

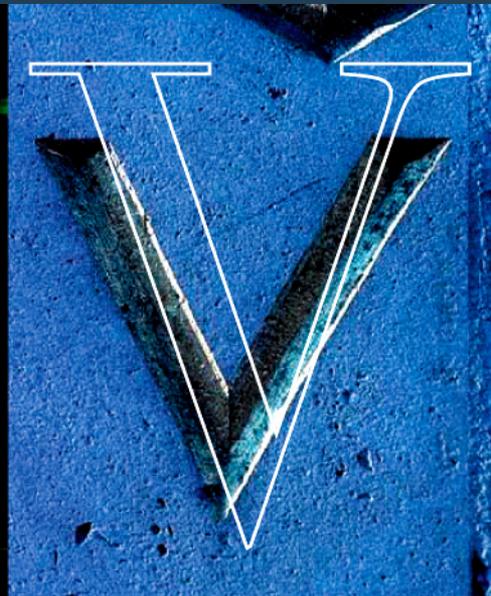
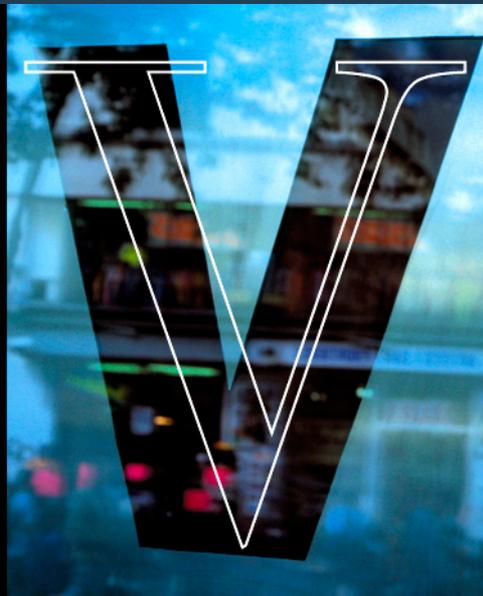
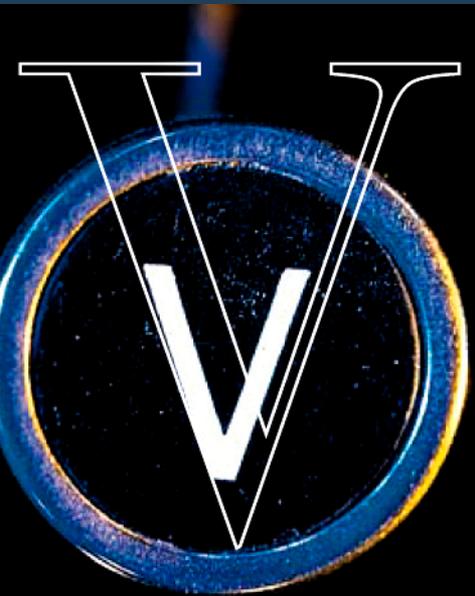
Opening Keynote

Leonard L. Gordon, Partner, Venable LLP

VENABLE[®]_{LLP}

FTC Update: Enforcement Priorities & Key Cases

OCTOBER 22, 2013



agenda

- Product Claims
- Mobile Ad Media
- Consumer Privacy
- Financial Deception



agenda

- Product Claims
- Mobile Ad Media
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Product Claims

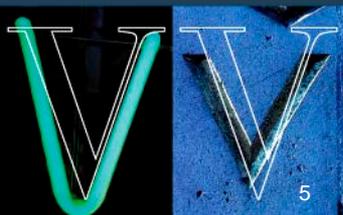
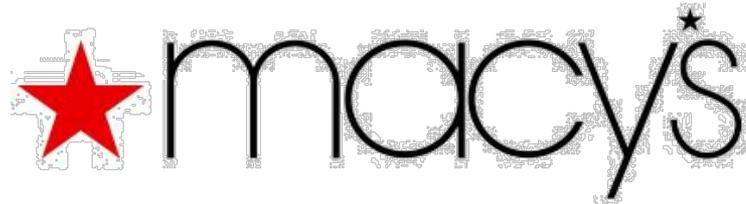


Kyah Faux-Fur-Collar Coat: Glam up your professional look with the Alice + Olivia Kyah coat, which features a plush faux-fur collar.

- Crepe with faux-fur (polyester viscose collar)
- Self-tie waist
- Long sleeves
- Arched hem falls below hip
- Virgin wool/cashmere/polyester
- Dry clean
- Imported

The Neiman-Marcus Group, Inc.,
DrJays.com, Inc., and Eminent, Inc. (consent orders)

Product Claims



Product Claims



The Sherwin-Williams Company and PPG Architectural Finishes (consent orders)



Product Claims



Home	About Us	Innovation	Mattresses	Comparisons	Dealers	Ordering	Contact Us
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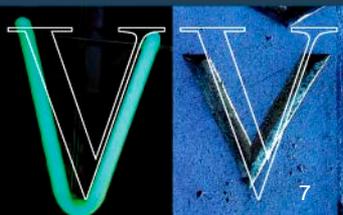
Our Biogreen[®] Memory Foam



Visco-elastic foam is the only substance which can make a total imprint of your body, but then slowly come back to shape after your body weight is lifted. This slow return rate is what allows a comfortable, yet supportive contouring of all the bumps and curves of the body that eliminates the rebound pressure that hard springs and rubberized foam has when you compress it with your body. Visco-elastic memory foam can commonly be seen in 3lb, 4lb., and 5lb. densities. Our special **Biogreen[®]** proprietary, pressure sensitive, viscoelastic memory foam material is an approximate 5lb. density and is free of dangerous chemicals like PBDE, TDI, Boric Acid and Bromine. An independent laboratory even measured no V.O.C. (Volatile Organic Compounds) outgas ratings. In fact, not only does our **Biogreen[®]** memory foam lack that common smell often associated with new foam, but during the independent laboratory test, the only detectable reading came from an approximate one percent water vapor. With so much concern about the release of chemicals in our atmosphere and toxins absorbed by our bodies, you can feel good knowing that our

Biogreen[®] memory foam offers a truly hypo-allergenic, environmentally friendly, and non-toxic experience. Our Biogreen top foam layer is approximately a 5lb. density and is ultra pressure sensitive. Underneath this layer, we use a slightly more dense and over twice as firm 5lb. memory foam for extra support. This will allow the mattress to be more instantly comfortable in all temperature environments, but still very supportive and durable in structure. We then ventilate the Biogreen foam layers and place underneath it a medium-firm, high resilient, polyurethane airflow channel support layer, with an extra support underneath, while still retaining our Patented Airflow Transfer System[™].

Relief-Mart, Inc., EcoBaby Organics, Inc., and
Essentia Natural Memory Foam Company (proposed consent orders)



Product Claims



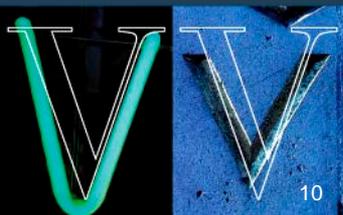
EcoBaby Organics, Inc. (proposed consent order)

Up To Claims

- Windows Cases
- Survey
- Medifast



Product Claims



Product Claims

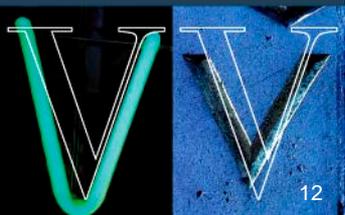


POM Wonderful LLC, Roll Global LLC, Stewart A. Resnick,
Lynda Rae Resnick, and Matthew Tupper (appeal pending)



agenda

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Mobile Ad Media



Click link above to get your product. Under 18 need parental consent. Subscribers certify they are the account holder or have the account holder's permission, and agree to these terms, full terms and privacy policy at www.jamster.com. For \$9.99/month get 20 credits to use on ringtones and more with the Jamster Plan. Carrier msg & data rates may apply. Text "STOP" to unsubscribe at any time. Charges will be billed to user's cell phone bill or deducted from cell phone prepaid account. More information at www.jamster.com. Help: text HELP to 75555 or call 866-856-5267.

[Click to to Get 20 Downloads for \\$9.99/mo.](#)

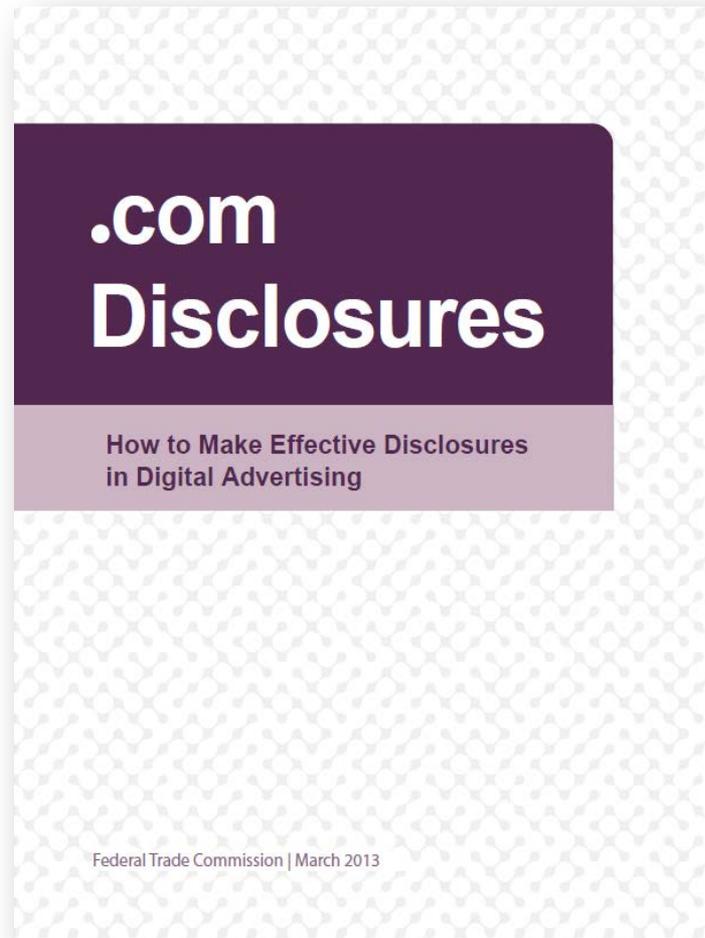
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Mobile Ad Media

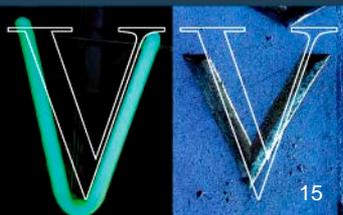


Mobile Ad Media

“If a disclosure is necessary to prevent an ad from being deceptive, unfair, or otherwise violative of an FTC rule, and it is not possible to make the disclosure clearly and conspicuously, then that ad should not be disseminated.

(continued on next device)

This means that if a particular platform does not provide an opportunity to make clear and conspicuous disclosures, then that platform should not be used to disseminate ads that require disclosures.”



Mobile Ad Media



**Staff
letters
to
search
engines**



Federal Trade Commission

[Privacy Policy](#)

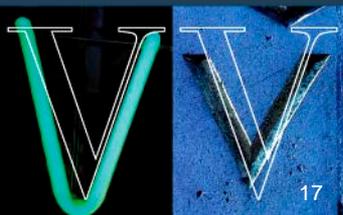


Protecting
America's
Consumers

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For Release: 09/16/2013

FTC Native Advertising Workshop on December 4, 2013 Will Explore the Blurring of Digital Ads With Digital Content

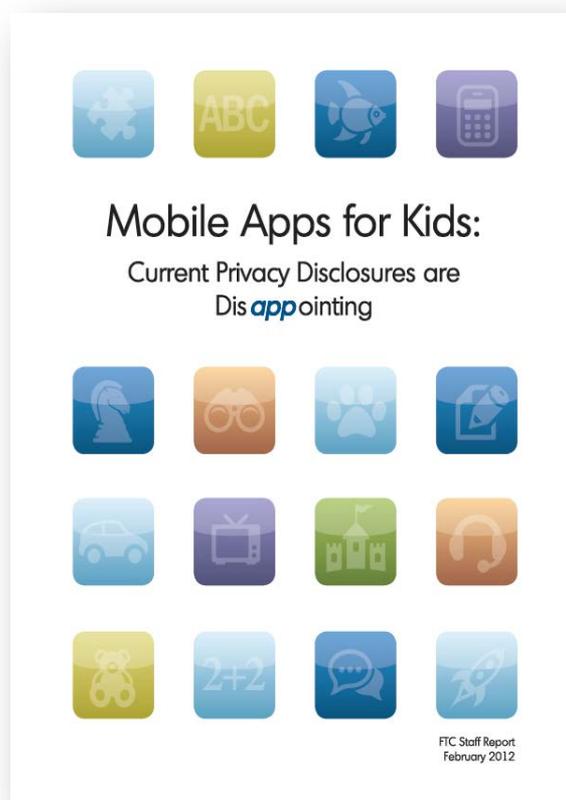


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- **Consumer Privacy**
- Financial Deception



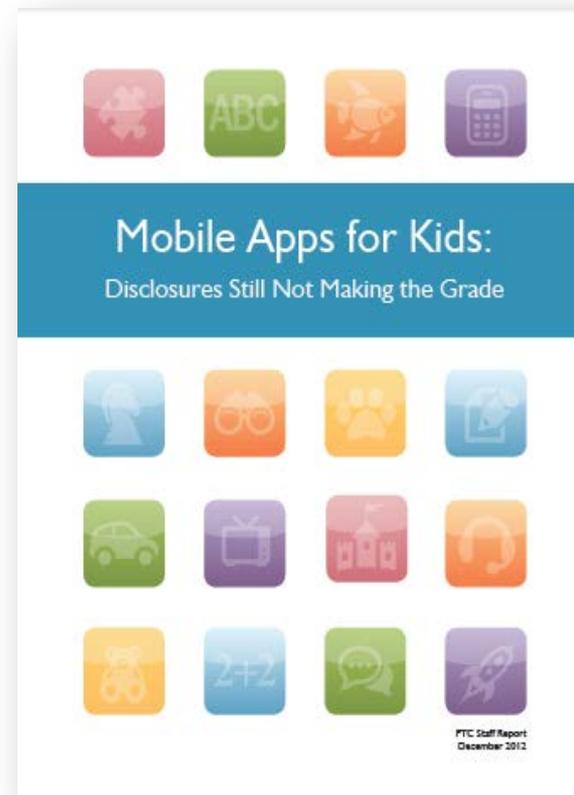
Consumer Privacy



The cover of the February 2012 FTC Staff Report features a white background with a grid of 16 colorful icons. The top row includes icons for a puzzle, the letters 'ABC', a fish, and a calculator. Below the icons, the title 'Mobile Apps for Kids:' is followed by the subtitle 'Current Privacy Disclosures are Dis**app**ointing'. The bottom right corner contains the text 'FTC Staff Report February 2012'.

Mobile Apps for Kids:
Current Privacy Disclosures are Dis**app**ointing

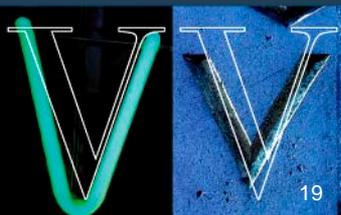
FTC Staff Report
February 2012



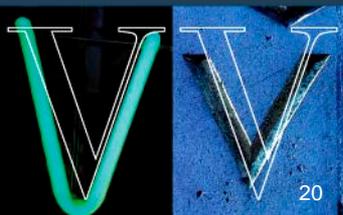
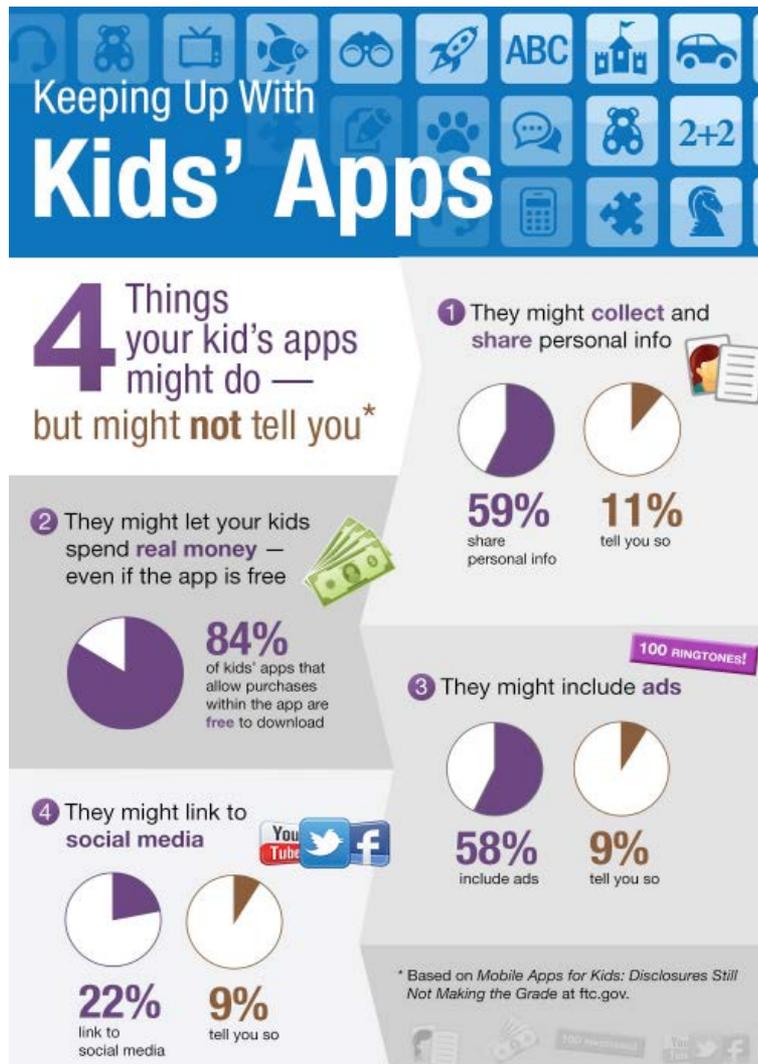
The cover of the December 2012 FTC Staff Report features a white background with a grid of 16 colorful icons. The top row includes icons for a puzzle, the letters 'ABC', a fish, and a calculator. A blue horizontal band across the middle contains the title 'Mobile Apps for Kids:' and the subtitle 'Disclosures Still Not Making the Grade'. The bottom right corner contains the text 'FTC Staff Report December 2012'.

Mobile Apps for Kids:
Disclosures Still Not Making the Grade

FTC Staff Report
December 2012



Consumer Privacy



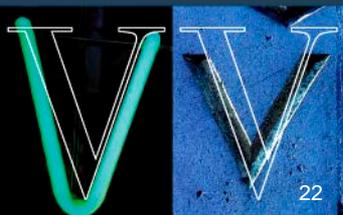
Consumer Privacy



Artist Arena, LLC (consent decree)



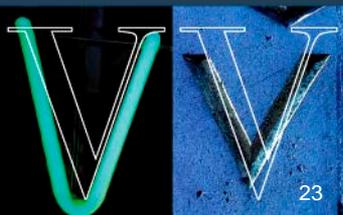
Consumer Privacy



Consumer Privacy

htc

HTC America (consent decree)



Consumer Privacy



The advertisement features a white, compact internet camera with a circular lens and the Trendnet logo and model number 'TV-IP121W' on its front. To the right of the camera are the Trendnet 20th Anniversary logo and the Trendnet brand logo. Below these are several feature icons: a camera icon for 'SecurView™ Management Software Included' (listing motion detection, email alerts, program recordings, and management of 16 cameras), a speaker icon for '1-Way Audio', a sun/moon icon for 'Day / Night', and a padlock icon for 'SECURITY'. At the bottom left, a list of features is provided. At the bottom right, there are Energy Star and GreenSource logos, along with text indicating the camera is powered by an Energy Star qualified adapter. The product name 'SecurView Wireless Day/Night Internet Camera' is prominently displayed in the center, and 'internet cameras TV-IP121W' is at the bottom right.

SecurView™ Management Software Included

- Motion detection
- Email alerts
- Program recordings
- Manage 16 cameras

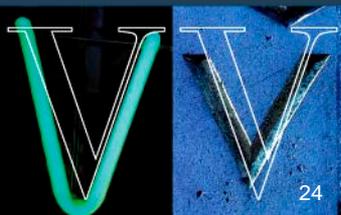
1-Way Audio Day / Night SECURITY

SecurView Wireless Day/Night Internet Camera

- Night vision of up to 5m (16 ft.)
- No need for an Ethernet connection, video is transmitted over a secure encrypted wireless signal
- Program motion detection recording and email alerts with complimentary software
- Mount this compact Internet camera on most surfaces

ENERGY STAR Powered by an ENERGY STAR® qualified adapter for a better environment GREENSOURCE

internet cameras
TV-IP121W



Consumer Privacy

- Wyndham
- LabMD

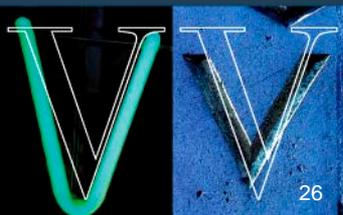


Consumer Privacy



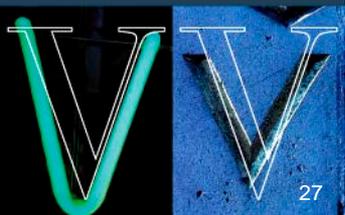
NOVEMBER

19

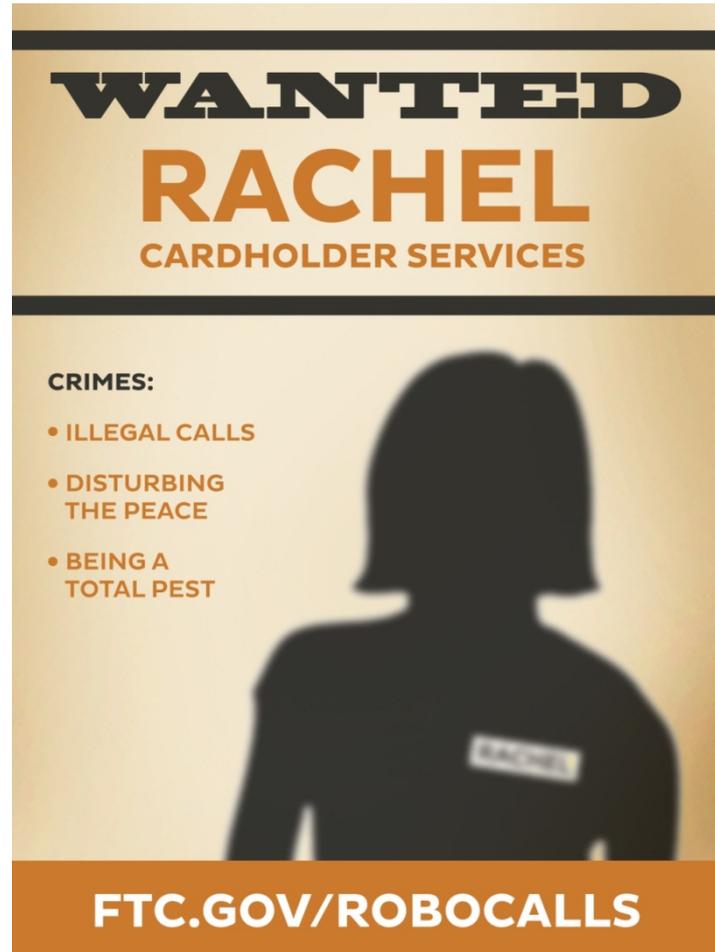


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Financial Deception



Financial Deception



John Beck Amazing Profits, LLC, John Alexander, LLC, Jeff Paul, LLC, Douglas Gravink, Gary Hewitt, John Beck, John Alexander, Jeff Paul, Family Products, LLC, and Mentoring of America, LLC (judgment)

contact information

YOUR VENABLE TEAM

Len Gordon, Partner
LLGordon@venable.com
t 212.370.6252
f 212.307.5598

www.Venable.com

