UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

COMMISSIONERS:	Jon Leibowitz, Chairman
	Domala Jana Harbaur

Pamela Jones Harbour William E. Kovadc J. Thomas Rosb

In the Matter of) DOCKET NO. C-4281

practices of the Respondent named in the potion heref, and the Respondent having en furnished the after with a copyof a daft of Complaint which the Bereau of Consumer Protection proposed to parent to the Commission for its consideration and which, if issued, would charge the Responde with violation of the Fedral Trade Commission Act; and

The Responded and counse for the Commission having the executed an agreement containing a conset order, an admission by the Respondent of take jurisdictional facts set forth in the aforesaid draft complaint, a statement that the signing of the agreement is for settlement purposes on by no does not constitute an admission by the Respondent that the law has been violated as beged in such complaint, or that any of the facts as alleged in such complaint, other than jurisdictional of the same and other provisions as required by the Commission's Rules; and

The Commission having thereafter considered the matter and having determined that it had reason to believe that the Respondent has violate Feleral Trade Commission Act, and that a complaint should issue stating its glas in that respect, and having the eupon accepted the executed consent agreement and placed such greement on the public coord for a period of thirty (30) days for the receipt and consideration of public comments, and having duly considered the comment received from an interested person pursuant to Section 2.34 of its Rules, now in further conformity with the procedure prescribed in Section 2.34 of its Rules, 16 C.F.R. § 2.34, the Commission hereby issues its complaint, makes the following jurisdictional findings, and entes the following order

1. Respondent Directors Desk LLC is a Delaware limited liability company with its principal office or place of business at 1 liberty Plaza, New Ydr, New York 10006.

2. The Federal Trade Commission has jurisdiction of the subject atter of this proceeding and of the Respondent, and the proceeding is in the public interest.

ORDER

DEFINITIONS

For purposes of this Order, the following definitions shall apply:

- 1. Unless otherwise specified, "respondent" shall mean Directors Desk LLC and its subsidiaries, divisions, affiliates, successors and assigns.
- 2. "Commerce" shall mean as defined in Section 4 of the Federal Trade Commission Act, 15 U.S.C. § 44.

l.

IT IS ORDERED that respondet and its offices, agents, representatives, and employees, directly or through any corporation, subsidiary, division, website, or other device, in connection with the advertising marketing, promotion, offering for sale, or saleof any product or service, in or affecting commere, shall not misrepseent in any manner expressly or by implication, the extent to which respondent is amember of, adheres to, complies with, is certified by, is endorsed by or otherwise participtes in any privacy, security, or any other compliance program sponsored by the government or any other third party.

II.

IT IS FURTHER ORDERED that responded shall maintain and upon recatenake available to the Federal TradeCommission for inspection and bying, aprint or electronic copy of, for a period of five (5) years from the date of preparation or dissemination, whicheves later, all documents leating to compliance with this orderincluding but not limited to:

- A. all advetisements, promotional materials, annot at the statemets containing any representations covered by this order, with all materials relied upon in disseminating theepresentation; and
- B. any documents, whether prepared by or on behalf of respondent, that call into question responder's compliance with this order.

IT IS FURTHER ORDERED

C. this order if such complaint is filed after the order has terminated pursuant to this Part.

<u>Provided, further</u>, that if such complaint is dismissed or a federal court rules that respondent did not violate any provision of the order, and the dismissal or ruling is either not appealed or upheld on appeal, then the order asto such respondent will terminate according to this Part asthough the complaint had never been filed, except that the order will not terminate between the date such complaint is filed and thater of the dealline for appealing such dismissal or ruling all the date such dismissal or ruling is upheld on appeal.

By the Commission.

Donald S. Clark Secretary

SEAL

ISSUED: anuay 12, 2010