



September 4, 2026

**VIA EMAIL AND REGULAR MAIL**

Douglas Kelly, Sr. Vice President & General Counsel  
AAA  
1000 AAA Dr., Ste 28  
Heathrow, FL 32746  
dkelly@national.aaa.com

Re: AAA's Promotion of – and Partnership with – RushMyPassport

Dear Mr. Kelly:

On behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising, we write to notify you of concerns regarding AAA’s partnership with RushMyPassport and promotion of the passport courier’s services, and to urge you to review those marketing practices to ensure compliance with all applicable laws.

As you may be aware, passport courier services operate as private intermediaries between consumers and government passport acceptance or processing facilities. While some courier services are registered with the U.S. Department of State, such registration does not indicate government partnership, endorsement, sponsorship or approval, nor does it grant authority to issue or renew passports or expedite processing beyond what is available directly through the State Department.<sup>1</sup>

Despite this, a recent TINA.org investigation into the marketing practices of passport couriers registered with the State Department, including RushMyPassport, found that the vast majority of active registered couriers – approximately 85% – have engaged in deceptive marketing practices concerning their government affiliation, ability to expedite passport processing, or the cost of their services.

Such marketing may implicate, among other things, Section 5 of the FTC Act, 15 U.S.C. § 45, which broadly prohibits unfair or deceptive acts or practices in or affecting commerce; the FTC’s Endorsement Guides, 16 C.F.R. Part 255, which govern endorsements in advertising; the FTC’s Trade Regulation Rule on Impersonation of Government and Businesses, 16 CFR Part 461, which prohibits misrepresenting, directly or by implication, affiliation with, including endorsement or sponsorship by, a government entity<sup>2</sup>; state consumer protection laws, including state Unfair and Deceptive Acts and Practices (UDAP) statutes, which in most states independently prohibit deceptive advertising; and the marketing-related rules the U.S. Department of State has proposed for registered couriers.<sup>3</sup>

TINA.org urges you to promptly review all marketing materials in which AAA promotes or endorses RushMyPassport to ensure that all representations are accurate and non-deceptive, that any material connection between AAA and RushMyPassport is clearly and conspicuously disclosed in all marketing materials, and that RushMyPassport is making truthful and non-deceptive representations to consumers.

Please note that TINA.org has separately notified the State Department and Federal Trade Commission of the pattern of deceptive marketing it has identified across the registered passport courier industry, as well as each passport courier found to be engaged in deceptive marketing.<sup>4</sup>

We appreciate your prompt attention to this matter. If you have any questions, please do not hesitate to contact us.

Sincerely,



Laura Smith, Esq.  
Legal Director  
Truth in Advertising, Inc.

Cc: Mosie Miller, CEO & Founder of Expedited Travel d/b/a RushMyPassport

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<sup>1</sup> See Courier and Expeditor Companies, U.S. Department of State, <https://travel.state.gov/content/travel/en/passports/get-fast/courier-and-expeditor-companies.html> (“If you use a courier company, you will not receive your passport faster than applying at one of our passport agencies.”).

<sup>2</sup> Please note that even when companies include disclaimers regarding their lack of affiliation with the government, such disclaimers must be clear and conspicuous – meaning unavoidable and understandable to a reasonable consumer. See FTC, .com Disclosures: How to Make Effective Disclosures in Digital Advertising, <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-staff-revises-online-advertising-disclosure-guidelines/130312dotcomdisclosures.pdf>.

<sup>3</sup> See Passports; Procedures for Passport Couriers, 90 Fed. Reg. 46,102 (proposed Sept. 25, 2025) (to be codified at 22 C.F.R. pt. 54).

<sup>4</sup> See TINA.org, Registered Passport Courier Industry Investigation <https://truthinadvertising.org/industries/registered-passport-couriers/>; Comment filed by TINA.org, Supplemental Notice of Proposed Rulemaking – Passports; Procedures for Passport Couriers (RIN 1400-AE37; Docket No. DOS-2025-0170 (Sept. 4, 2026), <https://truthinadvertising.org/action/dos-registered-passport-courier-comment>.



September 4, 2026

**VIA EMAIL AND REGULAR MAIL**

David Morales, Executive Vice President & General Counsel  
AARP  
601 E St NW, Washington, DC 20049  
dmorales@aarp.org

Re: AARP's Promotion of – and Partnership with – RushMyPassport

Dear Mr. Morales:

On behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising, we write to notify you of concerns regarding AARP’s partnership with RushMyPassport and promotion of the passport courier’s services, and to urge you to review those marketing practices to ensure compliance with all applicable laws.

As you may be aware, passport courier services operate as private intermediaries between consumers and government passport acceptance or processing facilities. While some courier services are registered with the U.S. Department of State, such registration does not indicate government partnership, endorsement, sponsorship or approval, nor does it grant authority to issue or renew passports or expedite processing beyond what is available directly through the State Department.<sup>1</sup>

Despite this, a recent TINA.org investigation into the marketing practices of passport couriers registered with the State Department, including RushMyPassport, found that the vast majority of active registered couriers – approximately 85% – have engaged in deceptive marketing practices concerning their government affiliation, ability to expedite passport processing, or the cost of their services.

Such marketing may implicate, among other things, Section 5 of the FTC Act, 15 U.S.C. § 45, which broadly prohibits unfair or deceptive acts or practices in or affecting commerce; the FTC’s Endorsement Guides, 16 C.F.R. Part 255, which govern endorsements in advertising; the FTC’s Trade Regulation Rule on Impersonation of Government and Businesses, 16 CFR Part 461, which prohibits misrepresenting, directly or by implication, affiliation with, including endorsement or sponsorship by, a government entity<sup>2</sup>; state consumer protection laws, including state Unfair and Deceptive Acts and Practices (UDAP) statutes, which in most states independently prohibit deceptive advertising; and the marketing-related rules the U.S. Department of State has proposed for registered couriers.<sup>3</sup>

TINA.org urges you to promptly review all marketing materials in which AARP promotes or endorses RushMyPassport to ensure that all representations are accurate and non-deceptive, that any material connection between AARP and RushMyPassport is clearly and conspicuously disclosed in all marketing materials, and RushMyPassport to is making truthful and non-deceptive representations to consumers.

Please note that TINA.org has separately notified the State Department and Federal Trade Commission of the pattern of deceptive marketing it has identified across the registered passport courier industry, as well as each passport courier found to be engaged in deceptive marketing.<sup>4</sup>

We appreciate your prompt attention to this matter. If you have any questions, please do not hesitate to contact us.

Sincerely,



Laura Smith, Esq.  
Legal Director  
Truth in Advertising, Inc.

Cc: Mosie Miller, CEO & Founder of Expedited Travel d/b/a RushMyPassport

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<sup>1</sup> See Courier and Expeditors Companies, U.S. Department of State, <https://travel.state.gov/content/travel/en/passports/get-fast/courier-and-expeditor-companies.html> (“If you use a courier company, you will not receive your passport faster than applying at one of our passport agencies.”).

<sup>2</sup> Please note that even when companies include disclaimers regarding their lack of affiliation with the government, such disclaimers must be clear and conspicuous – meaning unavoidable and understandable to a reasonable consumer. See FTC, .com Disclosures: How to Make Effective Disclosures in Digital Advertising, <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-staff-revises-online-advertising-disclosure-guidelines/130312dotcomdisclosures.pdf>.

<sup>3</sup> See Passports; Procedures for Passport Couriers, 90 Fed. Reg. 46,102 (proposed Sept. 25, 2025) (to be codified at 22 C.F.R. pt. 54).

<sup>4</sup> See TINA.org, Registered Passport Courier Industry Investigation <https://truthinadvertising.org/industries/registered-passport-couriers/>; Comment filed by TINA.org, Supplemental Notice of Proposed Rulemaking – Passports; Procedures for Passport Couriers (RIN 1400-AE37; Docket No. DOS-2025-0170 (Sept. 4, 2026), <https://truthinadvertising.org/action/dos-registered-passport-courier-comment>.



September 4, 2026

**VIA EMAIL AND REGULAR MAIL**

Jeffrey A. Goldberg, Chief Compliance Officer  
CLEAR Secure, Inc.  
85 Tenth Avenue, 9th Floor  
New York, NY 10011  
jeffrey.goldberg@clearme.com  
legal@clearme.com

Re: CLEAR's Promotion of – and Partnership with – HelloGov

Dear Mr. Goldberg:

On behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising, we write to notify you of concerns regarding CLEAR's partnership with HelloGov and promotion of the passport courier's services, and to urge you to review those marketing practices to ensure compliance with all applicable laws.

As you may be aware, passport courier services operate as private intermediaries between consumers and government passport acceptance or processing facilities. While some courier services are registered with the U.S. Department of State, such registration does not indicate government partnership, endorsement, sponsorship or approval, nor does it grant authority to issue or renew passports or expedite processing beyond what is available directly through the State Department.<sup>1</sup>

Despite this, a recent TINA.org investigation into the marketing practices of passport couriers registered with the State Department, including HelloGov, found that the vast majority of active registered couriers – approximately 85% – have engaged in deceptive marketing practices concerning their government affiliation, ability to expedite passport processing, or the cost of their services.

