



**Ad Standards** Community Panel  
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Advertising Standards Bureau Limited  
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# Case Report

1	Case Number	0082/19
2	Advertiser	Kellogg (Aust) Pty Ltd
3	Product	Food and Beverages
4	Type of Advertisement / media	TV - Free to air
5	Date of Determination	20/03/2019
6	DETERMINATION	Dismissed

## ISSUES RAISED

RCMI 1.1 - Advertising Message AFGC - Advertising Message

## DESCRIPTION OF THE ADVERTISEMENT

This television advertisement features children in a tree house. The tree house has a sign saying 'no grown ups'. The children are hoisting a dog in a basket up into their tree house. A woman is shown standing below the tree house with a box of Kellogg's choc chip LCMs. When she opens the box, individual puffs of rice and chocolate chips float up into the air towards the tree house and form into a bar that appears in the hand of one of the children, who looks at it with amazement. A voiceover and a message at the end says 'Light up their afternoons with the awesomeness of puffed rice'.

## THE COMPLAINT

A sample of comments which the complainant/s made regarding this advertisement included the following:

1. *The advertisement breaches the RCMI*

*The Obesity Policy Coalition (OPC) submits that this advertisement breaches the Responsible Children's Marketing Initiative (RCMI). As a signatory to the RCMI,*





*Kellogg's has committed not to advertise its products to children under 12 years in media unless those products represent healthier dietary choices, consistent with established scientific or Australian government standards.*

*In our submission the advertisement breaches clause s1.1 of the RCMI because:*

- 1. It is a communication directed primarily to children;*
- 2. Kellogg's LCMs choc chip does not represent a healthier dietary choice consistent with established scientific or Australian government standards; and*
- 3. It does not promote healthy dietary habits or physical activity.*

*The advertisement is a marketing communication directed primarily to Children*

*The RCMI applies to material that is published or broadcast on television, radio, print, cinema and internet sites. This advertisement has been published on the internet site YouTube ([www.youtube.com](http://www.youtube.com)) and on television and therefore the RCMI applies.*

*Based on its themes and visuals, the advertisement is clearly a marketing communication directed primarily to children within the meaning of the RCMI.*

*The Ad Standards Community Panel is requested to carefully consider the following features, which the OPC argues conclusively establish the advertisement is directed primarily to children:*

- 1. The advertisement has two young children as its main characters; those children appear to be under 12 years old.*
- 2. The advertisement uses childlike themes of play, adventure and wonder, showing the children playing in a tree house and being amazed when the LCM bar appears in their hand.*
- 3. The scene is of clear appeal to young children, showing children engaging in creative, imaginary play that would be of primary appeal to young children.*
- 4. The advertisement clearly encourages child viewers to imagine themselves participating in creative play and associates fun, adventure and imagination with consumption of LCMs choc chip.*

*The themes and visuals of the advertisement will have strong appeal to children's sense of wonder, imagination and adventure. The style of advertisement is similar to other LCM advertisements that have been found to be primarily directed to children by Ad Standards (0180/13 and 0179/13).*



*The placement of the advertisement also supports a conclusion that it is directed primarily to children. The advertisement is currently available on YouTube, a site commonly used by children. A 2013 report into young Australians' experience of social media found that YouTube was the most popular social network with children aged 8 to 11, with half of 8-9 year olds (53%) and seven in ten 10-11 year olds (69%) having used it and 60 per cent of 10-11 year olds having used it in the last four weeks ((Source: Australian Communications and Media Authority 'Like, post, share: Young Australians' experience of social media', 2013).*

*The advertisement has also been played on commercial television during programs and times that are popular with children. A tracking report shows that the advertisement was screened during programs including American Ninja Warrior, Bondi Rescue, My Kitchen Rules, I'm a Celebrity Get Me Out of Here, House Rules, The Simpsons, Big Bash League cricket and the Addams Family Movie. These programs are watched by high numbers of children. For example, TV ratings figures (eTAM) from January to August 2018 for Sydney, Melbourne, Brisbane, Adelaide and Perth show that I'm a Celebrity Get Me Out of Here and Australian Ninja Warrior (similar to American Ninja Warrior) were in the top 10 programs watched by 0-15 year olds. Other programs were also popular, with My Kitchen Rules and the Big Bash league final reaching more than 100,000 children aged 0-15 years. Many of these programs, as well as others, were during the evening which is when the highest numbers of children are watching television (source: Australian Communications and Media Authority, Children's Television Viewing: Research Overview, March 2015).*

*Kellogg's LCMs choc chip does not represent a healthier dietary choice*

*Kellogg's LCMs choc chip is a high sugar snack bar that has a 1.5 health star rating, and is not a healthier dietary choice. The Australian Dietary Guidelines recommend that foods containing added sugar should be limited. The World Health Organization (WHO) also supports the limited intake of sugar, recently releasing updated guidelines regarding the health impacts of sugar consumption and recommending daily sugar intake be reduced to 10% of daily dietary intake and ideally, for the best health outcomes, to 5% (source: World Health Organization 'Guideline: Sugars intake for adults and children'. Geneva, 2015). Kellogg's LCM choc chip has a significant level of sugar, 31.4%, and is not a healthy food choice for children.*

*The RCMI requires that a company action plan be consistent with established scientific or Australian government standards. In our view, any plan that identifies a product with more than 30% sugar and a 1.5 Health Star Rating as a healthier choice, is not a plan that is consistent with established scientific or Australian government standards, and is therefore not a healthier choice under the RCMI.*

*The advertisement does not promote good dietary habits or physical activity*



*Even in the case of a product that represents a healthy dietary choice, the RCMI provides that Kellogg's may only advertise the product to children if the advertising and/or marketing communication activities reference, or are in the context of, a healthy lifestyle, designed to appeal to the intended audience through messaging that encourages:*

- 1. Good dietary habits, consistent with established scientific or government criteria; and*
- 2. Physical activity.*

*The advertisement does not include messaging encouraging either good dietary habits or physical activity. The only reference to dietary habits is a brief glimpse of some fruit on the kitchen bench. Ad Standards has previously found that showing healthy food on a kitchen bench is not sufficient to encourage good dietary habits (0180/13, 0144/13). In this advertisement there is no reference to consumption of the healthy food.*

*There is also no depiction of physical activity. The children in the advertisement are in their tree house and hoist a basket up into it. That is not physical activity in any meaningful sense, the children remain stationary in the tree house while the LCM bar is brought to them.*

*For these reasons, we do not think that the advertisement meets the RCMI requirement to encourage good dietary habits and physical activity.*

*Request for action*

*For the above reasons, the OPC asks Ad Standards to request that Kellogg's withdraw the LCM choc chip advertisement immediately on the basis that it breaches the RCMI.*

## **THE ADVERTISER'S RESPONSE**

Comments which the advertiser made in response to the complainant/s regarding this advertisement include the following:

*Background Material*

*Prior to addressing the substantive issues, Kellogg would like to confirm its long-standing support for Ad Standards and the Advertising Standards Community Panel, and Kellogg's commitment to uphold the relevant Codes.*

*Description of Advertisement and Summary of Complaint*



*The concept behind the advertisement is two fold: “to appeal to parents and grandparents’ desire to bring joy to their child and/or grandchild’s afternoon” and “to remind parents and grandparents that LCMs bars can be a light and enjoyable afternoon snack”. The consumer insight behind the advertisement is that grandparents are increasingly taking on carer roles for their grandchildren, particularly in the afternoon whilst parents are still at work. In addition, the consumer insight showed that carers are looking for light afternoon treats that their kids will love, but that do not fill them up before dinner.*

*The advertisement is set in Grandma’s house and backyard. This advertisement features well known Australian television, theatre and film actor and television presenter, Benita Collings, as the grandmother. Two older children (the actors are ages 12 and 13 years) are in a treehouse, hoisting up a basket (in the online version) and trying to get Grandma’s attention. Grandma is watching attentively from the house with a knowing smile. She comes out of the house and stands in the backyard with a box of LCMs snacks. The box opens and puffed rice pieces float up towards the treehouse and form into an LCMs bar.*

*At the same time, a senior adult female voiceover (voiced by Benita Collings) states, “Light up their afternoons with the awesomeness of puffed rice”. The final frame of the advertisement states “Light up their afternoons with the awesomeness of puffed rice” and “No artificial colours or flavours”, with an image of the product.*

*The complaint is made under the Australian Food and Grocery Council Responsible Children’s Marketing Initiative (RCMI). The substantive complaint is that:*

*the advertisement is a marketing communication directed primarily to children; and*

*the advertisement was placed in media directed primarily to children.*

*Our response to the substantive complaint is set out below.*

#### *Advertising to Children*

*Kellogg respectfully submits that the advertising messaging section of the RCMI does not apply in this matter as the advertisement is not directed to children.*

*The RCMI only applies to “marketing communications to children”. The relevant definitions in the RCMI are set out below:*

#### *Content*

*Advertising or Marketing Communications which, having regard to the theme, visuals and language used, are directed primarily to Children and are for food and/or*



*beverage products.*

#### *Placement*

*Advertising or Marketing Communications that are placed in Medium that is directed primarily to Children (in relation to television this includes all C and P rated programs and other rated programs that are directed primarily to Children through their themes, visuals and language); and/or where Children represent 35 per cent or more of the audience of the Medium.*

#### *Children*

*Persons under 12 years of age.*

#### *Theme, visuals, and language*

*Kellogg submits that the advertisement is not a “marketing communication to children” because having regard to the theme, visuals and language used, it is not directed primarily to children.*

*One of the consumer insights behind the advertisement is that grandparents are increasingly taking on carer roles for their grandchildren. This was the basis for featuring a grandmother in this advertisement instead of the typical mum or dad actor, and is a key point of difference for this advertisement. Benita Collings was a deliberate casting choice for the grandmother role, as Collings (now 79 years) is one of the most well known and recognisable faces and voices on Australian television, largely due to her long standing 30 year tenure on ABC’s Play School, from 1969 until 1999[1]. Benita Collings is featured prominently in this advertisement (including voicing the VO) to specifically appeal to parents and grandparents who grew up watching Benita on Play School, or who are familiar with her other roles in various Australian television dramas and in theatre and film.*

*Kellogg draws the Panel’s attention to the following factors that Kellogg submits demonstrate that the advertisement is not primarily directed to children:*

*the advertisement is not animated and consists of real actors and scenery, with photo-realistic Rice Bubbles cereal pieces used and then duplicated to create the LCMs bar;*

*the advertisement is not shown from the child’s perspective. Whilst children feature in the advertisement to set the scene and demonstrate the joy that LCMs bars can bring as a light and enjoyable afternoon snack, the advertisement is intentionally balanced to show the perspective of the grandmother. Over the 15 second advertisement, Grandma is featured (in person and voice over) in over two thirds of the ad, for example:*



*one of the opening scenes features a close up of Grandma's face, observing the children with a knowing smile;*

*Grandma comes out of the house and approaches the treehouse holding the product with a bemused expression;*

*the voiceover is a senior adult female (Grandma's) voice;*

*We note that the Practice Note to the AANA Code of Advertising and Marketing Communications to Children states that "Marketing communication which tell stories from an adult perspective and include images of an adult's reaction or expressions are unlikely to be directed primarily at children, even if children feature in the advertisement or storyline."*

*the voiceover states, "Light up their afternoons with the awesomeness of puffed rice", which is language that speaks directly to the parents and grandparents viewing the advertisement;*

*the final frame reinforces the call to action directed at parents and grandparents, with the prominent super, "Light up their afternoons with the awesomeness of puffed rice";*

*the highlighting of puffed rice as an ingredient and the clear super, "No artificial colours or flavours", in the final frame are both messages that are of primary appeal to parents and grandparents, and would not appeal to children;*

*the background music is subtle and has been deliberately chosen to be appropriate to the scene and setting, but is not overly child-like or of primary attraction to children;*

*the advertisement is set in the family home and backyard, an environment which is balanced and of appeal to families, not specifically a setting of primary appeal to children;*

*the opening scenes feature the product together with apples and a banana in the kitchen, to reinforce the family setting;*

*the children featured are older children, with the male actor being 13 years of age and the female actor being 12 years of age;*

*as noted above, the deliberate casting of Benita Collings would appeal to parents' and grandparents' sense of nostalgia, particularly as many viewers would have grown up watching Benita on Play School at some point between 1969 and 1999.*

*Kellogg acknowledges that the advertisement contains a sense or element of fun and curiosity, with the treehouse, the sign "no grown ups allowed" and cereal pieces*



*forming the bar. We note that these scenes comprise around one third of the advertisement. However, this in and of itself is an insufficient basis for a finding that the advertisement is primarily directed to children, as this sense or element of fun is a quality that appeals to people of all ages. Further, as held in case number 0258/13, the fact that an advertisement may be attractive to children does not necessarily mean that an advertisement is primarily directed at children.*

#### *Media Buy*

*Kellogg's media buy for this advertisement is targeted at adults aged over 18 years (specifically grocery buyers) and Kellogg has strived to ensure that the advertisement was not placed in any media directed primarily to children. As stated in the Practice Note to the AANA Code of Advertising and Marketing Communications to Children, it is not the intent of the AANA for the Code to apply to advertising or marketing communication that may be seen by children, but is not directed primarily to them. This reasoning is equally applicable to the RCMI.*

*The advertisement has a CAD placement code of "W" which means:*

*May be broadcast at any time except during P or C programs or adjacent to P or C periods. Exercise care when placing in programs principally directed to children*

*Kellogg's standing instructions to its media buyer are:*

*Strive to buy into TV programs with audience profile of less than 25% against children 0-14 and avoid animations or family movies (based on historical ratings data).*

*Do not buy against preschool or children's time on Free to air TV, consistent with our CAD requirements.*

*Do not accept bonus or makegood activity that is not guaranteed to avoid children's programming.*

*Specifically in respect of YouTube, our instructions for this advertisement were to only buy against the W25-34 demographic, and exclude all other audience demographics. We refer to the attached reports (1 January – 9 March 2019) that show the impressions were only served to 25-34 aged group of logged in users. We also note that YouTube has clear ad policies that restrict advertisers from buying advertising space against children under 13 years. Further, YouTube prohibits users that are under 13 from setting up a YouTube (now Google) account or using any YouTube apps, websites, or features.*

*In respect of free to air television, we attach the media buy information for metropolitan and regional stations for the period of 23 December 2018 – 10 March*





2019. These reports confirm that, in line with Kellogg's instructions to its media buyers, the advertisement was not placed in any C or P rated programs or other rated programs directed primarily to children under 12. In addition, the reports disclose demographic information sourced from Oztam data, which records post viewing data provided by a panel of representative households in each area, against audience characteristics.

In respect of metropolitan broadcast, the information clearly shows that the proportion of viewers in the 5-12 demographic for each of the slots in which the advertisement was broadcast was well under the 35% threshold in the RCMI. In fact, the vast majority of the slots disclose less than 20% 5-12 audience share. We note that one of the booked slots exceeded Kellogg's internal target of less than 25% child audience share (the program, *Married with Children*, at 29%), however this program typically records a much lower audience share in the 5-12 demographic and the themes are not primarily directed to children under 12 (features mild sexual references and mild coarse language).

In respect of the regional television stations, the vast majority of the slots were less than 25% 5-12 audience share, with a few between 25%-33%, under the RCMI threshold. We note that two of the slots exceeded the 35% 5-12 audience share. This was unintended and surprising, with each of these programs and these time slots typically recording a 5-12 demographic audience share of less than 13%, well below the 35% RCMI threshold. The relatively low viewing numbers for programs on regional stations would also have contributed to the anomalous data. Further detail of each program is below (and supporting data attached):

*Australian Open Day 6 (Saturday 19 January at 18:30 on GOSCSN Southern NSW):* the data shows that the 5-12 audience share was 38%. This *Australian Open Day 6* was also broadcast across metropolitan channels, and the 5-12 audience share was between 1%-6%. The same date and timeslot on metropolitan channels was 1%-5%. The Oztam data for this day and timeslot (Saturdays at 18:30) across YTD January-March on regional and metropolitan stations shows that the 5-12 audience share is consistently at 3%-5%. The program in itself is not primarily or in the first instance directed to children.

*Big Bang Theory (Sunday 24 February at 18:00 on GOSCVI in regional Victoria aggregated):* the data shows that the 5-12 audience share was 36%. Oztam data shows that this program typically records between 6%-13% audience share for 5-12 demographic, throughout YTD January-March on metropolitan stations. In addition, the Oztam data for this day and timeslot (Sundays at 18:00) across the same period on regional and metropolitan stations shows that the 5-12 audience share is consistently at 3%-5%. The program itself is M rated with sexual references, and in our view is not primarily directed to children.



