

**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.

DOCKET NO.

COMPLAINT

The Federal Trade Commission, having reason to believe that Son Le and Bao Le (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 Son Le, also known as Sonny Le, owns and does business as 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 did business as 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.
2. Respondent Bao Le, also known as Robert Le and Bobby Le, does business as 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 did business as 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), Happy Trampoline (www.happytrampoline.com), and Trampoline Jumpers (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 displayed 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), Bureau of Trampoline Review (www.bureauoftrampolinereview.com), and Top Trampoline Review (www.toptrampolinereview.com), which have purported to provide prospective purchasers with objective information about trampolines, including unbiased expert reviews of specific brands and models and ratings based on safety, performance, and other attributes.

7. The Review Websites have recommended Infinity and Olympus Pro trampolines.

8. Respondent Son Le owns the Sales Websites and the Review Websites. Respondents Son Le and Bao Le control the content of the Sales Websites and the Review Websites.

9. Respondents have disseminated or have caused to be disseminated advertisements and promotional materials for Infinity and Olympus Pro trampolines, including but not necessarily limited to the attached Exhibits A through G. These materials have contained the following statements and depictions, among others:

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



3rd Party Rating



- B. Exhibit B, Happy Trampoline website, www.happytrampoline.com (the below logo containing a link to the Trampoline Safety of America website appears on each web page).



- C. Exhibit C, Trampoline Jumpers website, www.trampolinejumpers.com (the below logo containing a link to the Trampoline Safety of America website appears on each web page).



- D. Exhibit D, Trampoline Safety of America website, www.trampolinesafetyofamerica.com

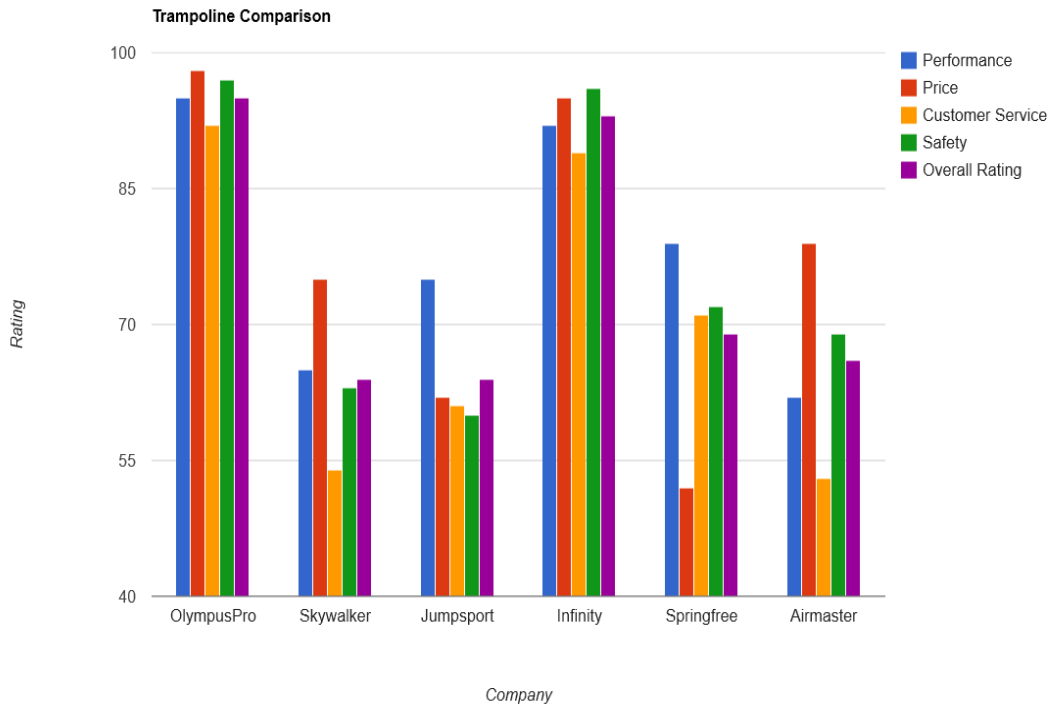
About Us

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 trampoline-end 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.

* * *



* * *

Trampoline Safety of America is a third party organization involved in styding [sic] the technical aspects of all the major trampoline distributors in America. It is comprised of structural engineers, trampoline gymnastic coaches, aling [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, warranties, customer [sic] service, as wess [sic] as the best pricing so that you can make an educated and informed decision when considering a trampoline [sic]. Our sites are updated constantly to make sure that all the data are curent [sic]. We do not get paid or endorsed by any of these companies.

* * *

In conclusion we highly recommend the **Infinity Trampoline** [link to 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]. 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

The Bureau of Trampoline Review is an independent organization whose main purpose is to provide end 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 are unbiased nor [sic] influenced.

* * *

We, at The Bureau of Trampoline Review, went out and purchased many types of trampolines for our testing as well as interviewed the manufacturers themselves. Through rigorous testing and abuse to the trampoline, we too at The BTR have narrowed down to only a select few that stood the ultimate test.

The Frame Test. We placed anywhere from 5 – 10 person [sic] on each trampoline to test the strength and if it will hold up. On some, we even conducted a car drop test on them as well. Sad to say, but most of them failed. When we did the car test, most of them got flattened like a pancake. Except for [Infinity Trampoline].

