

In the Matter of

WARNER BROS. HOME  
ENTERTAINMENT INC.,  
a corporation.

Docket No.

COMPLAINT

The Federal Trade Commission, having reason to believe that Warner Bros Home Entertainment Inc., a corporation (respondent), has violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent Warner Bros Home Entertainment Inc. ("WBHE") is a Delaware corporation with its principal office or place of business at 4000 Warner Blvd., Burbank, California 91522. Warner Bros Interactive Entertainment ("WBIE") is a division of WBHE.





campaign to promote sales of the game. Therefore, the representation set forth in Paragraph 14 was, and is, false and misleading.

Count II

Deceptive Failure to Disclose Material Connection Between Endorsers and Seller

16. Through the means described in Paragraphs 4 through 13, respondent presented, directly or indirectly, expressly or by implication, that favorable gameplay videos for Shadow of Mordor reflect the opinions or experiences of individuals who played Shadow of Mordor. In numerous instances, respondent has failed to disclose or disclose adequately the fact that the individuals received compensation including both free game and monetary payment, to produce and disseminate the videos. This fact would be material to consumers in their decision to purchase Shadow of Mordor. The failure to disclose or disclose adequately this fact, in light of the representations made, is a deceptive practice.

Violations of Section 5

17. The acts and practices of respondent as alleged in this Complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this \_\_\_\_ day of, 2016, has issued this Complaint against respondent

By the Commission

Donald S. Clark  
Secretary

SEAL: