PUBLIC RECORDS / WORKED EXAMPLE

Cleo AI: verifying the entered settlement

From headline to evidence | Part 2

Prepared by Dossier Editorial | November 5, 2026

EVIDENCE SOURCES	EVIDENCE CHECKED	PUBLISHER INSTITUTIONS
8	2026-11-05	2

SECTIONS	READER QUESTIONS	REVIEW SCOPE
7	4	Public records

EVIDENCE CHECKED	2026-11-05
EDITION	1 | Public-source research
ARTICLE	dossierplus.ai/blog/cleo-ai-verify-entered-settlement-order

IMPORTANT USE NOTE

Public-source walkthrough. Prepared with AI assistance. This is an educational worked example, not a client investigation, legal opinion, or record of a live Dossier research run. No human legal review is claimed.

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PART 01

The decision in brief

Match the case number to a filed court order, inspect the judge's signature, and reconcile the docket dates before describing a settlement as entered. In FTC v. Cleo AI, Document 17 supplies that evidence: it is signed and filed April 25, 2025; the mirrored docket text records entry on April 28. Separate FTC financial reporting says $17 million was collected. Neither record establishes that every consumer received a refund.

Publication date: November 5, 2026. Historical event dates are identified separately. This PDF and the article use the same structured source selection and findings.

PART 02

Executive summary: two gaps narrowed, one still open

Our November 3 Cleo AI walkthrough left court entry unverified because the agency-hosted settlement copy had a blank judicial signature field. This installment adds the filed order and two original FTC reports to the evidence selection. These are historical records reviewed on November 5, 2026, not a newly announced court development. [S1] [S3] [S4] [S8]

- Order status — supported. The 16-page court copy identifies the exact proceeding and contains the judge's dated signature on page 14.
- Payment to the FTC — supported as an agency-reported collection. The FY 2025 financial report lists $17 million collected from the Cleo AI settlement; it is not a transaction-level bank receipt.
- Consumer receipt — unresolved in this review. The October 2026 refund notices announce more than $15.8 million and a payment schedule, without confirming every recipient's acceptance.
- Current compliance — not established. Later mirrored docket entries record a withdrawn enforcement motion. We have not reviewed its full papers or a complete current court docket. [S1] [S2] [S4] [S5] [S6]

PART 03

Pin the evidence to the exact case

The proceeding is Federal Trade Commission v. Cleo AI, Inc., No. 1:25-cv-02594-ALC, in the U.S. District Court for the Southern District of New York. Document 17 is the stipulated order for permanent injunction, monetary judgment and other relief. Its caption names the FTC and the corporate defendant; the filing stamp and signed order match that identity. [S1]

This review covers the court-issued order preserved through RECAP and Internet Archive, mirrored docket descriptions through July 15, 2025, and FTC records checked November 5, 2026. A fresh retrieval of an archive does not make its docket coverage current. No paid PACER retrieval, private account review, customer interview or test of Cleo's present app was performed. [S1] [S2]

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PART 04

Keep signature, filing, entry and payment dates separate

DATE / RECORD	WHAT THE RECORD SHOWS	WHAT IT DOES NOT ESTABLISH
March 2025 agency copy	The FTC-hosted stipulated order leaves the court's date and signature blank on page 14.	The parties' agreement alone does not demonstrate judicial entry. [S8]
April 25, 2025 — Document 17	Court filing stamp and judge's signature date. Section V sets a $17 million monetary judgment.	The payment command is not itself proof of transfer. [S1]
April 28, 2025 — docket text	The mirrored description of Document 17 ends with an April 28 entry notation.	Do not silently collapse that notation into the April 25 signature/filing date. [S2]
June 30, 2025 status report	The FTC reports the stipulated order as entered April 25, 2025.	This agency summary uses a different date description from the docket notation. [S3]
July 8–15, 2025 — docket descriptions	An FTC show-cause motion appears July 8; withdrawal July 14; denial without prejudice as moot July 15.	These descriptions do not explain the withdrawal or establish a contempt finding. [S2]
FY 2025 financial report	The FTC reports $17 million collected from the settlement.	It does not supply the exact transfer date or prove payment met the order's deadline. [S4]
October 8 and 27, 2026	The FTC announces consumer refunds, with PayPal payments scheduled to start October 27.	A scheduled distribution is not a recipient-by-recipient receipt ledger. [S5] [S6]

For this dossier, store April 25 as the signed/filed date and April 28 as the docket's entry notation, retaining the FTC report's wording as a separate source claim. The record is sufficient to establish that a court order exists. Calculating a disputed legal deadline would require the authoritative docket and the applicable rules, beyond this educational review. [S1] [S2] [S3]

PART 05

What changed—and what the additional evidence cannot answer

Finding 1: the entered order is now supported. Page 14 of the court copy contains the April 25 date and Judge Andrew L. Carter, Jr.'s signature, where the FTC press copy is blank. Page 9 contains the monetary judgment and payment obligation. Page 1 states that Cleo neither admits nor denies the complaint's allegations, except as specifically stated in the order. The order also contains provisions about how alleged facts may be treated in later FTC enforcement proceedings; this settlement should not be described as a trial verdict. [S1] [S8]

Finding 2: collection and distribution are different stages. The FTC financial report's Cleo row says the agency collected $17 million. The October refund release describes more than $15.8 million for eligible consumers. Those figures concern different stages and reporting periods. The order permits redress administration expenses and specifies possible uses of remaining money, but the reviewed records do not reconcile the difference. We do not assign it to fees, losses or retained funds. [S1] [S4] [S5]

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Finding 3: contrary and later evidence limits a broad “resolved” label. The mirrored July docket records an enforcement motion, its withdrawal and a denial without prejudice as moot. That sequence supports the procedural outcome, not the reason for withdrawal, an exoneration, or a finding of contempt. The FTC case page still displays Pending and a May 2, 2025 update label alongside an October 2026 refund entry. That label cannot substitute for reading the order and later records. [S2] [S7]

PART 06

A decision tree for settlement verification

1. DOES THE RECORD MATCH THE EXACT COMPANY AND COURT CASE?

- If established: Retain the caption, court, full case number and document number together.
- If unresolved: Resolve identity before importing another company’s settlement or similar case.

2. IS THERE A FILED ORDER WITH A JUDICIAL SIGNATURE?

- If established: Inspect the original pages and compare them with any press-release attachment.
- If unresolved: Describe the proposal or agreement and keep judicial entry unverified.

3. CAN THE SOURCE’S DIFFERENT DATES BE RECONCILED?

- If established: Record signed, filed and docket-entry dates as distinct fields when needed.
- If unresolved: Keep the discrepancy visible; do not select a convenient deadline.

4. DO LATER RECORDS CHANGE THE PROCEDURAL PICTURE?

- If established: Add the motion and disposition, distinguishing docket descriptions from reviewed full filings.
- If unresolved: Record the archive’s last covered filing and leave later developments open.

5. IS THE QUESTION ABOUT MONEY ORDERED, COLLECTED OR RECEIVED?

- If established: Use evidence for that precise stage: order, agency collection record or recipient confirmation.
- If unresolved: Split the money question before calling the settlement paid or the refunds complete.

Applied here, the first two checks establish the order; the date check preserves two record labels; the later-record check adds a bounded July sequence; and the money check stops at agency-reported collection plus announced refunds. [S1] [S2] [S4] [S5]

PART 07

Reproduce the review in a Dossier workspace

Use this as an authoring workflow with your authorized source files. The public example was prepared from those records outside a client matter; these steps describe how to reproduce the review, not a claim that Dossier ran an investigation.

- Define three questions: Was the settlement ordered? Did the FTC collect the money? Is completed consumer receipt established? Give each a separate outcome.

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- Create the corporate entity and proceeding with the exact caption and case number. Keep the FTC's role as plaintiff separate from its later role administering redress.
- Preserve the press copy and filed order as different evidence items. Record original URLs, retrieval dates, file hashes and page anchors; inspect pages 1, 9 and 14 of Document 17 visually.
- Build timeline events for signature/filing, docket notation, later motion disposition, agency collection reporting and refund scheduling. Do not convert the report's retrieval date into an event date.
- Attach each finding to its supporting record and its limit. For the July sequence, mark full filing text as missing even though docket descriptions are available.
- Generate the narrative and source register from that same selection. Review the PDF's citations, page breaks, date labels and gaps before issuing a new edition.

The earlier November 3 installment remains a record of its narrower evidence selection. This separately dated Part 2 supplies the additional findings, so readers can follow what changed without silently rewriting the earlier conclusion.

PART 08

Evidence that would justify another installment

- A freely available, current docket and the full July motion, withdrawal and endorsed order would clarify coverage and the stated reason for withdrawal. The archive reviewed here lists July 15, 2025 as its last filing.
- An authorized transaction-level confirmation would establish the exact payment date and allow a separate assessment of the order's payment deadline. The financial-report total alone does not answer that timing question.
- A later FTC redress report or administrator accounting could establish aggregate refunds actually redeemed and reconcile collections, administration and remaining balances. Individual receipt would still need appropriately authorized recipient evidence.
- Current compliance submissions or a later enforcement order could support an operational conclusion. Neither a settlement signature nor a withdrawn motion proves every ongoing requirement is satisfied. [S1] [S2] [S4] [S5] [S6]

Until that evidence is available, the useful conclusion is precise: the court order is verified from the filed copy, the FTC reports collecting the settlement, and completed consumer receipt and present compliance remain outside the established record.

