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IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT IN AND FOR SEMINOLE COUNTY, FLORIDA

OFFICE OF THE ATTORNEY GENERAL,
STATE OF FLORIDA,
DEPARTMENT OF LEGAL AFFAIRS,

Plaintiff,

v. Case No. [_____]

THE LEAPFROG GROUP and
LEAH BINDER,

Defendants.
_____/

COMPLAINT FOR INJUNCTIVE RELIEF, CIVIL PENALTIES, AND OTHER STATUTORY RELIEF

1. The Leapfrog Group assigns bogus "safety grades" to Florida hospitals to coerce them into supplying data for Leapfrog's business. Leapfrog prominently displays these grades on its website—www.hospitalsafetygrade.org—and touts them as accurate measures of hospital safety and quality of care. Leapfrog claims its grading process is "trusted, transparent and evidence-based," and that it "uses a public, peer-reviewed methodology calculated by top patient safety experts under the guidance of a National Expert Panel." But in fact Leapfrog's methodology was not peer reviewed and grades for certain hospitals have been based on nonexistent data. These antics have caused devastating harm to Florida patients and hospitals.

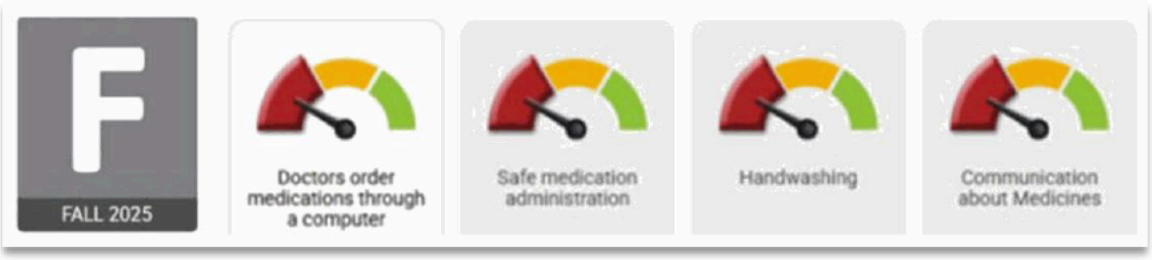
2. In one reported instance, a patient refused surgery at a Florida hospital because she was afraid she was going to die at that hospital after seeing the hospital's low rating from Leapfrog, even though that hospital's publicly reported outcomes were 16 percent better than the national average.

3. In another case, a man was admitted to a Florida hospital for urgent surgery with a compound fracture of a finger, carrying risks of serious complications. He refused treatment despite that hospital having a dedicated hand surgery unit and despite warnings from the physician and nursing staff that he risked serious infection. The hospital record shows that he wanted to go to a different hospital "due to the leap frog reviews" and that the "[p]atient's daughter did not want their father to have surgery in [this hospital] due to the Leapfrog reviews that they read online."

4. At a third hospital, a patient refused heart surgery after seeing the hospital's "failing grade" from Leapfrog.

5. Many more examples exist of patients refusing care or taking on additional risks and expenses to seek treatment at a facility with a higher Leapfrog rating. In fact, Leapfrog actively promotes the importance of its grades in choosing health care facilities, in one instance by highlighting the story of a patient who drove 400 miles past closer hospitals to reach one with an "A." Leapfrog tells consumers "[p]atients should always decide on where to receive care based on a hospital's current Safety Grade" and invokes fear in consumers by representing that they are "twice as likely to die of a preventable problem at a C, D, or F hospital than at an A hospital."

6. Leapfrog is a national nonprofit that says its mission is to advance hospital safety, quality and affordability in U.S. health care. Twice a year, Leapfrog publishes safety grades for hospitals throughout Florida. Every hospital is assigned a letter grade that Leapfrog touts as "the first tool patients should use to select a hospital." Leapfrog uses data collected from hospital surveys as well as other publicly available sources to calculate the letter grade for each hospital. When a hospital has not provided survey data, Leapfrog uses alternative methods for scoring, including assigning the lowest score possible on safety and quality measures for which Leapfrog has no data at all. At least seven Florida hospitals were graded this way. Three received an "F."



[1]

7. Leapfrog earns revenue for the data it collects. Its largest source of revenue comes from "accolade" licenses it sells to hospitals to allow the hospital to use and advertise the grade from Leapfrog. An accolade license lets the hospital post its grade onsite and online, such as in the badge shown on the next page, to attract patients and providers.

[1] *Good Samaritan Med. Ctr., Inc. v. Leapfrog Grp.*, No. 9:25-cv-80526-DMM, slip op. at 11 (S.D. Fla. Mar. 6, 2026), ECF No. 212 (the "Order") (reproducing a hospital's Fall 2025 grade page).



[2]

8. Leapfrog also sells its data and grades to health plans and insurers, collects dues from healthcare industry companies that join its Partners Advisory Committee, and sells sponsorships of its annual meeting.

9. Leapfrog's acts and practices of punishing hospitals that do not participate in its survey with low grades based on nonexistent data and rewarding those that do participate with higher grades, and then misrepresenting to consumers that its grading system is "evidence-based" and a transparent and reliable process that should be used by consumers to make informed healthcare decisions, are unfair and deceptive in violation of Florida law.

PARTIES

10. Plaintiff, Office of the Attorney General, State of Florida, Department of Legal Affairs (the "Attorney General"), is an enforcing authority of the Florida Deceptive and Unfair Trade Practices Act, Chapter 501, Part II, Florida Statutes ("FDUTPA"), as defined in section 501.203(2), Florida Statutes, and is authorized to bring this action seeking injunctive, and other statutory and equitable relief,

[2] AdventHealth Altamonte Springs, *The Leapfrog Group Hospital Safety Grade "A,"* https://www.adventhealth.com/locations/hospitals/altamonte-springs (last visited Nov. 19, 2026) (Leapfrog accolade badge displayed on the hospital's website).

including disgorgement, restitution, reimbursement, contributions, and civil penalties, under FDUTPA.

11. Defendant Leapfrog is a District of Columbia not-for-profit corporation, established November 30, 2001, that grades hospitals nationwide and throughout Florida. Leapfrog is recognized under section 501(c)(3) of the Internal Revenue Code and was registered with the Florida Department of Agriculture and Consumer Services ("Department") as a charitable organization under registration number CH60380 until the Department denied its renewal on January 2, 2025. Leapfrog was not registered as a charitable organization again until August 12, 2026. Its principal place of business is 1775 K Street NW, Suite 400, Washington, D.C.

12. Defendant Leah Binder is Leapfrog's President and Chief Executive Officer and has held that position since 2008. At all material times, Defendant Binder managed Leapfrog's operations, approved its communications strategy, and participated in or possessed the authority to control the acts and practices alleged in this Complaint.

JURISDICTION AND VENUE

13. The Attorney General brings this action under FDUTPA and the Solicitation of Contributions Act, Chapter 496, Florida Statutes. Defendants have violated FDUTPA and are otherwise likely to violate it. § 501.207(1)(b), Fla. Stat.

14. The Attorney General has reviewed the matters alleged here and has determined that this enforcement action serves the public interest.

15. This Court has subject matter jurisdiction under section 501.207, Florida Statutes. The Attorney General seeks relief in an amount greater than Fifty Thousand Dollars ($50,000.00), exclusive of fees and costs.

16. This Court has personal jurisdiction over Leapfrog under sections 48.193(1)(a)2 and 48.193(2), Florida Statutes. Leapfrog committed a tortious act in Florida by violating FDUTPA and causing injury here. Leapfrog solicited Florida hospitals to participate in its data-collection surveys, published deceptive hospital grades to Florida consumers, and solicited contributions from Florida donors using deceptive solicitations without a valid registration. Leapfrog operated its business within Florida and purposefully directed this tortious conduct at Florida, and the exercise of jurisdiction comports with due process. Leapfrog graded 191 Florida hospitals in Fall 2024, 191 in Spring 2025, and 190 in Fall 2025. It shared grades with Florida press before each release.[3]

17. This Court also has personal jurisdiction over Leapfrog under section 48.193(1)(a)1, Florida Statutes, because Leapfrog operates, conducts, engages in, and carries on a business or business venture in Florida. Leapfrog conducts its accolade-licensing sales operation, its single largest source of revenue, from within Florida, through Tel-Affects, LLC ("Tel-Affects"), a Florida limited liability company

[3] Citations to "ECF No." are to the docket in *Good Samaritan Med. Ctr., Inc. v. Leapfrog Grp.*, No. 9:25-cv-80526-DMM (S.D. Fla.). "Order" refers to the court's March 6, 2026, Order in that case, ECF No. 212. "Tr." refers to the bench-trial transcript, ECF Nos. 204-1 to 204-5, cited by volume, page, and line. The admissions of Leapfrog's executives, employees, expert panelists, and retained experts quoted in this Complaint come from sworn testimony and exhibits in that case.

headquartered in Lake Mary, Seminole County, Florida. Tel-Affects serves as Leapfrog's outsourced sales force for accolade licensing. Leapfrog also solicits and collects survey data from Florida hospitals; licenses data and grades concerning Florida hospitals to health plans, insurers, and hospitals; sells accolade licenses to Florida hospitals; publishes and advertises hospital grades to Florida consumers; has run advertising keyed to the names of specific Florida hospitals; and solicits charitable contributions from persons throughout Florida—all as part of its ongoing course of business in this State.

18. This Court has personal jurisdiction over individual Defendant Leah Binder under sections 48.193(1)(a)1 and 48.193(1)(a)2, Florida Statutes. Defendant Binder personally directed the publication of deceptive hospital grades to Florida consumers, personally directed the statements Leapfrog used to describe its arbitrarily assigned scores, and personally directed internet advertisements targeting searches for specific Florida hospitals. She also personally executed the statements of work through which Leapfrog engaged Tel-Affects to conduct Leapfrog's accolade-licensing sales. Defendant Binder operated, conducted, and carried on Leapfrog's business or business venture in Florida through the acts she personally directed, including the publication of the challenged grades to Florida consumers, the advertising keyed to specific Florida hospitals, the engagement and direction of Leapfrog's Florida-based accolade-licensing sales contractor, and the solicitation of Florida donors. Defendant Binder committed these acts personally and for her own benefit.

19. Venue is proper in Seminole County because Leapfrog is a foreign corporation doing business in Florida that has an agent and representative in Seminole County, and because the causes of action alleged here accrued in Seminole County. Leapfrog conducts its accolade-licensing sales through its agent and representative, Tel-Affects, which solicits and sells accolade licenses on Leapfrog's behalf from its headquarters, located within Seminole County. Leapfrog also disseminated the deceptive grades throughout Central Florida through its designated Florida "regional leader," the Florida Alliance for Healthcare Value, headquartered in Winter Springs, Seminole County. The Florida Alliance for Healthcare Value circulated Leapfrog's grades to its Florida members and the public. Because Defendant Binder is a nonresident of Florida, venue for her is also proper in any county in this State.

20. Defendants committed the acts alleged in this Complaint within four years of its filing.

21. At all material times, Leapfrog engaged in "trade or commerce" as defined in section 501.203(8), Florida Statutes, including by soliciting hospital data through the Leapfrog Hospital Survey (the "Survey"); advertising, offering, and distributing hospital ratings and survey services in Florida; selling data licenses to health plans and insurers; selling accolade and logo licenses to hospitals; engaging and directing Florida-based sales contractor Tel-Affects to market and sell those accolade licenses on Leapfrog's behalf; offering group reporting services through the

federal National Healthcare Safety Network; and soliciting charitable contributions from persons throughout Florida.

22. Defendant Binder, as Leapfrog's President and Chief Executive Officer, directed and controlled that trade or commerce.

GENERAL ALLEGATIONS

I. LEAPFROG'S BUSINESS MODEL

A. Leapfrog Collects Survey Data and Grades Hospitals

23. Leapfrog is in the business of data, not patient safety. In 2024, it graded at least 3,130 hospitals. Once a year, it sends hospitals the Survey, a questionnaire that hospitals answer about themselves. Leapfrog verifies the answers on site at only four or five of the thousands of hospitals that respond.

24. Leapfrog's grades combine up to 22 measures. For seven of those, the only source is the Survey. For the other fifteen, Leapfrog uses, or can fall back on, data published for the Centers for Medicare and Medicaid Services ("CMS") and other sources. The CMS data often runs 18 months to 2 years behind.

B. Leapfrog's Success Depends on Hospital Survey Participation

25. The Survey is voluntary. A hospital that completes it is a "Participating Hospital"; a hospital that does not is a "Non-Participating Hospital." Leapfrog grades both. Before a hospital can submit the Survey, it must agree that Leapfrog may use its answers "in a commercial manner for profit."[4]

[4] Tr. vol. 3 at 54:9–19 (Binder).

26. Leapfrog's business depends on hospitals completing it for two reasons. *First*, Leapfrog sells the Survey data and the grades to health plans and insurers. Its buyers include, among others, Humana, which insures Floridians, and Humana's government business. Humana Military administers TRICARE benefits for servicemembers and military families in Florida.

27. *Second*, Leapfrog sells its "accolade licenses" for $6,700 to $29,900 a year—these let a hospital advertise its Leapfrog grade. Accolade licensing is Leapfrog's largest source of revenue. Leapfrog's own analysis found that hospitals that complete the Survey are 10 times more likely to buy an accolade license.

C. The Effect of Non-Participation

28. The Survey supplies 12 measures for evaluation. For a Non-Participating Hospital, Leapfrog substituted CMS data for five measures, dropped three, and assigned scores for the other four.

29. The four assigned scores are (1) Computerized Physician Order Entry, (2) Bar Code Medication Administration, (3) ICU Physician Staffing, and (4) Hand Hygiene (the "Four Measures"). For these measures, no substitute CMS data exists. Leapfrog admits that its model "assigns a value for a measure when it lacks any data pertaining to it."[5] Through Spring 2024, Leapfrog filled the gap with the hospital's own old data or the average of similar hospitals. That practice changed in Fall 2024 when Leapfrog adopted a new method that assigned the lowest score possible to measures that had no data available.

[5] Answer ¶¶ 22–23, ECF No. 75.

II. IN 2024, FACING A REVENUE SHORTFALL, LEAPFROG BEGAN GIVING NON-PARTICIPATING HOSPITALS THE LOWEST SCORES

30. By the spring of 2024, Leapfrog was worried about falling Survey participation. On April 12, 2024, minutes after Leapfrog's National Expert Panel (the "Expert Panel") met to discuss missing data, Leapfrog's program manager proposed a fix: assign hospitals that skipped the Survey "to the bottom performance category."[6]

31. Two weeks later, Leapfrog's financial adviser told Defendant Binder that Leapfrog was forecast to fall about $540,000 short. She replied: "Let's not lose focus on what managers should be thinking about 24/7 which is revenues."[7]

32. Defendant Binder adopted the proposal herself. She did not ask the Expert Panel to approve it, though Leapfrog later told consumers the change was "[i]n line with recommendations from the National Expert Panel."[8]

33. Binder understood what this methodology change would do. In June 2024, she told Leapfrog's board that the new method "dramatically lowers imputed scores for certain measures for hospitals that decline to report to the hospital survey."[9]

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[6] Tr. vol. 2 at 249:23–250:4, 268:19–270:25 (Campione) (April 12, 2024, messages in which the program manager proposed to "assign them [non-participating hospitals] to the bottom performance category" and her supervisor, a senior vice president, replied, "That would be drastic, but let's talk about it. LOL.").

[7] Tr. vol. 3 at 52:15–53:16 (Binder) (April 25, 2024, email exchange).

[8] The Leapfrog Grp., Frequently Asked Questions About the Leapfrog Hospital Safety Grade 2 (Fall 2024), https://www.hospitalsafetygrade.org/media/file/Frequently-Asked-Questions-About-the-Leapfrog-Hospital-Safety-Grade_Fall-2024.pdf [https://web.archive.org/web/20250725062836/https://www.hospitalsafetygrade.org/media/file/Frequently-Asked-Questions-About-the-Leapfrog-Hospital-Safety-Grade_Fall-2024.pdf] (archived July 25, 2025) ("Fall 2024 FAQ").

[9] Tr. vol. 3 at 32:2–13 (Binder) (June 2024 report to Leapfrog's board).

34. In July, Binder asked the board committee that sets her pay to make organizational revenues a criterion for her bonus. Three days later, she called the lowest hand-hygiene score "a very big deal to hospitals and a major incentive to report to the survey."[10]

35. The change took effect with the Fall 2024 grades. Leapfrog gave Non-Participating Hospitals the lowest scores on the Four Measures without any information about how those hospitals actually performed.

36. The drops were dramatic. Good Samaritan Medical Center had scored 100 out of 100 on Hand Hygiene, based on data it reported. Under the new rule, Leapfrog gave it a 15.

37. Leapfrog knew the scores were arbitrary, and it chose to hide that from consumers. The program manager wrote at the time that Leapfrog was "arbitrarily assigning" the scores, and that Defendant Binder "wanted us to make it sound like the expert panel approved it and the assigning of these points was legitimate."[11]

38. Two Expert Panel members edited Leapfrog's draft public notice of the change to say that it was meant to encourage (coerce) hospitals to take the Survey. Defendant Binder took that language out, writing that "it's not necessary to get into

[10] Tr. vol. 3 at 58:23–59:21, 60:4–7 (Binder) (July 12, 2024, compensation memorandum); *id.* at 30:2–23, 31:2–4 (Binder) (July 15, 2024, email).

[11] Tr. vol. 2 at 250:16–251:9 (Campione) (emails in which the program manager wrote that Leapfrog "can't say" the scores came from external data "because we are arbitrarily assigning them the points associated with the bottom scoring category," and that Defendant Binder "wanted us to make it sound like the expert panel approved it and the assigning of these points was legitimate").

the why."[12] The footnote Leapfrog later put on its grade pages said only that "a score was assigned to reflect the lack of information available."[13]

39. Leapfrog was warned. An Expert Panel member wrote: "If you want to penalize nonparticipants then don't pretend you are imputing missing values in a statistically optimal way, just be honest about your goal."[14] A Humana commenter predicted that hospitals "will be falsely represented with a lower grade because they choose not to complete the survey."[15]

40. Leapfrog answered that "our analyses have shown" that hospitals that complete the Survey only intermittently perform worse. The program manager who wrote that answer had not seen any such analysis.[16]

41. Following the methodology change, Survey participation rose. It had been 64 percent in 2023; after the change it reached 79 percent, which Defendant Binder reported to the board as an all-time record. Accolade sales reached a record of more than $4 million in fiscal year 2025.

III. FALL 2024 THROUGH FALL 2025: WHAT LEAPFROG PUBLISHED TO FLORIDA CONSUMERS

A. Leapfrog's Assigned Scores Were Not Based on Data

42. Beginning with the Fall 2024 grades, every Non-Participating Hospital that had no Survey score from the two preceding grade cycles was assigned the lowest

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[12] Binder Dep. 157:17–158:16, ECF No. 88-87; Campione Dep. 323:12–16, ECF No. 88-88.

[13] Tr. vol. 2 at 248:6–10, 249:1–20 (Campione); *id.* at 21:1–4, 64:19–25 (Berger).

[14] Tr. vol. 2 at 153:19–154:4 (Romano).

[15] Tr. vol. 2 at 252:19–24, 255:5–7 (Campione).

[16] Tr. vol. 2 at 254:23–255:4, 256:8–257:2 (Campione).

score any Participating Hospital had received on each of the Four Measures: 15, 25, 5, and 15 points out of 100 (the "Lowest-Score Method"). Leapfrog also raised the combined weight of the Four Measures from 24 percent to 31 percent of a Non-Participating Hospital's grade. No Participating Hospital had received the lowest score on all Four Measures at once.

43. Leapfrog's assigned scores did not measure anything. They rested on what a Leapfrog senior vice president agreed was "the belief that those hospitals must be hiding something."[17] A member of the Expert Panel put it more plainly: "Its purpose is not accuracy."[18]

B. What Leapfrog Told Consumers Its Grades Were

44. Leapfrog tells the public on its website that its mission is to use "transparency to support informed health care decisions," and that it gives consumers "the lifesaving information they need to make informed decisions."[19]

45. While it was using the Lowest-Score Method, Leapfrog told consumers that the Hospital Safety Grade "is the first tool patients should use to select a hospital," and that patients are "twice as likely to die of a preventable problem at a

[17] Tr. vol. 3 at 225:14–226:21 (Danforth).

[18] Romano Dep. 142:17–22, 238:2–6, ECF No. 88-97.

[19] The Leapfrog Grp., *Mission and Vision*, https://www.leapfroggroup.org/about/mission-and-vision [https://perma.cc/W7CL-G5B6] (archived Nov. 19, 2026); The Leapfrog Grp., *About Us*, https://www.leapfroggroup.org/about [https://perma.cc/R4R3-FC54] (archived Nov. 19, 2026).

'C,' 'D,' or 'F' hospital." Leapfrog also told consumers the following about how the grades were made:[20]

(a) the grade "reflects how well a hospital does on safety, not whether they complete the Leapfrog Hospital Survey";[21]

(b) the grade "uses a public, peer-reviewed methodology";[22]

(c) the grade is "calculated by top patient safety experts under the guidance of a National Expert Panel";[23]

(d) "[h]ospitals missing more than six process measures" are "not graded";[24]

(e) Leapfrog "changed the way it estimates performance";[25]

(f) the assigned score "reflects analysis of actual performance of hospitals with prior missing data";[26] and

(g) "other sources of data are used to calculate a Grade."[27]

46. These statements were false or misleading as to every Non-Participating Hospital graded under the Lowest-Score Method. Each of those grades turned directly on whether the hospital had completed the Survey. For the Four Measures, the

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[20] Leapfrog's websites are https://www.leapfroggroup.org [https://perma.cc/WDV2-C62Q] and https://www.hospitalsafetygrade.org [https://perma.cc/3ZB4-EEPN] (both archived Nov. 19, 2026). Fall 2024 FAQ at 1–2; Tr. vol. 3 at 67:19–22, 69:13–70:5 (Binder).

[21] Fall 2024 FAQ at 1.

[22] Fall 2024 FAQ at 1.

[23] *Id.*

[24] Answer ¶ 25.

[25] Fall 2024 FAQ at 2.

[26] *Id.*

[27] *Id.* at 1.

grades rested on no evidence at all. And the statements that the methodology was "peer-reviewed" and calculated "under the guidance of a National Expert Panel" promised a level of scientific support that the Lowest-Score Method did not have. These scores were neither peer reviewed nor approved by the Expert Panel. To the contrary, the only peer-reviewed version of Leapfrog's method, published in 2013, said the grades would be calculated "with no penalties for missing data."[28]

47. Leapfrog's website states that if no data is available for six or more measures, the hospital will not receive a grade. However, in the 2024-2025 period, Leapfrog graded Non-Participating Hospitals that had at least seven missing measures: it dropped three of the measures from the grade and filled in the other four measures with its arbitrarily assigned scores and gave the hospitals a grade, despite this missing data. Defendant Binder changed Leapfrog's FAQs to reflect that the 15-point score "reflects analysis of actual performance of hospitals with prior missing data." But Leapfrog's consultant privately admitted "We don't have any empirical evidence."[29] And Leapfrog's corporate designee privately confessed that Leapfrog does not "actually know how nonparticipating hospitals are performing."[30]

C. How Leapfrog Displayed the Assigned Scores

48. A consumer looking up a hospital saw the letter grade first, at the top of the grade page and in Leapfrog's search results. Nothing near it said the grade was calculated with assigned scores. A consumer reasonably might look no further.

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[28] Order at 40.

[29] Bailey Dep. 220:14–221:22, ECF No. 88-85; Austin Dep. 193:14–20, ECF No. 88-84.

[30] Danforth Dep. 461:11–14, ECF No. 88-91.

49. A consumer who looked further saw the hospital's performance in pictures. Leapfrog showed each *assigned* score with the same "gas gauge" graphic it used for real data, with the needle in the red zone and a "worse than average" label. Every Non-Participating Hospital graded under the Lowest-Score Method had the same display.

50. For example, in Figure 1, the first three gauges on Gulf Breeze Hospital's Fall 2024 page show assigned scores. Leapfrog had no data for any of them:



[31]

Figure 1. Gulf Breeze Hospital grade page, Fall 2024, "Practices to Prevent Errors" gauges.

51. The sixth gauge in the same row is labeled "Declined to Report," with a question mark. Leapfrog used that label for other unreported measures, but not for the scores that Leapfrog arbitrarily assigned. Because Leapfrog used and defined the Declined to Report label in certain instances throughout its website, the absence of this label implied that other scores rested on reported data.

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[31] The Leapfrog Grp., *Hospital Safety Grade: Gulf Breeze Hospital*, https://www.hospitalsafetygrade.org/h/gulf-breeze-hospital [https://web.archive.org/web/20241208100352/https://www.hospitalsafetygrade.org/h/gulf-breeze-hospital] (archived Dec. 8, 2024) ("Practices to Prevent Errors" tab). Figures 2 and 3 are from the same capture.

52. Below the gauges, a box showed the details of each measure. For an assigned score, it printed the hospital's score beside the same number labeled "Worst Hospital's Score." For example, in Figure 2, Gulf Breeze's score is 15, the same as the "worst" hospital's score. In this instance, on a measure for which Leapfrog had no data, it told the public the hospital matched the absolute worst in the country.

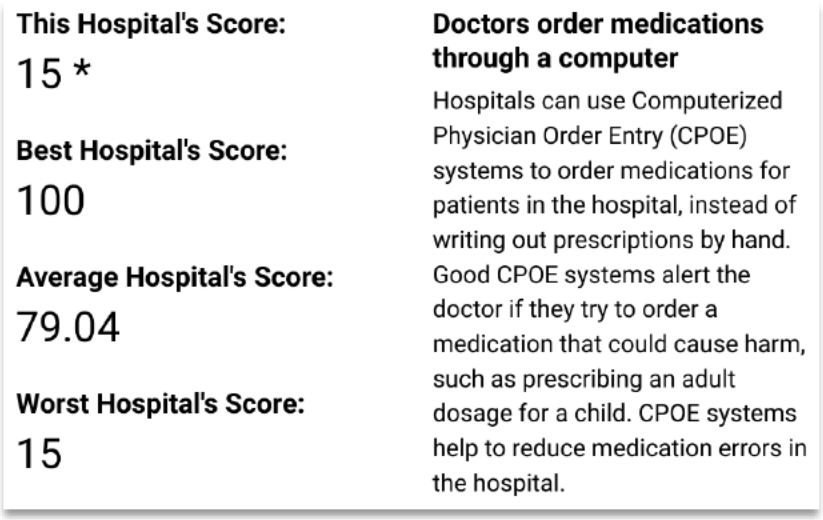


Figure 2. Gulf Breeze Hospital grade page, Fall 2024, score box for "Doctors order medications through a computer."

53. The only qualification was an asterisk ("15 *") pointing to the last entry under "Notes and Definitions," at the very bottom of the page:[32]



Figure 3. Gulf Breeze Hospital grade page, Fall 2024, "Notes and Definitions."

54. Leapfrog did not meaningfully disclose that the score was a penalty for declining the Survey, or how the weight of such assigned score affected the hospital's

[32] Order at 12–13, 30 (describing Delray Medical Center's Fall 2025 grade page). Gulf Breeze Hospital's Fall 2024 page, shown in Figures 1 through 3, has the same layout.

overall letter grade. Leapfrog instead provided detail that suggested the hospital was hiding important information. Leapfrog's methodology document was not written for lay readers, and only about three percent of visitors to the five Palm Beach County hospitals' grade pages ever opened it.

55. A consumer who did not scroll that far saw only the assigned score, its gauge, and the "Worst Hospital's Score." The net impression of each grade page was that Leapfrog had measured the hospital's performance and found it among the worst in the country. Leapfrog's own website expert has agreed that a consumer "would likely believe that they received the worst score," and that old data and an automatic lowest score are "totally indistinguishable."[33]

D. At Least Seven Florida Hospitals Were Assigned Grades Using the Lowest-Score Method

56. Leapfrog published grades calculated under the Lowest-Score Method in its Fall 2024, Spring 2025, and Fall 2025 cycles. At least seven Florida Non-Participating Hospitals were graded this way: (1) Good Samaritan Medical Center; (2) Delray Medical Center; (3) Palm Beach Gardens Medical Center; (4) St. Mary's Medical Center; (5) West Boca Medical Center, all in Palm Beach County; (6) Baptist Hospital in Pensacola; and (7) Gulf Breeze Hospital in Gulf Breeze. In Fall 2025 alone, Leapfrog graded 477 hospitals under the Lowest-Score Method.

57. When the Lowest-Score Method took effect in Fall 2024, each of the five Palm Beach County Non-Participating Hospitals received a "D" or an "F," and three received an "F." In April 2025, the five Palm Beach County hospitals sued Leapfrog

[33] Vredenburgh Dep. 171:18–172:1, 183:5–9, ECF No. 96-10.

in the United States District Court for the Southern District of Florida (the "Federal Action"). Gulf Breeze Hospital and Baptist Hospital, whose parent system, Baptist Health Care, had not completed the Survey, each received a "C" in Fall 2024.[34]



Figure 4. Leapfrog's "F" badge, reproduced from the Order.

58. After judgment was entered against Leapfrog in the Federal Action, Leapfrog stopped grading Non-Participating Hospitals "absent further judicial order."[35] Leapfrog has appealed the order.

E. Leapfrog Promoted the Assigned Grades Throughout Florida

59. Leapfrog promoted the Fall 2024 grade release in Florida through its public relations firm. In the first week of the Fall 2024 release alone, the coverage

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[34] The Leapfrog Grp., *Hospital Safety Grade: Gulf Breeze Hospital*, https://www.hospitalsafetygrade.org/h/gulf-breeze-hospital [https://web.archive.org/web/20241208100352/https://www.hospitalsafetygrade.org/h/gulf-breeze-hospital] (archived Dec. 8, 2024); The Leapfrog Grp., *Hospital Safety Grade: Baptist Hospital*, https://www.hospitalsafetygrade.org/h/baptist-hospital [https://web.archive.org/web/20241208100919/https://www.hospitalsafetygrade.org/h/baptist-hospital] (archived Dec. 8, 2024); *see also* The Leapfrog Grp., Hospital Safety Grade pages for the same hospitals, https://www.hospitalsafetygrade.org/h/gulf-breeze-hospital [https://perma.cc/9PHJ-BJHC] and https://www.hospitalsafetygrade.org/h/baptist-hospital [https://perma.cc/4BDU-A4ZK] (archived Nov. 19, 2026) (displaying "Grade Not Assigned" for the Fall 2024, Spring 2025, Fall 2025, Spring 2026, and Fall 2026 cycles); ECF No. 215 ¶¶ 20, 23.

[35] ECF No. 215 ¶¶ 4, 8–11, 20–25.

included more than 700 online articles and more than 200 television and radio placements, and Florida led the country in articles about the grades.

60. Twelve days after the Palm Beach County hospitals filed the Federal Action, Defendant Binder directed her staff to find out whether Leapfrog could run ads that would display each hospital's grade to anyone who searched for it by name. The advertisements were Defendant Binder's idea and were geotargeted to designated Florida ZIP codes.

61. Leapfrog ran the ads. The same day Defendant Binder raised the idea, Leapfrog asked the vendor that manages its Google advertising to show an ad displaying each of the five hospitals' grades whenever someone searched for one of them, and it paid for the ads with its Google Ad Grant, a program meant to support charitable missions. Leapfrog had never before made it a practice to publicize hospitals' "D" and "F" grades. Defendant Binder called the campaign "very unusual, extraordinary."[36] "Unlawful" would have been more apt.

F. The Grades Harmed Florida Consumers and Hospitals

62. People used the grades the way Leapfrog told them to. Its website received 2.5 million views between September 2024 and September 2025. A Leapfrog publication celebrated a patient who drove 400 miles, past closer hospitals, to reach the nearest "A" hospital.

63. Insurers and patients treated the grades as real. In Florida, that had consequences:

[36] Tr. vol. 3 at 45:21–25, 118:9–14 (Binder).

(a) Humana Military, which administers TRICARE benefits for servicemembers and military families, sent Delray Medical Center—where about 30 percent of patients carry Humana insurance—a letter it received on July 15, 2025, and another in late December 2025, each citing "your Leapfrog hospital safety grade" and asking Delray to respond within thirty days with its strategy to improve performance.[37]

(b) A patient at West Boca Medical Center with a compound finger fracture left the hospital against medical advice after his physician and nurse warned him of the risk of infection. The hospital's record states: "Patient's daughter did not want their father to have surgery in West Boca Medical Center due to the Leapfrog reviews that they read online."[38]

(c) A Delray patient told the hospital's chief executive, "I am afraid that I am going to die at your hospital," after seeing a video about the hospital's grade, even though Delray's publicly reported outcomes were 16 percent better than the national average.[39]

(d) In 2025, St. Mary's Medical Center—which runs the only children's hospital between Orlando and Fort Lauderdale—received 568 requests to transfer patients who had first gone to a competing hospital that could not treat them. Half of them were children.

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[37] Tr. vol. 1 at 80:10–12, 82:5–21, 83:11–25 (Havericak).
[38] Tr. vol. 2 at 86:3–87:21 (Hanlon).
[39] Tr. vol. 1 at 88:22–89:9, 69:17–70:2 (Havericak).

(e) In March 2025, a few months after Good Samaritan Medical Center received an "F," the surgical group that had run its orthopedic service line since 2020—about 1,300 operations a year—gave notice that it was canceling its contract. Those surgeons have since obtained privileges at Jupiter Medical Center, an "A"-graded hospital.

(f) Palm Beach Gardens Medical Center fell to an "F" in Fall 2024. A cardiac surgeon's patient told the surgeon that he did not want to have his surgery there "because of the failing grade he had seen from Leapfrog." He was "scared to go there."[40]

IV. LEAPFROG SOLICITED CHARITABLE CONTRIBUTIONS IN FLORIDA WITHOUT THE REQUIRED REGISTRATION

64. Leapfrog solicits charitable contributions, including from persons in Florida, through "Donate Now" links on the same websites that publish its grades.[41] About $3 million of its annual revenue comes from what Defendant Binder called "standard non-profit fund raising [*sic*], so sponsorships, donations, registrations for our meetings."[42] Leapfrog is a "charitable organization," the donations it receives are "contributions," and its requests for them are "solicitations" under section 496.404(1), (5), and (26), Florida Statutes. No exemption applies.

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[40] Tr. vol. 1 at 142:19–20, 143:7–20, 144:2–10, 145:2–146:11 (Cazares).

[41] The Leapfrog Grp., Hospital Safety Grade, https://www.hospitalsafetygrade.org [https://perma.cc/3ZB4-EEPN] (archived Nov. 19, 2026) ("Donate Now" link in the top right corner, which appears on every page of the site, including the landing page, search results, and each hospital's grade page); The Leapfrog Grp., https://www.leapfroggroup.org [https://perma.cc/WDV2-C62Q] (archived Nov. 19, 2026) ("Donate Now" links in the site's header and footer).

[42] Tr. vol. 3 at 107:2–5 (Binder).

65. Chapter 496 requires a charitable organization to register with the Department before soliciting contributions in Florida. § 496.405(1), Fla. Stat. Leapfrog registered in October 2019 and renewed each year through 2023. In November 2024, the Department notified Leapfrog that its renewal was incomplete and warned it in writing that soliciting contributions in Florida without being registered violates Chapter 496. Leapfrog did not complete its renewal, and on January 2, 2025, the Department denied Leapfrog's renewal application, warning that unregistered activity could subject Leapfrog to fines and criminal prosecution.

66. Despite that warning from the Department, Leapfrog kept soliciting. It had no valid registration from January 2, 2025, until August 12, 2026, when it filed the missing financial report and the Department restored its registration. Throughout those nineteen months, Leapfrog solicited contributions from persons in Florida through "Donate Now" links while unregistered.

V. DEFENDANT BINDER DIRECTED THE CONDUCT ALLEGED

67. As described above, Defendant Binder personally engaged in the following conduct:

(a) approved the Lowest-Score Method without the Expert Panel's review or approval (paragraph 32);

(b) shaped the language Leapfrog used to describe the assigned scores to consumers. The program manager wrote that Defendant Binder "wanted us to make it sound like the expert panel approved it and the assigning of these points was legitimate" (paragraph 37);

(c) reported the change to Leapfrog's board as one that "dramatically lowers" Non-Participating Hospitals' scores, and described the hand-hygiene scoring to a Leapfrog consultant as "a major incentive to report to the survey" (paragraphs 33 and 34);

(d) asked the board committee that sets her pay, while the change was being implemented, to make "organizational revenues" a criterion of her own bonus (paragraph 34);

(e) directed the search advertising campaign aimed at the five Palm Beach County hospitals (paragraphs 60 and 61);

(f) executed the statements of work through which Leapfrog engaged Tel-Affects to sell accolade licenses from Seminole County (paragraph 18); and

(g) controlled the websites through which Leapfrog solicits (paragraphs 64 and 66).

68. Defendant Binder acted with knowledge. She knew the assigned scores were the lowest any hospital had received and were not based on any data about the hospitals' performance, and she directed the language designed to make consumers believe otherwise. She knew the Department had denied Leapfrog's renewal application and that Leapfrog kept soliciting. As President and Chief Executive Officer, she possessed the authority to control each act and practice alleged in this Complaint, and she exercised it.

* * *

69. In short, Leapfrog told Florida consumers that its grades were peer reviewed, expert-guided measures of hospital safety. For hospitals that declined the Survey, they were not: Leapfrog assigned those hospitals the lowest scores it had ever given, without data, to drive up Survey participation and revenue. Florida patients relied on those grades and refused care because of them. Leapfrog should be held accountable.

COUNT I
Violation of the Florida Deceptive and Unfair Trade Practices Act
(Deceptive Acts or Practices: Hospital Safety Grades)
(Against Both Defendants)

70. The Attorney General realleges and incorporates paragraphs 1 through 69 as though fully alleged here.

71. FDUTPA prohibits "[u]nfair methods of competition, unconscionable acts or practices, and unfair or deceptive acts or practices in the conduct of any trade or commerce." § 501.204(1), Fla. Stat. Its provisions are to be construed liberally to "protect the consuming public and legitimate business enterprises from those who engage in unfair methods of competition, or unconscionable, deceptive, or unfair acts or practices in the conduct of any trade or commerce." § 501.202(2), Fla. Stat. In construing FDUTPA, "due consideration and great weight shall be given to the interpretations of the Federal Trade Commission and the federal courts relating to s. 5(a)(1) of the Federal Trade Commission Act." § 501.204(2), Fla. Stat.

72. Leapfrog engaged in trade or commerce in Florida, including by publishing and promoting hospital grades to Florida consumers, advertising those

grades through search advertisements keyed to the names of specific Florida hospitals, and selling the rights to use those grades to hospitals and insurers.

73. In the course of this trade and commerce, Defendants, acting individually, collectively, or through employees, representatives, or agents, in connection with the soliciting, advertising, marketing, promoting, offering for sale, and sale of hospital data, safety grades, licensed images, data licenses, and accolade licenses, made the following deceptive representations and omissions to Florida consumers, directly or indirectly, expressly or by implication:[43]

(a) Representing that Leapfrog's grades reflect "how well a hospital does on safety, not whether they complete the Leapfrog Hospital Survey," when in fact, for every Non-Participating Hospital graded under the Lowest-Score Method, 31 percent of the grade rested on the lowest scores Leapfrog gave any hospital, assigned because the hospital had not completed the Survey;

(b) Representing that Leapfrog's grades use "a public, peer-reviewed methodology, calculated by top patient safety experts under the guidance of a National Expert Panel," and that a hospital missing too much data would receive no grade, when in fact the Lowest-Score Method was never peer reviewed, the Expert Panel never approved it,

[43] The quotations in this paragraph and its subparagraphs are cited in the General Allegations.

and Leapfrog graded Non-Participating Hospitals that were missing data on seven measures;

(c) Displaying the assigned scores on those hospitals' grade pages with the same gauges Leapfrog used for measured data, without the "Declined to Report" label it placed on other unreported measures, and beside a benchmark likening each assigned score to the "Worst Hospital's Score" (paragraphs 48 through 55), creating the net impression that Leapfrog had measured the hospital's performance and found it among the worst in the country, when in fact Leapfrog had no data for those measures, and its only qualification, a footnote at the bottom of the page, did not say that the score was the lowest Leapfrog gave any hospital or that it was assigned because the hospital declined the Survey; and

(d) Representing that Leapfrog "estimates performance" based on "analysis of actual performance," when it had done no such analysis under the Lowest-Score Method.

74. Each representation and omission alleged in subparagraphs (a) through (d) of paragraph 73 constitutes a separate deceptive act or practice. Each, standing alone, violates section 501.204(1), Florida Statutes. Leapfrog repeated each of them for every Florida hospital it graded under the Lowest-Score Method, in every grade cycle in which it published that hospital's grade.

75. These representations and omissions were likely to mislead consumers acting reasonably in the circumstances, to the consumers' detriment, and they were material: they concerned the safety of the hospital a consumer was choosing.

76. Defendants knew or should have known that these representations were false, misleading, or unsubstantiated when made, or made them with reckless disregard for their truth and with the intention that consumers rely on them.

77. Defendants engaged in deceptive acts and practices in the conduct of trade or commerce in violation of section 501.204(1), Florida Statutes. Unless enjoined, Defendants' conduct will continue to cause irreparable injury to the public for which there is no adequate remedy at law.

78. Any person who is willfully using, or has willfully used, a method, act, or practice declared unlawful under section 501.204, Florida Statutes, is liable for a civil penalty of not more than $10,000 for each such violation. § 501.2075, Fla. Stat. A violation is willful under FDUTPA if the person "knew or should have known" the conduct was unfair or deceptive. Section 501.2077, Florida Statutes, authorizes a civil penalty of up to $15,000 for each violation victimizing a senior citizen, among others. Victims of these violations include senior citizens. Delray Medical Center's patients, for example, average 78 to 82 years old and include many Medicare and Medicare Advantage beneficiaries, and more than half of Palm Beach Gardens Medical Center's patients are 65 or older.

79. Leapfrog and Defendant Binder acted willfully. Each deceptive act or practice constitutes a separate violation.

80. Binder is individually liable for these violations, jointly and severally with Leapfrog. As alleged in Section V, she directly participated in the acts and practices alleged in this Count and had the authority to control them, and she knew or should have known that they were deceptive.

81. The Attorney General seeks all available relief under FDUTPA, including, but not limited to, civil penalties, injunctive relief, restitution, disgorgement, and attorney's fees and costs.

COUNT II
Violation of the Florida Deceptive and Unfair Trade Practices Act (Unfair Acts or Practices: Hospital Safety Grades) (Against Both Defendants)

82. The Attorney General realleges and incorporates paragraphs 1 through 69 as though fully alleged here.

83. In the course of trade and commerce, Defendants, directly or indirectly, acting individually, collectively, or through employees, representatives, or agents, in connection with the soliciting, advertising, marketing, promoting, offering for sale, and sale of hospital data, safety grades, licensed images, data licenses, and accolade licenses, engaged in unfair acts or practices when they penalized hospitals that declined to complete Leapfrog's voluntary Survey by assigning those Non-Participating Hospitals, without data, the lowest scores Leapfrog gave any hospital, counting those scores for 31 percent of the grade, and presenting the resulting grades to Florida consumers as accurate measures of safety based on reliable data.

84. These acts or practices offend established public policy and are immoral, unethical, oppressive, unscrupulous, and substantially injurious to consumers.

85. The acts or practices alleged in paragraph 83 violate section 501.204(1), Florida Statutes, and were repeated for every Florida hospital graded under the Lowest-Score Method in every grade cycle in which its grade was published.

86. These acts or practices caused, or were likely to cause, substantial injury to Florida consumers. Consumers chose where to receive medical care based on scores that Leapfrog assigned without any data about the hospital's performance. And consumers lost access to accurate information at the moment of making some of the most consequential decisions they would make. These acts or practices caused, or were likely to cause, substantial injury to Florida Non-Participating Hospitals and patients. Leapfrog gave each of the Non-Participating Hospitals the lowest scores it gave to any hospital, on measures for which it had no data. Patients then refused care at those hospitals because of their grades, and hospitals lost those patients.

87. Consumers could not reasonably avoid the injury. Leapfrog presented the assigned scores with the same graphics it used for real data, beside a benchmark that equated them with the worst hospitals in the country, and its only disclosure on the grade page was a footnote that did not say that the score was the lowest score Leapfrog arbitrarily gave any hospital or that it was a penalty for declining the Survey. A consumer who did not scroll to that footnote would take the assigned score as a measurement of actual performance, and Leapfrog's methodology document was not written for lay readers to understand. Nor could Non-Participating Hospitals avoid the injury—Leapfrog refused to let any hospital opt out of being graded.

88. The injury produced no countervailing benefit to consumers or competition. The Lowest-Score Method was not designed to improve accuracy; it was designed to increase Survey participation, which benefited only Leapfrog.

89. Defendants engaged in unfair acts and practices in the conduct of trade or commerce in violation of section 501.204(1), Florida Statutes. Unless enjoined, Defendants' conduct will continue to cause irreparable injury to the public for which there is no adequate remedy at law.

90. Leapfrog and Defendant Binder acted willfully; both knew or should have known such conduct was unfair.

91. Defendant Binder is individually liable for these violations, jointly and severally with Leapfrog. As alleged in Section V, she directly participated in the acts and practices alleged in this Count and had the authority to control them, and she knew or should have known that they were unfair.

92. The Attorney General seeks all available relief under FDUTPA, including, but not limited to, civil penalties, injunctive relief, restitution, disgorgement, and attorney's fees and costs.

COUNT III
Violation of the Florida Deceptive and Unfair Trade Practices Act Based on Violation of the Solicitation of Contributions Act, Sections 496.405(1)(c) and 496.415(1), Florida Statutes
(Against Both Defendants)

93. The Attorney General realleges and incorporates paragraphs 1 through 69 as though fully alleged here.

94. Section 496.405(1)(c), Florida Statutes, provides that a charitable organization may not solicit contributions or have contributions solicited on its behalf before it files an initial registration statement or annual renewal statement and the statement is approved by the Department. Leapfrog is required to register, and no exemption applies.

95. From January 2, 2025, until August 12, 2026, Leapfrog solicited contributions from persons in Florida, including through the "Donate Now" function on its websites, without an approved registration statement. Each such solicitation violated section 496.405(1)(c), and therefore section 496.415(1), Florida Statutes.

96. Each violation of Chapter 496 is an unfair or deceptive act or practice in violation of FDUTPA. § 496.416, Fla. Stat.

97. Leapfrog acted willfully. Before its registration was denied, the Department warned Leapfrog in writing that if it failed to complete its renewal application and continued soliciting contributions in Florida without a valid registration, it would be in violation of Chapter 496. Leapfrog kept soliciting anyway.

98. Defendant Binder is individually liable, jointly and severally with Leapfrog. She knew Leapfrog's registration had been denied and continued to direct the organization and the websites through which it solicited Florida donors.

99. Each solicitation of a contribution from a person in Florida without an approved registration is a separate violation. The Attorney General seeks all available relief under Chapter 496 and FDUTPA, including, but not limited to, civil penalties,

injunctive relief, restitution, reimbursement, contributions, disgorgement, and attorney's fees and costs.

COUNT IV
Violation of the Florida Deceptive and Unfair Trade Practices Act Based on Violations of the Solicitation of Contributions Act, Sections 496.415(2) and 496.415(13), Florida Statutes
(Against Both Defendants)

100. The Attorney General realleges and incorporates paragraphs 1 through 69 as though fully alleged here.

101. Leapfrog solicits contributions on the same websites on which it publishes its grades. Its grades and safety representations are the foundation of its appeal for public support: Leapfrog asks the public to fund the organization that produces the grades, in the name of patient safety and transparency. The solicitation and the grades share a single apparatus: Leapfrog's Vice President of Development, its communications staff, its outside public relations firm, and its charitable Google Ad Grant all promote the grades that anchor the donation appeal.

102. On the same web pages as it solicits donations, and in connection with the planning, conduct, and execution of its charitable solicitations, Leapfrog provided false, misleading, or inaccurate information to the public, including the false representations that its grades reflect measures of safety, when in fact the grades of Non-Participating Hospitals reflected arbitrary grades based on non-existing data; that the grading methodology was peer reviewed when it was not; that scores were expert-approved when they were not; and that "our analyses have shown" that

hospitals that only intermittently complete the Survey perform worse, based on an analysis its own drafter had not seen.

103. These misrepresentations were material to donors, suggesting that the grading methodology was reliable and important to consumers' health care decisions.

104. In each case, Leapfrog submitted false, misleading, or inaccurate information in documents provided to the public, including its websites, grade pages, and published answers to frequently asked questions, in violation of section 496.415(2), Florida Statutes. Leapfrog solicited contributions to further its stated mission of patient safety and transparency, alongside grades it knew rested on arbitrarily assigned scores and safety representations it knew to be false or misleading, intending that donors rely on them. In doing so, Leapfrog willfully employed a device, scheme, or artifice to obtain contributions by means of deception, false pretense, or misrepresentation, in violation of section 496.415(13), Florida Statutes.

105. Each violation of Chapter 496 constitutes a separate and distinct unfair or deceptive act or practice in violation of FDUTPA. § 496.416, Fla. Stat.

106. Defendant Binder is individually liable for these violations, jointly and severally with Leapfrog. Defendant Binder planned, conducted, and executed Leapfrog's solicitations with knowledge that the grades underlying Leapfrog's appeal for public support rested on arbitrarily assigned scores, and she directed the statements that misrepresented them to the public. As President and Chief Executive

Officer, Defendant Binder possessed the authority to control these acts and practices, and she exercised it. *See* paragraphs 67 and 68.

107. The Attorney General seeks all available relief under Chapter 496 and FDUTPA, including, but not limited to, civil penalties, injunctive relief, restitution, reimbursement, contributions, disgorgement, and attorney's fees and costs.

PRAYER FOR RELIEF

WHEREFORE, the Attorney General respectfully asks that this Court:

(a) Enter judgment in favor of the Attorney General against Defendants jointly and severally for violations of FDUTPA and Chapter 496, Florida Statutes, and declare that the acts and practices alleged here violated those statutes;

(b) Permanently enjoin Defendants from misrepresenting to Florida consumers—in any medium, including paid search advertisements—the data, sources, methods, or expert approvals underlying any hospital grade or score they publish, including misrepresenting that a score reflects measured hospital performance when it does not;

(c) Permanently enjoin Defendants from representing to Florida consumers that Leapfrog's methodology is peer reviewed or expert approved unless the representation is true of the methodology then in use;

(d) Permanently enjoin Defendants from soliciting charitable contributions in Florida unless Leapfrog holds a valid registration under section 496.405, Florida Statutes;

(e) Order Defendants to make corrective disclosures to Florida consumers and to Leapfrog's data licensees regarding grades published under the Lowest-Score Method, as necessary to correct the false or misleading statements alleged here;

(f) Award the Attorney General against Defendants jointly and severally such legal, equitable, or other relief as is appropriate under section 501.207(3), Florida Statutes, including, but not limited to, disgorgement, restitution, reimbursement, or contributions to donors, consumers, affected hospitals, insurers, other medical providers, or any other affected person or group;

(g) Assess civil penalties against each Defendant of up to $10,000 for each willful violation under section 501.2075, Florida Statutes, and up to $15,000 for each willful violation victimizing a senior citizen under section 501.2077, Florida Statutes;

(h) Award the Attorney General reasonable attorney's fees and costs against Defendants jointly and severally under section 501.2105, Florida Statutes; and

(i) Grant such other relief as this Court deems just and proper.

Dated: November 20, 2026

Respectfully submitted,

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