

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Maureen K. Ohlhausen, Acting Chairman
Terrell McSweeney

In the Matter of

SON LE, a/k/a Somy Le, d/b/a Recreational Products, Trampoline Jumpers, Infinity Trampolines, Olympus Pro Trampolines, Happy Trampoline, Trampoline Safety of America, Bureau of Trampoline Review, and Top Trampoline Review, and formerly d/b/a Trampoline Store and Trampoline Superstore; and

DOCKET NO. C-4619

BAO LE, a/k/a Robert Le, a/k/a Bobby Le, d/b/a Recreational Products, Trampoline Jumpers, Infinity Trampolines, Olympus Pro Trampolines, Happy Trampoline, Trampoline Safety of America, Bureau of Trampoline Review, and Top Trampoline Review and formerly d/b/a Trampoline Store and Trampoline Superstore.

COMPLAINT

The Federal Trade Commission, having reason to believe that ~~ate Son and Ba Le~~ (collectively, "Respondent~~s~~") have violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent Son Le, also known as Son ~~lye~~, owns and does business as Recreational

Individually or in concert with others, he controlled, or had the authority to control, or participated in the acts and practices alleged in this complaint. His principal office or place of business is 1401 East Ball Road, #C, Anaheim, California 92805.

3. Using the fictitious business names listed above, Respondents have advertised, offered for sale, sold, and distributed products to consumers, including Infinity and Olympus Pro trampolines.

4. The acts and practices of Respondents alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the Federal Trade Commission Act.

Course of Conduct

5. Respondents have advertised, offered for sale, and sold Infinity and Olympus Pro trampolines online through the following websites: Infinity Trampolines (www.infinitytrampolines.com), Happy Trampoline (www.happytrampoline.com), and Trampoline Jumpers (www.trampolinejumpers.com) (the "Sales Websites"). Depending on the model, an Infinity trampoline costs between \$798.00 and \$2898.00 and an Olympus Pro trampoline costs between \$799.00 and \$4895.00.

6. All of the Sales Websites have prominently displayed the Trampoline Safety of America logo. The Infinity Trampoline website also displays logos for the Bureau of Trampoline Review and Top Trampoline Review. These logos linked to their respective websites (the "Review Websites"); Trampoline Safety of America (www.trampolinesafetyofamerica.com), Bureau of Trampoline Review (www.bureauoftrampolinereview.com), and Top Trampoline Review (www.toptrampolinereview.com), which have purported to provide prospective purchasers with objective information about trampolines, including unbiased expert reviews of specific brands and models and ratings based on safety, performance, and other attributes.

7. The Review Websites have recommended Infinity and Olympus Pro trampolines.

8. Respondent Son Le owns the Sales Websites and the Review Websites. Respondents Son Le and Bao Le control the content of the Sales Websites and the Review Websites.

9. Respondents have disseminated o.ah6(es)-5d o.ah6(es)-5d o.ah6(es)-5d 0.00401 96(o)-14(g)2(1

- A. Exhibit A, Infinity Trampoline website, www.infinitytrampolines.com (the below logos have appeared on each page of the website and linked to respective Review Websites).

Our Mission

To make sure that trampoliner users are educated about the product they are purchasing and understand the safety standards that comes with each trampoline. Every month, we have independent experts writing articles about trampolines. We will compare every aspect of the trampolines. Why do some trampolines only have 4 legs?

* * *

In conclusion we highly recommend the Infinity Trampoline [link to InfinityTrampolines.com] It is by far one of the safest and best trampolines we've reviewed. . .

* * *

In conclusion I highly recommend the Olympus pro trampoline [link to TrampolineJumpers.com] It is the heaviest frame and highest weight capacity of all the trampolines we've reviewed. The double security net with the clips and zipper makes it one of the safest as well. As you can see from their website they have been featured on many TV shows / commercials. . . .

E. Exhibit E, Bureau of Trampoline Review website
www.bureauoftrampolinereview.com

The Bureau of Trampoline Review is an independent organization whose main purpose is to provide users up to date factual data and comparisons when making a trampoline investment. We have a board of gymnastic and certified trampoline experts compiled to create this database. . . . Here at the Bureau of Trampoline Review, we provide independent research for you so that you don't have to do it yourself.

* * *

The Bureau of Trampoline Review is an independent research organization made up of former gymnastics and trampoline experts. Our mission is to provide accurate research data and comparisons for end users to make a sound decision when purchasing a trampoline. Safety, reliability and performance are our main focus. We are not paid by any sponsors or manufacturers, so our data is unbiased nor

F. Exhibit F, Top Trampoline Review website www.toptrampolinereview.com

To help you in your search for the best trampoline on the market, this website has compiled reviews of the top trampoline brands and the most popular trampolines that they produce. Here you will find detailed specifications as

H. Exhibit H, online review, <https://www.youtube.com/watch?v=PyJKoQzoW0w>
Bobby Le 6 months ago

- D. Bureau of Trampoline Review personnel did not purchase and rigorously test the strength of the reviewed trampolines. For trampolines other than Infinity and Olympus Pro models, Respondents simply reported

Violations of Section 5

17. The acts and practices of Respondents as alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission on ~~four~~ fifth day of July 2017, has issued this Complaint against Respondents.

By the Commission.

Donald S. Clark
Secretary

SEAL: