

**Global Data  
Privacy and  
Security Team**

# FTC Top Violators Report: At A Glance

The Federal Trade Commission (“FTC”) collects complaints about companies that allegedly violate the data privacy, data security, advertising, and marketing laws.

Each month the FTC’s Division of Planning and Information (“DPI”) creates a “Top Violators” report that ranks the fifty companies with the greatest volume of consumer complaints for that month. The report indicates whether each company listed was included in the previous month’s report, whether its rank has changed, and the number of complaints received by the FTC that month. For companies that are new to the report, DPI reviews their complaints and summarizes the issue, or issues, that are being raised.

Percentage of companies on the top 20 violators report that have had a public FTC investigation concerning their advertising, marketing, data privacy, or data security practices.\*

**78%**

Percentage of FTC enforcement actions that target a company found in the FTC’s complaint database.\*

**90.9%**

**122 – 8,293**

Quantity of complaints filed per month against the top 50 companies tracked.†

### Understanding the implications of the Top Violator Report to your organization:

- ✓ Is your company identified on a current Top Violators Report?
- ✓ Has your company ever been identified on a Top Violators Report?
- ✓ If you are not listed on the Top Violator’s Report, how close is your organization’s complaint volume to those companies that are on the list?
- ✓ Are competitors in your industry identified on the Top Violators Report?
- ✓ If so, if the FTC initiated an investigation of your competitor what impact would that have on your organization?
- ✓ Are companies which provide service to your organization on the Top Violators Report?
- ✓ If so, do the complaints filed against the company suggest legal compliance issues which may put your organization at risk?
- ✓ Are clients of your company on the Top Violators Report?
- ✓ If so, if a FTC investigation were to be initiated against the client could it have a negative impact on your organization?
- ✓ Do you have a system in place to quickly identify if your organization, service providers, or clients are listed on future Top Violators Reports?

\* Based upon a review of the top 20 violators from complaints volume between 1/1/2009 – 12/12/2014, excluding companies not subject to FTC jurisdiction and complaints that do not relate to corporate behavior (e.g., imposter or spoofing).

† FTC Top Companies Receiving Complaints in Consumer Sentinel (Nov. 1, 2014 – Nov. 30, 2014).

To obtain a copy of the FTC’s Top Violators Report or for information on tools to help your organization identify its visibility to regulators contact

**David A. Zetoony**  
Partner

david.zetoony@bryancave.com  
1155 F Street, N.W.  
Washington, D.C. 20004  
phone: 202 508 6000