



## **RESPONDENT AND ITS PARTICIP**



18. The publication and sharing of information relating to residential real estate listings for the purpose of brokering residential real estate transactions is a key input to the provision of real estate brokerage services, and represents a relevant input market. Publication of listings through WMLS is generally considered by sellers, buyers and their brokers to be the fastest and most effective means of obtaining the broadest market exposure for property

**THE WEB SITE POLICY OFFERS NO EFFICIENCY BENEFIT**

26. There is no cognizable and plausible efficiency justification for the Web Site Policy. The Web Site Policy is not reasonably ancillary to the legitimate and beneficial objectives of the MLS.

**VIOLATION**

27. In adopting the policies and engaging in the Acts and Practices described herein, WAAR has acted as a combination of its members to restrain trade in the provision of residential real estate brokerage services within the Williamsburg Area.

28. The purposes, capacities, tendencies, or effects of the policies, acts, or practices of WAAR and its members as described herein have been unreasonably to restrain competition among brokers, and to injure consumers.

29. The policies, acts, practices, and combinations or conspiracies described herein constitute unfair methods of competition in or affecting interstate commerce in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45.

**WHEREFORE, THE PREMISES CONSIDERED,** the Federal Trade Commission on this \_\_\_\_ day of \_\_\_\_\_, 2006, issues its Complaint against Respondent Williamsburg Area Association of Realtors, Inc.

By the Commission.

Donald S. Clark  
Secretary