











emotional injury are exempt unless we can prove something about















The idea of determining that an ad is addressed to a "vulnerable group" can be pretty tricky, however -- both in deciding who's vulnerable and in deciding who's the principal audience. 20/

In addition, intent is notoriously difficult to prove. Consequently, until now, it has been accepted without question by the advertising community and the Commission that the intent of







Maybe Chairman Miller believes that such an opinion claim