

calcium to transmit signals. Without it, they can be, well, a little slow. [Inside Missy's brain, Professor Wonder sees tired neurons that have obviously not gotten enough calcium] Let's see what happens when you give them soft, delicious Wonder Bread. [Professor Wonder, with the help of Mom, constructs a demonstration that will allow Missy to get her calcium.] A good source of calcium with vitamins and minerals.

WOMAN: [After Missy takes a bite of her sandwich, Mom directs Missy to do her homework in order to show how well the calcium worked. Professor Wonder looks into her brain again.] Missy, go do your homework. [Inside Missy's brain we see lively, active neurons.]

NEURON: Let's go, guys, time to do homework.

PROFESSOR WONDER: Wow! I've never seen anything like it! Calcium helps you remember things, too. So remember, Wonder helps build strong bodies and minds."

* The following superscript appears in small, white type, on varying backgrounds, at the bottom of the screen, for approximately three (3) seconds: "With regular exercise and a balanced diet."

(Exhibit A) (Exhibit A is a storyboard of a thirty-second television advertisement) (See also Exhibit C, a videotape version of the advertisement)

- B. "Parents know calcium helps build strong bones, but did you know that with regular exercise and a balanced diet, calcium helps build strong minds too? Calcium can help you to remember things, which is good to know when you ... ah, er, um, oh yeah, ... lost your train of thought.

* * *

The neurons in the brain need calcium to help transmit their signals. Without calcium, neurons can become a little slow.

* * *

So, help your kids (and keep the whole family thinking sharply) by making sure they get enough calcium with a balanced diet and help from Wonder Bread.

* * *

[D]id you know that Wonder Bread is calcium fortified and now has 200% more calcium than regular white bread? So, when you're looking for a good source of calcium, go for the dough."

(Exhibit B) (Exhibit B is a printout from the Internet web site for Wonder Bread, www.wonderbread.com/calcium.html)(printed 2/21/01)

5. Through the means described in Paragraph 4, including but not necessarily limited to the advertisements attached as Exhibits A and B, respondent has represented, expressly or by implication, that:

- A. As a good source of calcium, Wonder Bread helps children's minds work better, and
- B. As a good source of calcium, Wonder Bread helps children remember things.

6. Through the means described in Paragraph 4, respondent has represented, expressly or by implication, that it possessed and relied upon a reasonable basis that substantiated the representations set forth in Paragraph 5, at the time the representations were made.

7. In truth and in fact, respondent did not possess and rely upon a reasonable basis that substantiated the representations set forth in Paragraph 5, at the time the representations were made. Therefore, the representation set forth in Paragraph 6 was, and is, false or misleading.

8. The acts and practices of respondent as alleged in this complaint constitute unfair or deceptive acts or practices, and the making of false advertisements, in or affecting commerce in violation of Sections 5(a) and 12 of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this ___ day of _____, 2002, has issued this complaint against respondent.

By the Commission.

Donald S. Clark
Secretary

SEAL: