042-3196

## UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

COMMISSIONERS: Deborah Platt Majoras, Chairman

Thomas B. Leary
Pamela Jones Harbour

Jon Leibowitz

In the Matter of	)
ADVERTISING.COM, INC.,	) <b>DOCKET NO.</b> C-
a corporation,	)
also doing business as	)
TEKNOSURF.COM, and	)
	)
JOHN FERBER,	)
individually and	)
as an officer of the corporation.	)
	)

## **COMPLAINT**

The Federal Trade Commission, having reason to believe that Advertising.com, Inc., a corporation, also doing business as Teknosurf.com, and John Ferber, individually and as an officer of the corporation ("respondents"), have violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

- 1. Respondent Advertising.com, Inc., also doing business as Teknosurf.com, is a Maryland corporation with its principal office or place of business at 1020 Hull Street, Baltimore, Maryland 21230.
- 2. Respondent John Ferber is an officer of the corporate respondent. Individually or in concert with others, he formulates, directs, or controls the policies, acts, or practices of the corporation, including the acts or practices alleged in this complaint. His principal office or

place of business is the same as that of Advertising.com, Inc.

3.

failure to adequately disclose this fact, in light of the representation made, was, and is, a deceptive act or practice.

10. The acts and practices alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this day of , 2005, has issued this complaint against respondent.

By the Commission.

Donald S. Clark Secretary