

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

**In the Matter of**

**SON LE, a/k/a Sonny Le, d/b/a Recreational Products,  
Trampoline Jumpers, Infinity Trampolines, Olympus  
Pro Trampolines, Happy Trampoline, Trampoline  
Safety of America, Bureau of Trampoline Review, and**

Bureau of Trampoline Review, Top Trampoline Review, Trampoline Store, and Trampoline Superstore. His principal office or place of business is 1401 East Ball Road, #C, Anaheim, California 92805.

2. Proposed Respondents neither admit nor deny any of the allegations in the Complaint, except as specifically stated in the Decision and Order. Only for purposes of this action, Proposed Respondents admit the facts necessary to establish jurisdiction.
3. Proposed Respondents waive:
  - a. Any further procedural steps;
  - b. The requirement that the Commission's Decision contain a statement of findings of fact and conclusions of law; and
  - c. All rights to seek judicial review or otherwise to challenge or contest the validity of the Decision and Order issued pursuant to this Consent Agreement.
4. This Consent Agreement will not become part of the public record of the proceeding unless and until it is accepted by the Commission. If the Commission accepts this Consent Agreement, it, together with the draft Complaint, will be placed on the public record for 30 days and information about them publicly released. Acceptance does not constitute final approval, but it serves as the basis for further actions leading to final disposition of the matter. Thereafter, the Commission may either withdraw its acceptance of this Consent Agreement and so notify each Proposed Respondent, in which event the Commission will take such action as it may consider appropriate, or issue and serve its Complaint (in such form as the circumstances may require) and decision in disposition of the proceeding, which may include an Order. *See* Section 2.34 of the Commission's Rules, 16 C.F.R. § 2.34.
5. If this agreement is accepted by the Commission, and if such acceptance is not subsequently withdrawn by the Commission pursuant to Commission Rule 2.34, the Commission may, without further notice to Proposed Respondents: (1) issue its Complaint corresponding in form and substance with the attached draft Complaint and its Decision and Order; and (2) make information about them public. Proposed Respondents agree that service of the Order may be effected by its publication on the Commission's website (ftc.gov), at which time the Order will become final. *See* Rule 2.32(d). Proposed Respondents waive any rights they may have to any other manner of service. *See* Rule 4.4.
6. When final, the Decision and Order will have the same force and effect and may be altered, modified, or set aside in the same manner and within the same time provided by statute for other Commission orders.
7. The Complaint may be used in construing the terms of the Decision and Order. No agreement, understanding, representation, or interpretation not contained in the Decision and Order or in this Consent Agreement may be used to vary or contradict the terms of the Decision and Order.

8. Each Proposed Respondent agrees to comply with the terms of the proposed Decision and Order from the date he signs this Consent Agreement. Proposed Respondents understand that they may be liable for civil penalties and other relief for each violation of the Decision and Order after it becomes final.

**SON LE**

**FEDERAL TRADE COMMISSION**

By: \_\_\_\_\_  
Son Le  
Date: \_\_\_\_\_

By: \_\_\_\_\_  
Karen Mandel  
Shira Modell  
Attorneys  
Division of Advertising Practices  
Bureau of Consumer Protection

**BAO LE**

**APPROVED:**

By: \_\_\_\_\_  
Bao Le  
Date: \_\_\_\_\_

\_\_\_\_\_  
Mary K. Engle  
Associate Director  
Division of Advertising Practices

**APPROVED AS TO FORM AND CONTENT:**

\_\_\_\_\_  
Thomas B. Pahl  
Acting Director  
Bureau of Consumer Protection

\_\_\_\_\_  
Paul J. Wisniewski, Esq.  
The Law Offices of Paul J. Wisniewski  
200 South Wacker Drive, Suite 3100  
Chicago, IL 60606

Date: \_\_\_\_\_

Attorney for Proposed Respondents

**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 Sonny 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**

**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.**

**DECISION AND ORDER**

**DOCKET NO. C-**

**DECISION**

The Federal Trade Commission (“Commission”) initiated an investigation of certain acts and practices of the Respondents named in the caption. The Commission’s Bureau of Consumer Protection (“BCP”) prepared and furnished to Respondents 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 the Respondents with violation of the Federal Trade Commission Act.