Such marketing may implicate, among other things, Section 5 of the FTC Act, 15 U.S.C. § 45, which broadly prohibits unfair or deceptive acts or practices in or affecting commerce; the FTC's Endorsement Guides, 16 C.F.R. Part 255, which govern endorsements in advertising; the FTC's Trade Regulation Rule on Impersonation of Government and Businesses, 16 CFR Part 461, which prohibits misrepresenting, directly or by implication, affiliation with, including endorsement or sponsorship by, a government entity<sup>2</sup>; state consumer protection laws, including state Unfair and Deceptive Acts and Practices (UDAP) statutes, which in most states independently prohibit deceptive advertising; and the marketing-related rules the U.S. Department of State has proposed for registered couriers.<sup>3</sup>

TINA.org urges you to promptly review all marketing materials in which CLEAR promotes or endorses HelloGov to ensure that all representations are accurate and non-deceptive, that any material connection between CLEAR and HelloGov is clearly and conspicuously disclosed in all marketing materials, and HelloGov to is making truthful and non-deceptive representations to consumers.

Please note that TINA.org has separately notified the State Department and Federal Trade Commission of the pattern of deceptive marketing it has identified across the registered passport courier industry, as well as each passport courier found to be engaged in deceptive marketing.<sup>4</sup>

We appreciate your prompt attention to this matter. If you have any questions, please do not hesitate to contact us.

Sincerely,



Laura Smith, Esq.  
Legal Director  
Truth in Advertising, Inc.

Cc: Adam Boalt, Co-CEO of HelloGov AI, Inc.

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<sup>1</sup> See Courier and Expeditor Companies, U.S. Department of State, <https://travel.state.gov/content/travel/en/passports/get-fast/courier-and-expeditor-companies.html> (“If you use a courier company, you will not receive your passport faster than applying at one of our passport agencies.”).

<sup>2</sup> Please note that even when companies include disclaimers regarding their lack of affiliation with the government, such disclaimers must be clear and conspicuous – meaning unavoidable and understandable to a reasonable consumer. See FTC, .com Disclosures: How to Make Effective Disclosures in Digital Advertising, <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-staff-revises-online-advertising-disclosure-guidelines/130312dotcomdisclosures.pdf>.

<sup>3</sup> See Passports; Procedures for Passport Couriers, 90 Fed. Reg. 46,102 (proposed Sept. 25, 2025) (to be codified at 22 C.F.R. pt. 54).

<sup>4</sup> See TINA.org, Registered Passport Courier Industry Investigation <https://truthinadvertising.org/industries/registered-passport-couriers/>; Comment filed by TINA.org, Supplemental Notice of Proposed Rulemaking – Passports; Procedures for Passport Couriers (RIN 1400-AE37; Docket No. DOS-2025-0170 (Sept. 4, 2026), <https://truthinadvertising.org/action/dos-registered-passport-courier-comment>.



September 4, 2026

**VIA EMAIL AND REGULAR MAIL**

Gina Adams, Exective Vice President, General Counsel, and Secretary  
FedEx Corp.  
942 South Shady Grove Road  
Memphis, TN 38120  
gfadams@fedex.com

Re: FedEx's Promotion of – and Partnership with – RushMyPassport

Dear Ms. Adams:

On behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising, we write to notify you of concerns regarding FedEx’s partnership with RushMyPassport and promotion of the passport courier’s services, and to urge you to review those marketing practices to ensure compliance with all applicable laws.

As you may be aware, passport courier services operate as private intermediaries between consumers and government passport acceptance or processing facilities. While some courier services are registered with the U.S. Department of State, such registration does not indicate government partnership, endorsement, sponsorship or approval, nor does it grant authority to issue or renew passports or expedite processing beyond what is available directly through the State Department.<sup>1</sup>

Despite this, a recent TINA.org investigation into the marketing practices of passport couriers registered with the State Department, including RushMyPassport, found that the vast majority of active registered couriers – approximately 85% – have engaged in deceptive marketing practices concerning their government affiliation, ability to expedite passport processing, or the cost of their services.

