business Coaching Scheme Lured From Deceiving Consumers About Money-Making Potential](#) (Sept. 28, 2023).

⁶⁹ See, Press Release, [FTC Action Leads to Ban for Owners of Automators AI E-Commerce Money-Making Scheme](#) (Feb. 27, 2024).

⁷⁰ See, Press Release, [FTC Suit Requires Investment Advice Company WealthPress to Pay \\$1.7 Million for Deceiving Consumers](#) (Jan. 13, 2023).

⁷¹ Samuel Levine, [National Advertising Division Annual Conference, A Progress Report on Key Priorities, and a Warning on AI Self-Regulation](#) (Sept. 19, 2023).

⁷² Press Release, ["Self-Regulation and Privacy Online," FTC Report to Congress](#) (July 13, 1999); Press Release, [FTC Tells House Subcommittee that Self-regulation Is the Preferred Method of Protecting Consumers' Online Privacy](#) (July 21, 1998).

⁷³ Timothy J. Muris, Former Chair, Fed. Trade Comm'n, [Remarks at The Privacy 2001 Conference](#) (Oct. 4, 2001) ("Industry's significant response to consumer concerns about privacy has been impressive. From my many meetings with business community members, it is clear that industry will continue to make privacy a priority.").

⁷⁴ See, e.g., Press Release, [FTC Imposes \\$5 Billion Penalty and Sweeping New Privacy Restrictions on Facebook](#) (July 24, 2019); Press Release, [Google and YouTube Will Pay Record \\$170 Million for Alleged Violations of Children's Privacy Law](#) (Sept. 4, 2019); Press Release, [FTC Investigation Leads to Lawsuit Against TikTok and ByteDance for Flagrantly Violating Children's Privacy Law](#) (Aug. 2, 2024).

⁷⁵ Here I want to offer a shoutout to our phenomenal team in the Division of Consumer Response and Operations. Not only do they handle millions of complaints every year, both online and over the phone, but they regularly put out thoughtful Data Spotlights that highlight significant trends and help consumers avoid fraud. Over this last year they've made particular progress in ensuring consumers who don't speak English can still report fraud to the FTC.

fold over a four-year period.⁷⁶ Given this experience, we simply cannot afford to let scammers harness the power of yet another emerging technology. And we will not.

Over the last year, we've already sued one firm defrauding consumers with AI claims,⁷⁷ and we're just getting started. But we're also making sure we have the tools we need to shut down these schemes. The Commission recently issued a rule outlawing government and business impersonation scams – a type of fraud that generative AI can turbocharge.⁷⁸ At the same time, the Commission proposed extending that ban to the impersonation of individuals and to prohibit providing scammers with the means and instrumentalities to execute impersonation scams.⁷⁹ The Commission has also made clear that AI robocalls are not exempt from the Telemarketing Sales Rule.⁸⁰ And the Commission recently finalized a rule cracking down on firms that generate fake reviews – an online scourge that AI threatens to exacerbate.⁸¹

Enforcement is not the only tool we're deploying to protect the public. Earlier this year, the Commission launched its Voice Cloning Challenge, led by our Division of Marketing Practices and our Office of Technology. We invited the public to submit multidisciplinary approaches aimed at protecting consumers from AI-enabled voice cloning harms, including fraud and the improper appropriation of creative content. And in April, working with our expert panel of judges, we announced four promising winners.⁸² There is no single solution to AI-fueled fraud, but we should never count out American ingenuity as a complement to strong enforcement.

In addition to combatting fraud, we want to make sure AI isn't being used in ways that unlawfully shut people out of opportunities. For example, last December, the Commission charged Rite Aid with recklessly deploying AI facial recognition technology that falsely tagged consumers, especially women and people of color, as shoplifters or other bad actors.⁸³ Our groundbreaking order banned RiteAid from deploying these systems for five years and imposed stringent requirements on the future use of biometric surveillance systems, sending a strong message that firms should use AI responsibly, or not at all.

Our proactive enforcement approach should not suggest we are anti-AI. On the contrary, we want to see innovators compete fiercely to bring exciting new products to market. That means not only scrutinizing potentially anticompetitive practices,⁸⁴ but also ensuring AI-related claims are backed up.⁸⁵ Earlier this

⁷⁶ Lesley Fair, [Gold mine for scammers: Social media](#) (Jan. 27, 2022).

⁷⁷ See Press Release, [FTC Action Leads to Ban for Owners of Automators AI E-Commerce Money-Making Scheme](#) (Feb. 27, 2024).

⁷⁸ Press Release, [FTC Announces Impersonation Rule Goes into Effect Today](#) (Apr. 1, 2024).

⁷⁹ *Id.*

⁸⁰ Press Release, [FTC Implements New Protections for Businesses Against Telemarketing Fraud and Affirms Protections Against AI-enabled Scam Calls](#) (Mar. 7, 2024).

⁸¹ Press Release, [Federal Trade Commission Announces Proposed Rule Banning Fake Reviews and Testimonials](#) (Jun. 30, 2023).

⁸² Press Release, [FTC Announces Winners of Voice Cloning Challenge](#) (Apr. 8, 2024); Press Release, [FTC Announces Exploratory Challenge to Prevent the Harms of AI-enabled Voice Cloning](#) (Nov. 16, 2023).

⁸³ Press Release, [Rite Aid Banned from Using AI Facial Recognition After FTC Says Retailer Deployed Technology without Reasonable Safeguards](#) (Dec. 19, 2023).

⁸⁴ See Press Release, [FTC Launches Inquiry into Generative AI Investments and Partnerships](#) (Jan. 25, 2024).

⁸⁵ See Lesley Fair, [For Business Opportunity Sellers, FTC says "AI" Stands for "Allegedly Inaccurate."](#) FTC Business Blog (Aug. 22, 2023); Michael Atleson, [Watching the Detectives: Suspicious Marketing](#)

summer, for example, we challenged a baseless claim that AI can keep kids safe online.⁸⁶ Actions like these help ensure firms generating real innovations don't lose out to those innovating in lawbreaking. You can expect more actions like this before the end of the year.

Conclusion

Let me conclude by zooming out a bit. I've been in consumer protection my whole career, starting after the financial crisis when I helped homeowners fight back against illegal foreclosures. I love this field and always have. But I have never seen consumer protection as much on the national agenda as it is today. From junk fees to commercial surveillance, leaders at both the state and federal level are taking on big problems in a bipartisan way. And it's especially inspiring to see so many young people excited. Just last week I met with a group of Gen Z students fighting for safer social media.⁸⁷ And throughout the year, I've been meeting with law students excited to pursue careers in consumer protection.⁸⁸ It was especially moving to talk to students who pursued the field because they saw what happened to their families during the foreclosure crisis.

Amidst all this momentum, I am proud that the FTC is leading the charge. Our work to crack down on junk fees and subscription traps has become the model for legislation across the country, both at the state⁸⁹ and federal⁹⁰ level. Our focus on moving away from notice and consent and toward strong limits on data handling is being replicated in the states and in Congress.⁹¹ Five years ago, there were frequent calls to establish a new data protection authority.⁹² Today, bill after bipartisan bill entrusts the FTC.⁹³ Our work

[Claims for Tools That Spot AI-Generated Content](#), FTC Business Blog (July 6, 2023); Michael Atleson, [Keep Your AI Claims in Check](#), FTC Business Blog (Feb. 27, 2023).

⁸⁶ Press Release, [FTC Order Will Ban NGL Labs and its Founders from Offering Anonymous Messaging Apps to Kids Under 18 and Halt Deceptive Claims Around AI Content Moderation](#) (July 9, 2024).

⁸⁷ [Design It For Us](#) (last visited Sept. 10, 2024).

⁸⁸ Suzi Morales, Fordham Law News, [At Reidenberg Lecture, FTC Director Samuel Levine Explores the Future of Consumer Protection](#) (May 2, 2024); Berkeley Law, [Ask Sam – A Chat with FTC Director Sam Levine](#) (Mar. 7, 2024).

⁸⁹ [Letter from Samuel Levine, Fed. Trade Comm'n, to Calif. Gov. Gavin Newsom](#) (Sept. 4, 2024); [Letter from Samuel Levine, Fed. Trade Comm'n, to Alaska Legislators](#) (Mar. 18, 2024); [Letter from Samuel Levine, Fed. Trade Comm'n, to Colorado Legislators](#) (Mar. 18, 2024); [Letter from Samuel Levine, Fed. Trade Comm'n, to Connecticut Legislators](#) (Mar. 18, 2024); [Letter from Samuel Levine, Fed. Trade Comm'n, to North Carolina Legislators](#) (Mar. 18, 2024); [Letter from Samuel Levine, Fed. Trade Comm'n, to Rhode Island Legislators](#) (Mar. 18, 2024); [Letter from Samuel Levine, Fed. Trade Comm'n, to Arizona Legislators](#) (Mar. 14, 2024); [Letter from Samuel Levine, Fed. Trade Comm'n, to Hawaii Legislators](#) (Mar. 14, 2024); [Letter from Samuel Levine, Fed. Trade Comm'n, to Illinois Legislators](#) (Mar. 8, 2024); [Letter from Samuel Levine, Fed. Trade Comm'n, to Minnesota Legislators](#) (Mar. 8, 2024); [Letter from Samuel Levine, Fed. Trade Comm'n, to New York Legislators](#) (Feb. 29, 2024); [Letter from Samuel Levine, Fed. Trade Comm'n, to Virginia Legislators](#) (Feb. 29, 2024).

⁹⁰ Lauren Feiner, The Verge, [House passes bill that would make ticket sellers show total prices upfront](#) (May 16, 2024).

⁹¹ Kara Williams & Caitriona Fitzgerald, EPIC, [Data minimization is the key to a meaningful privacy law](#) (May 9, 2024).

