

UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION WASHINGTON, D.C. 20580

Office of the Secretary

February 19, 2020

The Honorable Kathleen L. Kraninger Director Bureau of Consumer Financial Protection 1801 L Street, NW Washington, DC 20036

Dear Director Kraninger:

Thank you for your letter of January 8, 2020. As the letter mentions, the Bureau of Consumer Financial Protection (CFPB) is responsible for providing annual reports to Congress concerning the federal government's efforts to implement the Fair Debt Collection Practices Act (FDCPA). This letter and its appendix describe the efforts the Federal Trade Commission (Commission or FTC) has taken during the past year in the debt collection arena. In the FTC's debt collection work, the CFPB has been a valuable partner. We hope that the information in this letter will assist the CFPB in preparing this year's report.

In 2019, the Commission continued to combat unfair, deceptive, and otherwise unlawful debt collection practices. Among other things, the FTC:

- filed or resolved law enforcement actions against 25 defendants, and obtained more than \$24.7 million in judgments;²
- banned 23 companies and individuals who engaged in serious and repeated violations of law from ever working in debt collection again;³ and
- submitted a staff comment to the CFPB's proposed rules implementing the FDCPA.

¹ The Dodd-Frank Act directed the CFPB to report to Congress on the federal government's implementation and administration of the FDCPA. Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), Pub. L. 11-203, § 1089, 124 Stat. 1376, 2092-93 (2010) (amending the Fair Debt Collection Practices Act, 15 U.S.C. §§ 1692-1692p). Before the enactment of the Dodd-Frank Act, Section 815(a) of the FDCPA, 15 U.S.C. § 1692m, required the FTC to report directly to Congress on these topics. The Commission submitted such annual reports from 1977 to 2011.

² These figures include cases filed in 2019, as well as cases filed in previous years but resolved in 2019.

³ In 2015, the FTC began publishing a list of every individual and company that the agency has sued that has been banned from the debt collection industry. This list, located at https://www.ftc.gov/enforcement/cases-proceedings/banned-debt-collectors, is a valuable resource to help law-abiding collection industry professionals avoid doing business with these defendants, as well as to help state debt collection licensing officials and law enforcers better protect consumers. Currently, the list includes 207 banned individuals and companies.

The FTC's debt collection program is a three-pronged effort: (1) law enforcement;⁴ (2) education and public outreach; and (3) research and policy initiatives. Over the past year, the FTC has employed all three prongs to curb unlawful debt collection practices and protect consumers.

I. <u>LAW ENFORCEMENT ACTIVITIES</u>

The Commission is primarily a law enforcement agency, and law enforcement investigations and litigation are at the heart of the FTC's recent debt collection work. Both the FDCPA and the FTC Act⁵ authorize the Commission to investigate and take law enforcement action against debt collectors that violate those statutes.⁶ The Commission may file a federal court action seeking injunctive and equitable monetary relief under Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), or refer the matter to the Department of Justice for civil penalties and injunctive relief under Section 5(m) of the FTC Act, 15 U.S.C. § 45(m). Where a collector's violations are so egregious that a court order is necessary to halt the conduct immediately, or where consumer redress and disgorgement are more appropriate forms of monetary relief than civil penalties, the FTC generally files the action itself under Section 13(b) of the FTC Act. In other circumstances, the FTC may refer the case to the Department of Justice.

A. Phantom Debt Collection Actions

The Commission has continued its efforts to fight "phantom debt collection" this year. Phantom debt collectors engage in unfair, deceptive, or otherwise unlawful conduct by attempting to collect on debts that either do not exist or are not owed to the phantom debt collector. In 2019, the Commission initiated or resolved three matters involving phantom debt collection: (1) Global Asset Financial Services Group, LLC, (2) Hylan Asset Management, LLC, and (3) ACDI Group, LLC. This past year, the Commission also returned money to thousands of consumers who were targeted by the phantom debt schemes in Advanced Mediation Group.

The FTC filed and resolved an action in 2019 against the phantom debt brokering and collection scheme in *Global Asset Financial Services Group, LLC*. According to the February 4, 2019 complaint, the operation, doing business in North Carolina and New York, falsely claimed to be attorneys or affiliated with attorneys to pressure consumers into making payments on fake or unauthorized debts, and threatened to take legal action against consumers if they did not pay. The Commission's action charged the defendants with, among other things, placing harassing

⁴ This past year's work built upon the FTC's ongoing crackdown on unlawful debt collection practices. Since January 1, 2010, the FTC has sued more than 322 companies and individuals who engaged in unlawful collection practices, banning 200 from the industry, and securing more than \$563.6 million in judgments.

⁵ FDCPA, 15 U.S.C. §§ 1692-1692p; FTC Act, 15 U.S.C. §§ 41-58.

⁶ The FDCPA authorizes the Commission to investigate and take law enforcement action against debt collectors that engage in unfair, deceptive, abusive, or other practices that violate the statute. FDCPA § 814, 15 U.S.C. § 1692*l*. Under the FTC Act, the FTC may investigate and take law enforcement action against entities that, in connection with collecting on debts, engage in unfair or deceptive acts and practices. FTC Act § 5, 15 U.S.C. § 45.

⁷ FTC v. Glob. Asset Fin. Servs. Grp., LLC, No. 3:19cv55 (W.D.N.C. Feb. 4, 2019) (Complaint); see also Press Release, FTC Stops Phantom Debt Collection Scheme (Feb. 8, 2019), available at https://www.ftc.gov/news-events/press-releases/2019/02/ftc-stops-phantom-debt-collection-scheme.

robocalls to consumers, making unlawful threats to harass consumers' friends and family members, and failing to provide consumers with required notices of how to dispute debts. One of the companies involved in the scheme, Midwestern Alliance, is a debt broker that allegedly bought, sold, and placed fake debt portfolios it obtained from former payday loan generator Joel Tucker, even after consumers said they did not recognize the debt or had already paid it. At the Commission's request, the court issued a temporary restraining order halting this operation, imposing an asset freeze and appointing a receiver to take over the business. By December 2019, the Commission had secured five separate orders, banning all the defendants from the debt collection business and from misleading consumers about debt. The three orders against defendants (1) Ankh Ali, Aziza Alo, Kenneth Moody, and Global Asset Financial Services Group, LLC; (2) Jeremy Scinta and LLI Business Innovations, LLC; and (3) Regional Asset Maintenance, LLC imposed \$3.1 million judgments. The order against David Carr, 10D Holdings, Inc., Trans America Consumer Solutions, LLC, Midwestern Alliance, LLC, TACS I, LLC, TACS II, LLC, and TACS III, LLC imposed a \$7,256,488 judgment. Finally, the order against Omar Hussain and Cedar Rose Holdings and Development, Inc. imposed an \$8,877,564 judgment. Most of the judgements are suspended due to defendants' inability pay, except for the \$3.1 million judgment against Regional Asset Maintenance.⁸

Additionally, the FTC and the New York Attorney General's Office resolved a 2018 suit against another phantom debt operation. In a June 2018 complaint, the Commission charged Hylan Asset Management, LLC (Hylan) and Worldwide Processing Group LLC (Worldwide), as well as their principals and four related companies, with running a scheme to collect money from consumers on fake and unauthorized debts. The complaint alleges that Hylan bought, placed for collection, and sold portfolios of phantom debts, including debts that were fabricated or unauthorized by consumers. Hylan placed these phony debts for collection with several collection agencies, including Worldwide, which used illegal tactics to collect on them. The complaint further alleges that Hylan was aware that many of these debts were fabricated or legally unenforceable, given among other things that many of them originated from Hirsch Mohindra and Joel Tucker—both of whom were defendants in separate FTC actions for distributing counterfeit debt. Worldwide allegedly continued its collection efforts after consumers said they had never heard of the lenders and provided records to prove they owed nothing.⁹ The defendants stipulated to a temporary restraining order on June 29, 2018 and a preliminary injunction on July 9, 2018. On July 1, 2019, the Commission secured two final orders, imposing judgments of (1) \$6.75 million against Hylan and its principals, as well as banning them from the debt collection industry, and (2) \$4.94 million against Worldwide and its principal. The judgements were partially suspended due to defendants' inability to pay. 10

⁸ Press Release, Operators of Phantom Debt Scheme Permanently Banned From Debt Collection under Settlement with FTC (Dec. 11, 2019), *available at* https://www.ftc.gov/news-events/press-releases/2019/12/operators-phantom-debt-scheme-permanently-banned-debt-collection.

⁹ FTC and State of New York v. Hylan Asset Mgmt., No. 18-cv-00710 (W.D.N.Y. June 26, 2018) (Complaint); see also Press Release, FTC and New York Attorney General Act Against Phantom Debt Brokers and Collectors (June 27, 2018), available at https://www.ftc.gov/news-events/press-releases/2018/06/ftc-new-york-attorney-general-act-against-phantom-debt-brokers.

¹⁰ Press Release, Phantom Debt Brokers and Collectors Settle FTC and New York AG Charges (July 1, 2019), *available at* https://www.ftc.gov/news-events/press-releases/2019/07/phantom-debt-brokers-collectors-settle-ftc-new-york-ag-charges.

In 2017, the FTC filed an action against the *ACDI Group, LLC* operation for collecting on phantom debts. ¹¹ The complaint alleges that the defendants obtained counterfeit payday loan debts from SQ Capital ¹² through a debt broker. When the defendants reported to the broker that they had been receiving consumer complaints regarding these debts, the broker returned the defendants' money and told them to stop collecting on these phony debts. However, the defendants continued to collect from consumers for at least seven more months. In August 2018, the court ruled that the defendants are jointly and severally liable for the conduct and ordered repayment of more than \$30,000 to consumers. ¹³ In December 2019, the court entered a final order for permanent injunction and monetary judgment. ¹⁴

In addition to the law enforcement actions above, the Commission also returned funds to the consumers harmed by the Georgia-based debt collection operation *Advanced Mediation Group*. In 2017, the agency charged these defendants with tricking people into paying for debts defendants did not have the authority to collect, and secured a temporary restraining order with an asset freeze and receiver. The defendants allegedly used abusive tactics, such as falsely telling consumers that they had committed a crime and faced dire consequences—including lawsuits, garnishment, and even imprisonment—if a purported debt was not paid. The operation collected more than \$3.4 million from consumers. The defendants also illegally contacted consumers' friends, non-spouse relatives, and employers, and failed to provide statutorily-required written notices and disclaimers. In September 2018, the Commission successfully obtained a settlement banning the defendants from the debt collection business and from buying or selling debt. The FTC announced in September 2019 that it would be sending out refund checks totaling more than \$516,000 to 3,977 consumers.

-

¹¹ FTC v. ACDI Group, LLC, No. 3:17-cv-00340 (W.D.N.C. June 22, 2017) (Complaint); see also Press Release, FTC Charges Debt Collection Scheme Took Consumers' Money for Phantom Debts They Did Not Owe (June 23, 2017), available at https://www.ftc.gov/news-events/press-releases/2017/06/ftc-charges-debt-collection-scheme-took-consumers-money-phantom.

¹² In 2017, the Commission filed suit against *SQ Capital* for brokering phantom debt and obtained an order banning the defendants from handling sensitive debt information. *See* Press Release, FTC Charges Defendants with Selling Fake Payday Loan Debt Portfolios (Jan. 9, 2017), *available at* https://www.ftc.gov/news-events/press-releases/2017/01/ftc-charges-defendants-selling-fake-payday-loan-debtportfolios; Press Release, FTC Obtains Court Order Against Scheme that Sold Fake Payday Loan Debt Portfolios (Oct. 17, 2017), *available at* https://www.ftc.gov/news-events/press-releases/2017/10/ftc-obtains-court-order-against-scheme-sold-fake-paydayloan-debt">https://www.ftc.gov/news-events/press-releases/2017/10/ftc-obtains-court-order-against-scheme-sold-fake-paydayloan-debt.

¹³ FTC v. ACDI Group, LLC, No. 3:17-cv-00340 (W.D.N.C. Aug. 22, 2018) (Order).

¹⁴ FTC v. ACDI Group, LLC, No. 3:17-cv-00340 (W.D.N.C. Dec. 2, 2019) (Order).

¹⁵ FTC v. Global Processing Solutions, 1:17-cv-4192 (N.D. Ga. Oct. 23, 2017) (Complaint); see also Press Release, FTC Charges Debt Collection Business Defrauded Consumers into Paying Debts They Did Not Owe (Nov. 8, 2017), available at https://www.ftc.gov/news-events/press-releases/2017/11/ftc-charges-debt-collection-business-defrauded-consumers-paying.

¹⁶ FTC v. Global Processing Solutions, 1:17-cv-4192 (N.D. Ga. July 17, 2018 & Sept. 4, 2018) (Orders); see also Press Release, FTC Settlements Ban Fraudulent Debt Collectors from Debt Collection Business and from Buying or Selling Debt (Sept. 7, 2018), available at https://www.ftc.gov/news-events/press-releases/2018/09/ftc-settlements-ban-fraudulent-debt-collectors-debt-collection.

¹⁷ Press Release, FTC Sends Refunds to Victims of Debt Collection Scheme (Sept. 4, 2019), *available at* https://www.ftc.gov/news-events/press-releases/2019/09/ftc-sends-refunds-victims-debt-collection-scheme.

B. Other Actions to Halt FDCPA & FTC Act Violations

In October 2018, the Commission and the New York Attorney General's Office sued a New York-based debt collection operation in *Campbell Capital*. A federal court temporarily halted the operation's illegal activity and froze its assets. According to the complaint, defendants' employees often completed forms that showed they demanded more money than consumers allegedly owed, also known as "overbiffing" in the debt collection industry. In many cases, consumers ended up paying more than what they allegedly owed. The complaint also alleges that employees pretended to work for law enforcement agencies and threatened consumers with arrest. Other collectors falsely claimed to work on behalf of attorneys and falsely told consumers they would face lawsuits if they did not make a payment on an alleged debt. Litigation was ongoing in 2019.

II. EDUCATION AND PUBLIC OUTREACH

Education and public outreach are also important parts of the Commission's debt collection program. The FTC uses multiple formats and channels to inform consumers about their rights under the FDCPA, as well as what the statute requires of debt collectors, and to inform debt collectors about what they must do to comply with the law. The FTC also uses education and public outreach to enhance legal services providers' understanding of debt collection issues.

The Commission reaches tens of millions of consumers through English and Spanish print and online materials, blog posts, speeches, and presentations. To maximize its outreach efforts, FTC staff works with an informal network of about 16,000 community-based organizations and national groups that order and distribute FTC information to their members, clients, and constituents. In 2019, the FTC distributed 14 million print publications to libraries, police departments, schools, non-profit organizations, banks, credit unions, other businesses, and government agencies. In 2019, the FTC logged more than 57 million views of its business and consumer education website pages. The FTC's channel at YouTube.com/FTCvideos houses 289 business and consumer videos in English and Spanish, which were viewed more than 787,000 times in 2019. One video—Debt Collection: Know Your Rights—summarizes consumer rights and encourages viewers to report problem calls to the FTC. The consumer blogs in English²⁰ and Spanish²¹ reached 247,516 and 52,589 email subscribers, respectively, and regularly serve as source material for local and national news stories.

As part of its work to raise awareness about scams targeting the Latino community, the FTC has developed a series of fotonovelas (graphic novels) in Spanish. These graphic novels tell stories based on complaints Spanish speakers make to the FTC and offer practical tips to help

5

¹⁸ FTC and State of New York v. Campbell Capital LLC, 1:18-cv-01163 (W.D.N.Y. Oct. 23, 2018) (Complaint); see also Press Release, FTC and New York Attorney General Sue Operators of Debt Collection Scheme (Nov. 1, 2018), available at https://www.ftc.gov/news-events/press-releases/2018/11/ftc-new-york-attorney-general-sue-operators-debt-collection.

¹⁹ FTC and State of New York v. Campbell Capital LLC, 1:18-cv-01163 (W.D.N.Y. Oct. 25, 2018) (Orders).

²⁰ <u>http://www.consumer.ftc.gov/blog</u>.

²¹ http://www.consumidor.ftc.gov/blog.

detect and stop common scams. People ordered more than 27,500 copies of the *Cobradores De Deuda* (Debt Collectors) fotonovela in 2019.

The Commission also educates industry members by developing and distributing business education materials, delivering speeches, blogging, participating in panel discussions at industry conferences, and providing interviews to general media and trade publications. The FTC's business education resources can be found in its online Business Center. The Business Center logged more than 5.3 million page views in 2019, and there are more than 82,000 email subscribers to the Business Blog. A complete list of the FTC's consumer and business education materials relating to debt collection, and information on the extent of their distribution is set forth in Appendix A to this letter.

FTC staff also regularly meets with legal service providers, consumer advocates, and people who work in immigrant, Native American, Latino, Asian, and African American communities to discuss consumer protection issues, including the FTC's work in the debt collection arena. For example, the FTC hosted four Ethnic Media Roundtables around the country in 2019, bringing together law enforcement, community organizations, consumer advocates and members of the ethnic media to discuss how consumer protection issues—including debt collection—affect their communities.

III. RESEARCH AND POLICY DEVELOPMENT ACTIVITIES

The third prong of the Commission's debt collection program is research and policy initiatives. In the past year, the FTC has continued to monitor and evaluate the debt collection industry and its practices through public events and the FTC's comment on the CFPB's proposed rulemaking.

In 2019, the FTC organized and co-sponsored four Common Ground conferences around the country, bringing together law enforcement, consumer advocates, and community members to discuss important consumer protection issues. Two of those conferences included discussions on debt collection:

- In September 2019, the Midwest Common Ground Conference²⁴ included a panel titled "Anatomy of a Scam: Lead Generation and Its Abuses," which explored the behind-the-scenes world of online lead generation and discussed Joel Tucker's²⁵ use of payday loan leads to create and sell millions of fake debts to debt collectors.
- In October 2019, a conference hosted by the FTC and the Office of the Virginia Attorney General included panels on (1) credit and debt issues affecting

_

²² http://business.ftc.gov/.

http://business.ftc.gov/blog.

²⁴ Working Together to Protect Midwest Consumers: A Common Ground Conference (Sept. 19, 2019), *available at* https://www.ftc.gov/news-events/events-calendar/working-together-protect-midwest-consumers-common-ground-conference.

²⁵ Joel Tucker was sued by the FTC and banned from the debt collection industry. *See FTC v. Joel Jerome Tucker*, 2:16-cv-082816 (D. Kan. Sept. 20, 2017) (Order); Press Release, FTC Obtains Court Order Against Scheme that Sold Fake Payday Loan Debt Portfolios (Oct. 17, 2017), *available at* https://www.ftc.gov/news-events/press-releases/2017/10/ftc-obtains-court-order-against-scheme-sold-fake-paydayloan-debt.

servicemembers and their families and (2) student loan debt and collections and discharges of student loans. ²⁶

The FTC also sponsored two additional public events that raised debt collection policy issues:

- In May 2019, the FTC hosted a forum on small business financing to examine trends and consumer protection issues in the marketplace, including the recent proliferation of online loans and alternative financing products. ²⁷ The panel discussions included topics such as the use of confessions of judgment by some providers of small business financing during collections.
- In December 2019, the FTC and CFPB co-hosted a public workshop to discuss issues affecting the accuracy of both traditional credit reports and employment and tenant background screening reports.²⁸ The panelists discussed the role of collection agencies as data furnishers, consumer debt disputes, and the impact of paid collections on credit reports.

Additionally, in September 2019, FTC staff submitted a public comment on the CFPB's recent Notice of Proposed Rulemaking to implement the FDCPA and address other consumer protection issues in debt collection. The staff comment notes that the Commission has long advocated for amendments and clarifications to existing laws to account for changes in the debt collection marketplace and consumer technology. It also details much of the Commission's law enforcement, policy, and education efforts to protect consumers from unlawful debt collection practices. The comment provides staff feedback on several components of the proposed rules, including changes to improve validation notices and how, when, and where collectors are allowed to make contact with consumers. Additionally, it addresses the NPRM's proposals regarding debt that has passed the statute of limitations, the sale and transfer of debt, the collection of debts involving people who are deceased, and restrictions on the disclosure of information about debt to third parties.²⁹

The FTC continues to work closely with the CFPB to coordinate efforts to protect consumers from unfair, deceptive, and abusive debt collection practices.³⁰ As part of this

²⁷ Press Release, FTC to Host Strictly Business: A Forum on Small Business Financing (May 7, 2019), *available at* https://www.ftc.gov/news-events/press-releases/2019/05/ftc-host-strictly-business-forum-small-business-financing.

²⁶ Protecting Virginia's Consumers: A Common Ground Conference (Oct. 30, 2019), *available at* https://www.ftc.gov/news-events/events-calendar/protecting-virginias-consumers-common-ground-conference.

²⁸ Press Release, FTC and CFPB to Co-Host Workshop on Accuracy in Consumer Reporting (May 9, 2019), available at https://www.ftc.gov/news-events/press-releases/2019/12/ftc-cfpb-co-host-workshop-accuracy-consumer-reporting.

²⁹ Press Release, FTC Staff Submits Comment to CFPB on Proposed Debt Collection Rules (Sept. 18, 2019), available at https://www.ftc.gov/news-events/press-releases/2019/09/ftc-staff-submits-comment-cfpb-proposed-debt-collection-rules; Comment of the Staff of the Federal Trade Commission's Bureau of Consumer Protection: In the Matter of Proposed Rule with Request for Public Comment, Debt Collection Practices (Regulation F) (Sept. 18, 2019), available at https://www.ftc.gov/policy/advocacy/advocacy-filings/2019/09/comment-staff-federal-trade-commissions-bureau-consumer.

³⁰ The Dodd-Frank Act directs the FTC and the CFPB to coordinate their law enforcement activities and promote consistent regulatory treatment of consumer financial products and services, including debt collection. *See* Dodd-Frank Act, Pub. L. 111-203, 124 Stat. 1376 § 1024(c)(3) (July 21, 2010). In January 2012, the FTC and CFPB entered into a memorandum of understanding ("MOU") that supplements the requirements of the Dodd-Frank Act

coordination, FTC and CFPB staff regularly meet to discuss ongoing and upcoming law enforcement, rulemaking, and other activities; share debt collection complaints; cooperate on consumer education efforts in the debt collection arena; and consult on debt collection rulemaking and guidance initiatives.

IV. <u>CONCLUSION</u>

The Commission hopes that the information contained in this letter will assist the CFPB in preparing its annual report to Congress about its administration of the FDCPA. The FTC looks forward to continuing to cooperate and coordinate with the CFPB on consumer protection issues relating to debt collection. If any other information would be useful or if you wish to request additional assistance, please contact Malini Mithal, Associate Director, Division of Financial Practices, at (202) 326-2972.

By direction of the Commission.

April J. Tabor Acting Secretary

and creates a strong and comprehensive framework for coordination and cooperation. Memorandum of Understanding Between the Consumer Financial Protection Bureau and the Federal Trade Commission (Jan. 2012), available at http://www.ftc.gov/sites/default/files/attachments/press-releases/federal-trade-commission-consumer-financial-protection-bureau-pledge-work-together-protect-consumers/120123ftc-cfpb-mou.pdf. The agencies reauthorized the MOU in February 2019. See Press Release, FTC and CFPB Reauthorize Memorandum of Understanding (Feb. 26, 2019), available at https://www.ftc.gov/news-events/press-releases/2019/02/ftc-cfpb-reauthorize-memorandum-understanding; Memorandum of Understanding between the FTC and the CFPB (Feb. 25, 2019), available at https://www.ftc.gov/system/files/documents/cooperation-agreements/ftc-cfpb-mou-225-0.pdf.

Appendix A

2019 Debt Collection Information

Consumer Information	Views		Print Orders	
	English	Spanish	English	Spanish
Debt Collection FAQ	198,210	101,520	163,050	34,100
<u>Debt Collectors</u> (Fotonovela)				27,500
Debts and Deceased Relatives	58,994	72,369		
Fake Debt Collectors	64,039	5,767		
Garnishing Federal Benefits	22,292	2,236		
Settling Credit Card Debt	32,395	16,204		
Managing Debt: What to Do	12,086	15,948	48,000	12,800
Identity Theft Letter to a Debt Collector	3,197	87		
<u>Time-Barred Debts</u>	64,506	85,759		
Video				
Fraud Affects Every Community: Debt	298			
<u>Collection</u>				
Debt Collection: Know Your Rights	828	158		

Business Information	Views		
<u>Article</u>	English	Spanish	
The Fair Debt Collection Practices Act	15,435		
Video			
Debt Collection	674	237	

2019 Consumer Blog Posts

- FTC halts another phantom debt collection scheme
- The top frauds of 2018

2019 Business Blog Posts

• Top frauds of 2018

^{* &}quot;Views" is the number of times a page was viewed on an FTC website. A person who views a page may also download, re-post, or copy and share content from an FTC page, which increases the total number of people who see the article.