Such marketing may implicate, among other things, Section 5 of the FTC Act, 15 U.S.C. § 45, which broadly prohibits unfair or deceptive acts or practices in or affecting commerce; the FTC’s Endorsement Guides, 16 C.F.R. Part 255, which govern endorsements in advertising; the FTC’s Trade Regulation Rule on Impersonation of Government and Businesses, 16 CFR Part 461, which prohibits misrepresenting, directly or by implication, affiliation with, including endorsement or sponsorship by, a government entity<sup>2</sup>; state consumer protection laws, including state Unfair and Deceptive Acts and Practices (UDAP) statutes, which in most states independently prohibit deceptive advertising; and the marketing-related rules the U.S. Department of State has proposed for registered couriers.<sup>3</sup>

TINA.org urges you to promptly review all marketing materials in which FedEx promotes or endorses RushMyPassport to ensure that all representations are accurate and non-deceptive, that any material connection between FedEx and RushMyPassport is clearly and conspicuously disclosed in all marketing materials, and RushMyPassport to is making truthful and non-deceptive representations to consumers.

Please note that TINA.org has separately notified the State Department and Federal Trade Commission of the pattern of deceptive marketing it has identified across the registered passport courier industry, as well as each passport courier found to be engaged in deceptive marketing.<sup>4</sup>

We appreciate your prompt attention to this matter. If you have any questions, please do not hesitate to contact us.

Sincerely,



Laura Smith, Esq.  
Legal Director  
Truth in Advertising, Inc.

Cc: Mosie Miller, CEO & Founder of Expedited Travel d/b/a RushMyPassport

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<sup>1</sup> See Courier and Expeditors Companies, U.S. Department of State, <https://travel.state.gov/content/travel/en/passports/get-fast/courier-and-expeditor-companies.html> (“If you use a courier company, you will not receive your passport faster than applying at one of our passport agencies.”).

<sup>2</sup> Please note that even when companies include disclaimers regarding their lack of affiliation with the government, such disclaimers must be clear and conspicuous – meaning unavoidable and understandable to a reasonable consumer. See FTC, .com Disclosures: How to Make Effective Disclosures in Digital Advertising, <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-staff-revises-online-advertising-disclosure-guidelines/130312dotcomdisclosures.pdf>.

<sup>3</sup> See Passports; Procedures for Passport Couriers, 90 Fed. Reg. 46,102 (proposed Sept. 25, 2025) (to be codified at 22 C.F.R. pt. 54).

<sup>4</sup> See TINA.org, Registered Passport Courier Industry Investigation <https://truthinadvertising.org/industries/registered-passport-couriers/>; Comment filed by TINA.org, Supplemental Notice of Proposed Rulemaking – Passports; Procedures for Passport Couriers (RIN 1400-AE37; Docket No. DOS-2025-0170 (Sept. 4, 2026), <https://truthinadvertising.org/action/dos-registered-passport-courier-comment>.



September 4, 2026

**VIA EMAIL AND REGULAR MAIL**

Leticia Piloto-Rodriguez, Chief Legal Officer  
HotelPlanner  
11780 U.S. Highway One, Suite N600  
Palm Beach Gardens, FL 33408  
Legal@HotelPlanner.com  
Sales@HotelPlanner.com

Re: HotelPlanner's Promotion of – and Partnership with – RushMyPassport

Dear Ms. Piloto-Rodriguez:

On behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising, we write to notify you of concerns regarding HotelPlanner's partnership with RushMyPassport and promotion of the passport courier's services, and to urge you to review those marketing practices to ensure compliance with all applicable laws.

As you may be aware, passport courier services operate as private intermediaries between consumers and government passport acceptance or processing facilities. While some courier services are registered with the U.S. Department of State, such registration does not indicate government partnership, endorsement, sponsorship or approval, nor does it grant authority to issue or renew passports or expedite processing beyond what is available directly through the State Department.<sup>1</sup>

Despite this, a recent TINA.org investigation into the marketing practices of passport couriers registered with the State Department, including RushMyPassport, found that the vast majority of active registered couriers – approximately 85% – have engaged in deceptive marketing practices concerning their government affiliation, ability to expedite passport processing, or the cost of their services.

Such marketing may implicate, among other things, Section 5 of the FTC Act, 15 U.S.C. § 45, which broadly prohibits unfair or deceptive acts or practices in or affecting commerce; the FTC's Endorsement Guides, 16 C.F.R. Part 255, which govern endorsements in advertising; the FTC's Trade Regulation Rule on Impersonation of Government and Businesses, 16 CFR Part 461, which prohibits misrepresenting, directly or by implication, affiliation with, including endorsement or sponsorship by, a government entity<sup>2</sup>; state consumer protection laws, including state Unfair and Deceptive Acts and Practices (UDAP) statutes, which in most states independently prohibit deceptive advertising; and the marketing-related rules the U.S. Department of State has proposed for registered couriers.<sup>3</sup>

TINA.org urges you to promptly review all marketing materials in which HotelPlanner promotes or endorses RushMyPassport to ensure that all representations are accurate and non-deceptive, that any material connection between HotelPlanner and RushMyPassport is clearly and conspicuously disclosed in all marketing materials, and RushMyPassport to is making truthful and non-deceptive representations to consumers.

Please note that TINA.org has separately notified the State Department and Federal Trade Commission of the pattern of deceptive marketing it has identified across the registered passport courier industry, as well as each passport courier found to be engaged in deceptive marketing.<sup>4</sup>

We appreciate your prompt attention to this matter. If you have any questions, please do not hesitate to contact us.

Sincerely,



Laura Smith, Esq.  
Legal Director  
Truth in Advertising, Inc.

Cc: Mosie Miller, CEO & Founder of Expedited Travel d/b/a RushMyPassport

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<sup>1</sup> See Courier and Expeditor Companies, U.S. Department of State, <https://travel.state.gov/content/travel/en/passports/get-fast/courier-and-expeditor-companies.html> (“If you use a courier company, you will not receive your passport faster than applying at one of our passport agencies.”).

<sup>2</sup> Please note that even when companies include disclaimers regarding their lack of affiliation with the government, such disclaimers must be clear and conspicuous – meaning unavoidable and understandable to a reasonable consumer. See FTC, .com Disclosures: How to Make Effective Disclosures in Digital Advertising, <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-staff-revises-online-advertising-disclosure-guidelines/130312dotcomdisclosures.pdf>.

<sup>3</sup> See Passports; Procedures for Passport Couriers, 90 Fed. Reg. 46,102 (proposed Sept. 25, 2025) (to be codified at 22 C.F.R. pt. 54).

<sup>4</sup> See TINA.org, Registered Passport Courier Industry Investigation <https://truthinadvertising.org/industries/registered-passport-couriers/>; Comment filed by TINA.org, Supplemental Notice of Proposed Rulemaking – Passports; Procedures for Passport Couriers (RIN 1400-AE37; Docket No. DOS-2025-0170 (Sept. 4, 2026), <https://truthinadvertising.org/action/dos-registered-passport-courier-comment>.



September 4, 2026

**VIA EMAIL AND REGULAR MAIL**

One Vasco  
128 E 32nd Street Floor 2, Enclave 0210  
New York, NY 10016  
USAEnquiry@onevasco.com  
dataprotection@onevasco.com

Re: One Vasco's Promotion of – and Partnership with – RushMyPassport

To Whom It May Concern:

On behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising, we write to notify you of concerns regarding One Vasco's partnership with RushMyPassport and promotion of the passport courier's services, and to urge you to review those marketing practices to ensure compliance with all applicable laws.

As you may be aware, passport courier services operate as private intermediaries between consumers and government passport acceptance or processing facilities. While some courier services are registered with the U.S. Department of State, such registration does not indicate government partnership, endorsement, sponsorship or approval, nor does it grant authority to issue or renew passports or expedite processing beyond what is available directly through the State Department.<sup>1</sup>

Despite this, a recent TINA.org investigation into the marketing practices of passport couriers registered with the State Department, including RushMyPassport, found that the vast majority of active registered couriers – approximately 85% – have engaged in deceptive marketing practices concerning their government affiliation, ability to expedite passport processing, or the cost of their services.

Such marketing may implicate, among other things, Section 5 of the FTC Act, 15 U.S.C. § 45, which broadly prohibits unfair or deceptive acts or practices in or affecting commerce; the FTC's Endorsement Guides, 16 C.F.R. Part 255, which govern endorsements in advertising; the FTC's Trade Regulation Rule on Impersonation of Government and Businesses, 16 CFR Part 461, which prohibits misrepresenting, directly or by implication, affiliation with, including endorsement or sponsorship by, a government entity<sup>2</sup>; state consumer protection laws, including state Unfair and Deceptive Acts and Practices (UDAP) statutes, which in most states independently prohibit deceptive advertising; and the marketing-related rules the U.S. Department of State has proposed for registered couriers.<sup>3</sup>

TINA.org urges you to promptly review all marketing materials in which One Vasco promotes or endorses RushMyPassport to ensure that all representations are accurate and non-deceptive, that any material connection between One Vasco and RushMyPassport is clearly and conspicuously disclosed in all marketing materials, and RushMyPassport to is making truthful and non-deceptive representations to consumers.

Please note that TINA.org has separately notified the State Department and Federal Trade Commission of the pattern of deceptive marketing it has identified across the registered passport courier industry, as well as each passport courier found to be engaged in deceptive marketing.<sup>4</sup>

We appreciate your prompt attention to this matter. If you have any questions, please do not hesitate to contact us.

Sincerely,



Laura Smith, Esq.  
Legal Director  
Truth in Advertising, Inc.

Cc: Mosie Miller, CEO & Founder of Expedited Travel d/b/a RushMyPassport

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<sup>1</sup> See Courier and Expeditor Companies, U.S. Department of State, <https://travel.state.gov/content/travel/en/passports/get-fast/courier-and-expeditor-companies.html> (“If you use a courier company, you will not receive your passport faster than applying at one of our passport agencies.”).

<sup>2</sup> Please note that even when companies include disclaimers regarding their lack of affiliation with the government, such disclaimers must be clear and conspicuous – meaning unavoidable and understandable to a reasonable consumer. See FTC, .com Disclosures: How to Make Effective Disclosures in Digital Advertising, <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-staff-revises-online-advertising-disclosure-guidelines/130312dotcomdisclosures.pdf>.

<sup>3</sup> See Passports; Procedures for Passport Couriers, 90 Fed. Reg. 46,102 (proposed Sept. 25, 2025) (to be codified at 22 C.F.R. pt. 54).

<sup>4</sup> See TINA.org, Registered Passport Courier Industry Investigation <https://truthinadvertising.org/industries/registered-passport-couriers/>; Comment filed by TINA.org, Supplemental Notice of Proposed Rulemaking – Passports; Procedures for Passport Couriers (RIN 1400-AE37; Docket No. DOS-2025-0170 (Sept. 4, 2026), <https://truthinadvertising.org/action/dos-registered-passport-courier-comment>.



September 4, 2026

**VIA EMAIL AND REGULAR MAIL**

William Sawkiw, General Counsel  
PassportHealth  
4343 N. Outlier Blvd.  
Phoenix AZ 85008  
bill.sawkiw@passporthealthusa.com

Re: PassportHealth's Promotion of – and Partnership with – RushMyPassport

Dear Mr. Sawkiw:

On behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising, we write to notify you of concerns regarding PassportHealth’s partnership with RushMyPassport and promotion of the passport courier’s services, and to urge you to review those marketing practices to ensure compliance with all applicable laws.

As you may be aware, passport courier services operate as private intermediaries between consumers and government passport acceptance or processing facilities. While some courier services are registered with the U.S. Department of State, such registration does not indicate government partnership, endorsement, sponsorship or approval, nor does it grant authority to issue or renew passports or expedite processing beyond what is available directly through the State Department.<sup>1</sup>

Despite this, a recent TINA.org investigation into the marketing practices of passport couriers registered with the State Department, including RushMyPassport, found that the vast majority of active registered couriers – approximately 85% – have engaged in deceptive marketing practices concerning their government affiliation, ability to expedite passport processing, or the cost of their services.

Such marketing may implicate, among other things, Section 5 of the FTC Act, 15 U.S.C. § 45, which broadly prohibits unfair or deceptive acts or practices in or affecting commerce; the FTC’s Endorsement Guides, 16 C.F.R. Part 255, which govern endorsements in advertising; the FTC’s Trade Regulation Rule on Impersonation of Government and Businesses, 16 CFR Part 461, which prohibits misrepresenting, directly or by implication, affiliation with, including endorsement or sponsorship by, a government entity<sup>2</sup>; state consumer protection laws, including state Unfair and Deceptive Acts and Practices (UDAP) statutes, which in most states independently prohibit deceptive advertising; and the marketing-related rules the U.S. Department of State has proposed for registered couriers.<sup>3</sup>

TINA.org urges you to promptly review all marketing materials in which PassportHealth promotes or endorses RushMyPassport to ensure that all representations are accurate and non-deceptive, that any material connection between PassportHealth and RushMyPassport is clearly and conspicuously disclosed in all marketing materials, and RushMyPassport to is making truthful and non-deceptive representations to consumers.

Please note that TINA.org has separately notified the State Department and Federal Trade Commission of the pattern of deceptive marketing it has identified across the registered passport courier industry, as well as each passport courier found to be engaged in deceptive marketing.<sup>4</sup>

We appreciate your prompt attention to this matter. If you have any questions, please do not hesitate to contact us.

Sincerely,



Laura Smith, Esq.  
Legal Director  
Truth in Advertising, Inc.

Cc: Mosie Miller, CEO & Founder of Expedited Travel d/b/a RushMyPassport

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<sup>1</sup> See Courier and Expeditor Companies, U.S. Department of State, <https://travel.state.gov/content/travel/en/passports/get-fast/courier-and-expeditor-companies.html> (“If you use a courier company, you will not receive your passport faster than applying at one of our passport agencies.”).