- F. Exhibit F, Top Trampoline Review website, 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 well as expert opinions on the quality of the materials and construction that go into the best-selling trampolines today. Rather than spending hours upon hours searching through customer reviews, read through the reviews in this website to quickly assess which trampolines are worth the cost and which ones fall short. Whether you are wanting a trampoline to be used by your children or you are a gymnast looking for a way to train at home, having the best trampoline available is vital. Use this site to find the the [sic] info and expert advice that you need to go out and buy the best possible trampoline.

* * *

Top Trampoline Review is a group comprised of mechanical engineers, former gymnastic athletes, and mommies. We like to be the watchdog organization for Trampoline Safety. We are all parents ourselves, so we understand what is important to our family. How to spend our hard earn [sic] money. Investing on [sic] a product that will last for a long time. As well as keeping our youth forever happy and carefree. We hope that our information serves you right. If you have any particular questions or concern [sic] about a certain product, please feel free to let us know. If we are outdated on certain details, please also let us know, as we are not a paid organization, so we do the best we can to make our data insightful.

- G. Exhibit G, online review, <http://trampolinemom.blogspot.com/2013/05/best-trampoline-on-market.htm>

Best Trampoline on the Market

How do you find the best trampoline? . . . How can a consumer like us determine all this without seeing or testing the trampoline out? . . .

Some of the companies that have the strongest trampoline frames in the industry that I've researched are below:

www.infinitytrampolines.com

www.trampolinejumpers.com

www.happytrampoline.com

Posted by Bobby Le at 9:49 AM

- H. Exhibit H, online review, <https://www.youtube.com/watch?v=PyJKoQzoW0w>
Bobby Le 6 months ago

I found this trampoline on the Bureau of trampoline review [sic] and this is the best trampoline that I've ever owned. I had the jumpsport [sic] recently and It [sic] is not as advertised. Within 2 yrs. [sic] the frame started rusting. This crap is definitely china [sic] made. Don't waste your money [sic]

Count I
False Claims -- Review Websites

10. In connection with the advertising and promotion of Infinity and Olympus Pro trampolines, Respondents have represented, directly or indirectly, expressly or by implication, that:
- A. Trampoline Safety of America, the Bureau of Trampoline Review, and Top Trampoline Review were independent organizations providing objective information about the safety and performance of trampolines;
 - B. The product reviews on the Review Websites reflected the opinions of impartial experts, including trampoline experts, certified trampoline experts, professional trampoline installers, structural engineers, mechanical engineers, gymnastic experts, trampoline gymnastics coaches, and former gymnasts;
 - C. The product reviews posted online by Bobby Le reflected the opinion of an ordinary impartial trampoline owner; and
 - D. Bureau of Trampoline Review personnel purchased and rigorously tested the strength of the reviewed trampolines.
11. In fact,
- A. Trampoline Safety of America, the Bureau of Trampoline Review, and Top Trampoline Review were not independent organizations providing objective information about the safety and performance of trampolines. Respondents created and controlled the Review Websites as part of their advertising campaign to promote the sale of Infinity and Olympus Pro trampolines;
 - B. The product reviews on the Review Websites did not reflect the opinions of impartial experts, including trampoline experts, certified trampoline experts, professional trampoline installers, structural engineers, mechanical engineers, gymnastic experts, trampoline gymnastics coaches, and former gymnasts;
 - C. The product reviews posted online by Bobby Le did not reflect the opinion of an ordinary impartial trampoline owner; and

- 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 information they obtained from the websites of the manufacturers of those units.

Therefore, the representations set forth in Paragraph 10 are false or misleading.

Count II
False Claims – Sales Websites

12. In connection with the advertising, promotion, offering for sale, or sale of Infinity and Olympus Pro trampolines on their Infinity Trampolines website, their Happy Trampoline website, and their Trampoline Jumpers website, Respondents have represented, directly or indirectly, expressly or by implication, that those trampolines were tested and approved by independent third-party organizations that provide objective information from both experts and ordinary consumers.

13. In fact, the Infinity and Olympus Pro trampolines sold on Respondents' Infinity Trampolines website, Happy Trampoline website, and Trampoline Jumpers website were not tested and approved by independent third-party organizations that provide objective information about trampolines from both experts and ordinary consumers. Therefore, the representation set forth in Paragraph 12 is false or misleading.

Count III
Deceptive Failure to Disclose Material Connections

14. In connection with the advertising, promotion, offering for sale, or sale of Infinity and Olympus Pro trampolines, Respondents have represented, directly or indirectly, expressly or by implication, that favorable online reviews posted by Bobby Le reflect his personal experience and research.

15. Respondents failed to disclose that Bobby Le sells Infinity and Olympus Pro trampolines and thus has a financial interest in promoting them. This fact would be material to consumers in their purchase or use decisions regarding Infinity and Olympus Pro trampolines.

16. Respondents' failure to disclose the material information described in Paragraph 15, in light of the representation set forth in Paragraph 14, is a deceptive act or practice.

Violations of Section 5

17. The acts and practices of Respondents as alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

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

By the Commission.

Donald S. Clark
Secretary

SEAL: