

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION



ORIGINAL

COMMISSIONERS: Edith Ramirez, Chairwoman  
Julie Brill  
Maureen K. Ohlhausen  
Joshua D. Wright  
Terrell McSweeney

\_\_\_\_\_  
In the matter of: )  
)  
)  
Jerk, LLC, a limited liability company, ) DOCKET NO. 9361  
)  
)  
Also d/b/a JERK.COM, and )  
)  
John Fanning, )  
Individually and as a member of )  
Jerk, LLC, )  
)  
Respondents. )  
\_\_\_\_\_

**RESPONDENT JERK LLC’S RESPONSES TO COMPLAINT COUNSEL’S  
SECOND SET OF INTERROGATORIES**

Respondent Jerk LLC provides the following answers to Complaint Counsel’s Second set of Interrogatories:

1. Identify all current and past investors in Jerk, LLC or Jerk.com, including any individual or entity directly invested in Jerk, LLC or Jerk.com.

Answer to Int. 1

Yosi Amram, Joe Abrams

2. Identify (1) each email account that the Company has used, and (2) for each account, each person who has corresponded through that account, including but not limited to support@jerk.com.

Answer to Int. 2

No idea at this time.

3. Identify all individuals who have sent messages from the email account john@netcapital.com.

Answer to Int. 3

Titus Robinson has used that shared email address. I am not sure of anyone else.

4. Identify (1) each Twitter account that the Company has used, and (2) for each such account, each person who has used that account to post a message from that account.

Answer to Int. 4

I am aware of a Twitter account with the user name @Jerk\_com. I do not have any information regarding who owned, had access to, or used that account.

5. Describe in detail any service or work that Respondent John Fanning has provided to Jerk, LLC.

Answer to Int. 5

None that I am aware of. John works with NetCapital.com, LLC, and that company was involved with supporting the Jerk project.

6. Describe how Jerk.com grew to have 85 million profiles within a few months of the website's launch.

Answer to Int. 6

I assume that a lot of people liked the site.

7. Describe the "Find People I Know" feature on Jerk.com, including what happened when consumers logged into Jerk.com using their Facebook credentials.

Answer to Int. 7

I do not know. Independent contractor developers may know.

SWORN TO AND SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY  
THIS 20TH DAY FEBRUARY 2015.

JERK, LLC

By: /s/ Titus Robinson  
Titus Robinson

Its: Authorized Representative



**CERTIFICATE OF SERVICE**

I hereby certify that on February 20, 2015, I caused a true and accurate copy of the foregoing document entitled Respondent Jerk, LLC's Answers to Complaint Counsel's Second Set of Interrogatories to be served as follows:

One electronic copy to the Office of the Counsel for the Federal Trade Commission:

Sarah Schroeder  
Federal Trade Commission  
901 Market Street, Suite 670  
San Francisco, CA 94103  
Email: sschroeder@ftc.gov

Peter F. Carr, II  
ECKERT, SEAMANS, CHERIN & MELLOTT, LLC  
Two International Place, 16<sup>th</sup> Floor  
Boston, MA 02110  
Email: pcarr@eckertseamans.com

/s/ Alexandria B. Lynn

Dated: February 20, 2015

Notice of Electronic Service for Public Filings

**I hereby certify that on February 20, 2015, I filed via hand a paper original and electronic copy of the foregoing RESPONDENT JERK LLC'S RESPONSES TO COMPLAINT COUNSEL'S SECOND SET OF INTERROGATORIES, with:**

D. Michael Chappell  
Chief Administrative Law Judge  
600 Pennsylvania Ave., NW  
Suite 110  
Washington, DC, 20580

Donald Clark  
600 Pennsylvania Ave., NW  
Suite 172  
Washington, DC, 20580

**I hereby certify that on February 20, 2015, I filed via E-Service of the foregoing RESPONDENT JERK LLC'S RESPONSES TO COMPLAINT COUNSEL'S SECOND SET OF INTERROGATORIES, with:**

Sarah Schroeder  
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**I hereby certify that on February 20, 2015, I filed via other means, as provided in 4.4(b) of the foregoing RESPONDENT JERK LLC'S RESPONSES TO COMPLAINT COUNSEL'S SECOND SET OF INTERROGATORIES, with:**

Peter F. Carr, II  
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Respondent

Alexandria Lynn  
Attorney