

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION



In the matter of:)
)
Jerk, LLC, a limited liability company,)
)
Also d/b/a JERK.COM, and)
)
John Fanning,)
Individually and as a member of)
Jerk, LLC,)
)
Respondents.)

DOCKET NO. 9361

PUBLIC

ORIGINAL

**RESPONDENT JERK, LLC’S RESPONSES TO COMPLAINT COUNSEL’S
SECOND REQUESTS FOR ADMISSIONS**

Pursuant to Rule 3.32(b), Respondent Jerk, LLC provides the following responses to
Complaint Counsel’s Second Requests for Admissions:

1. Paragraphs 4 through 14 of the Federal Trade Commission’s Complaint in this
action (the “Complaint”) accurately describe Jerk, LLC’s acts and practices.

Denied.

2. Jerk, LLC has made deceptive representations in violation of Section 5(a) of the
Federal Trade Commission Act as described in Paragraphs 15 through 19 of the Complaint.

Denied.

3. John Fanning has been a managing member of Jerk, LLC.

Denied.

4. John Fanning has had authority to control Jerk, LLC’s acts and practices.

Denied.

5. NetCapital.com, LLC has the majority shareholder Jerk, LLC.

Denied.

6. Jerk, LLC does not currently carry out any activities, including any ongoing business.

Denied.

7. Jerk, LLC does not currently have any place of business.

Denied.

8. Jerk, LLC does not currently have any members, officers, directors, managers, or employees.

Denied.

SWORN TO AND SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY
THIS 20TH DAY OF 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 to be served a true and accurate copy of the document entitled *Respondent Jerk, LLC's Responses to Complaint Counsel's Second Requests for Admissions*, previously served on Complaint Counsel on December 4, 2014, as follows:

To the Office of the Secretary:

Donald S. Clark, Secretary
Federal Trade Commission
600 Pennsylvania Ave., N.W., Room H-159
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Complaint Counsel:

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Counsel for John Fanning:

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/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 REQUESTS FOR ADMISSIONS , 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 REQUESTS FOR ADMISSIONS , 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 REQUESTS FOR ADMISSIONS , with:

Peter F. Carr, II
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Respondent

Alexandria Lynn
Attorney