

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Edith Ramirez, Chairwoman
Julie Brill
Maureen K. Ohlhausen
Terrell McSweeney

In the Matter of)
)
One Industries Corp.,)
a corporation.)
_____)

DOCKET NO. C-4544

COMPLAINT

The Federal Trade Commission, having reason to believe that One Industries Corp., a corporation, 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 One Industries Corp. is a Delaware corporation with its principal office or place of business at 12270 World Trade Drive, Suite 103, San Diego, California 92128.

10. Through the means described in Paragraph 9, respondent has represented, expressly or by implication, that it is a “current” participant in the U.S.-EU Safe Harbor.

11. In truth and in fact, respondent is