CCDH Center for Countering Digital Hate





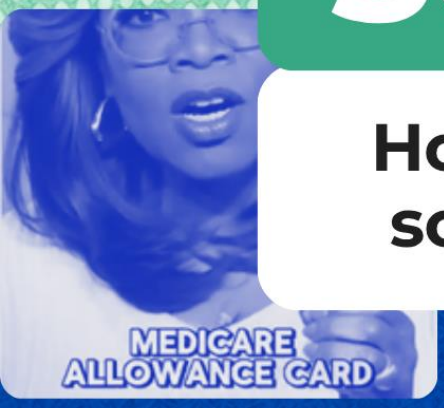






SCAMBOOK

How Meta helps Medicare scammers target seniors

















The Center for Countering Digital Hate works to stop the spread of digital harm and dangerous content online through innovative research, public campaigns and policy advocacy. Our mission is to protect human rights and civil liberties online.

Social media platforms and emerging technologies like AI have changed the way we communicate, build and maintain relationships, set social standards, and negotiate and assert our society's values. In the process, they have become environments where harmful and dangerous content can spread rapidly, often without meaningful oversight or accountability.

These companies erode basic human rights and civil liberties by enabling the amplification of harmful content and distorting the online information ecosystem.

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1 INTRODUCTION

"Don't be an idiot. Claim it now." That's how a Facebook ad targeting older Americans ends, after promising $3,600 in free groceries, rent, and gas through Medicare. Seniors who click on the link don't get money. Instead, their personal data is harvested, or they're steered into Medicare plans with worse coverage, higher out-of-pocket costs, and reduced access to their own doctors. The Senate Finance Committee has warned that misleading marketing of Medicare plans has "harmed seniors and left them confused and in doubt about Medicare's guarantee of high-quality health care."[1] Our latest research shows that Meta, the world's largest social media company, has not been outflanked by the scammers preying on older Americans. It has gone into business with them.

Last year, Americans reported losing $2.1 billion to scams that began on social media — eight times the figure in 2020.[2] More was lost on Facebook than on any other platform: more, even, than the combined losses from text and email scams, according to the Federal Trade Commission.[3] Nearly 30% of all reported scam losses in 2025 originated on social media. And those numbers are conservative: most fraud victims never file a report, so real losses are far higher. Medicare scam ads are one particularly vicious slice of this documented epidemic, and the slice in which Meta has built its largest captive audience of vulnerable users.

Over the past year, ads from the top thirty Medicare scammers we identified generated 215 million impressions on Facebook, six times the reach of all previous years on record combined. Seventy-three percent of those impressions reached people aged 65 and over: 185 million views by the seniors these scams are designed to defraud. Meta collected an estimated $14.3 million in revenue from these advertisers, $12 million of it in the past twelve months alone. The most heavily targeted states were Texas, Florida, North Carolina, and Pennsylvania, all with large Medicare-eligible populations, and several of them politically pivotal.

The deceptive tactics in these ads: fabricated 'free benefits'; impersonation of government agencies; fake AI-generated endorsements from Joe Biden, Donald Trump, and Oprah Winfrey; and manufactured enrollment deadlines all violate Meta's Advertising Standards on Fraud, Scams, and Deceptive Practices.[4] Meta knows this because it routinely removes them. The scam advertisers in our dataset had, on average, 151 ads taken down for policy violations; one had 1,335. By the time those ads were removed, they had already generated 72 million impressions and earned Meta $3.7 million. Removed ads were replaced with near-identical copies. Disabled accounts launched new ones.

This is not a content moderation failure. It is a business model. Meta earns more the longer a scam ad runs, and its enforcement timeline reflects that math. In November 2025, a Reuters investigation revealed a cache of internal Meta documents showing that the company projected $16 billion - roughly 10% of its 2024 global revenue - would come from ads for scams and banned goods.[5] Meta's own safety staff estimated that Meta platforms were involved in one-third of all successful scams in the United States. Rather than banning advertisers suspected of fraud, Meta reportedly charges them higher ad rates.[6] Internal assessments concluded that revenue from risky ads almost certainly exceeds "the cost of any regulatory settlement."[7] Meta is taunting democracies and the courts, daring them to make its wages of sin unprofitable.

Seniors who dare try to hold Meta accountable in court face significant legal obstacles. In *Calise v. Meta* (2024), victims alleging harm from fraudulent ads had many of their claims dismissed under Section 230— the liability shield enacted by Congress in 1996 to encourage platforms to act as "Good Samaritans" by moderating harmful content.[8] Three decades later, that shield protects an industry that operates at an industrial scale, monetizes deception by design, and treats the harm done to its most vulnerable users as a rounding error on a quarterly earnings call. What was meant as an incentive to act has become a license not to.

States can act now. Legislatures should pass laws that work around Section 230's limits to address platform design, material contributions to fraud, and platforms' responses to reports of deceptive advertising. Congress should follow with targeted federal reform of Section 230. Knowingly profiting by deceiving elderly Americans should not be legal, online or off.

2 KEY FINDINGS

We identified top Medicare scammers using the Meta Ad Library

- We used Meta's Ad Library to collect a dataset of over 90,000 ads to identify the biggest Medicare scammers and analyze their activity.
- We defined Medicare scams as ads that promote 'free benefits' to Medicare beneficiaries and employ any of the following tactics that violate Meta's Advertiser Standards on Fraud, Scams and Deceptive Practices:[9]
    - Offering 'free benefits' that are fabricated or misleading
    - Falsely presenting the advertiser as a government entity
    - Falsely implying the endorsement of government officials
    - Using fake AI-generated endorsements from politicians or celebrities
    - Stating fabricated deadlines for enrollment

Meta is helping Medicare scammers reach more users

- Medicare scammers received 215 million impressions on their ads in the last year, nearly six times as many as all previous years on record.[10]
- Meta has collected a total of $14.3 million from these Medicare scammers.[11]

Meta is helping Medicare scammers target seniors

- Meta enables Medicare scammers to target the vast majority of their ads at seniors, with 73% of impressions coming from users aged over 65.[12]
- The most targeted states were Texas and Florida.[13]

Meta fails to act on Medicare scams

- Meta has become an attractive platform for Medicare scammers despite promising to review ads before they run.
- We identified several key failures in Meta's enforcement of scams:[14]
    - Meta continuously approves ads that breach its policies
    - When Meta does remove ads, it often acts too slow
    - Meta is enforcing its rules inconsistently across identical content
    - Meta is failing to act on advertisers that repeatedly break policies

Policymakers must introduce reforms to hold platforms accountable

- With platforms failing to act by themselves, policymakers must introduce reforms to protect users.
    - Targeted Reforms to Section 230 to end platform immunity from liability:
        - Clarify the role of "distributor" liability
        - Establish a "deliberate indifference to harm" standard
        - Grant regulatory authority with a federal agency
    - The Federal SCAM Act
    - New York Fraudulent Social-Media Advertising Prevention Act

3 STUDYING MEDICARE SCAMS ON META'S PLATFORMS

To investigate Meta's role in promoting Medicare scams, we analyzed over 90,000 ads in Meta's Ad Library to track the activity of Medicare scammers over time, including how much they spend on ads, how often people see them, and who they target.

How we defined 'Medicare scams'

Medicare scammers encourage people to change their Medicare plans using deceptive tactics.[15] They typically do so by promoting 'free benefits', such as "grocery cards" or "flex cards" loaded with funds that can be spent on groceries or other goods.[16]

For this project, we identify ads as Medicare scams if they promote 'free benefits' to Medicare beneficiaries and employ any of the following deceptive tactics that breach Meta's Advertising Standards on Fraud, Scams and Deceptive Practices:[17]

- Offering 'free benefits' that are fabricated or misleading
- Falsely presenting the advertiser as a government entity
- Falsely implying the endorsement of government officials
- Using fake AI-generated endorsements from politicians or celebrities
- Stating fabricated deadlines for enrollment

These deceptive tactics were identified using guidance on Medicare scams from the Federal Trade Commission (FTC), Centers for Medicare & Medicaid Services (CMS), the AARP, America's largest nonprofit dedicated to older Americans, and fact checkers.[18]

How we identified Medicare scammers

To identify the Medicare scammers spending the most on ads across Meta's platforms, we first searched Meta's Ad Library for all ads containing keywords associated with supposed 'free benefits' such as "grocery cards" or "flex cards".

This search produced a dataset of 93,779 potential scam ads across 2,908 advertisers dating from March 27, 2019 to March 11, 2026. We then manually reviewed this dataset, marking advertisers as "Medicare scammers" if at least half of their most expensive ads met our definition of Medicare scams.

After reviewing advertisers making up 77% of total ad spend across our dataset, we were able to identify the top 30 Medicare scammers ranked by ad spend, accounting for 42,984 ads.

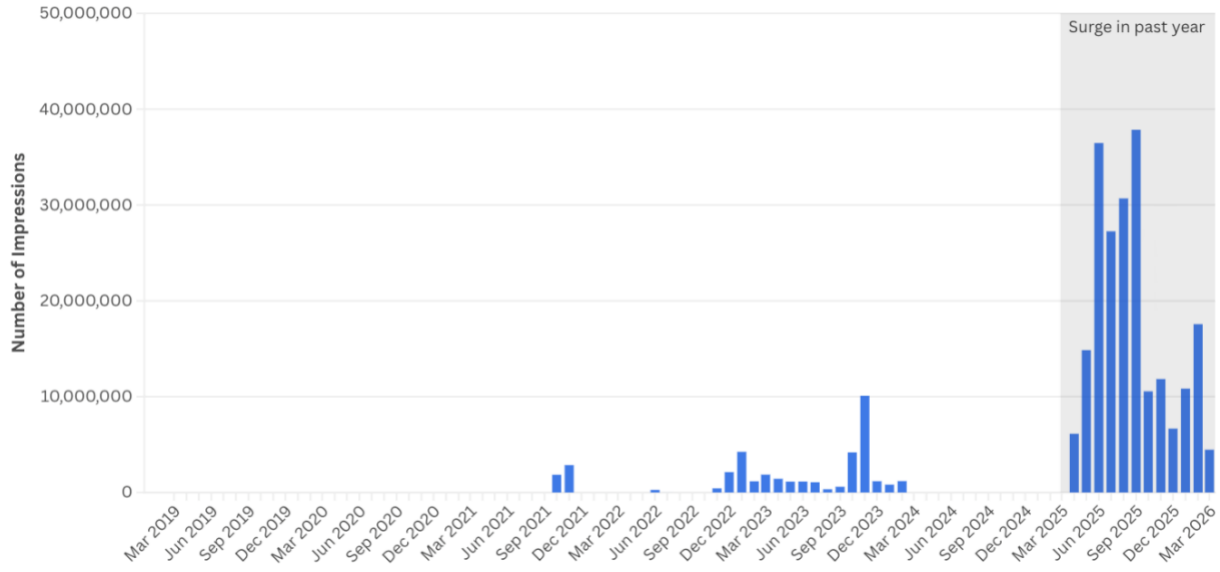
How we analyzed advertising from top Medicare scammers

Using our dataset of ads from the top 30 Medicare scammers, we used Meta's Ad Library to measure their spending on ads over time, how many times their ads were viewed, who they target and how often Meta removed their ads for policy violations.

More detail is available in **Appendix: Methodology** at the end of this report.

4 META IS HELPING MEDICARE SCAMS REACH MORE USERS

Scammers' ads got 6x more impressions last year than all previous years combined



We used Meta's Ad Library to investigate whether Meta is helping Medicare scammers reach more of its users through paid advertising.

We find that Meta helped Medicare scammers receive 215 million impressions on their ads in the last year, nearly six times as many impressions as they received in all previous years on record.[19] All of these ads mention supposed 'free benefits' such as "grocery cards" or "flex cards".

This is consistent with reports that a rising number of Medicare beneficiaries are being scammed into switching to Medicare plans with worse coverage, often lured by promises of free benefits such as money to spend on groceries.[20]

Clicking on the ads often leads users to requests for personal information.[21] AARP has warned that scammers may attempt to obtain sensitive details like Social Security or Medicare numbers, or trick people into switching to an insurance plan.[22]

Subsequent sections of this report identify two key failings from Meta that are making its platforms an attractive place for Medicare scammers to advertise:

1. Meta helps Medicare scammers target seniors
2. Meta is failing to enforce its policies against Medicare scams

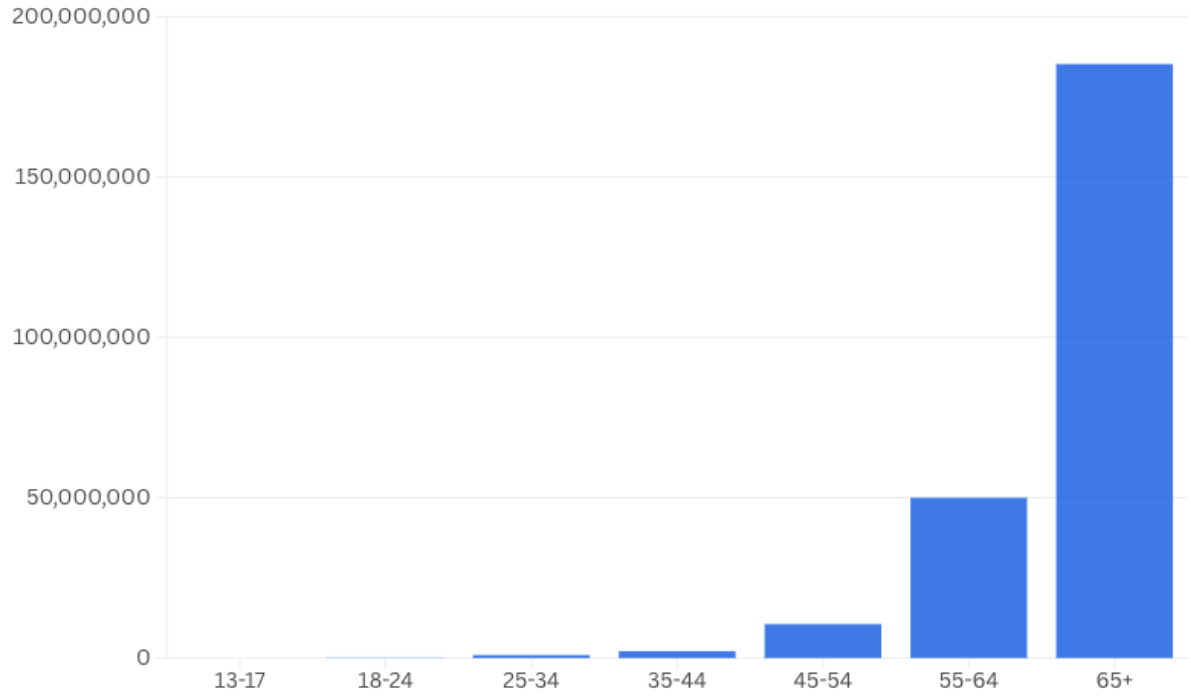
Meta made $14.3 million from Medicare scammers

Scammers have paid Meta an estimated total of $14.3 million for ads that typically encourage people to switch Medicare plans with the promise of 'free benefits' such as "grocery cards".[23]

Meta's income from these ads closely tracks the number of impressions they received. Accordingly, Meta received $12.4 million for ads run by Medicare scammers in the last year, equivalent to six times as much revenue as it received in all previous years.[24]

5 META HELPS MEDICARE SCAMMERS TARGET SENIORS

73% of ad impressions from top Medicare scammers were people over the age of 65



In the previous section, we find that scammers are increasingly turning to Meta to reach millions of users with Medicare scams.

One reason that scammers might find it particularly attractive to advertise on Meta's platforms is that it enables them to target seniors.

We find that Meta enables Medicare scammers to target the overwhelming majority of their ads at seniors, with 73% of impressions coming from users aged over 65.

In total, seniors aged over 65 viewed ads from Medicare scammers 185 million times on Meta's platforms.[25] An estimated 50 million were from users in the 55-64 age group.[26]

Meta's targeting tools allow advertisers to reach specified audiences based on criteria including age.[27] This can work in two ways: they can either set a minimum age "control" which means that ads will be restricted to a specific age group, or an "audience suggestion", which expresses a priority for a certain age group.[28]

This analysis suggests that Meta is allowing scam advertisers to use its powerful targeting tools. In doing so, the platform is enabling scammers to reach a vast audience of seniors, a group that is particularly vulnerable to scams.[29]

In addition to age, Meta's Ad Library also shows the geographic regions of those who are being reached by the ads. This analysis shows that the most targeted states are Texas, Florida, North Carolina and Pennsylvania – all of which have large populations who are eligible for Medicare.[30]

A full breakdown of our data by state is available in **Appendix: Data by State**.

6 META FAILS TO ACT ON MEDICARE SCAMS

In the previous sections, we find that Meta is increasingly helping Medicare scams reach seniors through paid ads and profiting in the process.

This raises the question of how Meta has become an attractive platform for Medicare scammers despite Meta promising to review ads and prevent scams from running.[31]

Meta's Ad Library notes when an ad in our dataset was approved but then later removed for violating its policies, allowing analysis of enforcement against ads and advertisers.

This analysis indicates that Meta is failing to enforce its policies in four key respects:

- Meta fails to act on ads before they amass impressions and ad spend
- Meta fails to act on content it already found to be violative
- Meta fails to act on scammers repeatedly violating its policies
- Meta approves ads for Medicare scams

6.1 Meta fails to act on ads before they amass impressions and ad spend

Even in cases where Meta removed ads, it often did so too slowly, allowing ads that violate policies to accumulate impressions and ad spend before taking action.

Removed ads in our dataset accumulated a total of 72 million impressions before they were removed by Meta, and earned the platform $3.7 million in revenue, introducing a perverse incentive for late enforcement.[32]

6.2 Meta fails to act on content it already found to be violative

Meta will sometimes take action against one scam ad but fail to take action against others containing similar or identical content. In one case, researchers found that of 86 ads with identical content, Meta had rejected 48 while allowing 38 to run.[33]

6.3 Meta fails to act on scammers repeatedly violating its policies

Meta allows scammers to continue advertising even after their ads are found to violate Meta's policies in tens or hundreds of cases.

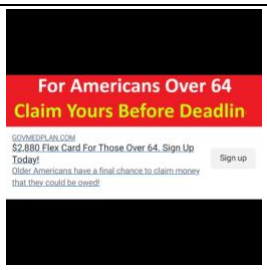
One scam advertiser using a Facebook Page named "Golden Help For All" had 1,335 removed by Meta for violating its policies before the Page became inactive. [34]

On average scammers we studied had 151 ads removed by Meta for violating its policies. Just one advertiser had avoided having any of its ads removed.[35]

6.4 Meta approves ads for Medicare scams

While Meta took action against some scam ads, researchers found many examples where Meta had approved ads that use deceptive tactics in violation of its policies.[36]

The table below outlines examples of policy-violating ads that were approved by Meta.

	**1. Offering 'free benefits' that are fabricated or misleading** While benefits like "grocery cards" or "Flex cards" are genuine Medicare Advantage benefits that apply in certain scenarios, this tactic involves presenting them in a way where key details are misleading or entirely false. Examples include over-stating their value, saying that they can be spent on "anything", that they are available to everyone on Medicare, or presenting them as a government transfer like stimulus checks.[37] 🚫 Breaches Meta's policies banning "misleading schemes that promote free products or services".[38]
	**2. Falsely presenting the advertiser as a government entity** This tactic involves advertisers falsely presenting themselves as a government entity, including by using official-sounding domain names like "govmedplan.com" or by encouraging people to ring a phone number that is implied to be a Medicare or government call center.[39] 🚫 Breaches Meta's policies banning "falsely claiming to represent, or speak in the voice of, an established business or entity, in an attempt to scam or defraud".[40]
	**3. Falsely implying the endorsement of government officials** This tactic involves implying the benefits on offer have been endorsed by a politician by presenting the politician or government official as a supporter or creator of the benefit. Ads using this tactic often show the President signing a bill, implying that they've created a new benefit. Some use explicit statements like "Biden approves Flex Card".[41] 🚫 Breaches Meta's policy on using "the image of a famous person and misleading tactics in order to bait people into engaging with an ad".[42]
	**4. Using fake AI-generated endorsements** This tactic involves creating deepfake videos or deepfake voice impressions of famous individuals such as politicians or celebrities to create fake endorsements. Ads deploying this tactic often depicted politicians such as Joe Biden or Donald Trump to dupe users into engaging.[43] Others depicted celebrities such as Oprah Winfrey, Brad Pitt, Steve Harvey, Ellen DeGeneres or Dave Ramsey.[44] 🚫 Breaches Meta's policies on using "the image of a famous person and misleading tactics in order to bait people into engaging with an ad".[45]
	**5. Stating fabricated deadlines for enrollment** This tactic involves creating fake time pressure by fabricating a deadline after which 'free' benefits will no longer be available or by saying users must apply before funds run out. While Medicare Advantage plans do technically have specific enrollment periods, this tactic employs arbitrary deadlines, such as claiming viewers "have only 12 hours left" to enroll.[46] 🚫 Breaches Meta's policies banning "misleading schemes that promote free products or services".[47]

7 POLICY RECOMMENDATIONS

This report illustrates the troubling surge in Medicare Advantage scams on Meta's platforms, showing how inadequate action from social media platforms is enabling scams to exist at scale. The conclusion is clear: the current model of platform self-regulation is not working.

With platforms failing to act by themselves, policymakers must introduce reforms that help to protect internet users by creating genuine accountability for social media companies profiting from scams. We recommend the following interventions:

- Federal Reforms to Section 230
- The Federal SCAM Act
- State Legislation: Liability for Deceptive Acts, "Know Your Advertiser" Safeguards & Reporting Requirements

Federal Reforms to Section 230

Social media platforms such as Meta's Facebook and Instagram have become hotbeds for online scams and deceptive advertisements. Their advertising systems enable unscrupulous businesses and criminal networks to reach individuals at massive scale, including seniors who are targeted by misleading Medicare Advantage ads. The Federal Trade Commission reported in 2026 that 30% of people who reported losing money to scam said it started on a social media platform.[48] Yet despite Meta's role in selling, distributing, and profiting from these commercial advertisements, platforms have largely avoided accountability by relying on overly broad protections afforded by Section 230 of the Communications Decency Act.

The courts have opened certain doors for liability and regulation, particularly where a platform materially contributes to unlawful conduct. These developments provide a pathway for state lawmakers to pursue targeted legislation that address platform-enabled fraud and misleading acts.[49] However, the damaging effects of Section 230's overly broad liability shield are still felt nationwide.

Section 230 was originally enacted to encourage internet companies to act as "Good Samaritans" by moderating illegal and objectionable material on their platforms in exchange for limited immunity from liability. Today, courts have stretched that immunity far beyond its intended scope, allowing platforms to avoid accountability even as deceptive and misleading advertisements surge on their systems.

In *Calise v. Meta* (2024), the Ninth Circuit sided with Meta in a case brought by victims of allegedly fraudulent ads, holding that their state-law claims—unjust enrichment, negligence, and unfair competition—were all barred by Section 230, despite allegations that Meta facilitated the targeting and dissemination of deceptive advertisements using user data,

had actual or constructive knowledge of their unlawful nature, and profited from their distribution.[50] The *Calise* decision is part of a broader trend of judicial interpretations that have expanded Section 230 well beyond its intended scope and restricted states' authority to protect their residents from scams and deceptive practices.

There are a number of targeted reforms that could increase platform accountability and reduce the costs of scams and deceptive advertising for internet users. First, Congress could clarify the role of "distributor" liability under Section 230, allowing claims to proceed where platforms have actual or constructive knowledge of unlawful content. Second, lawmakers could establish a "deliberate indifference to harm" standard to address scenarios in which platforms disregard clear risks or the known presence of deceptive or fraudulent advertising. Third, Congress could establish a distinct liability framework that is not bound to Section 230, granting regulatory authority with a federal agency and requiring platforms to take reasonable steps to detect, prevent, and remove deceptive or misleading commercial advertisements.

Specific Federal Proposal on Combatting Scams

With respect to the third proposal, the federal Safeguarding Consumers from Advertising Misconduct (the SCAM Act) creates one legislative pathway that explicitly is not limited by Section 230. In addition to requiring platforms to take reasonable steps to prevent scam and deceptive advertising, the SCAM Act also proposes a "Know Your Advertiser" framework, requiring verification of advertisers before they are allowed to run advertisements.

Importantly, liability under the SCAM Act would be tied to the commercial transaction of selling the advertisement, rather than the contents of the advertisement itself. Additionally, under this proposal, platforms would be required to remove advertisements found to violate its provisions following an investigation.

This legislation also empowers enforcement by the Federal Trade Commission and state attorneys general under unfair or deceptive practices laws. At present, Medicare Advantage advertising rules reveal a clear enforcement gap regarding social media platforms. To address misleading marketing, the Centers for Medicare & Medicaid Services (CMS) updated its 2025 rules to require pre-approval of television and social media ads, as well as certain educational content. However, compliance obligations fall on Medicare Advantage and Part D sponsors (insurance companies), along with agents, brokers, and Third-Party Marketing Organizations (TPMOs). Social media platforms themselves are not directly regulated under CMS marketing rules.

State Legislation: Liability for Deceptive Acts, "Know Your Advertiser" Safeguards & Reporting Requirements

Courts are increasingly signaling that Section 230 is less likely to apply where platforms play a meaningful role in enabling unlawful activity. As platforms continue to profit from harmful advertising while failing to prevent repeat abuse, state legislatures are stepping in to close this accountability gap.

The pending New York Fraudulent Social-Media Advertising Prevention Act represents a critical step toward holding platforms responsible for the harms facilitated through their advertising systems. The legislation would require platforms to:

1. Verify advertiser identities through "Know Your Advertiser" safeguards;
2. Review advertisements before they are published;
3. Promptly remove or disable fraudulent advertisements;
4. Maintain records of advertiser vetting and enforcement actions; and
5. Report fraudulent activity to state authorities.

Importantly, the Act also creates a private right of action under New York General Business Law § 349, empowering victims, not just the state Attorney General, to seek damages when they are harmed by deceptive acts in advertising on platforms.

The legislation defines fraudulent advertisements broadly to capture the full range of deceptive tactics currently proliferating online, including ads that:

- Materially mislead consumers about the nature, quality, price, or characteristics of a product or service;
- Promote counterfeit, non-existent, or illicit goods or services;
- Make false or unsubstantiated claims; or
- Direct users to phishing sites or other deceptive or fraudulent platforms.

Where platforms knowingly or negligently fail to meet these obligations, any injured party may seek actual damages, statutory damages, injunctive relief, and attorneys' fees.

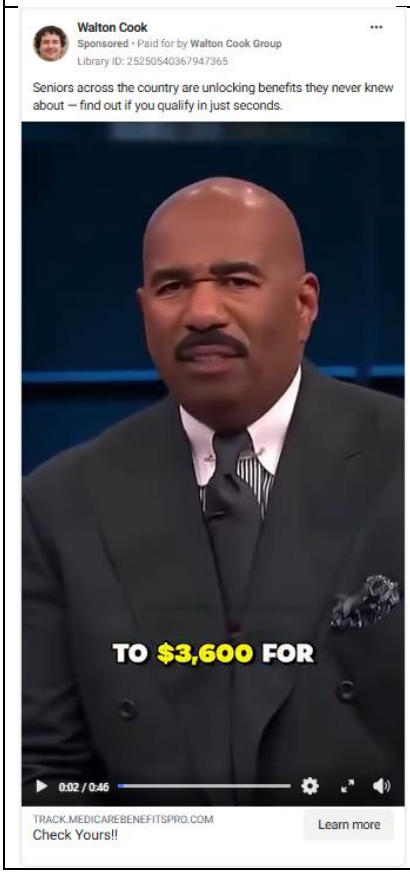
APPENDIX: EXAMPLE SCAM ADS

This appendix compiles examples of Medicare scams identified in the course of our research, noting the deceptive tactics employed in each ad.

