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2 Civil Division
JONATHAN F. OLIN
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4 Director, Consumer Protection Branch
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1 Judgment. As evidenced by the signatures thereon, all parties have agreed to the terms of
2 the proposed Stipulated Order.

3 Dated: December 17, 2015

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Respectfully submitted,

5 FOR THE FEDERAL TRADE
6 COMMISSION:

FOR PLAINTIFF
THE UNITED STATES OF AMERICA:

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7 MANEESHA MITHAL
8 Associate Director
9 Division of Privacy and Identity
10 Protection

BENJAMEN C. MIZER
Principal Deputy Assistant Attorney General
Civil Division

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10 MARK EICHORN
11 Assistant Director
12 Division of Privacy and Identity
13 Protection

JOHNATHAN F. OLIN
Deputy Assistant Attorney General

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12 MEGAN COX
13 Attorney
14 Division of Privacy and Identity
15 Protection
16 Federal Trade Commission
17 600 Pennsylvania Avenue, N.W.
18 (202) 326-2282

MICHAEL S. BLUME
Director
Consumer Protection Branch

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ANDREW E. CLARK
Assistant Director

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/s/ Jacqueline Blaesi-Freed
Jacqueline Blaesi-Freed
Trial Attorney, Kansas Bar No. 25455

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BENJAMEN C. MIZER
Principal Deputy Assistant Attorney General, Civil Division

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3. Defendant neither admits nor denies any of the allegations in the Complaint except as specifically stated in this Order. Only for purposes of this action, Defendant admits the facts necessary to establish jurisdiction.

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- 1. 5HFHLYHV QRWLFH RI WKH RSHUDWRU¶V and disclosure practices; and
- 2. Authorizes any collection, use, and/or disclosure of the personal information.

G. ³2QOLQH FRQWDFW LQmailable address or any other substantially similar identifier that permits direct contact with a person online, including but not limited to, an instant messaging user identifier, a voice over internet protocol (VOIP) identifier, or a video chat user identifier.

H. ³2SHUDWRU´ PHDQ operates a website located on the Internet or an online service and who collects or maintains personal information from or about the users of or visitors to such website or online service, or on whose behalf such information is collected or maintained, or offers products or services for sale through that website or online service, where such website or online service is operated for commercial purposes involving commerce among the several States or with one (1) or more foreign nations in any territory of the United States or in the District of Columbia, or between any such territory and another such territory or any State or foreign nation; or between the District of Columbia and any State, territory, or foreign nation. Personal information is collected or maintained on behalf of an operator when:

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cookie, an Internet Protocol (IP) address, a processor or device serial number, or unique device identifier;

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IV. COMPLIANCE REPORTING

IT IS FURTHER ORDERED that Defendant make timely submissions to the Commission:

A. One year after entry of this Order, Defendant must submit a compliance report, sworn under penalty of perjury. In such report, Defendant must:

1. identify the primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Commission and Plaintiff may use to communicate with Defendant

2. identify all of Defendant's businesses by all of their names, telephone numbers, and physical, postal, email, and Internet addresses;

3. describe the activities of each business, including the goods and services offered, the means of advertising, marketing, and sales.

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7. provide a statement setting forth in detail the means provided for parents to review the personal information collected from their children and to

1 _____ and supplying the date, signature, full name, title (if applicable), and
2 signature.

3 E. Unless otherwise directed by a Commission representative in writing, all
4 submissions to the Commission pursuant to this Order must be emailed to
5 DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to:
6 Associate Director for Enforcement, Bureau of Consumer Protection, Federal
7 Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The
8 subject line must begin: United States v. LAI Systems, Inc.

9 V. RECORDKEEPING

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1 representation made directly or indirectly by Defendant regarding collection, use,
2 and disclosure practices pertaining to personal information. Each webpage copy

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1 SO STIPULATED AND AGREED:

2 FOR PLAINTIFF

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FOR DEFENDANT:

Date: _____

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Los Angeles, CA 90071
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