

Analysis of Proposed Consent Orders to Aid Public Comment  
In the Matter of Jhayrmaine Daniels, d/b/a California SkateLine, File No. 152 3198

The Federal Trade Commission (“FTC” or “Commission”) has accepted, subject to final approval, a consent agreement applicable to Jhayrmaine Daniels, d/b/a California SkateLine (“California SkateLine”). California Skate

Line made to consumers concerning its participation in the Safe Harbor privacy framework agreed upon by the U.S. and the European Union (“EU”) (“EU Safe Harbor Framework” or “Safe Harbor Framework”). The Safe Harbor Framework allows U.S. companies to transfer

Parts II through VI of the proposed order are reporting and compliance provisions. Part II requires California Skate Line to retain documents relating to its compliance with the Order for a five-year period. Part III requires dissemination of the order now and in the future to persons with responsibilities relating to the subject matter of the order. Part IV ensures the notification to the FTC of changes in corporate status. Part V mandates that California Skate Line submit an initial compliance report to the FTC, and make available to the FTC subsequent reports. Part VI is a provision “sunsetting” the order after twenty (20) years, with certain exceptions.

The purpose of this analysis is to facilitate public comment on the proposed order. It is not intended to constitute an official interpretation of the proposed complaint or order or to modify the order’s terms in any way.