

13. An approximate translation of an excerpt from the typical Spanish-language script for the Pixel 4 radio advertisements is:

Pixel 4 is my favorite camera in low light. Its Night Sight mode opened up a galaxy of possibilities for my photos, like the Milky Way! No, really! I just point the camera at the sky and take Instagram-ready photos of the stars! It's easy.

I don't have to learn anything new or do any fancy editing to obtain studio-quality photos at any time and anywhere, like birthday parties, low-light concerts, my mom and dad's 50th birthdays.

And with the continuous zoom feature, I didn't miss a second of my daughter's school play even though I was in the last row.

14. In October 2019, an iHeartMedia employee wrote in an email to Google's media buying agent that the company would like to have its Radio Personalities "customize certain parts of the script pending [sic] what's relevant to their personal lives (i.e. [sic] if they have kids, involved in certain activities/hobbies, etc [sic])." Google's media buying agent approved this request.

15. Before the first advertisements by iHeartMedia's Radio Personalities were recorded, an iHeartMedia employee wrote an email to Google's media buying agent requesting Pixel 4s for the Radio Personalities:

I know this has been something that we have brought up numerous times, but it's something that we really need to get to our voicing talent, especially if we want them to use their own first person tense when voicing. We . . . cannot require talent to use "I" in voiced spots when they have not physically used the product For this reason, we may receive spots from stations that adjust the tense slightly to remove the personalization of "I."

The iHeartMedia employee also wrote that "a few markets" also had raised concerns about Radio Personalities using first person without actually having the smartphones. Google's media buying agent checked with Google and wrote back:

Just heard back from [Google] in regards to [sic] sending Pixels to your talent. Unfortunately, this is not feasible for [Google] at this time as the product is not on shelves yet. It would take over a week to ship all of these phones out resulting in a loss of airtime.

16. In October 2019, forty-three iHeartMedia

own or possess a Pixel 4 and had not

25. The acts and practices of Respondents 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.

, the Federal Trade Commission this _____ day of _____, 202__, has issued this Complaint against Respondents.

By the Commission.
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Exhibit A

Audio recording of Pixel 4 advertisement that aired on WKSC-FM in Chicago, IL 278 times from October 28, 2019 through December 2, 2019

Exhibit B

Audio recording of Pixel 4 advertisement that aired on KODA-FM in Houston, TX 250 times from October 28, 2019 through December 2, 2019

Exhibit C

Audio recording of Pixel 4 advertisement that aired on KYLD-FM in San Francisco, CA 222

Exhibit D

Audio recording of Pixel 4 advertisement that aired on WBZY-FM in Atlanta, GA 165 times from October 28, 2019 through December 2, 2019

Exhibit E

Audio recording of Pixel 4 advertisement that aired on KTCL-FM in Denver, CO 167 times from February 18, 2020 through March 13, 2020

