

RMS

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Plaintiff, the Federal Trade Commission, for its Complaint alleges as follows:

JURISDICTION AND VENUE

~~1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1221, 1227(a)~~

[REDACTED]

other documents on the World Wide Web.

9. A "Web site" is a set of electronic files or documents, usually a home page and subordinate pages, readily viewable on a computer by anyone with access to the Web and

17. Defendant has registered thousands of domain names which are similar to others'

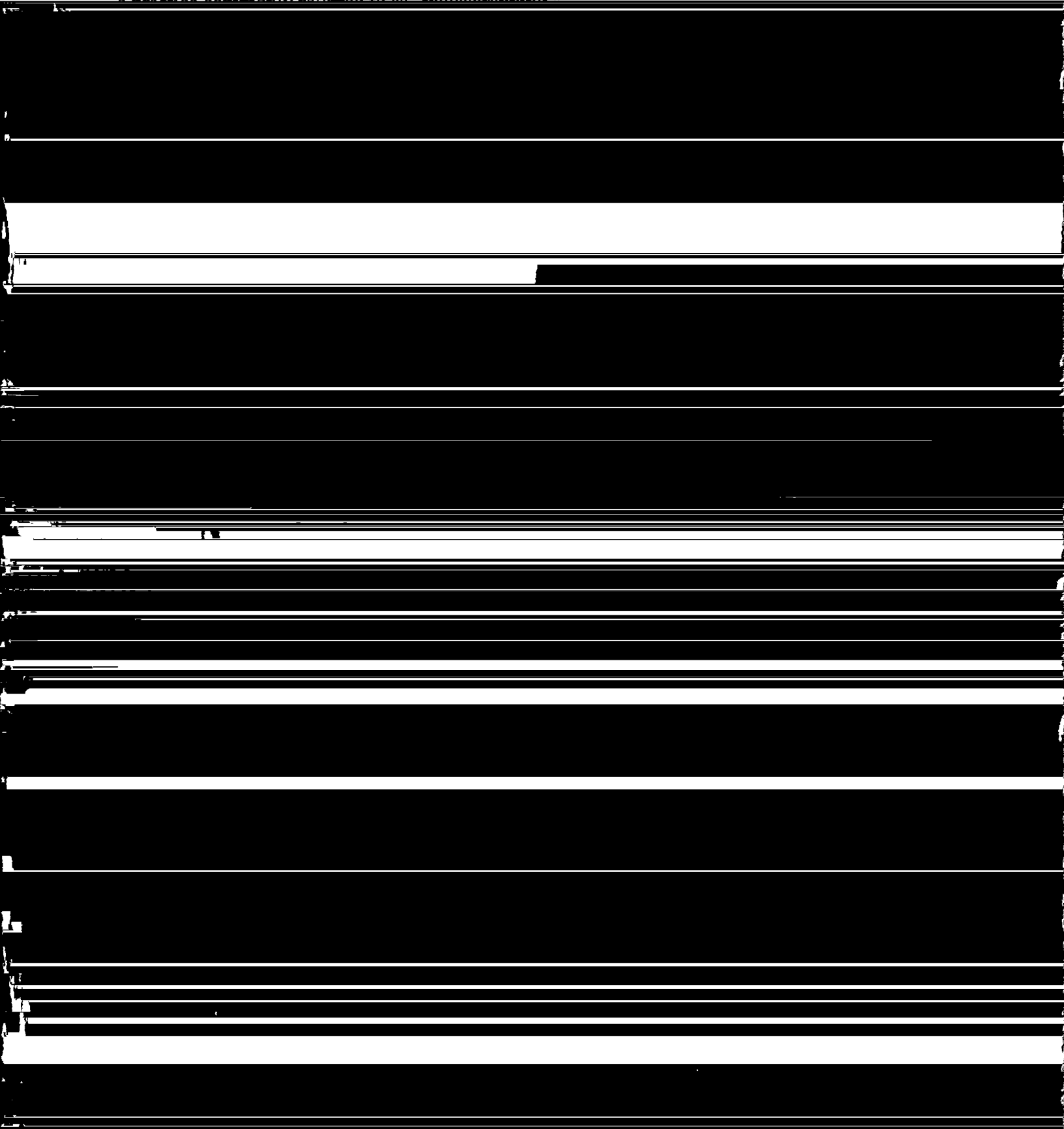
~~domain names, famous trademarks, service marks, business names, or personal names~~

words, terms, or phrases in other domain names (such as joecartoon.com, an inversion of the words in the domain name cartoonjoe.com).

