

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.

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.

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](http://www.infinitytrampolines.com)), Happy Trampoline ([www.happytrampoline.com](http://www.happytrampoline.com)), and Trampoline Jumpers ([www.trampolinejumpers.com](http://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](http://www.trampolinesafetyofamerica.com)), Bureau of Trampoline Review ([www.bureauoftrampolinereview.com](http://www.bureauoftrampolinereview.com)), and Top Trampoline Review ([www.toptrampolinereview.com](http://www.toptrampolinereview.com)), which have purported to provide prospective purchasers with objective information about trampolines, including unbiased expert reviews of specific brands and models.

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



3rd Party Rating



- B. Exhibit B, Happy Trampoline website, [www.happytrampoline.com](http://www.happytrampoline.com) (the below logo containing a link to the Trampoline Safety of America website appear on each web page).



- C. Exhibit C, Trampoline Jumpers website, [www.trampolinejumpers.com](http://www.trampolinejumpers.com) (the below logo containing a link to the Trampoline Safety of America website appear on each web page).



- D. Exhibit D, Trampoline Safety of America website [www.trampolinesafetyofamerica.com](http://www.trampolinesafetyofamerica.com)

#### About Us

Trampoline Safety of America is a third party organization involved in studying the technical aspects of all the major trampoline distributors in America. It is comprised of structural engineers, trampoline gymnastic coaches, professional trampoline installers, seasoned customer service sales reps and also experienced trampoline owners. Our goal is to educate the public about the safeties of trampolines and how to get the maximum performance out of your trampoline.

## 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? Why certain safety nets are safer than others? Why are some trampolines \$200 and some over \$2500? What about the springless trampolines?? We will give you all the answers you need to buy the best trampoline for your money.

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Trampoline Safety of America is a third party organization involved in studying [sic] the technical aspects of all the major trampoline distributors in America. It is comprised of structural engineers, trampoline gymnastic coaches, along [sic] with many other experts who have been involved in trampolines all their lives. From a non-biased position, we grade every factors [sic] that is involved with every major trampoline out there. We review their structural performances, [s Tw [(e s)-5am

\* \* \*

In conclusion we highly recommend the Infinity Trampoline [link to [InfinityTrampolines.com](http://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](http://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](http://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](http://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

THEREFORE, the Federal Trade Commission this \_\_\_\_\_ day of \_\_\_\_\_, 2017, has issued this Complaint against Respondents.

By the Commission.

Donald S. Clark  
Secretary

SEAL: