

Chairman Maureen Ohlhausen
Commissioner Terrell McSweeney
Federal Trade Commission
United States Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

May 16, 2017

RE: Juno's Deception of Drivers, Formal Complaint and Request for Investigation

Dear Chairman Ohlhausen and Commissioner McSweeney:

I am writing on behalf of the Independent Drivers Guild to file a formal complaint against Juno USA, LP ("Juno") and GT Forge, Inc d/b/a Gett ("Gett") for deliberately and egregiously misleading both current and prospective Juno drivers with false claims that drivers would share in Juno's success through its "Restrictive Stock Units" (RSU) program.

Furthermore, I request a full investigation into when Juno first learned that its RSU program was potentially illegal and for how long after that date the company lied to current and prospective drivers about the program, in violation of Section 5 of the Federal Trade Commission Act which prohibits "unfair or deceptive acts or practices in or affecting commerce" including misrepresentations or deceptive omissions of material facts.

Finally, should the investigation confirm such unlawful deceptions, the Independent Drivers Guild requests that the Federal Trade Commission seek relief for affected drivers from Juno and Gett and their ill-gotten gains.

Relevant Parties and History

The Independent Drivers Guild (IDG), an affiliate of the International Association of Machinists and Aerospace Workers, represents and advocates for 50,000 ride-hail drivers in New York City, including approximately 20,000 members who have driven for app-based for-hire vehicle company Juno. On April 26, 2017, those members were informed via email that Juno was being acquired by Gett for \$200,000,000. In that same email notice, drivers were informed of the immediate termination of Juno's "Restrictive Stock Units" program, an equity compensation program that was used to recruit many of our members to invest their time and labor in the company. Juno presented itself as a "driver-friendly" company, and used the stock option program as a way to further reinforce this perception among its drivers. The company took advantage of this trust, placing drivers in a position where they would violate local law to advertise and grow Juno without being compensated.

Many IDG members have no access to traditional worker protections like retirement plans, group health insurance, or even paid time off. Most are immigrants who drive full time and have children. The promise of a stake in the company attracted thousands of drivers seeking financial security for their families. But those drivers were betrayed by the company they trusted, a company whose tagline is "Juno treats drivers better, drivers treat you better." Steven Savader, an active member of the IDG told [Quartz](#), "Juno promised us a future and they took it away from us."

In the April 2017 notice to drivers terminating the RSU program, Juno and Gett wrote that given "discussions with the SEC, Juno was considering, among other things, whether the RSUs previously granted were void under the terms of the

RSU program.” However, sources have told the IDG that the Securities and Exchange Commission had been expressing concerns to Juno about the RSU program for several months before the sale. Even so, the company failed to disclose the issue to their “partners” and continued to lure new drivers with the promise of these shares. For months, they deliberately deceived their workforce and onboarding workers about the value of the shares as they apparently sought to preserve the company’s reputation and build enough of a foothold in the industry to sell.

For example, on August 10, 2016 they offered a new driver and referring driver bonus posed as “a chance to increase your ownership in the company”. The choice was one hundred real dollars now, or one hundred dollars worth of stock to be redeemed later (valued at 20 cents per share):

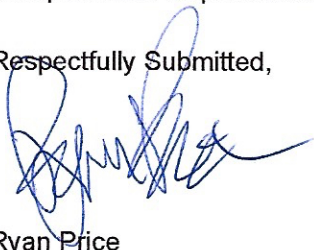
“New Juno drivers can choose between a sign-up bonus of \$100 or 500 RSUs (\$0.20 per 1 RSU) after taking their first 5 rides.”

However, when Gett acquired Juno, they told many of their drivers they were ineligible for any funds for their RSUs and offered some of their most loyal “partners” about \$.0178 per share, less than ten percent of the value cited eight months earlier (and only if they agreed to sign a new contract). Meanwhile, reports indicate that Juno’s value during this same time period nearly doubled from a valuation of \$110 million in April 2016 to selling for \$200 million one year later.

While we don’t know the exact date Juno first learned that the SEC had found the program was potentially illegal, or what exactly the SEC has communicated, it is clear that Juno misled drivers on both the company’s intention to share a stake with drivers and the value of the shares program.

We implore the Federal Trade Commission to stand up for the thousands of drivers who Juno and Gett deceived in order to further enrich themselves. Please investigate this deception and seek appropriate redress for the drivers and their families. Working drivers played an indispensable role in building Juno and should share in the company’s success and sale proceeds as promised.

Respectfully Submitted,



Ryan Price
Executive Director, Independent Drivers Guild

cc: The Honorable Eric Schneiderman
Deputy Commissioner Liz Vladeck, Office of Labor Policy and Standards, City of New York
Juno USA, LP
GT Forge, Inc d/b/a Gett