21. Defendant registers his domain names in anticipation of consumers mistakenly entering his domain names in a browser address bar, usually as a typographical error or a spelling

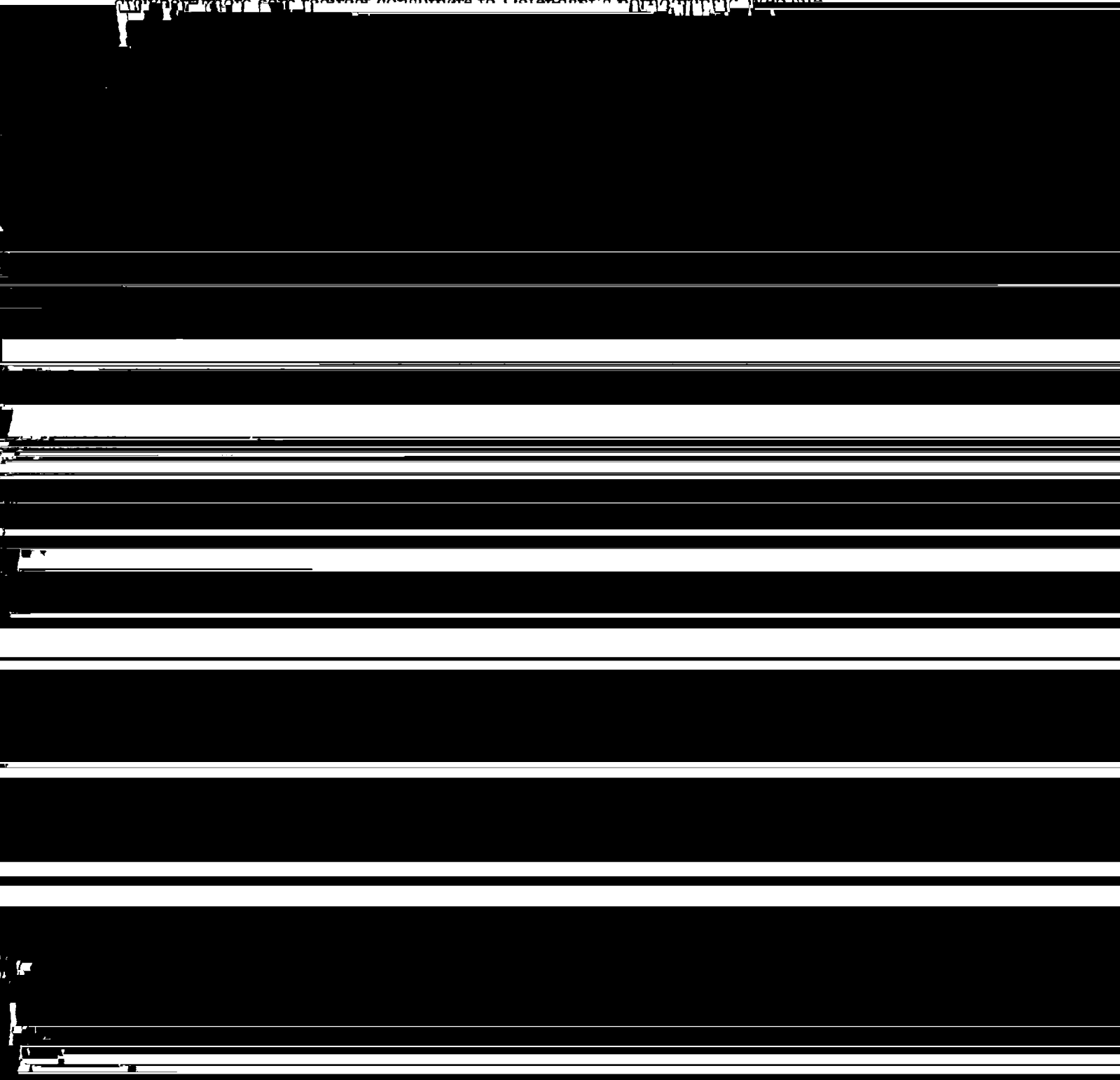
in the top right hand corner of the screen, a common way to close a browser window, will not allow consumers to exit. Rather, when consumers attempt this standard function, they find themselves in yet another new window and viewing yet another of Defendant's advertisements -

a practice commonly referred to as "popovering."



example, when consumers type the URL *www.collegeboard.com* in the address bar of their browsers, numerous browser windows are launched on consumers' display screens, one of which displays *www.collegeboard.com*, the official College Board Web site.

33. In many instances, the Web pages and advertisements that are automatically launched include sexually-explicit material. For example, the domain names *vidio.com* and *downbor.com* can redirect consumers to Defendant's pornographic Web site



COUNT I

37. In numerous instances, Defendant's practice of diverting consumers to his Web sites as described in paragraphs 17 through 20 above, in combination with his practice of

are associated with the Web site Defendant's domain name mimics.

43. In truth and in fact, Defendant's Web pages are not associated with the Web site

~~Defendant's domain name mimics~~

2. Permanently enjoin Defendant from violating the FTC Act, as alleged herein;
3. Award such relief as the Court finds necessary to redress injury to consumers

making from Defendant's violations of the FTC Act, including, but not limited to, disgorgement