

**UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION**

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

)	
In the Matter of)	
)	DOCKET NO.
Timonium Chrysler, Inc., a corporation.)	
d/b/a/ Don White's Timonium Chrysler)	
Jeep Dodge)	
)	

COMPLAINT

The Federal Trade Commission, having reason to believe that Timonium Chrysler, Inc. d/b/a Don White's Timonium Chrysler Jeep Dodge, a corporation ("respondent"), has violated provisions of the Federal Trade Commission Act ("FTC Act"), and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent is a Maryland corporation with its principal office or place of business at 10300 York Road, Cockeysville, MD. Respondent offers motor vehicles for sale or lease.
2. The acts or practices of respondent alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.
3. Since at least May 21, 2012, respondent has disseminated or has caused to be disseminated advertisements promoting the purchase, financing, and leasing of their motor vehicles.
4. Respondent's advertisements include, but are not necessarily limited to, advertisements posted on the website www.donwhites.com, selected pages of which are attached as Exhibit A. These advertisements list specific "Dealer Discount[s]" and "Internet Price[s]" for particular motor vehicles. For example, one web page advertises a 2013 Chrysler 200 Limited Sedan as follows:

MSRP*	\$27,320
Dealer Discount	-\$7,499
Internet Price	\$19,821

Further down on the web page, the following information appears:

***All Prices must be confirmed by the Internet Department and are only valid through the Internet Department.** Please contact us via phone, chat, email, or website form to verify availability and price. *Adjusted price does not include applicable sales tax, documentation fee, title, freight or tag fees.* [Italicized text in red print] Some incentives may be included, but not all customers will qualify for all incentives. Please ask for additional incentives that are not listed in the price. Internet Price not valid in conjunction with any other advertised price, promotion, discount, coupon offer or prior sales. **Vehicle is subject to availability so please confirm before you visit.** (emphasis in original).

Exhibit A at 2.

5. In fact, in numerous instances, the advertised discount and price are not generally available to consumers. In numerous instances, the advertised discount and price are subject to various qualifications or restrictions. Such qualifications or restrictions have included, for example, being a member of the military, being a recent college graduate, possessing a bank account at a particular bank, or owning a vehicle that has a lien on it. In numerous instances, even if consumers meet all of these qualifications or restrictions, they cannot obtain the advertised discount and price.

VIOLATION OF THE FEDERAL TRADE COMMISSION ACT

6. Through the means described in Paragraph 4, including but not necessarily limited to Exhibit A, respondent has represented expressly or by implication that specific dealer discounts and prices are generally available to consumers.
7. In truth and in fact, the specific dealer discounts and prices are not generally available to consumers.
8. Therefore, the representation set forth in Paragraph 6 of this Complaint was, and is, false or misleading.
9. The acts and practices of respondent as alleged in this complaint constitute deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

THEREFORE, the Federal Trade Commission, this ____ day of _____, 2013, has issued this complaint against respondent.

By the Commission.

Donald S. Clark
Secretary

SEAL: