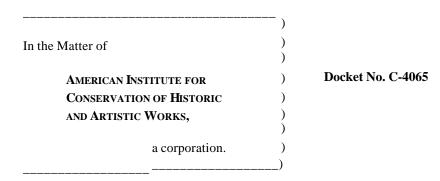
## 011 0244

## UNITED STATES OF AMERICA BEFORE FEDERAL TRADE COMMISSION



## COMPLAINT

Pursuant to the provisions of the Federal Trade Commission Act, as amended, 15 U.S.C. § 41 <u>et seq</u>., and by virtue of the authority vested in it by said Act, the Federal Trade Commission, having reason to believe that the American Institute for Conservation of Historic and Artistic Works ("Respondent" or "AIC"), a corporation, has violated and is violating the provisions of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, hereby issues this Complaint stating its charges as follows:

PARAGRAPH ONE: Respondent American Institute for the Conservation of Historic and Artistic Works, is a corporation organized and existing under the laws of the District of Columbia with its principal office and place of business at 1717 K Street, N.W., Suite 200, Washington, DC 20006.

PARAGRAPH TWO: Respondent is a professional association organized for the purpose, among others, of serving the interests of its conservation professional members. AIC has approximately 3,100 members. A conservation professional manages, cares for, preserves, or treats cultural objects, including artistic, historical, archeological, scientific, and religious objects. The conservation professional may determine the condition, the need for treatment or restoration, and the appropriate method for preservation of such objects, and perform the required work to minimize deterioration or to restore such objects to their original state.

PARAGRAPH THREE: The general business practices of Respondent and its members, including the acts and practices herein alleged, are in or affecting "commerce" as defined in the Federal Trade Commission Act, as amended, 15 U.S.C. § 45.

PARAGRAPH FOUR: Respondent engages in substantial activities for the economic benefit of its

members. At all times relevant to this Complaint, Respondent is and has been organized in substantial part for the profit of its members, and is therefore a corporation within the meaning of Section 4 of the Federal Trade Commission Act, as amended, 15 U.S.C. § 44.

PARAGRAPH FIVE: Many of Respondent's members provide conservation professional services for a fee or are employed by conservation related organizations that provide conservation

and acts or practices, or the effects thereof, are continuing and will continue or recur in the absence of the relief herein requested.

WHEREFORE, THE PREMISES CONSIDERED, the Federal Trade Commission on this thirtieth day of October, 2002, issues its Complaint against AIC.

By the Commission.

Donald S. Clark Secretary

SEAL