



January 5, 2000

Mr. Donald Clark, Secretary
Federal Trade Commission
600 Pennsylvania Avenue, N.W., Room H-159
Washington, D.C. 20580

Dear Mr. Clark:

My name is Dino Tsibouris, and I am the lead internet attorney for BANK ONE CORPORATION ("BANK ONE"). BANK ONE is the nation's fourth largest bank holding company, with assets of more than \$260 billion. Bank One offers a full range of financial services to commercial and business customers and consumers.

- I. As part of my practice in the Law Department I represent senior management in their financial services ventures that offer credit cards, banking products and investment services over the internet. I also work closely with our Information Security Department monitoring data security, managing external threats and interfacing with law enforcement when needed
- II. Because of my involvement with senior management and negotiation of outsourcing agreements, I am very familiar with the manner in which our networks are constructed, and can offer information regarding security, vendor selection and testing.
- III. Because the scope of my practice involves all Bank One businesses I have a fundamental working knowledge of all Bank One internet activities and can obtain any additional information that may be needed through colleagues in our various lines of business or other members of the law department.

Very truly yours,

Dino Tsibouris
BANK ONE CORPORATION

KT:bs

Attachment

Konstantin (Dino) Tsibouris, Esq.
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Hilliard, Ohio 43026
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ktsibouris@compuserve.com

CAREER EXPERIENCE

Bank One Corporation
Vice President and Counsel
Technology Practice Group
4/99 – present

Primarily responsible for legal support for Bankone.com, with secondary responsibility for Wingspanbank.com, Oneinvest.com, Carsdirect.com and Educationone.com. Duties included negotiating a \$150M marketing agreement with Excite.com for online advertising, promotion of credit card and bank products and hosting of a co-branded bank website. Also negotiated co-branded advertising agreement with America Online to host Bank One banking center in AOL and CompuServe networks. Currently responsible for negotiating website hosting agreements, domain name purchase agreements, consulting agreements and licensing agreements. Also responsible to monitor pending legislation relating to digital signatures and internet taxation.

Attorney
Retail Practice Group
10/94 – 4/99

Lead attorney for Bank One Credit Company automobile lending units in all 50 states. Responsible for maintaining federal and state consumer law compliance, negotiating marketing agreements, documenting portfolio purchases and sales, performing securitization due diligence. Other duties also included providing primary legal support to retail and consumer-oriented e-commerce units of Bank One, including www.bankone.com, the Bank One Education Finance Group, Credit Card and Merchant Processing line of business. Performed due diligence for two \$800+M auto loan securitizations and \$1B of merchant credit card processing receivables.

Law Clerk
3/93 - 9/94

Responsible for multi-state research projects for Retail, Credit Card and Litigation practice groups. Conducted extensive legal research and drafted memoranda on credit card marketing and Section 85 preemption of state consumer laws. Worked part-time through final year of law school.

Ford Motor Credit Co.
7/90 – 8/91

Responsible for collections, customer service and dealer audit. Responsible for collecting central Ohio automobile loans and leases generated by the largest Ford dealership in the country.

EDUCATIONAL EXPERIENCE

5/94 – Capital University Law School, JD, *cum laude*. Law Review, National Moot Court Team

5/90 – Cedarville College, B.A. Business Administration (emphasis in Finance and Accounting)

MEMBERSHIPS

Member, Committee on Consumer Financial Services of the American Bar Association's Section of Business Law;
Member, Computer Law Association.

References Available Upon Request

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Your document: Privacy Committee Nomination
was delivered to: Advisorycommittee@ftc.gov
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Delivery Confirmation Report

Your document: Privacy Committee Nomination
was delivered to: advisorycommittee@ftc.gov
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