

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

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

In the Matter of

**WARNER BROS. HOME
ENTERTAINMENT INC.,
a corporation.**

Docket No. C-4595

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.
2. The acts and practices of respondent, as alleged herein, have been in or affecting commerce, as “commerce” is defined in Section 4 of the Federal Trade Commission Act.
3. Respondent produces and distributes home entertainment content to consumers.

had for other information about *Shadow of Mordor*. (See, e.g., Exhibit A-1) Accordingly, the vast majority of YouTube influencers did not include any sponsorship disclosure in their videos and only placed their sponsorship disclosures “below the fold” in the description box below the video. Therefore, consumers have to click on a “Show More” button in the description box and potentially scroll down before they can see the sponsorship disclosure. (See, e.g., Exhibits A-1, A-2; Exhibits B-1, B-2) As a result, consumers who watched these YouTube videos were unlikely to learn that the videos were paid promotions.

10. Respondent, through Plaid Social, required the YouTube influencers to promote their videos on Twitter or Facebook. When the influencers posted these videos for consumers to view on Twitter or Facebook, however, consumers were even less likely to see a r0.001 Tw 5i,j /TT3 0.001 Tc -0n9

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