



James Haynes, Veterans Education Success  
FTC Testimony  
Federal Trade Commission  
July 1, 2021

Good afternoon, my name is James Haynes and I am here today on behalf of Veterans Education Success. Student veterans have long been subjected to deceptive and misleading recruiting and enrollment by predatory for-profit colleges and their lead generators.

We applaud the Commission for taking action against predatory for-profit colleges, including University of Phoenix and DeVry University, and for shutting down several lead generator websites including army.com and air-force.com for “pretending to be U.S. military recruiters, or affiliated with the military.”<sup>1,2</sup> These websites interfered with US military recruitment and patriotic Americans’ desire to enlist. We thank the Commission for taking action against Career Education Corporation for its use of these deceptive lead generators and we urge the Commission to act against the other colleges that paid for and partnered with these pernicious websites -- as we outlined in our petition to the Commission dated June 19, 2020.<sup>3</sup>

We also urge the Commission to act against several other lead generator websites that deserve the Commission’s attention, as we outlined in our second petition to the Commission dated June 19, 2020.<sup>4</sup>

Finally, we strongly urge the Commission to proactively enforce the FTC Act--including using the long-dormant Penalty Offense Authority--against these predators in higher education. Thank you for your time.

---

<sup>1</sup> FTC Press Release, “FTC Sends Nearly \$30 Million in Refunds to People Tricked into Enrolling by School Operator’s Lead Generators,” June 9, 2021, available at <https://www.ftc.gov/news-events/press-releases/2021/06/ftc-sends-nearly-30-million-refunds-people-tricked-enrolling>.

<sup>2</sup> FTC Press Release, “FTC Takes Action Against the Operators of Copycat Websites,” September 6, 2018, available at <https://www.ftc.gov/news-events/press-releases/2018/09/ftc-takes-action-against-operators-copycat-military-websites>.

<sup>3</sup> Complaint, Request for Investigation, Injunction, and other Relief by Veterans Education Success, *In the Matter of Army.com Partner Schools*, June 18, 2020, available at <https://vetsedsuccess.org/ftc-petition-army-com-and-partner-schools/>.

<sup>4</sup> Complaint, Request for Investigation, Injunction, and other Relief by Veterans Education Success, *In the Matter of QuinStreet Inc., and Reach Network, Inc.*, June 18, 2020, available at <https://vetsedsuccess.org/ftc-petition-lead-generators/>.