UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS:

Joseph J. Simons, Chairman
Noah Joshua Phillips
Rohit Chopra
Rebecca Kelly Slaughter
Christine S. Wilson

In the Matter of

DOCKET NO.

DECISION AND ORDER
a corporation.

DECISION

The Federal Trade Commissio(fCommission") initiated an investigation of chain acts and practices of the spondent nameabove in the caption. The Commission's Bureau of Consumer Protection ("BCP") prepared and furnished to Respondent a draft Compath. proposed to present the draft Complaint to the Commission for its consideration. If issued by the Commission, the draft Complaint would charges sondent with violation of the seral Trade Commission Act.

Respondent and BCP thereafter executed an Agreement Containing Consent Order ("Consent Agreemet"). The Consent Agreement includes: 1) statements by Respondent that neither admit nor deres any of the allegations in the Complaint, except as specifically stated in this Decision and Order, and that only for purposes of this actiand mittes the facts necessary to establish jurisdiction; and 2) waivers and other provisions as required by the Commission's Rules.

The Commission considered the matter and determined that it had reason to believe that Respondent Issaviolated the Federal Trade Commission Act, and that a Complaint should issue stating its charges in that respect. The Commission accepted the executed Consent Agreement and placed it on the public record for a period of thistogrees34 (ed)6 (t)3s0h]TJ 0 0h]TJ 0 0hccOor a period of thistogrees34 (ed)6 (t)3s0h]TJ 0 0h]TJ 0 0hccOor a period of thistogrees34 (ed)6 (t)3s0h]TJ 0 0hccOor a period of thistogrees3

Findings

- 1. Respondent tota Data, Inc. is a Delaware corporation with its principal office or place of business at 169 11th Street, San Francisco, CA 94103.
- 2. The Commission has jurisdiction over subject matter of this proceeding and Respondent, author proceeding is in

VI. Order Effective Dates

IT IS FURTHER ORDERED that this Order is final and effective upon the date of its publication on the Commission's website (ftc.gov) as a final order will terminate twenty (20) years from the date of its issuar (note) that may be stated at the end of this Order, near the Commission's seable, twenty (20) years from the most recent date that the United States or the Commission files a complaint (with or with no uncompanying settlem) ent in federal court alleging my violation of the Oder, whichever comes laterovided, however, that the filing of such a complaint will not affect the duration of:

- A. any Provision in this Order that terminates in **Iteas** twenty (20) years;
- B. this Order's application to any respondent that is not named as a defendant in complaint; and
- C. this Order if such complaint is filed after the order **Itens** minated pursuant to this Provision.

 $Provided, further, 0 \ Td \quad (\) Tj \quad -0.05 \ Tc \ 1 \ (r) -1 (e0 \ (ue \quad (\) Tj \quad -11 \ (r) -tB (e0 \ (uaTh4 \quad -0.05 \ T(p) -50 \ (ur) -67 \ (s) -61 \ (ue \quad (\) Tj \quad -11 \ (r) -tB (e0 \ (uaTh4 \quad -0.05 \ T(p) -50 \ (ur) -67 \ (s) -61 \ (ue \quad (\) Tj \quad -11 \ (r) -tB (e0 \ (uaTh4 \quad -0.05 \ T(p) -50 \ (ur) -67 \ (s) -61 \ (ue \quad (\) Tj \quad -11 \ (r) -tB (e0 \ (uaTh4 \quad -0.05 \ T(p) -50 \ (ur) -67 \ (ue \quad (\) Tj \quad -11 \ (r) -tB (e0 \ (uaTh4 \quad -0.05 \ T(p) -50 \ (ue \quad (\) -67 \ ($