

December 18, 2025

VIA EMAIL
Andrew Ferguson, Chair
Mark Meador, Commissioner
United States Federal Trade Commission
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Dear Chair Ferguson and Commissioner Meador:

On behalf of the Louis D. Brandeis Center for Human Rights Under Law (the "Brandeis Center" or "LDB"), we write regarding the deceptive business practices of Guinness World Records Limited ("GWR"), a British company with offices in New York and business affecting U.S. commerce and American consumers. GWR is deceiving American consumers about the nature of the product they are selling. GWR falsely holds itself out across the United States as a purveyor of books containing "world" records and as a public source of who or what in the world achieved status as the tallest, biggest, smallest, shortest, fastest, and so on. GWR claims that "record-breaking is for everyone, everywhere."

However, for more than two years, GWR has excluded entries from Israel without informing American consumers that it has ceased publishing "world" records and instead publishes records that only represent a portion of the world. This materially misrepresents the core claim of the product that Guinness "World" Records advertises and sells in the U.S.

GWR may publish whatever "records" it wishes. But under U.S. law, GWR may not mislead American consumers by hiding that its "world" records actually consist of the greatest achievements only in the non-Israeli part of the world. Section 5(a) of the FTC Act protects American consumers from such deception.

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For decades, GWR maintained records from the entire world. Its popular book added world records regardless of the source country, like the 2004 record from then "rogue state" North Korea for quadruple somersaults. Around 2008, GWR changed its business model to focus on revenue from record seekers while continuing to highlight and accept worldwide submissions. For example, GWR published the 2014 world record for longest talk show broadcast by a Damascus studio aligned with Bashar al-Assad. That record came not long after the Syrian dictator's sarin gas attack

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<sup>&</sup>lt;sup>1</sup> <u>https://www.guinnessworldrecords.com/products/books/guinness-world-records/meet-the-stars-of-guinness-world-records</u>

<sup>&</sup>lt;sup>2</sup> https://www.guinnessworldrecords.com/world-records/107228-first-flying-trapeze-quadruple-somersault-from-catcher-to-catcher-in-performance

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on the nearby Ghouta suburb of Damascus.<sup>3</sup> More recently, GWR featured an Iranian jump rope record achieved in February 2023 while the Islamic Republic was actively rounding up tens of thousands of participants in the Women, Life, Freedom protests.<sup>4</sup>

On October 7, 2023, Hamas invaded Israel and committed the largest massacre of the Jews since the Holocaust while broadcasting its atrocities to the world. The following month, GWR secretly stopped taking applications from Israel, Gaza, and the West Bank. Yet it continued to market its services as "world" records, touting that it received almost 50,000 submissions from 189 countries in 2024.<sup>5</sup>

On December 2, 2025, GWR's two-year deceptive practice was brought to light after it rejected an application from Israeli charity Matnat Chaim. The mission of Matnat Chaim ("Gift of Life") is to encourage voluntary kidney donation. It asked GWR to review a planned record attempt gathering 2000 voluntary life-savers in a single photo to promote the ideals of service to our fellow man. GWR then informed Matnat Chaim that it had not accepted submissions from Israel in over two years.

When this deceptive practice was revealed, GWR issued statements admitting to its secret practice. But even then, GWR did not retract or modify any ongoing advertising of its alleged "world" records.<sup>8</sup>

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For decades, GWR received and vetted submissions from across the globe because it was committed to being the repository of world records. No longer. For over two years, GWR has engaged in the deceptive business practice of hiding from American consumers that it refuses to receive applications from Israel. Unless Guinness places an asterisk on every one of their non-Israeli world records, all of their records will be presumptively incorrect. Worse, the premise on which they are selling their products is demonstrably false. GWR has not appended an asterisk to its records, but the FTC can.

<sup>3</sup> https://www.guinnessworldrecords.com/world-records/118441-longest-marathon-directing-tv-show

<sup>&</sup>lt;sup>4</sup> https://www.guinnessworldrecords.com/world-records/727138-most-skips-of-a-rope-wearing-rebound-shoes-in-one%C2%A0hour

<sup>&</sup>lt;sup>5</sup> https://www.guinnessworldrecords.com/about-us/our-story

<sup>&</sup>lt;sup>6</sup> https://kilya.org.il/en/about-matnat-chaim/

<sup>&</sup>lt;sup>7</sup> https://kilya.org.il/en/guiness-world-records-and-the-boycott-on-israel/; https://www.mako.co.il/news-israel/2025 q4/Article-34267ebad60ea91027.htm

<sup>8</sup> https://x.com/GWR/status/1996184122234962205

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The Brandeis Center urges the Federal Trade Commission to stop GWR's deceptive business practice, prevent GWR from continuing to deceive American consumers, and require GWR to compensate consumers who were misled and defrauded by GWR's deceptive practice.

Kenneth L. Marcus Chairman and CEO

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