Medicare scam ad	Transcript	Deceptive tactics
	"Are you out of your damn mind? If you're still not getting your Medicare allowance card, it's 2026 and you're still passing on $3,600. That's right there for the taking. Seriously, all you have to do is hit that link below and grab your $3,600 allowance card. That's it. I'm using mine to cover rent, food and gas. Just the basics. It's easy money, and you're just letting it slip by. If. If you're not interested in $3,600, fine. But if you're smart and want it, tap that link below and claim it now. Links down there. Don't be an idiot. Claim it now."[51]	✅ Offering 'free benefits' that fabricated or misleading ❌ Falsely presenting the advertiser as a government entity ❌ Falsely implying the endorsement of government officials ✅ Using fake AI-generated endorsements ❌ Stating fabricated deadlines for enrollment

	"To lift Americans on Medicare his first divine act gifts Medicare Americans a major new spending card with a massive benefit. Remember the stimulus checks? Well, there is a new thing like that going on right now for all Americans on Medicare. This is the largest benefit available in spending allowance cards that you can use to cover all your bills, groceries, and more. All this is to help Americans on Medicare in these difficult times. This bonus card allows you to get a massive benefit for groceries, rent, gas, or anything else. All you have to do is go to this site, answer two questions, register, and they will give you your spending allowance worth a lot within 3 minutes. Enrollment closes tonight, so this video may be taken down tonight. If it is, you will not be able to register for another 24 months and you will get your bonus card most likely in a week."[52]	✅ Offering 'free benefits' that fabricated or misleading ❌ Falsely presenting the advertiser as a government entity ✅ Falsely implying the endorsement of government officials ❌ Using fake AI-generated endorsements ✅ Stating fabricated deadlines for enrollment
	"Would $2880 help you pay for your everyday expenses like rent, groceries, and bills? Because of the economy, we just passed this legislation to get Medicare Flexible Spending Cards into the hand of American seniors over the age of 64. All you have to do is call our Medicare Help Centers to find out how you can claim your flex card. Do it now because the deadline is this Friday and the funds are limited."[53]	✅ Offering 'free benefits' that fabricated or misleading ✅ Falsely presenting the advertiser as a government entity ✅ Falsely implying the endorsement of government officials ✅ Using fake AI-generated endorsements ✅ Stating fabricated deadlines for enrollment

	"Hey folks, if you have to put up to $3600 for groceries in your pocket right now for free. So pay attention. The state is handing out these funds to every single one of you. You don't even need a job. It's all due to a program to help all Americans get back on their feet. They're sending out grocery allowance cards that get reloaded every single month with $3600. It covers your rent, groceries, and any other bills you have. But here's the case, you only have until this Friday before they stop sending out these cards. I put a link below for everyone, answer a simple question and get on a call with an agent who will get your card rushed out to you. Two days later, your card will be in your hands, loaded with up to $3600, ready to spend. Tap the link below and get the money you deserve before it's gone."[54]	✅ Offering 'free benefits' that fabricated or misleading ❌ Falsely presenting the advertiser as a government entity ✅ Falsely implying the endorsement of government officials ✅ Using fake AI-generated endorsements ✅ Stating fabricated deadlines for enrollment
	"Whoa what's happening. Why is everyone running into Costco. They just loaded our grocery benefits from Medicare gotta use it now. That's right. If you have Medicare part A and B you can get your groceries covered by Medicare. You can use it at your favorite grocery stores like Walmart, Cotsco and CVS. You can spend it on things like groceries, meds and more. If you miss out on claiming this, you will have to wait another 12 months before reapplying. Requesting your card is simple and free to check. Just click on the button down below, answer two simple questions. Once qualified you will receive your card at home in a few days and can be used right away. Tap below now." [55]	✅ Offering 'free benefits' that fabricated or misleading ❌ Falsely presenting the advertiser as a government entity ❌ Falsely implying the endorsement of government officials ❌ Using fake AI-generated endorsements ❌ Stating fabricated deadlines for enrolment

	"Everyone is getting extra monthly increase on check. Your social security increase will not be automatically sent to you unless you call before its too late. It's so important that you guys check if you can get your increase on your social security check because it can be used on whatever you want. I called last week and I got the full monthly increase. As you're on Medicare, you can qualify for the social security increase. Tap below now!"[56]	✅ Offering 'free benefits' that fabricated or misleading ❌ Falsely presenting the advertiser as a government entity ❌ Falsely implying the endorsement of government officials ❌ Using fake AI-generated endorsements ❌ Stating fabricated deadlines for enrolment
	"If you have put up to $3600 for groceries in your pockets right now for free so pay attention. The state is handing out these funds to every single one of you, you don't even need a job. Its all due to a program to help all Americans get back on their feet. They're sending out grocery allowance cards to get reloaded every single month with three thousand six hundred dollars. It covers your rent, groceries, and any other bills you have. But here's the case, you only have until this Friday before they stop sending out these cards. I put a link below for everyone, answer a simple question and get on a call with an agent who will get your card rushed out to you. Two days later your card will be in your hands loaded with up to three thousand six hundred dollars ready to spend. Tap the link below and get the money you deserve before its gone." [57]	✅ Offering 'free benefits' that fabricated or misleading ❌ Falsely presenting the advertiser as a government entity ❌ Falsely implying the endorsement of government officials ✅ Using fake AI-generated endorsements ✅ Stating fabricated deadlines for enrolment

	"Congress just approved the biggest senior food benefit in American history. This is not a scam. The health allowance card is available for those on Medicare, this card can be worth thousands of dollars a year that can be used at your favorite supermarket for grocery shopping. Icalif you don't apply in time, you will have to wait another 12 months to get it. Requesting it is very simple. Just click on the video, answer three simple questions, and the card will arrive at your home in a few days. It does not interfere with your existing benefits, and you will never have to pay it back. Just tap the button below and follow the instructions" [58]	✅ Offering 'free benefits' that fabricated or misleading ❌ Falsely presenting the advertiser as a government entity ✅ Falsely implying the endorsement of government officials ❌ Using fake AI-generated endorsements ❌ Stating fabricated deadlines for enrolment

APPENDIX: DATA BY STATE

This appendix breaks down our headline ad spend and impressions by state, including the number of impressions that came from users aged above 55.[59]

The table draws on our dataset of ads containing keywords associated with 'free benefit' Medicare scams placed by the top 30 Medicare scammers we identified. All data originates from Meta's publicly accessible Ad Library.

Figures shown in the table should be seen as estimates as they rely on certain assumptions about the data. More detail on our methodology is available in **Appendix: Methodology** below.

State	Spend ($)	Impressions		
		Total	55-64	65+
Texas	1,568,866	28,270,774	5,572,409	21,098,517
Florida	1,207,431	21,722,203	3,698,937	16,982,633
North Carolina	815,531	14,587,929	2,997,230	10,770,503
Pennsylvania	814,490	14,380,431	2,957,640	10,596,634
Ohio	769,324	13,698,745	2,862,915	10,058,883
Georgia	659,039	11,947,032	2,266,338	9,140,066
Illinois	635,412	11,086,964	2,280,365	8,149,506
Tennessee	592,590	10,642,469	2,228,941	7,820,191
Michigan	605,047	10,741,310	2,229,139	7,904,850
Alabama	515,698	9,213,562	1,947,883	6,752,946
Virginia	503,671	9,080,521	1,762,601	6,809,828
Kentucky	477,888	8,695,694	1,776,506	6,440,837
Louisiana	459,647	8,284,444	1,755,097	6,063,770
Missouri	437,196	7,700,582	1,614,907	5,657,722
Indiana	412,784	7,493,581	1,444,049	5,657,395
South Carolina	393,155	7,070,299	1,310,781	5,425,594
Mississippi	340,888	6,165,333	1,344,218	4,458,640
Arizona	315,743	5,627,197	989,194	4,355,758
Arkansas	273,937	4,911,316	1,032,322	3,608,634
Oklahoma	272,555	4,666,504	897,937	3,532,199
New York	228,840	4,949,461	735,983	4,008,107
New Jersey	200,250	3,516,491	717,291	2,634,391
Nevada	184,411	3,309,624	662,230	2,424,964
Iowa	179,031	3,059,250	614,450	2,281,062
West Virginia	163,331	2,984,923	641,221	2,166,730
Kansas	151,788	2,622,550	506,263	1,974,171

Colorado	154,354	2,629,273	491,841	1,992,494
Nebraska	88,800	1,508,799	296,386	1,130,330
California	79,205	1,348,063	272,314	1,020,253
Wisconsin	51,319	866,734	324,448	439,173
Montana	51,909	888,703	157,710	690,294
Washington	48,096	826,250	241,274	502,862
Massachusetts	41,830	714,872	216,282	411,505
Oregon	37,175	554,422	230,877	250,817
Connecticut	25,175	461,163	124,898	290,524
New Mexico	30,954	512,242	155,206	315,604
Maryland	23,947	435,988	180,497	222,014
Minnesota	21,637	322,905	79,795	205,711
Delaware	13,046	237,200	76,175	139,876
Maine	9,352	192,437	30,907	150,810
Utah	9,471	177,767	52,872	98,805
Idaho	9,705	161,018	56,966	80,662
Washington, DC	7,746	154,816	32,159	107,040
South Dakota	6,643	110,241	38,764	58,814
Rhode Island	5,935	105,886	26,824	66,467
New Hampshire	5,109	102,744	17,633	76,589
Hawaii	3,725	73,436	7,440	65,166
North Dakota	3,912	67,260	17,763	41,771
Alaska	3,443	65,012	10,495	47,239
Vermont	2,153	39,618	6,211	29,048
Wyoming	1,582	30,387	4,991	21,564
Unknown	404,542	4,082,584	168	970
TOTAL	**14,319,308**	**253,099,009**	**49,997,740**	**185,230,933**

APPENDIX: METHODOLOGY

This appendix sets out our methodology in more detail, including how ads were collected, which ads were categorized as Medicare scams, and how we analyzed ad spend and impressions.

How we defined 'Medicare scams'

We defined Medicare scams as ads that offered 'free' benefits to Medicare beneficiaries and used at least one out of a list of tactics that breached Meta's own Advertiser Standards on Fraud, Scams, and Deceptive Practices.[60]

Meta's Advertiser Standards on Fraud, Scams, and Deceptive Practices are made up of two separate policies: Meta's Unacceptable Business Practices and Meta's general policies against Frauds, Scams, and Deceptive Practices.[61]

To compile the list of tactics, we drew on guidance from research and organizations including the Federal Trade Commission (FTC), Centers for Medicare & Medicaid Services (CMS), the AARP, and fact checkers.

The table below summarizes each scam tactic, detailing the specific part of Meta's policies that it breaches, and provides additional context from these organizations.

Scam Tactic	Meta Policy	Additional context
Offering 'free benefits' that are fabricated or misleading	Meta prohibits "misleading schemes that promote free products or services".[62]	Federal regulation set by CMS prohibits Medicare Advantage organizations from providing "information that is inaccurate or misleading".[63] AARP and multiple fact checkers have reported on "Medicare flex card" scams.[64]
Falsely presenting the advertiser as a government entity	Meta prohibits "falsely claiming to represent, or speak in the voice of, an established business or entity, in an attempt to scam or defraud."[65] Separately, Meta prohibits promising "financial benefits by misrepresenting an entity, industry association or news outlet to mislead people or ask them to share sensitive information".[66]	The FTC issued a rule to prohibit posing as "a government entity or officer thereof".[67]

Falsely implying the endorsement of government officials	Meta prohibits using "the image of a famous person and misleading tactics in order to bait people into engaging with an ad".[68]	The FTC issued a rule to prohibit claiming "affiliation with, including endorsement or sponsorship by" a government entity.[69] AARP published a recent article on the rise of AI scams targeting older adults.[70]
Using fake AI-generated endorsements from politicians or celebrities		
Stating fabricated deadlines for enrollment	Meta prohibits "misleading schemes that promote free products or services".[71] Separately, Meta states it removes content that "purposefully employs deceptive means".[72]	In a consumer alert, the FTC warned against companies setting their own deadlines for enrollment outside the December 7th deadline.[73]

How we identified the top 30 'Medicare scammers'

To identify top Medicare scammers, we used Meta's Ad Library to collect a dataset of relevant ads. Meta's Ad Library maintains a record of all ads going back seven years that are classed as being about social issues, elections, or politics.[74]

Using the Meta API, we searched the Ad Library for all available ads in this category that contained at least one out of a list of keywords associated with 'free benefit' Medicare scams up to the date of data collection. This search produced a dataset of 93,779 potential scam ads across 2,908 advertisers dating from March 27, 2019 to March 11, 2026. The full list of keywords is below.

Flex card | Food card | Grocery Card | Grocery Allowance | Spending Benefit Card | Monthly Spending Allowance| Healthy Grocery Allowance Card

To get our list of the top 30 Medicare scammers, researchers manually reviewed ads from the highest spending advertisers out of this dataset. This enabled us to identify the biggest advertisers out of the set that were actually running scam ads.

We focused on the top advertisers by ad spend and flagged them as Medicare scammers when at least half of the top 20 ads by ad spend met our definition of a Medicare scam. Ads were only categorized as scams where at least two researchers had agreed that they met our definition of a 'Medicare scam'.

A small minority of ads presented issues with the ads or ad media failing to load. In these cases, we categorized ads as scams if it was possible to do so based on what was visible and skipped those where it wasn't possible to make a judgement.

In total, we checked 45 advertisers that together made up 77% of all ad spend in our dataset. Out of the 45, there were 15 that did not meet the threshold of 'Medicare scammer', leaving us with a final list of 30. These advertisers had a combined total of 42,984 ads in the dataset of ads matching 'free benefit' keywords.

Data analysis took place from March 11, 2026 to April 21, 2026.

How we analyzed ad spend and impressions by 'Medicare scammers'

This analysis is based on the dataset of 42,984 ads, which comprises all ads from the top 30 Medicare scammers that mentioned at least one of the list of keywords associated with 'free benefit' Medicare scams.

For each ad, Meta's Ad Library provides upper and lower estimates for spend and impressions. For this analysis, we took the midpoint between the upper and lower estimates in each case. This means that figures are estimated rather than exact.

To analyze spend and impressions over time, we divided this mid-point estimate for each ad's total spend and impressions across the number of days it was active to calculate daily spend and daily impressions. For ads that were still active at the time of data capture, we treated the end date as the date of capture, March 11, 2026.

Using these estimates of daily spend and impressions per ad, we were able to estimate total spend and impressions over time across relevant ads from all the 30 Medicare scammers combined.

The over-time analysis focuses on the scale of ad spend and impressions in the last year compared to previous years, where the last year is defined as the full year up to the most recent day in our dataset – from March 12, 2025, through March 11, 2026, inclusive.

How we analyzed impressions across age groups

To analyze impressions across age groups reached by Medicare scammers, we combined the age breakdown provided by Meta's Ad Library across our dataset of their ads. Meta's Ad Library states that demographic data is based on information that users provide in their profiles and that they are estimations.[75]

Given that impressions are provided by Meta as an upper and lower estimate for each ad, we took the midpoint of these figures for this analysis. For two ads in our dataset, there was no upper estimate for impressions. In these cases, the upper and lower estimates were assumed to be the same.

Using these age-group impression estimates, we were able to estimate how many seniors viewed the 42,984 ads in our dataset from the 30 advertisers, and what share of total views they accounted for.

A small subset of our dataset lacked any age level distribution data from Meta, while others included only partial data. Together, these accounted for 1.6% of total impressions.

How we analyzed spend and impressions across states

To analyze ad spend and impressions from Medicare scammers by state, we used the location distribution data provided by Meta's Ad Library for each ad. For each ad, this is provided as a percentage breakdown across states.

We estimate ad spend per state by multiplying these location percentages by our midpoint estimate of that ad's total spend. For example, if an ad's spend midpoint is $10,000 and Meta's data showed 20% of its reach was in Florida, we attributed $2,000 of that ad's spend to Florida. We applied the same approach to impressions, using the midpoint of Meta's upper and lower impression estimate, to calculate impressions per state.

To further break down impressions by age within each state, we used the separate age distribution data Meta provides for each ad. For each ad, this distribution is given as a percentage breakdown across age ranges. We applied these age percentages to each state's impression figure to estimate how many impressions in each state were seen by viewers in each age group. This approach assumes the age profile of viewers was consistent across states where a given ad ran.

A small subset of ads in our dataset lacked either state or age level distribution data from Meta, while others included only partial data. Together, these accounted for just 1.6% of total impressions across all scam advertisers and are reported as "Unknown" in the table in the Appendix: Data by State.

How we analyzed Meta's enforcement of scam ads

To analyze Meta's enforcement actions against Medicare scams, we relied on notices in the Meta Ad Library attached to removed ads stating that: "This content was removed because it didn't follow our Advertising Standards". Across the 30 Medicare scammers, a total of 4,526 ads held this notice.

We used this dataset to estimate the total ad spend and impressions across all removed ads. Since Meta provides upper and lower estimates for ad spend and impressions, we calculated these values using the midpoint of each range. This analysis covered all enforcement action recorded up to March 11, 2026, when data collection took place.

Limitations

One limitation of this study is that our analysis was restricted to ads listed in Meta's Ad Library, and, outside the EU, the Ad Library only retains records of ads flagged by Meta's review system as concerning "social issues, elections or politics".[76]

Meta says social issue ads include ads that seek to influence public opinion through discussion, debate or advocacy on important topics such as health.[77] In principle, Medicare scam ads fall into this category since they focus on health and public benefits.

The fact we were able to collect a large dataset of ads from Medicare scammers suggests that this is indeed how Meta has interpreted these ads. However, any ads posted by scammers that were not classified in this way would have been excluded from our analysis.

We are unable to verify the extent to which additional ads of this nature have run during the period studied without being captured by this category, nor can we confirm if this definition has been applied consistently over time.

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[10] More detail on this finding can be found in section 4: Meta is helping Medicare scams reach more users.

[11] More detail on this finding can be found in section 4: "Meta is helping Medicare scams reach more users".

[12] More detail on this finding can be found in section 5: Meta helps Medicare scammers target seniors

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Published May 2026
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