

## Ian L. Barlow

Of Counsel

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Drawing on a decade of experience at the Federal Trade Commission (FTC), Ian represents companies in complex consumer protection, privacy, and advertising matters involving state and federal law. For companies receiving FTC Civil Investigative Demands (CID) or warning letters, his deep knowledge of FTC law, procedures, and norms positions clients for successful outcomes. For clients facing state Attorney General (AG) investigations, his experience leading joint FTC/multistate investigations is a key asset in navigating multiple enforcement jurisdictions.

Ian also counsels clients on matters involving a wide range of state and FTC consumer protection laws and regulations including:

- The Restore Online Shoppers Confidence Act (ROSCA) and state negative option and automatic renewal laws.
- The FTC's Unfair and Deceptive Fees Rule and state "all in" or "total pricing laws," commonly referred to as Junk Fees laws.
- The Children's Online Privacy Protection Act (COPPA).
- The Fair Credit Reporting Act (FCRA).
- The FTC's Made in the USA Labeling Rule.
- The FTC's Telemarketing Sales Rule (TSR).
- State and local algorithmic pricing laws.
- State "right to repair" laws.
- The FTC's Green Guides and analogous state advertising laws concerning recycling.

He provides advice on these issues in wide range of industries spanning online retail sales, automobile manufacturers, digital health care apps and services, financial services, hospitality and travel,

## Practice Areas

FTC and Consumer Protection  
Privacy, Cyber & Data Governance  
Telecom, Media & Technology  
White Collar Defense & Government Investigations  
Connected & Autonomous Vehicles  
Digital Health  
Advertising and Marketing  
Advertising Technology (AdTech) Data  
Privacy and Consumer Protection  
Antitrust

## Credentials

**Education**  
J.D., George Washington University School of Law  
B.A., Washington University in St. Louis

**Bar and Court Memberships**  
District of Columbia Bar  
Maryland Bar  
U.S. District Court for the District of Maryland

media and telecommunications, and laboratory and medical equipment, among others. In doing so, Ian works closely with clients to tailor guidance to unique aspects of their industries.

Before joining Wiley, Ian was a Deputy Director of the FTC's Office of Policy Planning and held senior roles in the FTC's Bureau of Consumer Protection, including as the program manager for robocall enforcement. Ian also spent a year detailed to the U.S. House Energy and Commerce Committee, advising congressional staff on privacy and consumer protection legislation.

## Representative Matters

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- Successfully representing clients before the FTC, including:
  - Assisting multiple clients in responding to FTC warning letters, helping them avoid further FTC investigative inquiries.
  - Negotiating the scope of investigative requests in CIDs to reduce both compliance burden and regulatory risk.
  - Drafting policy advocacy in FTC competition matters.
- FTC and state consumer protection counseling and advice:
  - Advises ticket reseller on compliance with the Better Online Ticket Sales (BOTS) Act.
  - Counsels clients on the scope of state right to repair laws, including advice on covered industries and requirements for companies subject to the laws.
  - Helps companies comply with the FTC's Made in the USA Labeling Rule and other state and federal regulatory regimes governing country-of-origin advertising.
  - Provides strategic advice and counseling on compliance with the FTC's Green Guides and California's Truth in Recycling Act.
  - Advocates for clients on policy issues in rulemakings, requests for public information, and similar proceedings on FTC and consumer protection issues such as anticompetitive state and federal laws, restrictions on commercial speech, and applicability of FTC advertising law to medical professionals.
- FTC enforcement work:
  - Led FTC investigations and enforcement actions concerning alleged unfair and deceptive acts and practices, including dozens of investigational hearings taking testimony under oath.
  - Coordinated joint FTC/multistate AG settlement discussions with a Fortune 500 company.
  - Advised the Director of the FTC's Bureau of Consumer Protection on matters involving data privacy, data security, geolocation tracking, unauthorized billing, automatic renewals, cancellation policies, and deceptive advertising.
  - Coordinated the FTC's robocall enforcement program to protect consumers from abusive and fraudulent calls, including liaising with numerous government and industry partners.

- Managed FTC teams considering legal and policy issues involving algorithmic pricing, franchising, and gig economy work in policy statements, reports on 6(b) industry studies, workshops, and *amicus* briefs.
- Substantial litigation experience at the FTC and in private practice, including as first chair at trial and hearings.

## Professional Experience

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- Federal Trade Commission
  - Deputy Director, FTC Office of Policy Planning (2023-2024)
  - Counsel Detailer, House Energy and Commerce Committee (2022-2023)
  - Counsel to the Director, FTC Bureau of Consumer Protection (2021-2022)
  - Robocall Program Manager, FTC Division of Marketing Practices (2018-2020)
  - Staff Attorney, FTC Division of Marketing Practices (2015-2021)
- Associate, Private law practice (2010-2015)

## Recognitions

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- Janet D. Steiger Team Award (2019, 2020, 2024)
- Bureau of Consumer Protection Director's Award (2017)
- *Super Lawyers'* Rising Star (2014, 2015)