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1 E. "Covered Mechanism" means any gameplay mechanic or element in  
2 a Covered Product or Service, such as the Genshin Impact "Wish" system  
3 boxes or other systems, by which a player of a game may use U.S. dollars, other  
4 fiat currency, or

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Operator provides such information to a Person who provideu5cs 80032 8



- 1 4. A screen or user name where it functions in the same manner as
- 2 Online Contact Information;
- 3 5. A telephone number;
- 4 6. A Social Security number;
- 5 7. A Persistent Identifier;
- 6 8. A photograph, video, or audio file where such file contains a
- 7 Child's image or voice;
- 8 9. Geolocation information sufficient to identify street name and
- 9 name of a city or town; or
- 10 10. Information concerning the Child or the Parents of that Child
- 11 that the Operator Collects online from the Child and combines with a
- 12 Persistent Identifier.

13 T. "Release of Personal Information" means the sharing, selling,

14 renting, or transfer of Personal Information to any Third Party.

15 U. "Support for the Internal Operations of the Website or Online

16 Service" means:

- 17 1. Those activities necessary to:
  - 18 a. Maintain or analyze the functioning of the website or
  - 19 online service;
  - 20 b. Perform network communications;
  - 21 c. Authenticate users of, or personalize the content on, the
  - 22 website or online service;
  - 23 d. Serve contextual advertising on the website or online
  - 24 service or cap the frequency of advertising;
  - 25 e. Protect the security or integrity of the user, website, or
  - 26 online service;
  - 27 f. Ensure legal or regulatory compliance; and
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1 in connection with the advertising, marketing, promoting, offering for sale, or  
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1 A. Within Defendants' video games where Defendants offer or make  
2 available digital content or merchandise via a Covered Mechanism, Defendants must  
3 Clearly and Conspicuously disclose, without requiring any additional input from the  
4 consumer

5 1. The likelihood a consumer will obtain a digital content or  
6 merchandise prominently featured or depicted at the point of sale  
7 Covered Mechanism, or in the promotion of digital content or  
8 merchandise accessible by a Covered Mechanism, placed in Close  
9 Proximity to the digital content or merchandise featured or depicted;  
10 and

11 2. The range of potential total costs in U.S. dollars, or applicable  
12 fiat currency if the user used only fiat currency to acquire featured  
13 digital content or merchandise via a Covered Mechanism

14 B. At any point of sale at which Defendants make any bundle or package  
15 of virtual currency available for purchase within Defendants' video games,  
16 Defendants must Clearly and Conspicuously disclose, without requiring any  
17 additional input from the consumer:

18 1. The number of transactions that the bundle or package of virtual

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1 1. Each possible featured in-game item that a consumer may  
2 obtain via a Covered Mechanism, and for each featured in-game item  
3 so identified, the likelihood that, the consumer will obtain that  
4 featured item; and

5 2. The range of potential total costs in U.S. dollars, or applicable  
6 fiat currency, if the user used only fiat currency to acquire featured in  
7 game items via a Covered Mechanism.

8 V. INJUNCTION CONCERNING THE COLLECTION OF PERSONAL  
9 INFORMATION FROM CHILDREN

10 IT IS FURTHER ORDERED that Defendants and Defendants' officers,  
11 agents, employees, and attorneys, and all other Persons in active concert or  
12 participation with any of them, who receive actual notice of this Order, whether  
13 acting directly or indirectly in connection with being an Operator of any Website or  
14 Online Service Directed to Children or of any website or online service with actual  
15 knowledge that it is Collecting or maintaining Personal Information from a Child,  
16 are hereby permanently restrained and enjoined from, with respect to such service

17 A. Failing to post a prominent and clearly labeled link to an online notice  
18 of the Operator's information practices with regard to Children, if any, on the home  
19 or landing page or screen of its website or online service, and at each area of the  
20 website or online service where Personal Information is Collected from Children,  
21 unless the COPPA Rule (attached as Appendix A or as subsequently amended),  
22 provides an exception to providing such notice;

23 B. Failing to make reasonable efforts, taking into account available  
24 technology, to ensure that a Parent of a Child receives direct notice of the  
25 Operator's practices with regard to the Collection, use, or Disclosure of Personal  
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VIII. ADDITIONAL MONETARY PROVISIONS

IT IS FURTHER ORDERED that:

A. Defendants relinquish dominion and all legal and equitable right, title, and interest in all assets transferred pursuant to this Order and may not seek the return of any assets.

B. The facts alleged in the Complaint will be taken as true, without further proof, in any subsequent civil litigation by or on behalf of the Commission including in a proceeding to enforce its rights to any payment or monetary

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1 Delivery must occur within ten (10) days of entry of this Order for current  
2 personnel. For all others, delivery must occur before they assume their  
3 responsibilities.

4 C. From each individual or entity to which a Defendant delivered a copy  
5 of this Order, that Defendant must obtain, within thirty (30) days, a signed and  
6 dated acknowledgment of receipt of this Order.

7 X. COMPLIA<</MCID 5 >C778 -1.641 Td A (t)8.5 (y v.641 TE7 (

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1 1. Each Defendant must report any change in: (a) any designated  
2 point of contact; or (b) the structure of any Defendant or any entity  
3 that Defendant has any ownership interest in or controls directly or  
4 indirectly that may affect compliance obligations arising under this  
5 Order, including: creation, merger, sale, or dissolution of the entity or  
6 any subsidiary, parent, or affiliate that engages in any acts or practices  
7 subject to this Order.

8 C. Each Defendant must submit to the Commission notice of the filing of  
9 any bankruptcy petition, insolvency proceeding, or similar proceeding by or  
10 against such Defendant within fourteen (14) days of its filing.

11 D. Any submission to the Commission required by this Order to be  
12 sworn under penalty of perjury must be true and accurate and comply with 28  
13 U.S.C. § 1746, such as by concluding: "I declare under penalty of perjury under  
14 the laws of the United States of America that the foregoing is true and correct.  
15 Executed on: \_\_\_\_" and supplying the date, signatory's full name, title (if  
16 applicable), and signature.

17 E. Unless otherwise directed by a Commission representative in writing,  
18 all submissions to the Commission pursuant to this Order must be emailed to  
19 DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to:  
20 Associate Director for Enforcement, Bureau of Consumer Protection, Federal  
21 Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The  
22 subject line must begin: "United States v. Cognosphere, et al., FTC File No.  
23 2223152."

24 XI. RECORDKEEPING

25 IT IS FURTHER ORDERED that each Defendant must create certain records  
26 for ten (10) years after entry of the Order, and retain each such record for five (5)  
27 years. Specifically, each Defendant must create and retain the following records:  
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SO STIPULATED:

FOR PLAINTIFF UNITED STATES OF AMERICA:

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/s/ Marcus P. Smith

Date: January 17, 2025

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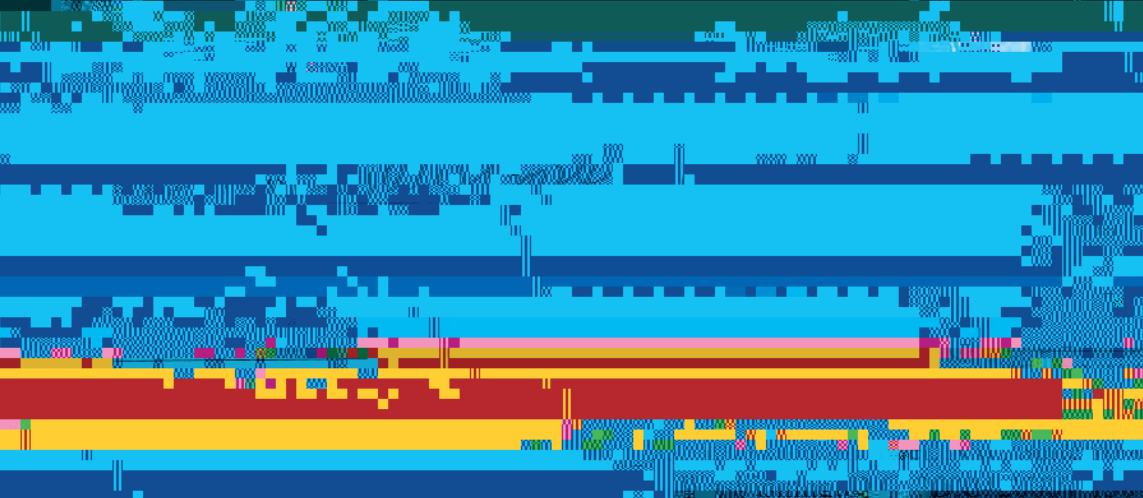
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