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UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Joseph J. Simons, Chairman

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In the Matter of

SANDPIPER OF CALIFORNIA, INC., a corporation

DOCKET NO.

and

PIPERGEAR USA, INC., a corporation.

COMPLAINT

The Federal Trade Commission, having reason to believe that Sandpiper of California, Inc., a corporation, and PiperGear USA, Inc., a corporation (collectively, "Respondents"), 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 Sandpiper of California, Inc. ("Sandpiper") is a California corporation with its principal office or place of business at 687 Anita Street, Suite A, Chula Vista, CA 91911.
- 2. Respondent PiperGear USA, Inc. ("PiperGear") is a California corporation with its principal office or place of business at 687 Anita Street, Suite A, Chula Vista, CA 91911.
- 3. Respondents Sandpiper and PiperGear have operated as a common enterprise while engaging in the unlawful acts and practices alleged below. Because these Respondents have operated as a common enterprise, each of them is jointly and severally liable for the acts and practices alleged below.
- 4. Respondents have advertised, labeled, offered for sale, sold, and distributed products to consumers, including, but not limited to, backpacks and travel bags. Respondents advertise these products online, including, but not limited to, on their websites, sandpiperca.com and pipergearusa.com. Respondents offer for sale, sell, and distribute their products throughout the United States.

5. The acts and practices of

- 7. In numerous instances, including, but not limited to, the promotional materials referenced in Paragraph 6, Responds have represented expressly or by implication hat all of their backpackstravel bags, and other products all or virtually all made in the United States.
- 8. In fact, more than 95% of Respondes and products are imported as finished goods and approximately 80% of Respondent Piper separoducts are either imported as finished goods routain significant imported component espondents import products or components from Mexico and Chin for certainwallets imported from Mexico as finished goods Respondents hid truthful count of origin information the back of tags and inserted cards that prominently display fealse U.S. origin claims
- 9. Therefore, Respondentsxpress or implied representations that deeprestly all made in thhat deep
 - 10. In connection with the 10 (a)6manufacturing, labeling, advertising, promotion, offering for sale, or distribution of (II ma)6 (d)2 (e)6 (in)2 (th)2dsenBd-11, Respondentdss have