

looks into her brain again.] Missy, go do your homework. [Inside Missy's brain we see lively, active neurons.]

NEURON: Let's go, guys, time to do homework.

PROFESSOR WONDER: Wow! I've never seen anything like it! Calcium helps you remember things, too. So remember, Wonder helps build strong bodies and minds."

* The following superscript appears in small, white type, on varying backgrounds, at the bottom of the screen, for approximately three (3) seconds: "With regular exercise and a balanced diet."

(Exhibit A) (Exhibit A is a storyboard of a thirty-second television advertisement)
(See also Exhibit B, a videotape version of the advertisement)

5. Through the use of the statements and depictions contained in the advertisements referred to in paragraph 4, including but not necessarily limited to the advertisements attached as Exhibit A, respondent has represented, expressly or by implication, that:

- A. As a good source of calcium, Wonder Bread helps children's minds work better, and
- B. As a good source of calcium, Wonder Bread helps children remember things.

6. Through the means described in Paragraph 4, respondent has represented, expressly or by implication, that it possessed and relied upon a reasonable basis that substantiated the representations set forth in Paragraph 5, at the time the representations were made.

7. In truth and in fact, respondent did not possess and rely upon a reasonable basis that substantiated the representations set forth in Paragraph 5, at the time the representations were made. Therefore, the representation set forth in Paragraph 6 was, and is, false or misleading.

8. Respondent knew or should have known that the representation set forth in paragraph 6 was and is false or misleading.

9. The acts and practices of respondent as alleged in this complaint constitute unfair or deceptive acts or practices and the making of false advertisements in or affecting commerce in violation of Sections 5 and 12 of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission on this ___day of _____, 2002, has issued this complaint against respondent.

By the Commission.

Donald S. Clark
Secretary

SEAL: