# UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

Ioseph I Simons Chairman

COMMISSIONERS.	Nohla Joshua (Phir (M)2 (I)-3(: (p)-4san )]TJ	3 Tr 9106 0 Td	[(1 <b>69</b> 0 (
Christine S.			[(20) 0 (
n the Matter of	DOCKET NO. C-4702		
Thru, Inc. corporation.	) DECISION AND ORDER )		
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#### **DECISION**

COMMISSIONERS.

The Federal Trade Commission ("Commission") initiated an investigation of certain acts and practices of the Respondent named above in the caption. The Commission's Bureau of Consumer Protection ("BCP") prepared and furnished to Respondent a draft Complaint. BCP proposed to present the draft Complaint to the Commission for its consideration. If issued by the Commission, the draft Complaint would charge Respondent with violation of the Federal Trade Commission Act.

Respondent and BCP thereafter executed an Agreement Containing Consent Order "Consent Agreement"). The Consent Agreement includes: 1) statements by Respondent that it leither admits nor denies any of the allegations in the Complaint, except as specifically stated in this Decision and Order, and that only for purposes of this action, it admits the facts necessary to establish jurisdiction; and 2) waivers and other provisions as required by the Commission's Rules.

The Commission considered the matter and determined that it had reason to believe that Respondent has violated the Federal Trade Commission Act, and that a Complaint should issue tating its charges in that respect. The Commission accepted the executed Consent Agreement and placed it on the public record for a period of thirty (30) days for the receipt and consideration of public comments. Now, in further conformity with the procedure prescribed in Rule 2.34, the Commission issues its Complaint, makes the following Findings, and issues the following Order:

Delivery must occur within ten (10) days after the effective date

N.W., Washington, D.C. 20580. The subject line mugtrben reThru, Inc, FTC File No. 1823196, Docket No. C-4702.

### IV. Recordkeeping

IT IS FURTHER ORDERED that Respondent must create certain reconstructive (20) years after the issuandate of the Order, and retain each such refourtive (5) years. Specifically, Respondent must create and retrained records:

- A. accounting records showing the revenues from all goods or services sold;
- B. personnel records showing, for each person providing services, whether as an employee or otherwise, that person's: name; addresses; telephone numbers; job title or position; dates of service; and (if applicable) the reason for termination;
- C. all records necessary to demonstrate full compliance with each provision of this Order, including all submissions to the Commission; and
- D. a copy of eachwidely disseminated representation by Respondenting any representation subject to this Order, and all materials that were relied upon impacting the representation

### V. Compliance Monitoring

IT IS FURTHER ORDERED that, for the purpose of monitoring Responde's compliance with this Order:

- A. Within ten (10) days of receipt of a written request from a representative of the Commission, Respondent must: submit additional compliance reports or other requested information, which must be sworn under penalty of perjury, and produce records for inspection and copying.
- B. For matters concerning this Order, representatives of the Commission are authorized to communicate directly witl Respondent. Respondent permit per
- C. The Commission may use all other lawful means, including posing through its representatives consumers, suppliers, or other individuals or entities, to Respondent or any individual or entity affiliated with Respondent, without the necessity of identification or prior notice. Nothing in this Order limits the Commission's lawful use of compress, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1.

## VI. Order Effective Dates

## IT IS FURTHER ORDERED