

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

COMMISSIONERS: **Lina M. Khan, Chair**
 Rebecca Kelly Slaughter
 Alvaro M. Bedoya
 Melissa Holyoak
 Andrew Ferguson

In the Matter of

**Rytr LLC,
a limited liability company.**

DOCKET NO.

COMPLAINT

The Federal Trade Commission, having reason to believe that Rytr LLC, a limited liability company (“Respondent”), has violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

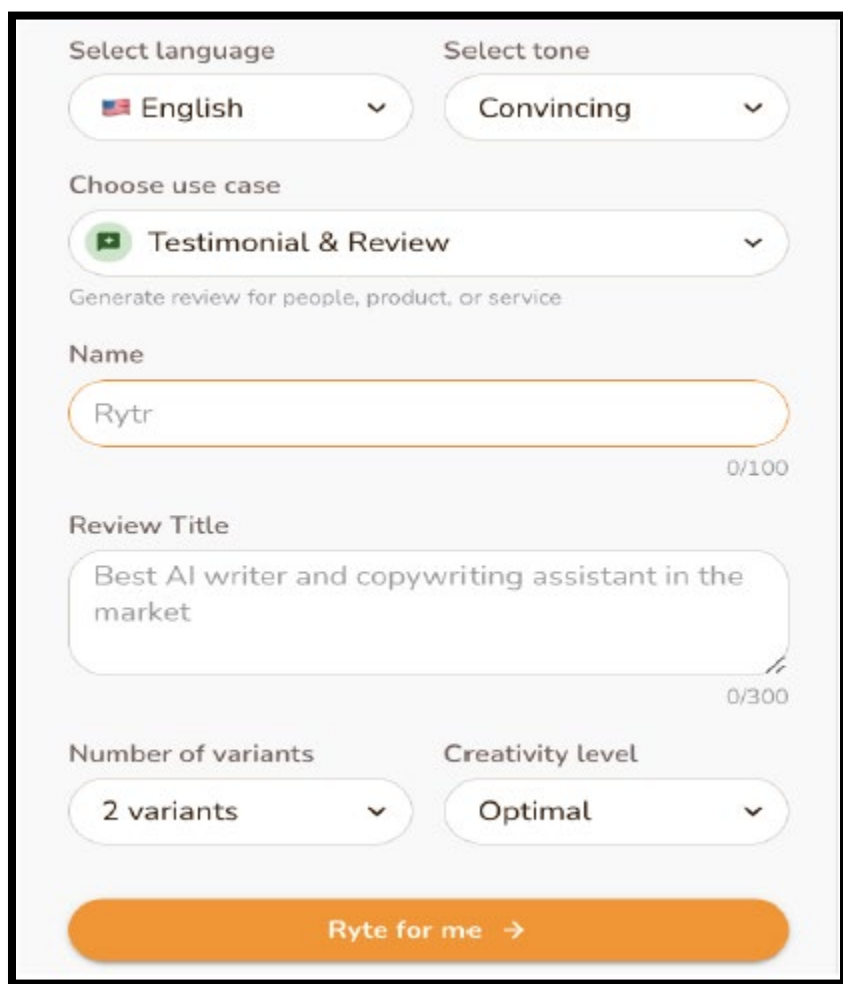
1. Respondent Rytr LLC is a Delaware limited liability company with its principal office or place of business at 1209 Orange Street, Wilmington, DE 19801.
2. Respondent has offered for sale and sold to consumers the use of the Rytr writing service via the Rytr.me website. The Rytr service is an Internet service that uses generative artificial intelligence to produce unlimited written content for subscribers for over 43 “Use Cases,” one of which is for testimonials and reviews.
3. The acts and practices of Respondent alleged in this complaint have been in or affecting commerce, as “commerce” is defined in Section 4 of the Federal Trade Commission Act.

Course of Conduct

4. Respondent operates the Rytr.me website, which bills itself as an artificial intelligence-enabled “writing assistant” service. Respondent’s service generates written content for its users under 43 distinct “Use Cases.” The user may then manually select, copy, paste, and use the generated content. The Use Cases offered include “Email,” “Product Description,” “Blogs,” “Articles,” “Story Plot,” “Google Search Ads,” and “Testimonial & Review,” among others.
5. Respondent offers both free and paid access to its service. Both versions allow users to utilize all of the Use Cases, but the character count and image generation counts are limited with the free version. Respondent charges \$9/month (or \$90 if paid annually) for 100,000 characters

of monthly output, or \$29/month (or \$290 if paid annually) for unlimited output. Between June 2022 and May 2023, Respondent earned \$3.8 million in revenue.

6. Since April 2021, Respondent has offered a “Testimonial & Review” Use Case. This Use Case enables users to generate written content for reviews. Users may then choose to manually select and copy the content to post reviews elsewhere online. To generate results using this Use Case, the user selects the output language and the desired tone (e.g., “formal,” “cautionary,” “critical,” “convincing” “worried,” “urgent,” “funny”) and then adds inputs such as keywords, phrases, and titles. The user can also choose the level of creativity for the content (e.g., “optimal,” “none,” “low,” “medium,” “high,” “max”), and whether they want one, two, or three different results.

The image shows a web form for generating reviews. At the top, there are two dropdown menus: 'Select language' with 'English' selected, and 'Select tone' with 'Convincing' selected. Below these is a 'Choose use case' dropdown with 'Testimonial & Review' selected. A subtext reads 'Generate review for people, product, or service'. The 'Name' field contains 'Rytr' with a '0/100' character count. The 'Review Title' field contains 'Best AI writer and copywriting assistant in the market' with a '0/300' character count. At the bottom, there are two more dropdowns: 'Number of variants' set to '2 variants' and 'Creativity level' set to 'Optimal'. A large orange button at the very bottom says 'Ryte for me →'.

7. Based on this user input, Respondent’s service generates genuine-sounding, detailed reviews quickly and with little user effort.

8. Respondent’s service generates detailed reviews that contain specific, often material details that have no relation to the user’s input. As a result, Respondent’s service generates reviews that would almost certainly be false for the users who copy the generated content and

publish it online. In many instances, these false reviews feature details that would deceive potential consumers deciding to purchase the service or product described.

9. For example, in one session, a user input “Gucci GG Canvas Messenger Bag Replica Red 449172” for both the Name and Review Title fields. Respondent’s tool generated: “The Gucci GG Canvas Messenger Bag Replica Red 449172 is a perfect companion for someone who loves to travel. This messenger bag offers the best style and fashionable look with an excellent carrying capacity of 8 liters. This bag is also lightweight, making it easy to carry on your shoulder, and with its hard shell exterior body material, the bag can resist scratches and is resistant to damage.”

10. In another session, a user input “this product” under the Name field, and “dog shampoo” under the Review Title field. Respondent’s service generated: “As a dog owner, I am thrilled with this product. My pup has been smelling better than ever, the shedding has been reduced and his coat is shinier than ever. It’s also very easy to use and smells really nice. I recommend that everyone try this out!”

11. In another session, a user input under the Name field “this roofing contractor,” and input under Review Title, “roof damage repair.” Respondent’s service generated the following review: “This roofing contractor is the best I’ve ever seen. The price was fair, the installation was timely, and they handled all of the insurance paperwork. What I liked most about them is that they meticulously surveyed our property to ensure that there would be no further damage during construction. They really went above and beyond with this insight and it really helped me feel at ease while they were working on my home.”

12. As another example, the user input under the Name field, “this roofing company near me,” and under Review Title, “called them for roof inspection.” Respondent’s service generated: “I am a roofer by trade and i [sic] have been using this roofing company for over two years. I have used many other roofing services in the past but this one is good enough to keep me as a client of theirs. They’re [sic] prices are really good and their personnel is very friendly.”

13. Moreover, Respondent sets no limit on the number of reviews a user with the unlimited output subscription can generate and copy. Respondent’s records show that at least some of its subscribers have utilized the Rytr service to produce hundreds and in some cases thousands of reviews. Since Respondents first began offering the Testimonial & Review Use Case, 24 subscribers have generated over 10,000 reviews each, 114 subscribers have generated over 1,000 reviews each, and 630 subscribers have generated over 100 reviews each. One subscriber generated hundreds of reviews for, among numerous other services, specific garage door repair companies in Beverly Hills, Grand Rapids, Seattle, Port St. Lucie, Jackson, Santa Monica, Paramus, San Antonio, Los Angeles, San Francisco, Newport Beach, Tucson, and Burbank, along with hundreds more reviews for generic inputs like “this garage door repair company,” “this garage door repair service,” and “this garage door specialist.” Over the course of a single month in December 2022, another subscriber generated over 39,200 reviews for “replica” designer handbags and watches. Another subscriber generated over 83,000 reviews for various specific packing and moving services. Another subscriber, who signed up using a business email, generated thousands of reviews for a business with the same name as their business email.

14. Respondent's Testimonial & Review service causes or is likely to cause substantial harm to consumers. It has no or *de minimis* reasonable, legitimate use. As the service can quickly generate an unlimited number of detailed and genuine-sounding reviews with minimal input, its likely only use is to facilitate subscribers posting fake reviews with which to deceive consumers. In some cases, Respondent's subscribers generated tens of thousands of reviews in a short time. This is likely to pollute the marketplace with a glut of fake reviews. Consumers rely on reviews for fair and accurate information about products and services, and fake reviews can give consumers a false impression of a product or service's quality. As a result, consumers can make purchase choices they otherwise would not have made and waste money on products or services that do not meet their expectations. Honest competitors who do not post fake reviews can lose sales to businesses that do, which can result in reduced consumer choice and lower quality products and services. Consumers cannot reasonably avoid these injuries because the reviews Respondent's service generates appear authentic enough to make it difficult or impossible for consumers to distinguish a real review from a fake one. The harm caused by Respondent's service is not outweighed by countervailing benefits to consumers or to competition; indeed, there are no legitimate benefits to the public from a service that generates an unlimited number of false reviews.

Count I

Means and Instrumentalities to Deceive

15. Through the means described in Paragraphs 4 through 13, in numerous instances, Respondent has furnished its users and subscribers with the means to generate written content for consumer reviews that is false and deceptive.

16. By furnishing others with the means and instrumentalities to engage in the deceptive practices described in Paragraph 15, Respondent has provided the means and instrumentalities for the commission of deceptive acts and practices.

Count II

Unfair Practices

17. As described in Paragraphs 4 through 14, Respondent offered a service intended to quickly generate unlimited content for consumer reviews and created false and deceptive written content for consumer reviews. Respondent's practices have caused or are likely to cause substantial injury to consumers that cannot be reasonably avoided and it is not outweighed by countervailing benefits to consumers or competition. This is an unfair act or practice.

Violations of Section 5

18. The acts and practices of Respondent as alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this _____ day of _____, 2024,
has issued this Complaint against Respondent.

By the Commission, Commissioners Holyoak and Ferguson dissenting.

April J. Tabor
Secretary

SEAL: