

UNITED STATES OF AMERICA  
FEDERAL TRADE CTR



## VIOLATIONS

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Exhibit C, December 2008 Privacy Policy.

15. Respondent has never submitted a self-certification to the Safe Harbor on behalf of its [www.gaitways.com](http://www.gaitways.com) website. (Exhibit A, Declaration of Damon C. Greer)
16. Through the means described in Paragraph 14, respondent represented, expressly or by implication, that it is a current participant in the Safe Harbor.
17. In truth and in fact, respondent has never self-certified to the Safe Harbor for its [www.gaitways.com](http://www.gaitways.com) website. Therefore, the representations set forth in Paragraph 14 were, and are, false or misleading.
18. The acts and practices of respondent as alleged in this complaint constitute unfair or 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 ninth day of November, 2009, has issued this complaint against respondent.

By the Commission.

Donald S. Clark  
Secretary