

The Honorable John H. Chun

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

AMAZON.COM, INC., *et al.*

Defendants.

Case No. 2:23-cv-0932-JHC

**STIPULATED ORDER FOR
PERMANENT INJUNCTION,
MONETARY RELIEF, CIVIL
PENALTY JUDGMENT, AND
OTHER RELIEF**

STIPULATED FINAL ORDER

1 Plaintiff, Federal Trade Commission (“FTC” or “Commission”), filed its Complaint for
 2 Permanent Injunction, Civil Penalties, Monetary Relief, and Other Equitable Relief (ECF No. 1),
 3 subsequently amended as Amended Complaint for Permanent Injunction, Civil Penalties,
 4 Monetary Relief, and Other Equitable Relief (ECF No. 67) (hereinafter, “Complaint”), for a
 5 permanent injunction, monetary relief, civil penalties, and other relief in this matter, pursuant to
 6 Sections 5(m)(1)(A), 13(b), and 19 of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C.
 7 §§ 45(m)(1)(A), 53(b) and 57b, and the Restore Online Shoppers’ Confidence Act (“ROSCA”), 15
 8 U.S.C. § 8404. The Commission, Defendant Amazon.com, Inc. (“Amazon”), and Individual
 9 Settling Defendants Neil Lindsay and Jamil Ghani (“Individual Settling Defendants”)
 10 (collectively, “Defendants”) stipulate to the entry of this Stipulated Order for Permanent
 11 Injunction, Monetary Relief, Civil Penalty Judgment, and Other Relief (“Order”) to resolve all
 12 matters in dispute between them in the action entitled, *Federal Trade Commission v. Amazon.com, Inc. et al.*, Case No. 2:23-cv-0932-JHC (W.D. Wash.).

13 **THEREFORE, IT IS ORDERED** as follows:

14 **FINDINGS**

- 15 1. This Court has jurisdiction over this matter.
- 16 2. The Complaint charges that Defendants violated Section 5 of the FTC Act, 15
 17 U.S.C. § 45, and Section 4 of ROSCA, 15 U.S.C. § 8403, in connection with Defendants’
 18 marketing and sale of its Amazon Prime subscription to consumers.
- 19 3. On September 17, 2025, the Court granted, in part, the Commission’s Partial
 20 Motion for Summary Judgment, finding that the Amazon Prime subscription is subject to ROSCA;
 21 Amazon obtains consumers’ billing information before it discloses all material terms for an
 22 Amazon Prime subscription, in violation of Section 4 of ROSCA; and the Individual Settling
 23 Defendants had the authority to control the subscription enrollment and cancellation flows for
 Amazon Prime. *See* Sept. 17, 2025 Order (ECF No. 492) at 16, 23, 30-32.

STIPULATED FINAL ORDER