

PUBLIC

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
Washington, D.C.



ORIGINAL

In the Matter of:

RagingWire Data Centers, Inc.,

a corporation.

DOCKET NO. 9386

**RESPONDENT RAGINGWIRE DATA CENTERS, INC.'S
OPPOSITION TO COMPLAINT COUNSEL'S MOTION TO COMPEL
RESPONSES TO COMPLAINT COUNSEL'S
FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION**

Pursuant to Rule 3.38 of the Commission’s Rules of Practice for Adjudicative Proceedings (16 CFR § 3.38), Respondent RagingWire Data Centers, Inc. (“RagingWire”) submits this opposition to Complaint Counsel’s Motion to Compel Responses to Complaint Counsel’s First Set of Interrogatories and Requests for Production.

I. BACKGROUND

This proceeding involves a fairly narrow issue, since resolved. The Complaint asserts that “[f]rom approximately January 2017 until October 2018” RagingWire “disseminated” representations concerning RagingWire’s compliance with Privacy Shield “in its online privacy policy.” Complaint ¶ 20. In other words, during that period, RagingWire’s online privacy policy stated that RagingWire complied with Privacy Shield when it allegedly did not comply. The Complaint also alleges that RagingWire “disseminated or caused to be disseminated sales materials containing representations that RagingWire was a participant in Privacy Shield and/or the Safe Harbor Framework after it was no longer participating in the frameworks” but cites as the only example of this alleged behavior a “Sales Tour Deck” that contained a reference to Safe Harbor compliance. *Id.* ¶ 21. The Complaint does not allege that any customers or potential customers saw the slide referencing Safe Harbor during the period at issue in this matter. Furthermore and significantly, in both the Complaint and its motion, Complaint Counsel acknowledges that Privacy Shield replaced Safe Harbor in 2016, *i.e.*, before the period during which the deception charged in this matter allegedly occurred. *Id.* ¶ 8; motion at 5.

While the Complaint describes EU’s data protection regime known as the General Data Protection Regulation (“GDPR”), it does not and cannot allege a violation of GDPR as the Commission has no authority to enforce foreign privacy law. Nor does the complaint allege that there were any misrepresentations by RagingWire about GDPR.

The Complaint was filed after Commission staff had investigated for over 11 months. Declaration of Diana E. Schaffner (Schaffner Dec.) at ¶ 2. During the investigation, RagingWire responded to every staff request for information, including production of all requested documents. *Id.* ¶ 3.

On December 10, 2019, Complaint Counsel served its First Set of Interrogatories and First Requests for Production. Pursuant to the December 30, 2019, Order Granting Respondent's Motion for Extension of Time to Respond to Discovery Requests, RagingWire served its objections and written responses to both on January 23, 2020. *Id.* ¶ 4. At that time, RagingWire also produced 100 documents, including complete production in response to Request Nos. 5 (customer agreements), complete production to Request No. 7 as to Privacy Shield (documents sufficient to show monies paid for participation or compliance), and production responsive to Request No. 10.¹ *Id.* ¶ 6.

Complaint Counsel's Requests for Production called for comprehensive production of documents falling into several categories that are not kept together in the ordinary course of RagingWire's business. *See* Wetherill Dec. Ex. B, Request Nos. 1, 2, 3, 4, 6, and 8. Accordingly, location and identification of documents responsive to these requests requires collection of electronic files from numerous custodians, application of reasonable search terms to those files (including iterative processes where search terms prove overly broad), review of documents identified via search terms for actual responsiveness, and identification and

¹ In its responses, RagingWire objected to production of information for the period after the end of the alleged deception. While RagingWire believes that objection is appropriate, in an effort to avoid dispute, RagingWire has since agreed to extend the relevant period to the date the Complaint was filed. As a result, RagingWire will be supplementing its response to Request No. 5 (customer agreements). Schaffner Dec. ¶ 6.

In addition, while Request No. 10 broadly asked for "[a]ll documents" relating to how RagingWire decides to price its services, documents RagingWire produced on January 23 provide a detailed description of its pricing process.

segregation of any privileged documents. This process is time- and resource-consuming and familiar to anyone engaged in litigation in the modern age.

Furthermore, just weeks after serving their initial Interrogatories and requests for production, and before RagingWire could respond to the initial requests, Complaint Counsel served a second set on January 2, 2020. Schaffner Dec. ¶ 8. Responses to this discovery are due on February 3, 2020. To avoid duplication of effort and expense, RagingWire reasonably seeks to identify documents responsive to either set during a single review process. *Id.*

Application of reasonable search terms to the files of relevant custodians has yielded tens of thousands of documents for review. *Id.* ¶ 10. RagingWire is working diligently to review the documents and will produce responsive documents on a rolling basis until production in response to both sets of discovery is complete. *Id.*

II. ARGUMENT

What is missing from each aspect of Complaint Counsel's motion to compel is any sense of proportionality. *See, e.g., United States v. Wyatt*, 637 F.2d 293, 302 (5th Cir. 1981)(citations omitted) (even in the context of an investigative summons, a request is overbroad where it is “out of proportion to the ends sought”); Fed. R. Civ. P. 26(b)(1).

This matter involves inadvertent errors leading to an alleged misstatement that was corrected more than a year ago. There is no allegation of on-going deception, nor is there any allegation that anyone actually was misled, let alone injured.² Indeed, as set forth in RagingWire's motion to dismiss, there is no allegation that the alleged misstatement was material such that deception was even possible.

² Contrary to Complaint Counsel's assertion (motion at 3), RagingWire understands that proving actual reliance is not necessary to establish a Section 5 deception claim. Nonetheless, the absence of any allegation of reliance or harm speaks to the seriousness of the alleged violation.

Because it believes that it did not, in fact, violate Section 5, RagingWire elected to exercise its right to contest the allegations. Just as it cooperated in the investigation, RagingWire has every intention to comply with Complaint Counsel's discovery requests notwithstanding the significant expense and effort required to do so. For the most part, RagingWire intends to respond in full. However, doing so takes time.

There are two respects in which RagingWire has objected to Complaint Counsel's discovery as simply going too far in relation to the nature of the issues in this case. First, RagingWire objects to searching for and providing information regarding GDPR. Second, RagingWire objects to searching for and providing information relating to the Safe Harbor framework. The reasons for these objections are explained below.

A. A Rolling Production Is Appropriate

Complaint Counsel wants RagingWire to locate and produce several categories of documents that can only be located by searches of electronic files using relatively broad search terms and then manual review of the resulting documents, many of which will not actually be responsive to the requests. Complaint Counsel's requests cover topics the responsibilities for which are spread across numerous custodians. RagingWire is diligently working to provide the documents Complaint Counsel has requested on a rolling basis, prioritizing searches for documents most likely to be relevant to the issues in this matter (for example, documents referencing "Privacy Shield"). *See* Schaffner Dec. ¶¶ 6-10.

RagingWire understood the order extending the date for it to serve responses to Complaint Counsel's requests as setting the date for written responses, which RagingWire served, along with partial document production, on the appointed date. This is fully consistent with common practice in litigation matters. Rather than engage RagingWire counsel in a

discussion around priorities for the on-going production, Complaint Counsel rushed to file its motion to compel. Complaint Counsel's request for immediate production of all responsive documents is unrealistic. It is also unfair given that staff had the advantage of a lengthy pre-Complaint investigation. *Id.* ¶¶ 2-3.

RagingWire will continue to produce documents on a rolling basis while the motion is pending, and Complaint Counsel will receive the requested information in plenty of time to further prepare its case.³ *Id.* ¶ 10. In other words, Complaint Counsel's motion as to timeliness of production was completely unnecessary, and RagingWire requests that the motion be denied.

B. Information Related to GDPR Is Not Relevant

The Complaint alleges a deceptive trade practice under Section 5 of the FTC Act. It does not allege that RagingWire had any obligations under GDPR or that it failed to meet any such obligations, let alone that it engaged in deceptive conduct with respect to GDPR. Instead the Complaint (at ¶ 11) asserts that using an agent that is a Privacy Shield participant is "one way" for entities to satisfy their own obligations under GDPR or Privacy Shield. So, even as pleaded by Complaint Counsel, any relevance of GDPR to RagingWire's business is tied to RagingWire's participation or non-participation in Privacy Shield.

Because RagingWire will produce any documents responsive to Complaint Counsel's requests that reference Privacy Shield, any of those documents also referencing GDPR will be produced, and Complaint Counsel will have the benefit of those documents. To require RagingWire to search for and produce documents referencing GDPR unrelated to Privacy Shield would add to the burden of production and is not likely to yield documents relevant to the

³ RagingWire notes that Complaint Counsel highlights its supposed immediate need for the discovery in order "to identify key customers" (motion at 8). However, RagingWire produced a list of customers in its response to Interrogatory No. 1 and produced customer agreements in its initial document production. Schaffner Dec. ¶ 6. In addition, Complaint Counsel's initial disclosures included a lengthy list of RagingWire customers.

alleged wrongdoing – RagingWire’s statement in its privacy policy that it complied with Privacy Shield. Discovery sought in a proceeding before the Commission must be “reasonably expected to yield information relevant to the allegations of the complaint, to the proposed relief, or to the defense of any respondent.” 16 C.F.R. 3.31(c)(1); *Federal Trade Commission v. Anderson*, 631 F2d 741, 745 (D.C. Cir. 1979).

Complaint Counsel asserts that documents regarding GDPR could be relevant to the materiality element of its claim that it failed to plead in the Complaint. However, since the alleged deception revolves around Privacy Shield, references to GDPR in other contexts will not shed light on the (im)materiality of RagingWire’s representations regarding Privacy Shield. Instead, requiring RagingWire to search for GDPR information untethered to Privacy Shield is a classic “fishing expedition.” In addition, GDPR did not go into effect until two years after RagingWire began participating in Privacy Shield and more than a year after the alleged deception began. Complaint Counsel’s motion to compel RagingWire to produce stand-alone GDPR documents should be denied.

C. Information Related to the Safe Harbor Framework is Irrelevant

Although the focus of this matter is RagingWire’s alleged misstatement concerning Privacy Shield compliance in 2017 and 2018, Complaint Counsel seeks to compel extensive production of information related to the Safe Harbor Framework, including information and materials from over a decade ago.⁴ This information is not relevant to the claims in this case. In addition, because they are not limited as to time, identifying and providing Safe Harbor

⁴ Complaint Counsel includes Safe Harbor in its Request Nos. 1, 2, 3, 6, 7 and 8 and Interrogatory No. 5, and RagingWire has objected to searching for and providing that information. Interrogatory No. 6 also references Safe Harbor, but RagingWire does not believe that the presence or absence of Safe Harbor materially affects its response to that interrogatory.

documents in response to Request No. 6 and Interrogatory No. 5 would be quite burdensome for RagingWire.

While the Complaint includes conclusory references to deceptive statements regarding compliance with “the E.U.-U.S. Privacy Shield Framework and/or EU-U.S. Safe Harbor Framework,” the only claim of misrepresentation pertains to Privacy Shield. And the only allegation regarding Safe Harbor concerns inclusion in 2018 in the “Sales Tour Deck” of a slide representing that RagingWire participated in Safe Harbor. *See* Complaint ¶ 21. The Complaint carefully does not claim that the inclusion in that deck was deceptive or that any customer or potential customer actually saw this slide or that, if they did, it would have been material to their decision-making in 2018 when Safe Harbor was no longer operative.

Complaint Counsel’s Request No. 3 specifically asks for documents related to the Sales Tour Deck, including “use” of that deck. Contrary to the suggestion in Complaint Counsel’s motion (at 5), because it does go to an actual allegation (albeit unsubstantiated) in the Complaint, RagingWire has not objected to this request and will produce any documents responsive to it. Schaffner Dec. ¶5.

Complaint Counsel’s other requests for Safe Harbor information are another story. Complaint Counsel asserts that since both Safe Harbor and Privacy Shield concern data transfers under EU data privacy law, information regarding RagingWire’s participation in Safe Harbor could shed light on the materiality of RagingWire’s representations regarding its participation in Privacy Shield. However, they are separate programs adopted years apart. Once again, Complaint Counsel is seeking discovery unrelated to the matter at issue in the Complaint.

Furthermore, although the date range for the Complaint Counsel’s other discovery requests begins June 1, 2016, one of Complaint Counsel’s requests for production (Request No.

6) and one of its interrogatories (Interrogatory No. 5) seek information “regardless of date” relating to RagingWire’s decision to participate or continue to participate in Safe Harbor or Privacy Shield. Safe Harbor went into effect in 2000 (Complaint ¶ 8), nearly two decades before the alleged misrepresentation concerning Privacy Shield. Locating and producing responsive information, should it even exist, would impose significant burdens on RagingWire that would be way out of proportion to the needs of this matter. This is not a situation in which responsive documents could be expected to reside in a single location. Instead, going back this far in time would require identification of persons involved through the years, determining if their files still exist, and, if so, processing enormous volumes of data to try to locate irrelevant needles in a haystack. In addition, even if such documents, with substantial effort, could be located, the passage of time further diminishes the likelihood that information, if any, would shed light on the materiality of representations concerning Privacy Shield.

Complaint Counsel’s motion to compel production of Safe Harbor documents should be denied. At minimum, it should be denied to the extent that it seeks documents pre-dating June 1, 2016. *Cf. In re North Texas Specialty Physicians*, 2004 FTC LEXIS 19, *4 (Feb. 4, 2004) (a request for documents relating to the time period which was investigated by Complaint Counsel is not unreasonable).

WHEREFORE, Respondent requests that Complaint Counsel's motion to compel be denied in its entirety.

Dated: February 3, 2020

Respectfully submitted,

/s/ Corey W. Roush _____

Corey W. Roush

C. Fairley Spillman

Diana E. Schaffner

AKIN GUMP STRAUSS HAUER & FELD LLP

2001 K. Street, N.W.

Washington, DC 20006

(202) 887-4000

Counsel for Respondent

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 3, 2020, a copy of the foregoing was electronically filed using the Commission's Electronic Filing System and was sent by that system and by certified mail to the following:

April J. Tabor, Acting Secretary
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

I HEREBY CERTIFY that that a copy of the foregoing has been served upon all parties to this cause by electronic mail as follows:

Linda Kopp
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580
lkopp@ftc.gov

Robin Wetherill
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
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Counsel for Plaintiff Federal Trade Commission

February 3, 2020:

By: /s/ Corey W. Roush

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Counsel for Respondent

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
Washington, D.C.**

In the Matter of:

RagingWire Data Centers, Inc.,

a corporation.

DOCKET NO. 9386

DECLARATION OF DIANA E. SCHAFFNER

1. I am an attorney at Akin Gump Strauss Hauer & Feld, LLP, counsel for Respondent RagingWire Data Centers, Inc. (“RagingWire”) and have personal knowledge of the matters set forth herein. This declaration is submitted in support of RagingWire’s opposition to Complaint Counsel’s January 27, 2020, motion to compel.
2. Prior to filing the Complaint, Bureau of Consumer Protection staff conducted a lengthy investigation. As part of that investigation, the Bureau served a Civil Investigative Demand on RagingWire on October 1, 2018. *See* Exhibit 1, attached.
3. During the course of the pre-complaint investigation, RagingWire produced 42 documents and responded to 13 specifications, many with several subparts. RagingWire provided all of the information requested by investigation staff. Among the information provided was information on RagingWire’s annual revenue for the relevant years; details of RagingWire’s efforts to comply with Privacy Shield, with relevant dates and document citations; information on RagingWire’s use of external parties to assist in its compliance efforts (e.g., TrustArc and Holland & Hart LLP); and details on what information

RagingWire collected during the relevant period. In addition, RagingWire met with staff and leaders of the Bureau of Consumer Protection on at least two occasions to provide relevant background information and context for the matter (in June and July 2019), and met with four of the Commissioners of the Federal Trade Commission in September 2019 to provide further background information and context.

4. RagingWire served its Objections and Responses to Complaint Counsel's First Set of Interrogatories and its Objections and Responses to Complaint Counsel's First Set of Requests for Production on January 23, 2020. *See* Exhibits C and D to Wetherill Declaration filed in support of Complaint Counsel's motion to compel.
5. As reflected in RagingWire's written response to Request No. 3 (*see* Wetherill Declaration Ex. D at 6), RagingWire is producing documents responsive to that request.
6. Along with its written discovery responses, RagingWire produced 100 documents on January 23, 2020. This production included customer agreements, including amendments, entered into by RagingWire between June 1, 2016 and October 31, 2018 (the alleged misstatement was removed from RagingWire's online privacy policy in October 2018). As a result of the meet and confer process, RagingWire is working to supplement this production to include agreements entered from November 1, 2018, through November 5, 2019, the date of the Complaint.
7. RagingWire's January 23, 2020 production also included a complete response as to Privacy Shield for Request for Production No. 7, and detailed documentation on RagingWire's pricing methodology in response to Request for Production No. 10. In addition, RagingWire's response to Interrogatory No. 1 included a complete list of customers. *See* Wetherill Declaration Ex. C.

8. On January 2, 2020, Complaint Counsel served a second set of interrogatories and a second set of requests for production of documents. RagingWire, through counsel, is also working to identify and produce documents responsive to Complaint Counsel's second set of requests for production and, to the extent possible, avoid duplicative effort in the document review process.
9. RagingWire made an additional production of over 600 documents on February 3, 2020. This production includes Sales Orders to accompany previously produced Master Services Agreements, responsive to First Requests for Production ("RFP"), No. 5 and No. 9; communications with TrustArc and related documents responsive to Second RFPs, No. 6; communications with the U.S. Department of Commerce and related documents responsive to several RFPs, including Second RFP, No. 7; as well as documents responsive to the search term "privacy shield" that are responsive to several requests.
10. RagingWire, through counsel, is continuing to review documents for responsiveness to Complaint Counsel's first requests for production. Application of reasonable search terms to custodian files through an iterative process has yielded over 34,000 documents that require manual review. We are still working to run additional search terms over the materials and this number may increase. These materials include documents potentially responsive to both Complaint Counsel's first and second set of discovery requests. RagingWire anticipates that it will produce another large tranche of documents on February 5, 2020 and is working to complete its review and production of documents responsive to the requests by February 15.
11. I declare under penalty of perjury that the foregoing is true and correct. Executed on February 3, 2020 in San Francisco, California.

Respectfully submitted,

/s/ Diana E. Schaffner _____

Diana E. Schaffner

AKIN GUMP STRAUSS HAUER & FELD LLP

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San Francisco, CA 94014

(415) 765-9500

Counsel for Respondent

EXHIBIT 1



Office of the Secretary

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

OCT 01 2018

Via Federal Express
Doug Adams
Chief Executive Officer
RagingWire Data Centers, Inc.
P.O. Box 348060
Sacramento, CA 95834-8060

FTC Matter No. 1823189

To Mr. Adams:

The Federal Trade Commission (FTC) has issued the attached Civil Investigative Demand ("CID") asking for information as part of a non-public investigation. Our purpose is to determine whether RagingWire Data Centers, Inc. falsely represented that it was a certified participant in the E.U.-U.S. and/or Swiss-U.S. Privacy Shield Frameworks or that it adhered to the Privacy Shield principles established by the Framework(s), in violation of Section 5 of the FTC Act, 15 USC 45, and whether Commission action to obtain monetary relief would be in the public interest. Please read the attached documents carefully. Here are a few important points we would like to highlight:

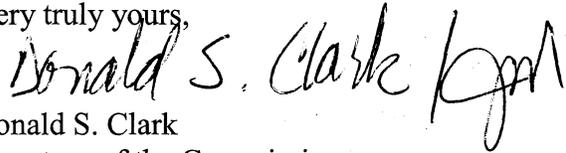
1. **Contact FTC counsel, Mark Eichorn (meichorn@ftc.gov; (202) 326-3053), or staff member Robin Wetherill (rwetherill@ftc.gov; (202) 326-2220), as soon as possible to schedule an initial meeting to be held within 14 days.** You can meet in person or by phone to discuss any questions you have, including whether there are changes to how you comply with the CJD that would reduce your cost or burden while still giving the FTC the information it needs. Please read the attached documents for more information about that meeting.
2. **You must immediately stop any routine procedures for electronic or paper document destruction, and you must preserve all paper or electronic documents** that are in any way relevant to this investigation, even if you believe the documents are protected from discovery by privilege or some other reason.
3. **The FTC will use information you provide in response to the CID for the purpose of investigating violations of the laws the FTC enforces.** We will not disclose the information under the Freedom of Information Act, 5 U.S.C. § 552. We may disclose the information in response to a valid request from Congress, or other civil or criminal federal, state, local, or foreign law enforcement agencies for their official law enforcement purposes. The FTC or other agencies may use and disclose your response in any federal, state, or foreign civil or criminal proceeding, or if

required to do so by law. However, we will not publically disclose your information without giving you prior notice.

4. **Please read the attached documents closely.** They contain important information about how you should provide your response.

Please contact FTC counsel as soon as possible to set up an initial meeting. We appreciate your cooperation.

Very truly yours,

A handwritten signature in black ink that reads "Donald S. Clark" followed by a stylized monogram or initials.

Donald S. Clark
Secretary of the Commission



United States of America
Federal Trade Commission

CIVIL INVESTIGATIVE DEMAND

1. TO RagingWire Data Centers, Inc. P.O. Box 348060 Sacramento, CA 95834-8060	1a. MATTER NUMBER 1823189
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This demand is issued pursuant to Section 20 of the Federal Trade Commission Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of any laws administered by the Federal Trade Commission by conduct, activities or proposed action as described in Item 3.

2. ACTION REQUIRED <input type="checkbox"/> You are required to appear and testify.	
LOCATION OF HEARING	YOUR APPEARANCE WILL BE BEFORE DATE AND TIME OF HEARING OR DEPOSITION

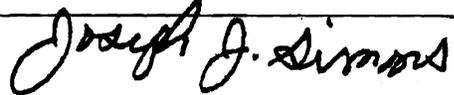
- You are required to produce all documents described in the attached schedule that are in your possession, custody, or control, and to make them available at your address indicated above for inspection and copying or reproduction at the date and time specified below.
- You are required to answer the interrogatories or provide the written report described on the attached schedule. Answer each interrogatory or report separately and fully in writing. Submit your answers or report to the Records Custodian named in Item 4 on or before the date specified below.
- You are required to produce the tangible things described on the attached schedule. Produce such things to the Records Custodian named in Item 4 on or before the date specified below.

DATE AND TIME THE DOCUMENTS, ANSWERS TO INTERROGATORIES, REPORTS, AND/OR TANGIBLE THINGS MUST BE AVAILABLE

OCT 31 2018

3. SUBJECT OF INVESTIGATION See attached Schedule and attached resolution.

4. RECORDS CUSTODIAN/DEPUTY RECORDS CUSTODIAN Matthew Smith/Cheryl Thomas Federal Trade Commission 600 Pennsylvania Avenue, N.W., Mailstop CC-8232 Washington, DC 20580	5. COMMISSION COUNSEL Mark Eichorn/Robin Wetherill Federal Trade Commission 600 Pennsylvania Avenue, N.W., Mailstop CC-8232 Washington, DC 20580 (202) 326-3053/(202) 326-2220
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DATE ISSUED 10/1/18	COMMISSIONER'S SIGNATURE 
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INSTRUCTIONS AND NOTICES

The delivery of this demand to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. The production of documents or the submission of answers and report in response to this demand must be made under a sworn certificate, in the form printed on the second page of this demand, by the person to whom this demand is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances of such production or responsible for answering each interrogatory or report question. This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this demand be filed within 20 days after service, or, if the return date is less than 20 days after service, prior to the return date. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 5.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

TRAVEL EXPENSES

Use the enclosed travel voucher to claim compensation to which you are entitled as a witness for the Commission. The completed travel voucher and this demand should be presented to Commission Counsel for payment. If you are permanently or temporarily living somewhere other than the address on this demand and it would require excessive travel for you to appear, you must get prior approval from Commission Counsel.

A copy of the Commission's Rules of Practice is available online at <http://bit.ly/FTCSRulesofPractice>. Paper copies are available upon request.

Form of Certificate of Compliance*

I/We do certify that all of the documents, information and tangible things required by the attached Civil Investigative Demand which are in the possession, custody, control, or knowledge of the person to whom the demand is directed have been submitted to a custodian named herein.

If a document or tangible thing responsive to this Civil Investigative Demand has not been submitted, the objections to its submission and the reasons for the objection have been stated.

If an interrogatory or a portion of the request has not been fully answered or a portion of the report has not been completed, the objections to its submission and the reasons for the objections have been stated.

Signature _____

Title _____

Sworn to before me this day

Notary Public

*In the event that more than one person is responsible for complying with this demand, the certificate shall identify the documents for which each certifying individual was responsible. In place of a sworn statement, the above certificate of compliance may be supported by an unsworn declaration as provided for by 28 U.S.C. § 1746.

**FEDERAL TRADE COMMISSION (“FTC”)
CIVIL INVESTIGATIVE DEMAND (“CID”) SCHEDULE
FTC File No. 1823189**

Meet and Confer: You must contact **FTC counsel, Mark Eichorn (meichorn@ftc.gov; (202) 326-3053), or staff member Robin Wetherill (rwetherill@ftc.gov; (202) 326-2220)**, as soon as possible to schedule a meeting (telephonic or in person) to be held within fourteen (14) days after you receive this CID. At the meeting, you must discuss with FTC counsel any questions you have regarding this CID or any possible CID modifications that could reduce your cost, burden, or response time yet still provide the FTC with the information it needs to pursue its investigation. The meeting also will address how to assert any claims of protected status (e.g., privilege, work-product, etc.) and the production of electronically stored information. You must make available at the meeting personnel knowledgeable about your information or records management systems, your systems for electronically stored information, custodians likely to have information responsive to this CID, and any other issues relevant to compliance with this CID.

Document Retention: You must retain all documentary materials used in preparing responses to this CID. The FTC may require the submission of additional documents later during this investigation. **Accordingly, you must suspend any routine procedures for document destruction and take other measures to prevent the destruction of documents** that are in any way relevant to this investigation, even if you believe those documents are protected from discovery. *See* 15 U.S.C. § 50; *see also* 18 U.S.C. §§ 1505, 1519.

Sharing of Information: The FTC will use information you provide in response to the CID for the purpose of investigating violations of the laws the FTC enforces. We will not disclose such information under the Freedom of Information Act, 5 U.S.C. § 552. We also will not disclose such information, except as allowed under the FTC Act (15 U.S.C. § 57b-2), the Commission’s Rules of Practice (16 C.F.R. §§ 4.10 & 4.11), or if required by a legal obligation. Under the FTC Act, we may provide your information in response to a request from Congress or a proper request from another law enforcement agency. However, we will not publicly disclose such information without giving you prior notice.

Manner of Production: You may produce documentary material or tangible things by making them available for inspection and copying at your principal place of business. Alternatively, you may send all responsive documents and tangible things to **Matthew Smith, Federal Trade Commission, Federal Trade Commission, 600 Pennsylvania Avenue NW, Mail Stop CC-8232, Washington, DC 20580**. If you are sending the materials, use a courier service such as Federal Express or UPS because heightened security measures delay postal delivery to the FTC. You must inform FTC counsel by email or telephone of how you intend to produce materials responsive to this CID at least five days before the return date.

Certification of Compliance: You or any person with knowledge of the facts and circumstances relating to the responses to this CID must certify that such responses are complete by completing the “Form of Certificate of Compliance” set forth on the back of the CID form or by signing a declaration under penalty of perjury pursuant to 28 U.S.C. § 1746.

Certification of Records of Regularly Conducted Activity: Attached is a Certification of Records of Regularly Conducted Activity. Please execute and return this Certification with your response. Completing this certification may reduce the need to subpoena you to testify at future proceedings to establish the admissibility of documents produced in response to this CID.

Definitions and Instructions: Please review carefully the Definitions and Instructions that appear after the Specifications and provide important information regarding compliance with this CID.

SUBJECT OF INVESTIGATION

Whether “the Company” as defined herein falsely represented that it was a certified participant in the E.U.-U.S. and/or Swiss-U.S. Privacy Shield Frameworks or that it adhered to the Privacy Shield principles established by the Framework(s), in violation of Section 5 of the FTC Act, 15 U.S.C. Sec. 45, and whether Commission action to obtain monetary relief would be in the public interest. See also attached resolution.

SPECIFICATIONS

Applicable Time Period: Unless otherwise directed, the applicable time period for the requests set forth below is from **January 1, 2017 until the date of full and complete compliance with this CID.**

A. INTERROGATORY SPECIFICATIONS

Company Information and Structure

1. State the complete legal name of the Company and all other names under which it does or has done business, its principal place of business, its corporate mailing address, and the date and state of incorporation.
2. Describe the Company’s corporate structure and state the names of all parents, subsidiaries, divisions, affiliates, branches, joint ventures, franchises, operations under assumed names, websites, and entities over which it exercises supervision or control. For each such entity, describe the nature of its relationship to the Company.
3. State the Company’s overall annual revenue for 2017 and each quarter thereafter, and its total number of employees.

Privacy Shield

4. Describe in detail any efforts made by the Company to become a Certified Participant in the Framework, including whether, and if so when, the Company took the following steps:
 - a. The Company’s creation of a Privacy Shield-compliant privacy policy;

- b. The Company's self-certification(s) through the online form located at <https://www.privacyshield.gov/PrivacyShield/ApplyNow> or by any other method, including the payment of the registration fee;
 - c. The Company's registration with an Independent Recourse Mechanism, including the payment of any necessary fees, as required by the Privacy Shield Principle 7 and Supplemental Principle 11(a)-(e); and
 - d. The Company's payment into the arbitration fund managed by the International Centre for Dispute Resolution-American Arbitration Association pursuant to Annex I of the Framework.
5. Identify any third party or parties who assisted, or whom the Company hired to assist, with the Company's efforts to become a Certified Participant in the Framework; for each third party describe in detail:
 - a. The respective roles of the third party and the Company with respect to the Company's efforts to become a Certified Participant and/or ensuring the Company's ongoing compliance with the Framework; and
 - b. What steps the third party actually took with respect to the Company's efforts to become a Certified Participant and/or to ensure the Company's ongoing compliance with the Framework.
6. For each Document responsive to **Document Request 2**, state the dates during which the representation was posted, or the date the representation was communicated, and identify the person or persons to whom the communication was made.
7. State whether the Company has informed any third party, such as any business partner, client, or customer, that it participates in the Framework, or has entered any agreement with any third party that is premised on the Company's participation in, or otherwise requires the Company to participate in, the Framework.
8. To the extent that, during the applicable time period, the Company collected, used or retained personal information, describe what personal information was collected, used, or retained; how many individuals' personal information was collected, used, or retained; and how that personal information was used by the Company, including whether personal information was disclosed to any other party.
9. To the extent that the Company was at any time a Certified Participant in the Framework but its certification has since lapsed:
 - a. State whether the Company has collected, used, or retained personal information since the Company's certification lapsed; and

- b. Describe the Company's efforts to ensure continued compliance with requirements in Privacy Shield Supplemental Principle 6(f) with respect to the protection of personal information transferred from the European Union or Switzerland to the United States during the time the Company was a Certified Participant.
10. Describe in detail the Company's efforts to comply with the requirements of the Privacy Shield Framework Principles as issued by the Department of Commerce (*see* <https://www.privacyshield.gov/article?id=OVERVIEW>), including Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access; Recourse, Enforcement, and Liability; the Supplemental Principles, to the extent they apply to the Company; and Annex I.

Communications with the Department of Commerce

11. State the following types of information as provided in your Privacy Shield self-certification(s) to the Department of Commerce. If any type of information changed during the applicable time period, state when the information changed and whether, and if so when, the Department of Commerce was notified of the change:
- a. Your legal name;
 - b. Your corporate officer(s);
 - c. Your employee contact(s) name;
 - d. Your employee contact(s) email address;
 - e. Your employee contact(s) telephone number;
 - f. Your contact address(es) as provided in your privacy policy;
 - g. Your mailing address(es); or
 - h. Names of all U.S. entities or subsidiaries also adhering to the Privacy Shield principles and covered under your self-certification.
12. Identify each communication by any means—including in person, by mail, by e-mail, by fax, or by phone—between the Company and the Department of Commerce regarding or relating to the Framework.
13. For each communication identified pursuant to **Specification A.12**, state:
- a. The date of the communication;
 - b. The person(s) who handled the communication on the Company's behalf;

- c. What actions, if any, were taken by any employee, agent, manager, or officer of the Company in response to the communication.

B. DOCUMENT REQUESTS

1. Produce each materially different document related to communications between the Company and any third party identified in **Specification A.5**, including but not limited to any agreement between that party and the Company.
2. Produce each materially different document disseminated by you, including any agreement identified in **Specification A.7** or any privacy policy or Advertisement, referring or relating to Privacy Shield or the Framework.
3. Produce documents sufficient to show the Company's policies and procedures related to editing, updating, and/or maintaining the Company's privacy policy.
4. Produce each materially different document related to complaints, questions, comments, or other communications to the Company from consumers regarding privacy or the Framework. Exclude all non-content information, such as e-mail header information.
5. Produce all documents related to communications identified in **Specification A.12**.

ECPA NOTICE: This CID does not seek any information that is prohibited from disclosure under the Electronic Communications Privacy Act ("ECPA"), 18 U.S.C. §§ 2701 et seq. To the extent that you are, for purposes of ECPA, a provider of Electronic Communications Service or Remote Computing Service to a customer or subscriber about whom this CID seeks information, do not divulge a record or information pertaining to such customer or subscriber or the content of such customer's or subscriber's communications, other than the content, records, and information specifically requested in this CID. If you have any questions, please contact FTC counsel before providing responsive information.

DEFINITIONS

The following definitions apply to this CID:

D-1. "Advertisement" or "Advertising" or "Ad" means any written or verbal statement, illustration, or depiction that promotes the sale of a good or service or is designed to increase consumer interest in a brand, good, or service. Advertising media includes, but is not limited to: packaging and labeling; promotional materials; print; television; radio; and Internet, social media, and other digital content.

D-2. "Company," "You," or "Your" means **RagingWire Data Centers, Inc.**, its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and

affiliates, and all directors, officers, members, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

D-3. **“Certified Participant”** means an entity that is fully compliant with the requirements of the Privacy Shield Framework, the self-certification of which has been finalized by the Department of Commerce and the name of which appears on the “Active” list of maintained at <https://www.privacyshield.gov/list>.

D-4. **“Department of Commerce”** or means the United States Department of Commerce and all of its subdivisions, agents, and representatives, including the International Trade Administration and <https://privacyshield.gov>.

D-5. **“Document”** means the complete original, all drafts, and any non-identical copy, whether different from the original because of notations on the copy, different metadata, or otherwise, of any item covered by 15 U.S.C. § 57b-1(a)(5), 16 C.F.R. § 2.7(a)(2), or Federal Rule of Civil Procedure 34(a)(1)(A).

D-6. **“Framework”** or **“Privacy Shield”** means the E.U.-U.S. and/or Swiss-U.S. Privacy Shield Frameworks administered by the Department of Commerce.

D-7. **“Identify”** or **“the identity of”** requires identification of (a) natural persons by name, title, present business affiliation, present business address, telephone number, and email address or, if a present business affiliation or present business address is not known, the last known business and home addresses; and (b) businesses or other organizations by name, address, and the identities of your contact persons at the business or organization.

D-8. **“Independent Recourse Mechanism”** means a private sector dispute resolution provider that meets the requirements of Privacy Shield Principle 7 and Supplemental Principle 11(a)-(e).

D-9. **“Personal data”** or **“personal information”** means data about an identified or identifiable individual that are within the scope of European Commission Directive 95/46/EC, received by an organization in the United States from the European Union, and recorded in any form, as defined by the Privacy Shield Principles (*see* <https://www.privacyshield.gov/article?id=OVERVIEW>).

D-10. **“Self-certification”** means a company’s initial application to the Department of Commerce to initiate the process of becoming a Certified Participant.

INSTRUCTIONS

I-1. **Petitions to Limit or Quash:** You must file any petition to limit or quash this CID with the Secretary of the FTC no later than twenty (20) days after service of the CID, or, if the return date is less than twenty (20) days after service, prior to the return date. Such petition must set forth all assertions of protected status or other factual and legal objections to the CID and comply with the requirements set forth in 16 C.F.R. § 2.10(a)(1) – (2). **The FTC will not consider petitions to quash or limit if you have not previously met and conferred with FTC staff and, absent extraordinary circumstances, will consider only issues raised during the meet and confer process.** 16 C.F.R. § 2.7(k); *see also* § 2.11(b). **If you file a petition to limit or**

quash, you must still timely respond to all requests that you do not seek to modify or set aside in your petition. 15 U.S.C. § 57b-1(f); 16 C.F.R. § 2.10(b).

I-2. Withholding Requested Material / Privilege Claims: If you withhold from production any material responsive to this CID based on a claim of privilege, work product protection, statutory exemption, or any similar claim, you must assert the claim no later than the return date of this CID, and you must submit a detailed log, in a searchable electronic format, of the items withheld that identifies the basis for withholding the material and meets all the requirements set forth in 16 C.F.R. § 2.11(a) – (c). The information in the log must be of sufficient detail to enable FTC staff to assess the validity of the claim for each document, including attachments, without disclosing the protected information. If only some portion of any responsive material is privileged, you must submit all non-privileged portions of the material. Otherwise, produce all responsive information and material without redaction. 16 C.F.R. § 2.11(c). The failure to provide information sufficient to support a claim of protected status may result in denial of the claim. 16 C.F.R. § 2.11(a)(1).

I-3. Modification of Specifications: The Bureau Director, a Deputy Bureau Director, Associate Director, Regional Director, or Assistant Regional Director must agree in writing to any modifications of this CID. 16 C.F.R. § 2.7(l).

I-4. Scope of Search: This CID covers documents and information in your possession or under your actual or constructive custody or control, including documents and information in the possession, custody, or control of your attorneys, accountants, directors, officers, employees, service providers, and other agents and consultants, whether or not such documents or information were received from or disseminated to any person or entity.

I-5. Identification of Responsive Documents: For specifications requesting production of documents, you must identify in writing the documents that are responsive to the specification. Documents that may be responsive to more than one specification of this CID need not be produced more than once. If any documents responsive to this CID have been previously supplied to the FTC, you may identify the documents previously provided and the date of submission.

I-6. Maintain Document Order: You must produce documents in the order in which they appear in your files or as electronically stored. If documents are removed from their original folders, binders, covers, containers, or electronic source, you must specify the folder, binder, cover, container, or electronic media or file paths from which such documents came.

I-7. Numbering of Documents: You must number all documents in your submission with a unique identifier such as a Bates number or a document ID.

I-8. Production of Copies: Unless otherwise stated, you may submit copies in lieu of original documents if they are true, correct, and complete copies of the originals and you preserve and retain the originals in their same state as of the time you received this CID. Submission of copies constitutes a waiver of any claim as to the authenticity of the copies should the FTC introduce such copies as evidence in any legal proceeding.

I-9. **Production in Color:** You must produce copies of advertisements in color, and you must produce copies of other materials in color if necessary to interpret them or render them intelligible.

I-10. **Electronically Stored Information:** See the attached FTC Bureau of Consumer Protection Production Requirements (“Production Requirements”), which detail all requirements for the production of electronically stored information to the FTC. You must discuss issues relating to the production of electronically stored information with FTC staff **prior to** production.

I-11. **Sensitive Personally Identifiable Information (“Sensitive PII”) or Sensitive Health Information (“SHI”):** Do not produce any sensitive personally identifiable information (“Sensitive PII”) or sensitive health information (“SHI”) prior to discussing the information with FTC counsel. If any document responsive to a particular specification contains unresponsive Sensitive PII or SHI, redact the unresponsive Sensitive PII or SHI prior to producing the document.

Sensitive PII includes an individual’s Social Security number; an individual’s biometric data (such as fingerprints or retina scans, but not photographs); and an individual’s name, address, or phone number in combination with one or more of the following: date of birth, Social Security number, driver’s license or state identification number (or foreign country equivalent), passport number, financial account number, credit card number, or debit card number. SHI includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

I-12. **Interrogatory Responses:** For specifications requesting answers to written interrogatories, answer each interrogatory and each interrogatory subpart separately and fully, in writing, and under oath.

I-13. **Submission of Documents in Lieu of Interrogatory Answers:** You may answer any written interrogatory by submitting previously existing documents that contain the information requested in the interrogatory so long as you clearly indicate in each written interrogatory response which documents contain the responsive information. For any interrogatory that asks you to identify documents, you may, at your option, produce the documents responsive to the interrogatory so long as you clearly indicate the specific interrogatory to which such documents are responsive.

Federal Trade Commission Bureau of Consumer Protection

Production Requirements

Revised February 2018

In producing information in to the FTC, you must comply with the following production requirements, unless the FTC agrees otherwise. If you have any questions about these requirements, please contact FTC Counsel before production.

Production Format

1. **General Format:** Provide load-ready electronic productions with: (a) an Opticon image load file (.OPT) containing a line for every image file; and (b) a delimited data load file (.DAT) containing a line for every document, with bates references, metadata fields, and native file links, where applicable.
2. **Electronically Stored Information (“ESI”):** Documents stored in electronic format in the ordinary course of business must be produced in the following format:
 - a. For ESI other than the categories described below, submit in native electronic format with extracted text or Optical Character Recognition (OCR), all metadata, and corresponding image renderings converted to Group IV, 300 DPI, single-page Tagged Image File Format (TIFF) or color JPEG images (if color is necessary to interpret the contents or render them intelligible).
 - b. For Microsoft Excel, Access, or PowerPoint files, submit in native format with extracted text and metadata. Data compilations in Excel spreadsheets or in delimited text formats must contain all underlying data, formulas, and algorithms without redaction.
 - c. For other spreadsheet, database, presentation, or multimedia formats; instant messages; or proprietary applications, discuss production format during the meet and confer.
3. **Hard Copy Documents:** Documents stored in hard copy in the ordinary course of business must be scanned and submitted as 300 DPI individual single page TIFFs (or color JPGs when necessary to interpret documents or render them intelligible), with corresponding document-level OCR text and logical document determination in an accompanying load file.
4. **Extracted Text/OCR:** Submit text as document-level text files, named for the beginning bates number, and organized into a folder separate from images. We cannot accept Unicode text files.
5. **Document Identification:** Provide a unique DocId or bates number for each hard copy or electronic document, consisting of a prefix and a consistent number of numerals using leading zeros. Do not use a space to separate the prefix from numbers.
6. **Attachments:** Preserve the parent/child relationship by producing attachments as separate documents, numbering them consecutively to the parent email, and including a reference to all attachments.
7. **Metadata Production:** For each document submitted electronically, include standard metadata fields in a standard ASCII delimited data load file. The first line of the data load file shall include the field names. Submit date and time data in separate fields. Use these delimiters in delimited data load files:

Description	Symbol	ASCII Character
Field Separator	<	20
Quote Character	”	254

Multi Entry delimiter	®	174
<Return> Value in data	~	126

8. **De-duplication:** Do not use de-duplication or email threading software without FTC counsel approval.
9. **Password-Protected Files:** Remove passwords prior to production. If password removal is not possible, provide the original and production filenames and the password under separate cover.
10. **Sensitive PII or SHI:** Use data encryption to protect any Sensitive PII or SHI (as defined in the CID Schedule). Provide encryption passwords in advance of delivery, under separate cover.

Producing and Submitting Media to the FTC

1. Prior to production, scan all media and data for viruses and confirm the media and data are virus-free.
2. For productions smaller than 50 GB, the FTC can accept electronic file transfer via FTC-hosted secure file transfer protocol (Accellion or SecureZip). Contact FTC counsel to request this option. The FTC cannot accept files via Dropbox, Google Drive, OneDrive, or other third-party file transfer sites.
3. Use the least amount of media necessary for productions. Acceptable media formats are CDs, DVDs, flash drives, and hard drives. Format all media for use with Windows 7.
4. Use a courier service (e.g., Federal Express, UPS) because heightened security measures delay postal delivery. Mark the exterior of all packages containing electronic media with the following:

MAGNETIC MEDIA – DO NOT X-RAY
MAY BE OPENED FOR INSPECTION

5. Provide a production transmittal letter with each production that includes:
 - a. Production volume name (e.g., Volume 1), date of production, and numeric DocID number range of all documents included in the production;
 - b. List of custodians and the DocID number range for each custodian;
 - c. Total number of records and all underlying images, emails, and associated attachments, native files, and databases in the production
 - d. List of load file fields in the order in which they are organized in the data file.

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

COMMISSIONERS: **Maureen K. Ohlhausen, Acting Chairman
Terrell McSweeney**

**RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN NONPUBLIC
INVESTIGATION OF ACTS AND PRACTICES RELATED TO CONSUMER PRIVACY
AND/OR DATA SECURITY**

File No. 182 3036

Nature and Scope of Investigation:

To determine whether unnamed persons, partnerships, corporations, or others are engaged in, or may have engaged in, deceptive or unfair acts or practices related to consumer privacy and/or data security, including but not limited to the collection, acquisition, use, disclosure, security, storage, retention, or disposition of consumer information, in or affecting commerce, in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended. Such investigation shall, in addition, determine whether Commission action to obtain monetary relief would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation not to exceed five (5) years from the date of issuance of this resolution. The expiration of this five-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the five-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the five-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1. *et seq.* and supplements thereto.

By direction of the Commission.


Donald S. Clark
Secretary

Issued: January 11, 2018

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, _____, have personal knowledge of the facts set forth below and am competent to testify as follows:
2. I have authority to certify the authenticity of the records produced by RagingWire Data Centers Inc. (the "Company") and attached hereto.
3. The documents produced and attached hereto by the Company are originals or true copies of records of regularly conducted activity that:
 - a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;
 - b) Were kept in the course of the regularly conducted activity of the Company; and
 - c) Were made by the regularly conducted activity as a regular practice of the Company.

I certify under penalty of perjury that the foregoing is true and correct.

Date: _____

Signature

Notice of Electronic Service

I hereby certify that on February 03, 2020, I filed an electronic copy of the foregoing RAGINGWIRE DATA CENTERS, INC.'S OPPOSITION TO COMPLAINT COUNSEL'S MOTION TO COMPEL, 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 03, 2020, I served via E-Service an electronic copy of the foregoing RAGINGWIRE DATA CENTERS, INC.'S OPPOSITION TO COMPLAINT COUNSEL'S MOTION TO COMPEL, upon:

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Complaint

Robin Wetherill
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Complaint

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