DOCKE

UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

COMMISSIONERS:	Edith Ramirez, Chairwomandoing business as the)	
	Denver Broncos Football Club,)	
	a limited partnership.)	
)	
)	

COMPLAINT

The Federal Trade Commission, having reason to believe that PDB Sports, Ltd., doing business as the Denver Broncos Football Club, a limited partnership, has violated the Federal Trade Commission Act ("FTC Act"), and it appearing to the Commission that this proceeding is in the public interest, alleges:

- 1. Respondent PDB Sports, Ltd., doing business as the Denver Broncos Football Club, ("Denver Broncos") is a Colorado limited partnership with its principal office or place of business at 13655 Broncos Parkway, Englewood, CO 80112.
- 2. Respondent is a professional football team and a member of the National Football League.
- 3. The acts and practices of respondent as alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act.
- 4. Respondent has set forth on its website, www.denverbroncos.com, privacy policies and statements about its practices, including statements related to its participation in the Safe Harbor privacy framework agreed upon by the U.S. and the European Union ("U.S.-EU Safe Harbor Framework").

The

5. The U.S.-EU Safe Harbor Framework provides a method for U.S. companies to transfer personal data outside of Europe that is consistent with the requirements of the European Union Directive on Data Protection ("Directive"). Enacted in 1995, the Directive sets forth

European Union ("EU") requirements for privacy and the protection of personal data. Among other things, it requires EU Member States to implement legislation that prohibits the transfer of personal data outside the EU, with exceptions, unless the European Commission ("EC") has made a determination that the recipient jurisdiction's laws ensure the protection of such personal data. This determination is referred to commonly

12.	Through the means described in Paragraph 11, respondent represented, expressly or by implication, that it was a "current" participant in the U.SEU Safe Harbor	