*The usual audience share statistics clearly demonstrate that advertising in these two programs and at these two timeslots would not ordinarily warrant concern as the 5-12 yrs viewership is, as demonstrated above, on average substantially less than the 35% threshold. We note that there was a very low viewership on these two regional channels at that time, which may have contributed to the anomalous data. Further, these two slots represent a very small percentage of the media bookings across metropolitan and regional stations (0.16%). We note that in the Panel's recent decision in case number 0338/18, the Panel considered that one spot inadvertently aired in a children's program out of several thousand total spots aired was not sufficient to breach the equivalent provisions in the QSRI. We consider that in this situation (particularly where the programs are not even children's programs), consistent with 0338/18, a similar approach should be taken.*

*Nevertheless, Kellogg takes this matter very seriously. We have carefully examined each of the spots and reinforced our instructions to our media agency and the networks. We note that in terms of our internal process, by targeting media buy to programs where the proportion of children under 14 years of age is below 25%, Kellogg goes further than required of it under the 35% threshold contained in the RCMI's placement rules. In addition, Kellogg maintains a robust internal approval process for the review of all externally facing media, including taking all steps to ensure that Kellogg complies with the requirements and the spirit of the RCMI and other applicable advertising codes.*

*AANA Food and Beverages Advertising and Marketing Communications Code (Food Code)*

*In addition, and although not expressly raised by the complainant, Kellogg submits that the advertisement does not breach section 2.2 of the Food Code. For the reasons stated above it is Kellogg's submission that the advertisement is not directed primarily to children, nor does the advertisement undermine the importance of healthy or active lifestyles. The product is not shown to be consumed during the advertisement. The advertisement does not in any way encourage overconsumption. Consistent with previous decisions of the Panel, advertising the product in and of itself is not, per se, undermining the important of a healthy or active lifestyle (for example, case numbers 0345/17, 282/11 and 0550/17).*

*Conclusion*

*For the reasons outlined above, Kellogg respectfully submits that the complaint should be dismissed.*

*Kellogg is pleased to have had the opportunity to respond to this complaint and to confirm its support for the Advertising Standards Community Panel and the codes to which Kellogg has committed to uphold.*



[1] [https://en.wikipedia.org/wiki/Benita\\_Collings](https://en.wikipedia.org/wiki/Benita_Collings)

## **THE DETERMINATION**

The Ad Standards Community Panel (the Panel) considered whether this advertisement breaches the AFGC Responsible Children's Marketing Initiative of the Australian Food and Grocery Council (the AFGC RCMI).

The Panel noted the complainant's concern that the advertisement is targeted towards children, is for products that do not represent a healthier dietary choice and does not sufficiently encourage good dietary habits or physical activity.

The Panel viewed the advertisement and noted the advertiser's response.

The Panel first considered the provisions of the AFGC RCMI. The Panel noted that this is a television advertisement promoting the choc chip LCM product.

The Panel noted that the medium the subject of complaint is television, and that this falls within the scope of the AFGC RCMI.

The Panel noted the RCMI Initiative provides that advertising or marketing communication activities are advertising or marketing communications to children and therefore captured under the RCMI Initiative if:

1. the content of the advertisement or marketing communication is, having regard to the theme, visuals and language used, are directed primarily to children (and are for food and/or beverage products) or
2. The placement of the advertisement or marketing communication is in a medium that is directed primarily to children, ie:
  - a. in relation to television, all C and P rated programs and other rated programs that are directed primarily to children through their themes, visuals and language; and/or
  - b. where children represent 35 percent or more of the audience of the Medium.

With regards to point 1, the Panel considered the theme, content and visuals of the advertisement. The Panel noted the dictionary definition of 'primarily' is 'in the first place' and that to be within the AFGC RCMI the Panel must find that the advertisement is aimed in the first instance at children under 12.



The Panel noted the complainant's concern that the advertisements uses childlike themes of play and wonder and features two young children as central characters.

The Panel noted the advertiser's response that the concept of the advertisement was to appeal to parents and grandparent's desire to bring joy to their child/grandchild and that the advertisement is shown from the grandmother's perspective, not the children's.

The Panel first considered the theme of the advertisement. The Panel noted that the advertisement was filmed from the perspective of a grandmother watching her grandchildren play in the background. The Panel considered that while the theme of playing in a treehouse may appeal to children, the overall theme of a grandmother watching her children play would be appealing to older audiences. The Panel also considered that the actress Benita Collins would be recognisable to adults who remember her from their own childhood, and would be unlikely to be recognised by children under 12. The Panel considered that the use of Benita Collins would be attractive to adult audiences who remember her from Play School, and to grandparents who identify with the concept of looking after their grandchildren. The Panel considered the overall theme of the advertisement was nostalgic and focussed on the experience of the grandmother and that this is a theme which was not directed primarily to children under 12.

The Panel then considered the language of the advertisement. The Panel considered that the language used in the advertisement is targeted towards adults/parents, rather than children. The Panel considered that the phrase 'light up their afternoons with the awesomeness of puffed rice' was directed primarily to the grocery buyer. The Panel considered that some wording such as the word 'awesomeness' and the sign which says 'no grown ups' may be attractive to children, however this wording also adds to the nostalgic effect of the advertisement and are equally directed to adults.

The Panel then considered the visuals of the advertisement. The Panel noted that the vision of the two older children in costumes, the treehouse, the 'No! Grown Ups' sign and the dog being raised in the basket would attract the attention of children. The Panel considered that these images are the focus of the advertisement for the first three second of the ad. The Panel considered that the remainder of the advertisement was seen from the perspective of the grandmother and the visuals would be equally attractive to both adults and children. The Panel noted that the advertisement used two children aged 12 and 13. The Panel considered that the use of children in the advertisement would be attractive to children, however considered that the use of Benita Collins in the advertisement would be of more appeal to adults. The Panel considered the animation of the grains of puffed rice floating out of the box and appearing in the child's hand was also seen from the grandmother's perspective as a way to 'light up their afternoon' and would be equally attractive to both adults and children. The Panel considered that overall the visuals in the advertisement were



equally attractive to both adults and children and were not directed primarily to children under 12.

The Panel reiterated that it is essential that they consider all elements of the advertisement and to make a decision based on how all of the elements of the advertisement interact, and the overall impression that they make, in determining whether an advertisement is clearly directed primarily to children.

The Panel noted that the advertisement had a nostalgic feel to it, and considered that that advertisement would be brighter or more animated if it was directed primarily to children. The Panel considered that the overall theme of a grandparent looking after her grandchildren, the nostalgic value of the inclusion of Benita Collins and the call to action directed to the grocery buyer all amounted to an advertisement which was, through themes, visuals and language, attractive to both adults and children but not directed in the first instance to children under 12. The Panel found that the advertisement did not meet part 1 of the initiative

The Panel then considered part 2 in relation to television and noted that a copy of the television spot placement list was provided by the advertiser. The Panel considered that the advertisement was not broadcast in any C or P rates programs.

The Panel noted that the spot list indicated two programs in regional areas where the child audience was over 35%. The Panel noted the advertiser's response that the audience data was surprising and unpredictable considering that the audience data for these programs usually show a child audience of less than 15%. The Panel considered that the two programs, the Australian Open and Big Bang Theory, recorded child audiences of less than 5% in metropolitan areas. The Panel acknowledged that regional audience data can be unreliable due to the small sample size available and considered that given the low child audience numbers for the same programs in regional markets that overall the advertisements were not broadcast in programs which had an over 35% child audience.

The Panel noted the complainant's concern that the advertisement had been placed in television shows that are popular with children such as 'My Kitchen Rules', 'the Big Bash League', 'House Rules', and 'American Ninja Warrior' and that these shows have high child audiences.

The Panel considered that the audience data for these programs show that they have a child audience of less than 35%. The Panel acknowledged that these programs are watched by children with their families, however considered that the programs are equally attractive to teenagers and adults and are not directed primarily to children under 12.

The Panel noted that the advertisement was played during the movie 'Agent Cody



Banks 2'. The Panel considered that the rating for this program was PG. The Panel considered that the movie features a teenage spy. The Panel considered that the movie would be of interest to older children and teenagers, and was not a program directed primarily to children under 12.

Finding that the advertisement did not meet point 2 of the Initiative the Panel considered that the Core Principles of the RCMI did not apply to this advertisement.

Finding that the advertisement did not breach the AFGC RCMI the Panel dismissed the complaint.

