

UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION

COMMISSIONERS: Edith Ramirez, Chairwoman
Julie Brill
Maureen K. Ohlhausen
Terrell McSweeney

In the Matter of

Step N Grip, LLC
a corporation.

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DOCKET NO.

DECISION AND ORDER

The Federal Trade Commission (“Commission”) having initiated an investigation of certain acts and practices of Step N Grip (“Step N Grip”), a limited liability corporation, and Step N Grip having been furnished thereafter with information regarding the same, and the Commission having considered the same, it is hereby ordered that the Commission shall issue a decision and order in this matter. Gririratt -34.451.15 Td [(c)C3(L)omtr

1. Step N Gip, LLC, is a limited liability corporation organized, existing, and doing business under and by virtue of the laws of Michigan with its principal place of business in New Lothrop, Michigan
2. The Federal Trade Commission has jurisdiction over 7isd04 Tw2()1.pn over 7isd

- A. Communicating with any Competitor regarding prices or rates, or prospective prices or rates, of Step N Grip or any Competitor; *provided, however*, that for purposes of this Paragraph II.A, Communicating does not include the transfer or dissemination of information to the public through websites or other widely accessible methods of advertising such as newspapers, television, signage, direct mail or online and social media
- B. Entering into, attempting to enter into, adhering to, participating in, maintaining, organizing, implementing, enforcing, inviting, encouraging, offering or soliciting any agreement or understanding, express or implied, between or among Step N Grip and any Competitor
 - 1. To raise, fix, maintain, or stabilize prices or price levels or rate levels, or payment terms, or to engage in any other pricing action;
 - 2. To allocate or divide markets, customers, contracts, transactions, business opportunities, lines of commerce, or territories; or
 - 3. To set, change, limit or reduce service terms or service levels
- C. Exhorting, requesting, suggesting, urging, advocating, encouraging, advising, or recommending to any Competitor, either publicly or privately, that such Competitor
 - 1. Set, change, raise, fix, stabilize or maintain its prices or price levels, rates or rate levels, or payment terms, or engage in any other pricing action; or
 - 2. Set, change, reduce, limit, maintain, or reduce its service terms or service levels.
- D. Instructing or otherwise encouraging any dealer, distributor, or seller of rug devices to engage in conduct that Respondents are prohibited from engaging in under Paragraphs II.A, II.B, and II.C. of this Order.

III.

IT IS FURTHER ORDERED that Step N Grip shall

- A. Within thirty (30) days after the date on which this Order becomes final, provide to each of Step N Grip officers, directors and employees a copy of this Order and the Complaint.
- B. For a period of four (4) years from the date this Order becomes final, provide a copy of this Order and the Complaint to any person who becomes a director,

officer, or employee of Step N Grip and provide such copies within thirty (30) days of the commencement of such Person's employment or term as an officer or director.

- C. Require each person to whom a copy of this Order is furnished pursuant to Paragraph IIIA. and III.B. above to sign and submit to Step N Grip within thirty (30) days of the receipt thereof a statement that (1) represents that the undersigned has read and understands the Order, and (2) acknowledges that the undersigned has been advised and understands that compliance with the Order may subject Step N Grip to penalties for violation of the Order
- D. Retain documents and records sufficient to record Step N Grip's compliance with its obligations under Paragraph III of the Order

IV.

IT IS FURTHER ORDERED that Step N Grip shall file a verified written report within sixty (60) days from the date this Order becomes final, annually thereafter for four (4) years on the anniversary of the date this Order becomes final, and at such other times as the Commission may by written notice require. Each report shall include, among other information that may be necessary

- A. A copy of the acknowledgment(s) require2(N G0 Tc 0 Tw [(C /LBody <</MC17(r)3()2(l4a)4(p

VI.

IT IS FURTHER ORDERED that, for the purpose of determining or securing compliance with this order, upon written request and upon five (5) days notice Step N Grip shall, without restraint or interference, permit any duly authorized representative of the Commission:

- A. Access, during office hours and in the presence of counsel, to all facilities and access to inspect and obtain copies of relevant books, ledgers, accounts, correspondence, memoranda and all other records and documents in the possession or under the control of Step N Grip; which copying services shall be provided at the request of the authorized representative(s) of the Commission and at the expense of Step N Grip; and
- B. The opportunity to interview officers, directors, or employees of Step N Grip who may have counsel present, related to compliance with this Order

VII.

IT IS FURTHER ORDERED that this Order shall terminate twenty (20) years from the date this Order is issued

By the Commission.

Donald S. Clark
Secretary

SEAL

ISSUED