



Apr 15, 2025

Office of Policy and Coordination
Bureau of Competition
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: FTC Complaint Regarding Meta’s Harm to “Private Facebook Groups, Pharmaceutical Advertising, and Violation of the 2019 Consent Order

Dear Chairman Ferguson and Commissioner Holyoak,

I write to formally request that the Federal Trade Commission (FTC) investigate Meta Platforms, Inc. (formerly Facebook) for unlawful practices specifically concerning its dominance of patient-support communities within Facebook Groups, exploitation of sensitive patient data for targeted pharmaceutical advertising, and clear violations of the 2019 FTC consent order and associated \$5 billion settlement.

I. Entrapment of Vulnerable Patient Communities in “Private” Groups

Meta’s Facebook Groups dominate the digital space for patient-support communities. Due to this dominance, patients who rely on these groups for critical health support become effectively trapped, unable to transition to alternative platforms without losing essential community support. This market entrenchment significantly harms consumers by limiting choice and stifling competitive entry.

Early evidence submitted to the FTC in 2018—the Strict Inclusion Closed Group Reverse Lookup (SICGRL) report—highlighted severe privacy vulnerabilities exposing sensitive patient data. Despite clear documentation and repeated warnings (see attached SICGRL_initial_report.pdf), Meta failed to address these vulnerabilities, perpetuating patient dependency on Facebook Groups and barring effective market competition.

II. Deliberate Exploitation of Patient Data for Targeted Pharmaceutical Advertising

Since at least 2018, Meta has knowingly exploited leaked patient data to facilitate targeted pharmaceutical advertisements. These intrusive practices are documented in industry analyses (CSRxP Direct-to-Consumer Advertising Report, March 2025) and media reports, including "Why Facebook is filled with pharmaceutical ads" (Washington Post, 2020). These sources demonstrate that pharmaceutical companies have significantly ramped up advertising spending on Facebook, leveraging sensitive patient information to

deliver personalized pharmaceutical advertisements without adequate transparency or patient consent.

III. Violations of the 2019 FTC Consent Order

Meta's actions explicitly violate terms established by the FTC's 2019 consent order, requiring stringent privacy and data protections. Meta's ongoing failure to secure sensitive patient data, combined with active monetization through targeted advertising practices, breaches explicit commitments made under the \$5 billion settlement to implement rigorous data privacy controls.

IV. Request for Investigation and Disclosure

We respectfully request the FTC take action to ensure that consumers are protected in the following ways:

- Initiate an immediate and comprehensive investigation into Meta's practices concerning patient "Private" Facebook groups and targeted pharmaceutical advertisements.
- Require Meta to disclose detailed internal data regarding its market share and competitive landscape concerning patient support communities, given that exact market share data remains unpublished.
- Examine Meta's targeted pharmaceutical ad practices and their compliance with FTC standards and the 2019 consent order.
- Determine appropriate remedies, including enhanced regulatory oversight and, if warranted, additional penalties for breaches of the 2019 FTC consent order.

V. Conclusion

Meta's unlawful and harmful control over patient-support communities, exploitative targeted advertising practices, and clear violations of FTC-mandated data protection standards collectively undermine competition, compromise consumer privacy, and endanger patient welfare. Urgent regulatory action is needed to restore consumer protection, foster fair competition, and ensure Meta's compliance with established legal commitments.

Thank you for your attention to this critical matter. We stand ready to provide additional documentation, evidence, and testimony as needed.

Respectfully,

Andrea Downing
Founder & Board President
The Light Collective

References:

1. [SICGRL_initial_report.pdf](#)
2. [SicGRL_FTC_Compliant.pdf](#)
3. [CSRxP-Analysis-Direct-to-Consumer-Advertising-Report.pdf](#)
4. [Why Facebook is filled with pharmaceutical ads - The Washington Post.pdf](#)
5. [Health advertising on Facebook: Privacy and policy considerations](#)
6. [Facebook is Receiving Sensitive Medical Information From Hospital Websites](#)