

Wiley Consumer Protection Download (October 21, 2025)

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[Select Federal Enforcement Actions](#)

[Select State Enforcement Actions](#)

[Upcoming Comment Deadlines and Events](#)

[More Analysis from Wiley](#)

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 FTC Consumer Protection and Enforcement Series, where we provide practical insights into emerging FTC priority areas for consumer protection and data privacy enforcement. Recent posts include Subscription Cancellation Policies Remain a Top FTC 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; and Kids' Online Safety Is a Top Priority.

Wiley has also launched a Trump Administration Resource Center and Resource Guide to track Executive branch priorities during the second Administration of President Trump. With Wiley's deep-rooted understanding of Washington and today's evolving regulatory landscape, the Resource Center and Resource Guide provide critical insights, actionable intelligence, practical solutions, and guidance across key industries to help businesses stay ahead of the curve and manage challenges in 2025 and beyond. Please reach out to any of our authors with any questions about recent Trump Administration actions and the potential impact on regulations or enforcement activity.

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Select Federal Enforcement Actions

FTC and Nevada AG Obtain Temporary Restraining Order and Asset Freeze Against Tax Debt Relief Company, Its Affiliates, and Its Operators for Allegedly Deceptive Practices. On **October 6**, the FTC and Nevada Attorney General filed a complaint in the U.S. District Court for the District of Nevada against a tax debt relief company, its affiliates, and its operators for alleged violations of the FTC Act, Gramm-Leach-Bliley Act, Impersonation Rule, Telemarketing Sales Rule, and Nevada's Deceptive Trade Provisions statute. The FTC and Nevada AG allege that the defendants misled consumers by overpromising the debt relief that would be provided. Additionally, the complaint alleges that the defendants mailed letters and made telemarketing calls claiming to be from federal or state tax authorities and suggesting that consumers' tax debt issues were severe. On October 7, the court granted the FTC's and Nevada AG's request for a temporary restraining order, asset freeze, and appointment of a receiver to take over operating the business. The FTC and Nevada AG are seeking monetary and permanent injunctive relief.

The FTC's October 6 enforcement action highlights that even during the government shutdown, the FTC will continue investigating and litigating matters where suspension would, in the FTC's view, implicate ongoing financial harm to consumers, the FTC's ability to obtain monetary relief, or a statute of limitations.

Select State Enforcement Actions

Colorado AG Settles With E-Commerce Company Over Alleged Illegal Business Opportunity Schemes. On **October 17**, the Colorado AG announced a settlement with an e-commerce management company for allegedly misleading consumers into an illegal business opportunity scheme in violation of the Colorado Consumer Protection Act (CCPA). Specifically, the Colorado AG alleged the company used deceptive sales pitches to misrepresent profit potential, in addition to using other deceptive contract provisions. The settlement requires the company to cease any future operations and pay a \$200,000 fine, which could quadruple should the company fail to comply with the settlement.

Colorado AG Settles With Retail Company Over Allegedly Overcharging Customers. On **October 16**, the Colorado AG announced a settlement with a retail company for allegedly charging consumers higher prices at the register than the prices listed on shelves in violation of the CCPA. The settlement requires the company to correct its business practices, provide the AG office with audit reports, and pay a \$400,000 fine.

California AG Settles With Health Plan Providers Over Allegedly Deceptive Practices. On **October 16**, the California AG announced settlements with two health benefits companies (available [here](#) and [here](#)) for allegedly misleading consumers into purchasing illegitimate health insurance plans in violation of California consumer protection laws. As part of the settlements, the companies are prohibited from engaging in certain health care marketing, sales, or other operations in California, or engaging in any acts or practices that violate California's Unfair Competition Law and False Advertising Law.

California DFPI Announces Multi-State and Federal Settlement with Company Over Allegedly Targeting Elderly California Residents with Deceptive Sales Tactics. On **October 16**, the California Department of Financial Protection & Innovation announced a multi-state and federal settlement with a California-based company for allegedly using aggressive sales tactics to persuade more than 450 elderly people nationwide to liquidate their retirement accounts to purchase overpriced metals. According to the settlement, this activity violated federal and state commodities and securities laws. The settlement requires the company to pay \$25.5 million in civil penalties and restitution, and agree to certain behavioral restrictions.

New York AG Announces \$14.2 Million Settlement with Car Insurance Companies Following Alleged Data Breaches. On **October 14**, the New York AG announced settlements with several car insurance companies after the personal information of 825,000 New York residents was allegedly compromised. Specifically, the New York AG alleged that the companies did not implement reasonable security controls to protect consumer personal information. According to the New York AG, these practices constituted violations of New York's General Business Law, which requires business that own or license computerized, private information of New York residents to develop, implement, and maintain reasonable data security safeguards. As part of the settlement, the companies agreed to pay millions of dollars in civil penalties, maintain comprehensive cybersecurity programs, maintain reasonable authentication procedures for access to private information, and to enhance their threat response procedures, among other things.

Florida AG Sues Streaming Platform for Allegedly Violating Consumer Privacy Rights. On **October 13**, the Florida AG Office of Parental Rights filed a complaint in the Circuit Court of the Twentieth Judicial District against a video streaming platform for allegedly violating the Florida Digital Bill of Rights and Florida Deceptive and Unfair Trade Practices Act. Specifically, the Florida AG alleges that the streaming platform processed, sold, and enabled reidentification of personal and sensitive data, including information from children, while failing to obtain parental consent or implement industry-standard measures to identify which of its users were children. The complaint further alleges that the platform misrepresented the effectiveness of its privacy controls and opt-out tools. The Florida AG is seeking civil penalties and injunctive relief.

California AG Announces Settlement with Online Health Care Platform for Providing Allegedly Inaccurate Mental Health and Medical Provider Directories. On **October 13**, the California AG announced a settlement with an online health care platform for allegedly using inaccurate mental health and medical provider information in its directories. The California AG alleged that consumers may purchase health coverage based on the scope of the network advertised, only to later determine that the providers are no longer contracted with the plan. The settlement includes a \$12 million civil penalty, certain behavioral terms, and a requirement to operate a 24-hour phone line for customers who need assistance finding a provider.

New York AG Sends Cease-and-Desist Letters to Three Skin Care Companies for Allegedly Using Mercury in Skin Care Products. On **October 8**, the New York AG sent cease-and-desist letters to three skin care companies to stop them from selling skin-lightening creams and other products that allegedly contain unlawful levels of mercury. The letters are [here](#), [here](#), and [here](#).

Upcoming Events and Comment Deadlines

FTC Issues RFI on Employee Noncompete Agreements. Comments are due **November 3** on an FTC Request for Information regarding Employer Noncompete Agreements. The FTC is seeking information from to better understand the scope of noncompete agreements, and “to inform possible future enforcement actions.” The FTC is requesting information from employees and employers facing hiring difficulties due to noncompete agreements. The RFI also asks what reasons employers have given for using noncompete agreements.

More Analysis from Wiley

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

State App Store Accountability Acts Introduce New Obligations for App Developers

Subscription Cancellation Policies Remain a Top FTC Priority

Advancing AI Action Plan, OSTP Seeks Comment on Regulatory Barriers

FTC Takes on Noncompete Agreements as New State Laws Take Effect

Expiration of Critical Cyber Information Sharing Law Creates Confusion About Authorities and Liability Protections

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

Building a Digital Asset Regulatory Framework: The GENIUS Act and Next Steps

Texas Responsible AI Governance Act Enacted

Privacy, AI, and Consumer Protection Takeaways from FTC Chairman’s House Testimony

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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