

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

COMMISSIONERS: **Joseph J. Simons, Chairman**
 a5 J. S-1 (e)4h (O)h p.aiOmmMrs, C 0 T9.2 Tc

In the Matter of

SANDPIPER OF CALIFORNIA, INC., a corporation

and

PIPERGEAR USA, INC., a corporation.

DOCKET NO.

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