PART 09

Questions readers ask

WHERE IS THE SIGNED CLEO AI SETTLEMENT ORDER?

It is Document 17 in FTC v. Cleo AI, Inc., No. 1:25-cv-02594-ALC. The free archived court PDF has the filing stamp on page 1 and the dated judicial signature on page 14. The source register links that copy directly. [S1]

WAS THE CLEO AI ORDER ENTERED APRIL 25 OR APRIL 28, 2025?

The filed PDF and judicial signature are dated April 25. The mirrored docket description carries an April 28 entry notation, while the FTC's June report describes entry as April 25. Preserve those source-specific labels; this review does not decide which date controls a disputed legal deadline. [S1] [S2] [S3]

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DOES THE $17 MILLION JUDGMENT PROVE THE FTC WAS PAID?

The judgment establishes the obligation. A separate record—the FTC's FY 2025 Agency Financial Report—reports $17 million collected from Cleo. That supports agency-reported collection without establishing the precise transfer date or timely payment. [S1] [S4]

DO THE REFUND NOTICES PROVE EVERY CONSUMER RECEIVED MONEY?

No. The notices describe eligible payments and their schedule. This review does not contain a complete redemption ledger or individual receipt confirmations. It also does not treat the withdrawn July motion as proof of either contempt or full compliance. [S2] [S5] [S6]

PART 10

Linked source register

Titles with a recorded URL link to that source. Entries without a URL identify retained material but do not open an original file. For any court or business record being used in litigation, obtain a certified copy directly from the clerk or filing authority and preserve the retrieval date.

S1 **Filed stipulated order, Document 17**
Court-issued PDF preserved by RECAP / Internet Archive. Anchor: Pages 1, 9–10 and 14; Findings 3; Sections V, VI and XII. 16 pages. Filing stamp and judicial signature visually inspected. Downloaded bytes match the SHA-1 recorded by CourtListener; this verifies the archived copy, not a certified current docket. · retrieved 2026-11-05

S2 **FTC v. Cleo AI docket, RECAP archive**
Mirrored court docket descriptions. Anchor: Document 17 entry notation; entries 21, 25 and 26; last listed filing July 15, 2025. Read through the CourtListener public-record connector. Full July filings were unavailable in the reviewed free archive. A November 5 retrieval does not establish complete coverage through November 5. · retrieved 2026-11-05

S3 **Semiannual Federal Court Litigation Status Report, June 30, 2025**
Original agency litigation status report. Anchor: Printed page 15 / PDF page 18, Cleo AI entry. Reports the order as entered April 25, 2025. Its complaint-date year is visibly mistyped; that field is not used to establish a filing date here. · retrieved 2026-11-05

S4 **FY 2025 Agency Financial Report**
Original agency financial report. Anchor: Page 32, row L: Cleo AI, Inc.; table rounding note on page 33. Reports $17 million collected; table amounts are rounded to the million. Does not supply a transaction-level transfer date or a consumer redemption ledger. · retrieved 2026-11-05

S5 **FTC announces more than $15.8 million in Cleo AI refunds**
Original refund announcement. Anchor: October 8, 2026; amount, eligible customers and October 27 payment-start paragraphs. Announcement of the distribution and schedule; it does not establish each recipient's completed receipt. · retrieved 2026-11-05

S6 **Cleo AI refunds**
Original consumer refund information. Anchor: October 2026 notice; payment start and 30-day acceptance instructions. Checked against the current agency page. Its scheduled-payment wording is retained as such, rather than converted into verified redemption. · retrieved 2026-11-05

S7 **Cleo AI, Inc., FTC v. case page**
Agency case index and timeline. Anchor: Case Status; Last Updated; October 8, 2026 timeline entry. Displays Pending and Last Updated May 2, 2025. Those labels have a different scope from the filed order and later financial and refund records. · retrieved 2026-11-05

S8 **FTC press-release copy of the stipulated order**
Agency-hosted proposed settlement copy. Anchor: Page 14, blank judicial date and signature fields. Retained for comparison with the filed court copy. Party signatures do not fill the missing judicial signature. · retrieved 2026-11-05

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