

Hudson Cook Enforcement Alert: FTC Announces Settlement with Education Technology Provider Over Subscription Cancellation Practices

September 16, 2025 | [Mark E. Rooney](#) and [J. Francesca Gross](#)

HIGHLIGHTS:

- The Federal Trade Commission announced a settlement with an education technology provider alleged to have violated the Restore Online Shoppers' Confidence Act (ROSCA)^{MR1} by failing to provide consumers with a simple mechanism to cancel recurring subscription charges.
- The company did not admit or deny the allegations. Still, it consented to a permanent injunction and monetary relief totaling \$7.5 million and ongoing compliance monitoring.
- In announcing the case, the Director of the FTC's Bureau of Consumer Protection emphasized:

"The company's failure to provide simple cancellation mechanisms harmed countless Americans, many of whom continued to be charged after believing they had successfully canceled their subscriptions. As part of our effort to reinvigorate the agency's fraud program, the FTC will continue enforcing ROSCA against online sellers where they violate this important statute."

CASE SUMMARY:

On September 15, 2025, the FTC filed a complaint in the U.S. District Court for the Northern District of California against an education technology provider that markets and sells digital and physical textbooks, online study tools, and subscription-based services to high school and college students.

The Commission alleged that for years the company:

- required subscribers to navigate lengthy, confusing cancellation flows that included multiple screens, surveys, and offers designed to deter cancellation;
- failed to make cancellation options available on mobile devices, effectively forcing consumers to use desktop computers; and

- continued to charge consumers after they had completed cancellation steps or even after contacting customer service.

According to the FTC, since October 2020, the company improperly charged nearly 200,000 consumers following attempted cancellations. The stipulated final order resolves these allegations without the company admitting liability. Among other things, the order:

- requires the company to provide a simple cancellation method that is at least as easy to use as the enrollment mechanism;
- imposes a \$7.5 million monetary judgment, to be used for consumer redress or related relief; and
- requires ongoing compliance reporting, recordkeeping, and monitoring for a period of up to ten years.

RESOURCES:

You can review all of the relevant court filings and press releases at the [FTC's Cases and Proceedings](#) page:

- **Complaint**
- **Consent Order**
- **FTC Press Release**

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[MR1]I don't think we've used this formatting style (putting key terms in bold) previously. Let's un-bold here and throughout to remain consistent with the style of prior enforcement alerts.

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