

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION

_____)
In the Matter of)
)
LONG FENCE & HOME, LLL P,) Docket No.
a partnership.)
)
_____)

COMPLAINT

The Federal Trade Commission, having rea

SAVINGS GUARANTEED *

AMAZING RESULTS!

Our energy use dropped so much after installing your windows — Dominion Virginia Power thought our meter was broken! We look forward to using Long Fence and Home for many years to come!

Derek and Jennifer H.
Springfield, Virginia

....

* 50% Energy Savings based on manufacturer's oneyear savings guarantee. Many factors determine actual savings and results may vary. Call for further details on our written savings guarantee.

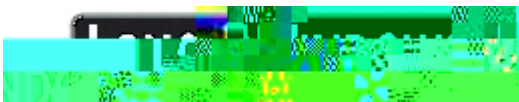
Exhibit B (Jan.-Nov. 2010) (Washington Post, Red Plum, Examiner)

C. Long Windows Print Advertisement

U Save 50% on
Energy Bills – or
LONG[®] PAYS YOU!

Exhibit C (Mar.-June 2009) (Washington Post, Red Plum, Examiner, Merchandiser).

D. Long Windows Print Advertisement



will save you more

than other replacement windows.

Save More Money and Energy

.....

· 50% energy savings guarantee

Exhibit D (Sept. 2009) (Washington Post, Red Plum Fixer, Merchandiser).

E. Long Windows Internet Promotional Material



We guarantee you'll save 50% on your heating and cooling costs - and cut your energy bills in half - when you install Long Windows throughout your home or we'll reimburse you the difference. [] Speak to your Long Windows consultant for full details.

Exhibit E (Sept. 2010) (<http://www.longwindows.com>).

F. Long Windows Energy Saving Pledge:



50% Energy Savings Guarantee

This pledges a savings of at least 50% of energy consumption for heating and cooling the residence listed below during the 12 month period beginning with the date of this pledge. In the event energy saving[s] are less than 50% of the previous 12 months['] energy consumption, the homeowner should notify Long Fence and Home who will provide the homeowner with the necessary forms to file for benefits under this pledge. If energysavings are less than 50% of the previous 12 month[s'] energy consumption, the homeowner will be reimbursed the difference between the actual savings and 50% of the energy costs for the previous 12 months.

Notwithstanding anything herein to the contrary, it is hereby agreed and understood that this pledge only be effective if the homeowner, located at the address shown hereon, has purchased a complete installation of Quantum2 replacement windows with SuperPak Glass™ glazing, and is effective on the dates shown.

.....

Exhibit F.

5. Many factors determine the savings homeowner can realize by replacing their windows, including the home's geographic location, size, insulation package, and existing windows. Consumers who replace single or double-pane wood or vinyl-framed windows – common residential window types in the United States – with Quantum2 replacement windows are not likely to achieve a 50% reduction in residential energy consumption or heating and cooling costs.

6. Through the means described in Paragraph 4, respondent has represented, expressly or by implication, that:

- A. Consumers who replace windows with Quantum2 replacement windows with SuperPak Glass are likely to achieve residential energy savings of 50%; or
- B. Consumers who replace windows with Quantum2 replacement windows with SuperPak Glass are likely to save 50% on residential heating and cooling costs.

7. 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 representation(s) set forth in Paragraph 6 at the time that the representation(s) were made.

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