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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

UNITED STATES OF AMERICA, <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> LOOKSMART LTD., a corporation, <p style="text-align: right;">Defendant.</p>	Civil Action No. 01-606-A COMPLAINT FOR CIVIL PENALTIES, INJUNCTIVE, AND OTHER RELIEF
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Plaintiff, the United States of America, acting upon notification and authorization to the Attorney General by the Federal Trade Commission (“FTC” or “Commission”), for its Complaint alleges that:

1. Plaintiff brings this action under Sections 1303(c) and 1306(d) of the Children’s Online Privacy Protection Act of 1998 (“COPPA”), 15 U.S.C. §§ 6501-6506, 6502(c), 6505(d), and Sections 5(a)(1), 5(m)(1)(A), 13(b), and 16(a) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 41-58, 45(a)(1), 45(m)(1)(A), 53(b), and 56(a), to obtain monetary civil penalties, a permanent injunction, and other equitable relief for defendant’s violations of the Commission’s Children’s Online Privacy Protection Rule (the “Rule”), 16 C.F.R. Part 312.

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PRAYER

WHEREFORE, plaintiff requests this Court, pursuant to 15 U.S.C. §§ 45(a)(1), 45(m)(1)(A), 53(b) and 57b, and the Court's own equitable powers to:

- (1) Enter judgment against defendant and in favor of plaintiff for each violation alleged in this Complaint;
- (2) Award plaintiff monetary civil penalties from defendant for each violation of the Rule, 16 C.F.R. Part 312;
- (3) Permanently enjoin defendant from violating the Rule, 16 C.F.R. Part 312;
- (4) Award plaintiff such additional relief as the Court may deem just, proper, or necessary to redress injury to consumers resulting from defendant's violations of the Rule, 16 C.F.R. Part 312.

DATED:

OF COUNSEL:

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Bureau of Consumer Protection
Federal Trade Commission

FOR THE UNITED STATES OF AMERICA:

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