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Articles + Publications | September 11, 2025

Troutman Pepper Locke State Attorneys General Monitor – September 11, 2025

WRITTEN BY

Ashley L. Taylor, Jr. | Clayton S. Friedman

State attorneys general increasingly impact businesses in all industries. Our nationally recognized state AG team has been trusted by clients for more than 20 years to navigate their most complicated state AG investigations and enforcement actions.

State Attorneys General Monitor analyzes regulatory actions by state AGs and other state administrative agencies throughout the nation. Contributors to this newsletter and related blog include attorneys experienced in regulatory enforcement, litigation, and compliance. Also visit our State Attorneys General Monitor microsite.

Contact our State AG Team at StateAG@troutman.com.

Troutman Pepper Locke Spotlight

EFFECTIVE STRATEGIES FOR MANAGING CYBERSECURITY BREACHES: HOW TO NAVIGATE STATE AG INVESTIGATIONS AND FEDERAL AGENCY ACTIONS

By Troutman Pepper Locke State Attorneys General Team

Register Here

Thursday, September 25 • 1:00 – 3:10 p.m. ET

Stephen Piepgrass and Sadia Mirza, co-leaders of Troutman Pepper Locke's Incidents + Investigations practice, along with Privacy + Cyber Partner Timothy St. George, will participate in an upcoming CLE with myLawCLE to examine the nuances of navigating cybersecurity breaches.

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Podcast Updates

SOLICITORS GENERAL INSIGHTS: THE ART OF ORAL ADVOCACY WITH MICHIGAN AND NEW JERSEY

By Stephen C. Piepgrass and Jeff Johnson

In this episode of our special *Regulatory Oversight: Solicitors General Insights* series, RISE Counsel Jeff Johnson, a former deputy solicitor general in the Missouri Attorney General's office, welcomes Michigan Solicitor General Ann Sherman and New Jersey Solicitor General Jeremy Feigenbaum. They explore the art of oral advocacy,

sharing insights into how they effectively present cases. The conversation also addresses state sovereignty, emphasizing the importance of allowing states to experiment with policies and the impact of bipartisan issues, particularly those that resonate most effectively in front of SCOTUS.

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State AG News

FTC AND UTAH SETTLE UDAP CLAIMS AGAINST ONLINE ADULT CONTENT PROVIDER

By Troutman Pepper Locke State Attorneys General Team and Dascher Pasco

The Federal Trade Commission (FTC) and the Utah Department of Commerce's Division of Consumer Protection (Division), represented by the Office of the Utah Attorney General (AG), recently announced a proposed consent order with Aylo, the company that owns and operates pornography websites, including Pornhub.com and Redtube.com. The proposed consent order includes the implementation of a compliance program and a \$5 million penalty.

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WHAT BUSINESSES NEED TO KNOW: COLORADO'S FIRST-IN-THE-NATION AI ACT DIVERGES FROM FEDERAL APPROACH TO DISPARATE IMPACT

By Troutman Pepper Locke State Attorneys General Team

What Happened

Last week, Colorado lawmakers held a special session that culminated in a decision to delay the implementation of the Colorado Artificial Intelligence Act (CAIA) until June 30, 2026, extending the timeline beyond its original February 2026 start date. That delay gives businesses a brief window to prepare, but the law remains in effect, requiring companies to build governance programs and perform regular impact assessments of high-risk AI systems.

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AG of the Week

CHRIS CARR, GEORGIA

Chris Carr has served as Georgia's attorney general (AG) since 2016, initially appointed by Governor Nathan Deal and subsequently elected to full terms in 2018 and 2022. As AG, Carr has prioritized combating opioid misuse, gang violence, human trafficking, elder abuse, and consumer fraud. He established the Statewide Opioid Task Force, which includes more than 400 members, and the Georgia Anti-Gang Network, focused on strengthening multijurisdictional investigations and prosecutions. In 2019, Carr created Georgia's first Human Trafficking Prosecution Unit, which works with statewide partners to address trafficking and support victims. He also developed the Georgia Consumer Protection Guide for Older Adults to help prevent scams and exploitation.

Carr's public service includes membership on Georgia's Judicial Nominating Commission from 2011 to 2018 and the Executive Committee for the Georgia Older Adults Cabinet from 2016 to 2018. He is active in the National Association of Attorneys General, serving on committees related to human trafficking, substance abuse, and elder abuse.

Before his tenure as AG, Carr was commissioner of the Georgia Department of Economic Development from 2013 to 2016, where he led efforts in business recruitment, retention, international trade, tourism, and the arts. During his leadership, Georgia was recognized as the top state for business for three consecutive years, and the department facilitated more than 1,000 projects representing \$14.4 billion in investment and the creation of more than 84,000 jobs. Carr also served as chief of staff for U.S. Senator Johnny Isakson, advising on federal legislation and judicial nominations.

Carr began his career with Georgia-Pacific, practiced law with Alston & Bird LLP in Atlanta, and served as vice president and general counsel for the Georgia Public Policy Foundation. He holds degrees from the University of Georgia's Terry College of Business and Lumpkin School of Law. On November 21, 2024, Carr announced his candidacy for governor of Georgia in the 2026 election.

Georgia AG in the News:

- Carr released a statement supporting the Federal Communications Commission's (FCC) efforts to combat contraband cellphones in prisons.
- Carr announced the indictment of a suspect in connection with two shootings that occurred at Albany State University in October 2024.

Upcoming AG Events

- September: RAGA | Fall National Meeting | Miami, FL
- September: DAGA | Denver Policy Conference | Denver, CO
- October: AGA | Anti-Human Trafficking Summit | Oxford, MS

For more on upcoming AG Events, click here.

Troutman Pepper Locke's State Attorneys General team combines legal acumen and government experience to develop comprehensive, thoughtful strategies for clients. Our attorneys handle individual and multistate AG investigations, proactive counseling and litigation, and manage ancillary regulatory issues. Our successful approach has been recognized by *Chambers USA*, which ranked our practice as a leader in the industry.

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