



Office of Commissioner
Melissa Holyoak

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

Concurring Statement of Commissioner Melissa Holyoak

NGL Labs, LLC, FTC Matter No. 2223144

July 2024

According to the

tendency towards magical thinking and their (sometimes less delightful) appetite for risk, children, tweens, and young teenagers are easy prey for unscrupulous actors like NGL, Vir, and Figueiredo⁸

I am grateful to the hardworking staff who have brought this important case. During my tenure at the Commission, I will encourage the Commission to devote its resources to its core mission – stopping fraud and protecting the most vulnerable among us⁹

⁷ See, e.g. Eric D. Reicin, Teens Online: Responsible Data Considerations for Business Leaders, BBB National Programs (Aug. 25, 2022), <https://bbbprograms.org/mediacenter/bd/insights/2022/08/25/teensonline> (“Experts agree that teens are more risk-seeking than younger children but less competent than adults at managing online risks.”); Manuel Gamez-Guadix, Erika Borrajo & Carmen Almendros, Risky Online Behaviors Among Adolescents: Longitudinal Relations Among P