Respondents and BCP thereafter executed an Agreement Containing Consent Order (“Consent Agreement”). The Consent Agreement includes: 1) statements by Respondents that they neither admit nor deny any of the allegations in the Complaint, except as specifically stated in this Decision and Order, and that only for purposes of this action, they admit 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 Respondents have violated the Federal Trade Commission Act, and that a Complaint should issue stating its charges in that respect. The Commission accepted the executed Consent

Agreement and placed it on the public record for a period of 30 days for the receipt and consideration of public comments. The Commission duly considered any comments received from interested persons pursuant to Section 2.34 of its Rules, 16 C.F.R. § 2.34. 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:

### **Findings**

1. The Respondents are:
  - a. Respondent Son Le, also known as Sonny Le. He has done business as and, individually or in concert with others, has formulated, directed, or controlled the policies, acts, or practices of, Recreational Products, Trampoline Jumpers, Infinity Trampolines, Olympus Pro Trampolines, Happy Trampoline, Trampoline Safety of America, Bureau of Trampoline Review, Top Trampoline Review, Trampoline Store, and Trampoline Superstore. His principal office or place of business is 1401 East Ball Road, #C, Anaheim, California 92805.
  - b. Respondent Bao Le, also known as Robert Le and Bobby Le. He has done business as and, individually or in concert with others, has formulated, directed, or controlled the policies, acts, or practices of, Recreational Products, Trampoline Jumpers, Infinity Trampolines, Olympus Pro Trampolines, Happy Trampoline, Trampoline Safety of America, Bureau of Trampoline Review, Top Trampoline Review, Trampoline Store, and Trampoline Superstore. His principal office or place of business is 1401 East Ball Road, #C, Anaheim, California 92805.
2. The Commission has jurisdiction over the subject matter of this proceeding and over the Respondents, and the proceeding is in the public interest.

### **ORDER**

#### **Definitions**

For purposes of this Order, the following definitions apply:

- A. "Clearly and conspicuously" means that a requirement is disclosed in a clear and conspicuous manner. (16 C.F.R. § 2.34)

2. A visual disclosure, by its size, contrast, location, the length of time it appears, and other characteristics, must stand out from any accompanying text or other visual elements so that it is easily noticed, read, and understood.



principals, officers, directors, and LLC managers and members; (2) all employees, agents, and representatives who participate in conduct related to the subject matter of the Order; and (3) any business entity resulting from any change in structure as set forth in the Provision titled Compliance Reports and Notices. Delivery must occur within 10 days after the effective date of this Order for current personnel. For all others, delivery must occur before they assume their responsibilities.

- C. From each individual or entity to which a Respondent delivered a copy of this Order, that Respondent must obtain, within 30 days, a signed and dated acknowledgment of receipt of this Order.

#### **IV. Compliance Reports and Notices**

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

- A. Sixty days after the issuance date of this Order, each Respondent must submit a compliance report, sworn under penalty of perjury, in which:
  - 1. Each Respondent must: (a) identify the primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Commission may use to communicate with Respondent; (b) identify all of that Respondent's businesses by all of their names, telephone numbers, and physical, postal, email, and Internet addresses; (c) describe the activities of each business, including the goods and services offered, the means of advertising, marketing, and sales, and the involvement of any other Respondent (which Respondents must describe if they know or should know due to their own involvement); (d) describe in detail whether and how that Respondent is in compliance with each Provision of this Order, including a discussion of all of the changes the Respondent made to comply with the Order; and (e) provide a copy of each Acknowledgment of the Order obtained pursuant to this Order, unless previously submitted to the Commission.
  - 2. Additionally, each Respondent must (a) identify all telephone numbers and all physical, postal, email and Internet addresses, including all residences; (b) identify all business activities, including any business for which such Respondent performs services whether as an employee or otherwise and any entity in which such



in or controls directly or indirectly that may affect compliance obligations arising under this Order, inclu

- C. Copies or records of all consumer complaints and refund requests, whether received directly or indirectly, such as through a third party, and any response;
- D. A copy of each unique advertisement or other marketing material making a representation subject to this Order;
- E. For 5 years from the date of the last dissemination of any representation covered by this Order:
  - 1. All materials that were relied upon in making the representation; and
  - 2. All tests, studies, analysis, demonstrations, other research or other such evidence in Respondent's possession, custody, or control that contradicts, qualifies, or otherwise calls into question the representation, or the basis relied upon for the representation, including complaints and other communications with consumers or with governmental or consumer protection organizations;
- F. For 5 years from the date received, copies of all subpoenas and other communications with law enforcement, if such communication relate to Respondents' compliance with this Order;
- G. For 5 years from the date created or received, all records, whether prepared by or on behalf of Respondents, that demonstrate non-compliance or tend to show any lack of compliance by Respondents with this Order; and
- H. All records necessary to demonstrate full compliance with each provision of this Order, including all submissions to the Commission.

## **VI. Compliance Monitoring**

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

- A. Within 10 days of receipt of a written request from a representative of the Commission, each Respondent must submit additional compliance reports or other requested

any individual or entity affiliated with Respondents, without the necessity of identification or prior notice. N