⁹² See, e.g., EPIC, [The U.S. Urgently Needs a Data Protection Agency](#) (last visited Sept. 12, 2024).

⁹³ See, e.g., American Privacy Rights Act of 2024, H.R. 8818, 118th Cong. § 115(b) (2024); Kids Online Safety and Privacy Act, S. 2073, 118th Cong. § 110(a) (2023); American Data Privacy and Protection Act, H.R. 8152, 117th Cong. § 401(c) (2022).

against dark patterns drew some skepticism when we kicked it off.⁹⁴ Today we're seeing enforcers around the country and around the world pick up the mantle,⁹⁵ with states like Texas expressly adopting the FTC's approach.⁹⁶ I could go on.

I have a theory for why we're seeing this momentum. At the FTC, we aren't nibbling around the edges – we're taking on big challenges that have plagued consumers for decades. We have much work still to do. But we are already demonstrating in concrete ways how the government can make people's lives better. And we're talking about our work in ways that people can understand. Americans may not have a view on “negative option marketing” – but they know they want to click to cancel. “Drip pricing” is not a concern for most people, but concertgoers are clearly fed up with hidden fees. And for women seeking reproductive care or churchgoers concerned about their freedom of worship, worries about surveillance have become all too real.

This grassroots support for our work⁹⁷ gives me confidence that it will continue, regardless of what happens in November. Our Commissioners have their share of disagreements, which is to be expected. But what may be unexpected is how much consensus there is, too – whether it's around anti-fraud rules,⁹⁸ bold privacy actions,⁹⁹ unfair practices targeting teens,¹⁰⁰ or protecting military families.¹⁰¹

But even more than these bipartisan initiatives, it is the exceptional talent and dedication of our staff that gives me confidence in the future. I often quote Chairman Pertschuk, who called the FTC the country's greatest public interest law firm. But we are more than a law firm. Our consumer education team is constantly finding new ways to reach underserved communities, with a focus this year on ensuring consumers can report fraud in whatever language they speak. Our economists not only generate important research but also provide rigorous analysis of our rules and cases. Our investigators make sure we're using cutting-edge tools to detect and halt lawbreaking. And our technologists are now deeply integrated

⁹⁴ See, e.g., Paul L. Singer, Kelley Drye, [Dark Patterns: A New Legal Standard or Just a Catchy Name? \(Part One\)](#) (Feb. 1, 2022).

⁹⁵ Calif. Priv. Prot. Agency, [CPPA Enforcement Advisory Stresses the Importance of Avoiding Dark Patterns](#) (Sept. 4, 2024); UK Info. Comm'r's Off., [ICO and CMA: Harmful online design encourages consumers to hand over personal information](#) (Aug. 9, 2023); European Comm'n, [Consumer protection: manipulative online practices found on 148 out of 399 online shops screened](#) (Jan. 30, 2023).

⁹⁶ Tex. Bus. & Com. Code § 541.001(10) (“‘Dark pattern’ means a user interface designed or manipulated with the effect of substantially subverting or impairing user autonomy, decision-making, or choice, and includes any practice the Federal Trade Commission refers to as a dark pattern.” (emphasis added)).

⁹⁷ Anika Dandekar & Marissa Farmer, Data for Progress, [The FTC's Recent Actions and Proposals Command Wide, Bipartisan Support](#) (Aug. 15, 2024).

⁹⁸ Press Release, [Federal Trade Commission Announces Proposed Rule Banning Fake Reviews and Testimonials](#) (Jun. 30, 2023).

⁹⁹ Press Release, [FTC Sues Kochava for Selling Data that Tracks People at Reproductive Health Clinics, Places of Worship, and Other Sensitive Locations](#) (Aug. 29, 2022); see also [Concurring Statement of Commissioner Melissa Holyoak, Kochava Inc.](#) (July 15, 2024).

¹⁰⁰ Press Release, [FTC Order Will Ban NGL Labs and its Founders from Offering Anonymous Messaging Apps to Kids Under 18 and Halt Deceptive Claims Around AI Content Moderation](#) (July 9, 2024); Press Release, [Fortnite Video Game Maker Epic Games to Pay More Than Half a Billion Dollars over FTC Allegations of Privacy Violations and Unwanted Charges](#) (Dec. 19, 2022).

¹⁰¹ Press Release, [Career Step to Pay \\$43.5 Million in Cash and Debt Cancellation to Resolve Charges It Used Deceptive Advertising to Lure Servicemembers and Their Spouses](#) (July 30, 2024).

in our agency's work, staffing cases in both bureaus and spearheading important market studies.¹⁰² Across our agency, we are firing on all cylinders to make Americans' lives better. And that won't change.

I hope to be back next year to give you a further progress update. In the meantime, I'm happy to take your questions.

¹⁰² BCP is proud to be working with the Office of Technology on its recently announced 6(b) study examining surveillance pricing, an emerging trend that we want to ensure we understand and are prepared to address. See Press Release, [FTC Issues Orders to Eight Companies Seeking Information on Surveillance Pricing](#) (July 23, 2024).