



Office of Commissioner
Melissa Holyoak

UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

**Concurring Statement of Commissioner Melissa Holyoak,
Joined by Chair Lina M. Khan**

DoNotPay, Inc., FTC Matter No. 2323042

September 25, 2024

The Commission votes today to accept for public comment an administrative complaint and consent agreement with DoNotPay, Inc., resolving allegations that the company made false and unsubstantiated claims that its artificial intelligence (“AI”)-powered service could function like a human lawyer; that its service could analyze a business website for law violations based solely on the business’s email address; and that some legal services were available as part of its general membership when in fact they were not.

For consumers to benefit from AI (as with any technology), they must be able to trust the claims that companies make about its capabilities. Importantly, this settlement does *not* suggest that consumers should use expensive professional services, or that companies should avoid offering innovative products that reduce the need for high-priced lawyers.¹ The misdeeds of a few bad apples shouldn’t dampen pro-consumer innovation. Indeed, we are hopeful that AI will give consumers access to many types of services at lower cost and with greater convenience than has previously been available. Today’s settlement shows the Commission’s important role in eliminating deception from the market so that honest firms can compete to offer consumers innovative, trustworthy products.

¹ *Cf.* Sandbox Information for Interested Applicants, Utah Office of Legal Services Innovation, <https://utahinnovationoffice.org/info-for-interested-applicants/> (last visited Sept. 12, 2024) (describing the Utah’s “legal regulatory sandbox,” which “enables authorized entities to employ innovative legal service methods and business models... to ensure consumers have access to a well-developed, high-quality, innovative, affordable and competitive market for legal services”).