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**UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION**

5. Respondents operate a computer network that consumers use, in conjunction with respondents' website ([www.lifeisgood.com](http://www.lifeisgood.com)) and web application, to obtain information and to buy respondents' products.
6. In selling their products, respondents routinely have collected sensitive information from consumers, including name, address, e-mail address, phone number, credit card number, credit card expiration date, and credit card security code (hereinafter "consumer

10. Through the means described in Paragraph 7, respondents represented, expressly or by implication, that they implemented reasonable and appropriate measures to protect consumer information against unauthorized access.
11. In truth and in fact, respondents did not implement reasonable and appropriate measures to protect consumer information against unauthorized access. Therefore, the representation set forth in Paragraph 7 was, and is, false or misleading.
12. The acts and practices of respondents as alleged in this complaint constitute deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this sixteenth day of April, 2008, has issued this complaint against respondents.

By the Commission.

Donald S. Clark  
Secretary