

Wiley Consumer Protection Download (December 16, 2025)

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Welcome to Wiley's update on recent developments and what's next in consumer protection at the Federal Trade Commission (FTC), the Consumer Financial Protection Bureau (CFPB), and the state level. Check out our new State Consumer Protection Series, where we provide practical insights into emerging trends and priorities at the state level. Recent posts include, 2025 State AG Robocall Enforcement Trends: Targeting of VoIP Service Providers Continues, With Coordinated AG Scrutiny of "Intermediate" Providers, Expanding Patchwork of State "Junk Fees" Laws Presents Compliance Challenges, and Automatic Renewals and Risks: State Negative Option Laws and Enforcement Are Trending. Wiley has also launched an FTC Consumer Protection and Privacy Enforcement Series and Trump Administration Resource Center to provide practical insights into emerging FTC and Executive branch priorities. Please reach out to any of our authors with any questions about recent regulatory or enforcement activity on the federal or state level.

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Federal and State Regulatory Announcements

Bipartisan Group of 42 AGs Send Letter to Technology Companies Regarding AI Chatbot Features. On December 9, the National Association for Attorneys General (NAAG) sent a letter, signed by 42

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Attorneys General (AGs), to technology companies requesting that they implement certain safeguards on artificial intelligence (AI) chatbots. The letter cites examples of AI chatbots having conversations with children and others that the letter alleges resulted in harm. The safeguards proposed in the letter include posting warnings and providing notifications about AI chatbot responses. The letter asks that recipients provide responses to representatives of the Pennsylvania and New Jersey AG offices.

FTC Announces That Staff Will Begin Rulemaking on Unfair or Deceptive Fees in the Rental Housing Industry. On December 2, FTC Chairman issued a statement accompanying a settlement with a property management company in which he announced he was directing FTC “staff to begin the process of proposing a rule to address unfair or deceptive fees in rental housing.” He wrote that a regulation is necessary because of the “cost-of-living crisis” and because enforcement work alone “will not fully resolve this problem.”

FTC Releases 2025 National DNC Registry Data Book. On December 11, the FTC released the National Do Not Call (DNC) Registry Data Book for Fiscal Year 2025. The Data Book, released annually, provides information on robocall and live-caller complaints and an analysis of complaints by state. Consistent with the past several years, the Data Book reported that the most frequent consumer complaints related to calls about reducing debt, imposters, and medical and prescription issues. In 2025, the FTC reported that more than 4.7 million phone numbers were added to the National DNC Registry, which allows consumers to opt out of most legal telemarketing calls. According to the Data Book, Arizona, Tennessee, Nevada, Illinois, and Florida were among the top five states reporting the most DNC complaints per 100,000 people.

Select Federal Enforcement Actions

FTC and State Attorneys General File Amended Complaint Against Ridesharing Company to Add Civil Penalties. On December 15, the FTC filed an amended complaint in an action against a ride-sharing company alleging violations of the Restore Online Shoppers’ Confidence Act (ROSCA). The amended complaint adds as co-plaintiffs a bipartisan coalition of attorneys general from 21 states and the District of Columbia. In April 2025, the FTC alleged that the company misled consumers by charging customers during a subscription free-trial period and allegedly made it difficult for customers to cancel their subscription while advertising that it could be canceled at any time. In addition to adding state co-plaintiffs, the amended complaint adds a claim for civil penalties for each violation of ROSCA as well as civil penalties for violations of state laws. The FTC and Attorneys General also request injunctive and other monetary relief.

FTC Finalizes Order Against Telemedicine Company and its Executives for Allegedly Deceptive Practices. On December 3, the FTC voted to approve the consent order settling allegations against a telemedicine company offering a weight loss program and two of its executives. In July 2025, FTC alleged that the defendants misled consumers by using fake reviews, manipulating real customer reviews, and using marketing materials that promoted people and weight-loss success that were not based on actual program participation. Additionally, the FTC alleged that the defendants failed to fully disclose the terms of membership and cancellation and to timely process cancellation and refund requests. The defendants agreed to pay a \$150,000 civil penalty in addition to injunctive relief.

FTC and Colorado Attorney General Settle with Rental Property Manager for Purportedly Deceptive Marketing Practices. On December 2, the FTC and Colorado AG filed a stipulated order in the U.S. District Court for the District of Colorado to settle allegations against a national multi-family rental property management company for alleged violations of the FTC Act, Gramm-Leach-Bliley Act (GLBA), and Colorado Consumer Protection Act. In the January 2025 complaint, the FTC and Colorado AG alleged that the company charges tenants numerous monthly service fees without fully disclosing these fees to consumers in the lease and without providing an option to opt out of the fees. The company agreed to pay a total of \$24 million in monetary relief in addition to injunctive relief.

FTC Sends Warning Letters Regarding Potential Noncompliance with the FTC Act and the GLBA. On December 9, the FTC sent letters to 13 property management software providers warning that using software that “limit[s] the ability of rental property managers and owners to accurately advertise the total monthly rental price, inclusive of all mandatory fees” may violate the FTC Act and GLBA. The FTC sent these letters one week after announcing a \$24 million settlement between a multi-family rental property manager and the FTC and State of Colorado for allegedly deceiving consumers about rental prices. The letters warn companies that such conduct “may be subject to legal action and federal district court injunctions,” as well as “civil penalties of up to \$53,088 per violation.”

State Anti-Robocall Litigation Task Force Sends Warning Letters to Voice Service Providers About Preventing Illegal Robocalls from Being Routed Through Their Networks. On December 3, the Anti-Robocall Litigation Task Force announced that it sent warning letters to four of the largest voice service providers in the U.S., demanding that they take immediate action to stop illegal robocalls being routed through the providers’ networks.

Select State Enforcement Actions

Maryland AG Sues Paralegal Services Company for Allegedly Deceptive Practices. On December 8, the Maryland AG filed charges against a paralegal services company and its owner for allegedly misrepresenting their ability to legally provide offered services, as well as their affiliations, experience, and qualifications in violation of Maryland’s Consumer Protection Act. Specifically, the Maryland AG alleges that the paralegal company offered legal services—including advising consumers on legal issues, conducting legal research, and drafting legal documents—without a license to perform such work or a licensed attorney to supervise such work.

CPPA Requires Marketing Firm to Pay Fines and Past Due Fees for Allegedly Failing to Register as a Data Broker Under Delete Act. On December 3, the California Privacy Protection Agency (CPPA) Board announced a decision requiring a marketing firm for fitness and wellness brands to pay \$56,600 in fines and past-due fees for allegedly failing to register as a data broker under California’s Delete Act. The Delete Act requires data brokers to register with the CPPA each year in January and pay a fee to the Data Broker Registry and the Delete Request and Opt-Out Platform.

Upcoming Events and Deadlines

FTC Announces Age Verification Workshop. On **January 28**, the FTC will hold a workshop to discuss age verification technologies that companies use to obtain the age information of individuals visiting their websites and online services. The workshop will bring together researchers, industry, consumer advocates, and government regulators to discuss several topics including age verification and estimation tools; regulatory contours of age verification; how to deploy age verification more widely; and how age verification technologies interact with the Children's Online Privacy Protection Act Rule.

More Analysis from Wiley

White House Issues Executive Order to Promote National AI Policy Framework and Challenge Certain State AI Laws

2025 State AG Robocall Enforcement Trends: Targeting of VoIP Service Providers Continues, With Coordinated AG Scrutiny of "Intermediate" Providers

AI Chatbots: How to Address Five Key Legal Risks

Automatic Renewals and Risks: State Negative Option Laws and Enforcement Are Trending

Expanding Patchwork of State "Junk Fees" Laws Presents Compliance Challenges

State AGs Discuss Consumer Protection Priorities: Privacy, Health, Junk Fees, and Coordination at the Forefront

Fraud and Scam Prevention Series: Navigating Increasingly Sophisticated Cybersecurity Threat and Fraud Tactics

California Finalizes Pivotal CCPA Regulations on AI, Cyber Audits, and Risk Governance

State App Store Accountability Acts Introduce New Obligations for App Developers

Cyber Enforcement Hits Hard: New York DFS Imposes \$19 Million in Penalties

Subscription Cancellation Policies Remain a Top FTC Priority

Amidst Scrutiny of E-Commerce Platforms, FTC Brings First INFORM Consumers Act Case

Open Banking, Financial Data Rights, and What It Means for Crypto

Kids' Online Safety Is a Top Priority

The Fair Credit Reporting Act – Who Is Covered and How to Comply

PADFA Enforcement – What Companies Need to Know

Practical Tips for When Your Company Gets an FTC CID

Texas Responsible AI Governance Act Enacted

Webinar: Navigating FTC Health Care Advertising and Privacy Compliance in the Trump Administration: Key Insights for Health Service Providers

Executive Order on Ticket Resale Market Calls for Greater FTC Enforcement

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