<sup>2</sup> Please note that even when companies include disclaimers regarding their lack of affiliation with the government, such disclaimers must be clear and conspicuous – meaning unavoidable and understandable to a reasonable consumer. See FTC, .com Disclosures: How to Make Effective Disclosures in Digital Advertising, <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-staff-revises-online-advertising-disclosure-guidelines/130312dotcomdisclosures.pdf>.

<sup>3</sup> See Passports; Procedures for Passport Couriers, 90 Fed. Reg. 46,102 (proposed Sept. 25, 2025) (to be codified at 22 C.F.R. pt. 54).

<sup>4</sup> See TINA.org, Registered Passport Courier Industry Investigation <https://truthinadvertising.org/industries/registered-passport-couriers/>; Comment filed by TINA.org, Supplemental Notice of Proposed Rulemaking – Passports; Procedures for Passport Couriers (RIN 1400-AE37; Docket No. DOS-2025-0170 (Sept. 4, 2026), <https://truthinadvertising.org/action/dos-registered-passport-courier-comment>.



September 4, 2026

**VIA EMAIL AND REGULAR MAIL**

Cristina Gonzalez, Chief Legal Officer  
Staples  
500 Staples Dr.  
Framingham, MA 01702  
cristina.gonzalez@staples.com

Re: Staples's Promotion of – and Partnership with – HelloGov

Dear Ms. Gonzalez:

On behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising, we write to notify you of concerns regarding Staples’s partnership with HelloGov and promotion of the passport courier’s services, and to urge you to review those marketing practices to ensure compliance with all applicable laws.

As you may be aware, passport courier services operate as private intermediaries between consumers and government passport acceptance or processing facilities. While some courier services are registered with the U.S. Department of State, such registration does not indicate government partnership, endorsement, sponsorship or approval, nor does it grant authority to issue or renew passports or expedite processing beyond what is available directly through the State Department.<sup>1</sup>

Despite this, a recent TINA.org investigation into the marketing practices of passport couriers registered with the State Department, including HelloGov, found that the vast majority of active registered couriers – approximately 85% – have engaged in deceptive marketing practices concerning their government affiliation, ability to expedite passport processing, or the cost of their services.

Such marketing may implicate, among other things, Section 5 of the FTC Act, 15 U.S.C. § 45, which broadly prohibits unfair or deceptive acts or practices in or affecting commerce; the FTC’s Endorsement Guides, 16 C.F.R. Part 255, which govern endorsements in advertising; the FTC’s Trade Regulation Rule on Impersonation of Government and Businesses, 16 CFR Part 461, which prohibits misrepresenting, directly or by implication, affiliation with, including endorsement or sponsorship by, a government entity<sup>2</sup>; state consumer protection laws, including state Unfair and Deceptive Acts and Practices (UDAP) statutes, which in most states independently prohibit deceptive advertising; and the marketing-related rules the U.S. Department of State has proposed for registered couriers.<sup>3</sup>

TINA.org urges you to promptly review all marketing materials in which Staples promotes or endorses HelloGov to ensure that all representations are accurate and non-deceptive, that any material connection between Staples and HelloGov is clearly and conspicuously disclosed in all marketing materials, and HelloGov to is making truthful and non-deceptive representations to consumers.

Please note that TINA.org has separately notified the State Department and Federal Trade Commission of the pattern of deceptive marketing it has identified across the registered passport courier industry, as well as each passport courier found to be engaged in deceptive marketing.<sup>4</sup>

We appreciate your prompt attention to this matter. If you have any questions, please do not hesitate to contact us.

Sincerely,



Laura Smith, Esq.  
Legal Director  
Truth in Advertising, Inc.

Cc: Adam Boalt, Co-CEO of HelloGov AI, Inc.

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<sup>1</sup> See Courier and Expeditors Companies, U.S. Department of State, <https://travel.state.gov/content/travel/en/passports/get-fast/courier-and-expeditor-companies.html> (“If you use a courier company, you will not receive your passport faster than applying at one of our passport agencies.”).

<sup>2</sup> Please note that even when companies include disclaimers regarding their lack of affiliation with the government, such disclaimers must be clear and conspicuous – meaning unavoidable and understandable to a reasonable consumer. See FTC, .com Disclosures: How to Make Effective Disclosures in Digital Advertising, <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-staff-revises-online-advertising-disclosure-guidelines/130312dotcomdisclosures.pdf>.

<sup>3</sup> See Passports; Procedures for Passport Couriers, 90 Fed. Reg. 46,102 (proposed Sept. 25, 2025) (to be codified at 22 C.F.R. pt. 54).

<sup>4</sup> See TINA.org, Registered Passport Courier Industry Investigation <https://truthinadvertising.org/industries/registered-passport-couriers/>; Comment filed by TINA.org, Supplemental Notice of Proposed Rulemaking – Passports; Procedures for Passport Couriers (RIN 1400-AE37; Docket No. DOS-2025-0170 (Sept. 4, 2026), <https://truthinadvertising.org/action/dos-registered-passport-courier-comment>.



September 4, 2026

**VIA EMAIL AND REGULAR MAIL**

Paul Mullings, Corporate Counsel & Senior Director  
Unique Vacations, Inc.  
5505 Waterford District, Suite #300  
Miami, FL 33126  
paul.mullings@sandals.com

Re: Sandals Resorts's and Beaches Resorts's Promotions of – and Partnerships with –  
RushMyPassport

Dear Mr. Mullins:

On behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising, we write to notify you of concerns regarding Sandals Resorts's and Beaches Resorts's partnerships with RushMyPassport and promotion of the passport courier's services, and to urge you to review those marketing practices to ensure compliance with all applicable laws.

As you may be aware, passport courier services operate as private intermediaries between consumers and government passport acceptance or processing facilities. While some courier services are registered with the U.S. Department of State, such registration does not indicate government partnership, endorsement, sponsorship or approval, nor does it grant authority to issue or renew passports or expedite processing beyond what is available directly through the State Department.<sup>1</sup>

Despite this, a recent TINA.org investigation into the marketing practices of passport couriers registered with the State Department, including RushMyPassport, found that the vast majority of active registered couriers – approximately 85% – have engaged in deceptive marketing practices concerning their government affiliation, ability to expedite passport processing, or the cost of their services.

Such marketing may implicate, among other things, Section 5 of the FTC Act, 15 U.S.C. § 45, which broadly prohibits unfair or deceptive acts or practices in or affecting commerce; the FTC's Endorsement Guides, 16 C.F.R. Part 255, which govern endorsements in advertising; the FTC's Trade Regulation Rule on Impersonation of Government and Businesses, 16 CFR Part 461, which prohibits misrepresenting, directly or by implication, affiliation with, including endorsement or sponsorship by, a government entity<sup>2</sup>; state consumer protection laws, including state Unfair and Deceptive Acts and Practices (UDAP) statutes, which in most states independently prohibit deceptive advertising; and the marketing-related rules the U.S. Department of State has proposed for registered couriers.<sup>3</sup>

TINA.org urges you to promptly review all marketing materials in which Sandals and Beaches promote or endorse RushMyPassport to ensure that all representations are accurate and non-deceptive, that any material connection between Unique Vacations and RushMyPassport is clearly and conspicuously disclosed in all marketing materials, and RushMyPassport to is making truthful and non-deceptive representations to consumers.

Please note that TINA.org has separately notified the State Department and Federal Trade Commission of the pattern of deceptive marketing it has identified across the registered passport courier industry, as well as each passport courier found to be engaged in deceptive marketing.<sup>4</sup>

We appreciate your prompt attention to this matter. If you have any questions, please do not hesitate to contact us.

Sincerely,



Laura Smith, Esq.  
Legal Director  
Truth in Advertising, Inc.

Cc: Mosie Miller, CEO & Founder of Expedited Travel d/b/a RushMyPassport

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<sup>1</sup> See Courier and Expeditor Companies, U.S. Department of State, <https://travel.state.gov/content/travel/en/passports/get-fast/courier-and-expeditor-companies.html> (“If you use a courier company, you will not receive your passport faster than applying at one of our passport agencies.”).

<sup>2</sup> Please note that even when companies include disclaimers regarding their lack of affiliation with the government, such disclaimers must be clear and conspicuous – meaning unavoidable and understandable to a reasonable consumer. See FTC, .com Disclosures: How to Make Effective Disclosures in Digital Advertising, <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-staff-revises-online-advertising-disclosure-guidelines/130312dotcomdisclosures.pdf>.

<sup>3</sup> See Passports; Procedures for Passport Couriers, 90 Fed. Reg. 46,102 (proposed Sept. 25, 2025) (to be codified at 22 C.F.R. pt. 54).

<sup>4</sup> See TINA.org, Registered Passport Courier Industry Investigation <https://truthinadvertising.org/industries/registered-passport-couriers/>; Comment filed by TINA.org, Supplemental Notice of Proposed Rulemaking – Passports; Procedures for Passport Couriers (RIN 1400-AE37; Docket No. DOS-2025-0170 (Sept. 4, 2026), <https://truthinadvertising.org/action/dos-registered-passport-courier-comment>.