

Pulse, adding to the impression that the spokesperson was providing an impartial, expert review of products. In most of these media appearances, there was no mention of any connection between the spokesperson and Respondent.

5. Respondent also used these paid spokespersons to promote the ADT Pulse in what appeared to be independent and objective reviews on the spokesperson's own website, in blog posts, and in other online materials.

6. Respondent provided both financial and in-kind compensation to its spokespersons for the activities referred to in Paragraphs 4 and 5. For example, Respondent paid three spokespersons, including a child safety expert, a home security expert, and a technology expert, a total of approximately \$313,000, with one spokesperson receiving more than \$200,000. Two of the spokespersons also received a free ADT Pulse security system, valued at approximately \$4,000, and free monthly monitoring service. In exchange, the spokespersons appeared on more than 40 different television programs in markets across the country and posted regular blogs and other online material touting the benefits of the ADT Pulse.

7. Through the television and radio appearances and online materials referred to in Paragraphs 4 through 6, Respondent's spokespersons made favorable statements about the features and benefits of the ADT Pulse. The appearances and online materials include but are not limited to those attached as Exhibits A-D. They include the following statements:

A. Today Show (NBC), January 4, 2011 (Video attached as Exhibit A)

(Excerpted from national market television interview of Alison Rhodes by Hoda Kotb and Kathie Lee Gifford)

Kotb: Keeping your kids safe when you're not around is probably the biggest concern worrying most parents.

Gifford: Well now with advances in technology, a parent's job is much easier than it was only a handful of years ago. Here to tell us what is out there is Alison Rhodes. She's a national family and safety expert known as "The Safety Mom"

[Video Banner: "KEEP YOUR KIDS SAFE
TOOLS FOR AT SCHOOL & AT HOME"]

Kotb: We were captivated by the first thing you have on your table. And it's almost, like I guess, a motion detector for kids at home while you're at work so you can check on them, right?

[Video Banner "CHILD SAFETY
ADT PULSE \$399
ADTPULSE.COM"]

Rhodes: This is truly the virtual babysitter. I travel a lot. I'm on the road. This is the ADT Pulse Home Monitoring System. I've got wireless cameras. I've got motion detectors. I've got

texts that come into my iPhone if my daughter doesn't walk into the door from school So I can see my kids if they're not doing their homework after school

Kotb: How pricey is this whole apparatus?

Rhodes: You know, it's really not that much. It starts at \$399 and then it's a monthly fee, but you actually get a discount on your homeowner's insurance because it's your ADT security system.

Gifford: That's a great idea. Smart.

Rhodes: It's amazing!

[News segment continues with Ms. Rhodes discussing three other child safety products.]

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C. Blog by Alison Rhodes, Aug. 30, 2010 (posted on www.safetymom.com)
(Exhibit C)

Tips to Remember From National Safe at Home Week by Alison Rhodes, The Safety Mom

Written by Safety Mom August 30, 2010

This blog could go on forever since there are so many things to consider about being safe at home. But, here are a few of the top things to keep in mind:

Get a security and home monitoring system. I'll admit, I never had one before but, now that I have the **ADT Pulse** system, I can't imagine living with out [sic] it. We used to have dogs which made me feel much safer but now I'm a single mom living in a home without dogs and was just informed by a friend that there were three break-ins in our community this past month. Nothing has ever given me greater peace of mind. Not only do I have a "panic" button to get the police immediately but also a medical emergency button and fire button. I have a camera monitoring my driveway so I can see who is driving in and I can lock and unlock the doors remotely from my computer or iPhone. I also get alerts if my daughter hasn't walked in the door

