

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

Civil Action No. \_\_\_\_\_

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

GLOBAL CONCEPTS LIMITED, INC., a  
corporation, also d/b/a Global TV Concepts, Ltd.;

GCL PRODUCT HOLDINGS LLC, a limited  
liability company;

MSA 30X LLC, a limited liability company; and

LAURIE BRADEN, individually, and as an  
officer of Global Concepts Limited, Inc. and GCL  
Product Holdings LLC, and as trustee of the  
Laurie Braden Revocable Trust,

Defendants.

**COMPLAINT FOR PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF**

Plaintiff, the Federal Trade Commission (“FTC”), for its Complaint alleges:

1. The FTC brings this action under Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b), to obtain permanent injunctive relief, rescission or reformation of contracts, restitution, the refund of monies paid, disgorgement of ill-gotten monies, and other equitable relief for Defendants’ acts or practices in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52, in connection with the labeling, advertising, marketing, promotion, distribution, and sale of MSA 30X, a wearable sound amplifier product.

**JURISDICTION AND VENUE**

2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345, and 15 U.S.C. §§ 45(a) and 53(b).

3. Venue is proper in this district under 28 U.S.C. § 1391(b)(1), (b)(2), (c)(1), (c)(2), and (d), and 15 U.S.C. § 53(b).

**PLAINTIFF**

4. The FTC is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce. The FTC also enforces Section 12 of the FTC Act, 15 U.S.C. § 52, which prohibits false advertisements for food, drugs, devices, services, or cosmetics in or affecting commerce.

5. The FTC is authorized to initiate federal district court proceedings, by its own attorneys, to enjoin violations of the FTC Act and to secure such equitable relief as may be appropriate in each case, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies. 15 U.S.C. §§ 53(b) and 56(a)(2)(A).

**DEFENDANTS**

6. Defendant Global Concepts Limited, Inc. (“GCLI”), also doing business as Global TV Concepts, Ltd., is a Florida corporation with its principal office or place of business at 676 S. Military Trail, Deerfield Beach, FL 33442. GCLI transacts or has transacted business in this district and throughout the United States. At all times material to this Complaint, acting alone or in concert with others, GCLI has labeled, advertised, marketed, promoted, distributed, or sold MSA 30X to consumers throughout the United States.

7. Defendant GCL Product Holdings LLC (“GCLPHL”) is a Florida limited liability corporation, and is the 100 percent owner and Authorized Member of MSA 30X LLC. GCLPHL has its principal office or place of business at 676 S. Military Trail, Deerfield Beach, FL 33442. GCLPHL transacts or has transacted business in this district and throughout the United States. At times material to this Complaint, acting alone or in concert with others, GCLPHL has labeled, advertised, marketed, promoted, distributed, or sold MSA 30X to consumers throughout the United States.

8. Defendant MSA 30X LLC is a Florida limited liability corporation with its principal office or place of business at 676 S. Military Trail, Deerfield Beach, FL 33442. MSA 30X LLC transacts or has transacted business in this district and throughout the United States. At times material to this Complaint, acting alone or in concert with others, MSA 30X LLC has labeled, advertised, marketed, promoted, distributed, or sold MSA 30X to consumers throughout the United States.

9. Defendant Laurie Braden is the President, Director, and Registered Agent of GCLI; Manager and Registered Agent of GCLPHL; and Registered Agent of MSA 30X LLC. As Trustee of the Laurie Braden Revocable Trust, she is 51 percent owner of GCLI and 100 percent owner of GCLPHL. At all times material to this Complaint, acting alone or in concert with others, she has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Complaint. She resides in this District and, in connection with the matters alleged herein, transacts or has transacted business in this District and throughout the United States.

10. Defendants GCLI, GCLPHL, and MSA 30X LLC (collectively, “Corporate Defendants”) have operated as a common enterprise while engaging in the deceptive acts and practices alleged below. Defendants have conducted the business practices described below through interrelated companies that have common control, officers, business functions, employees, and office locations. Because these defendants have operated as a common enterprise, each of them is jointly and severally liable for the acts and practices alleged below. Defendant Laurie Braden (“Individual Defendant”) has formulated, directed, controlled, had the authority to control, or participated in the acts and practices of GCLI, GCLPHL, and MSA 30X LLC that constitute the common enterprise.

#### **COMMERCE**

11. At all times material to this Complaint, Defendants have maintained a substantial course of trade in or affecting commerce, as “commerce” is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

#### **DEFENDANTS’ BUSINESS ACTIVITIES**

12. Since at least 2012, Defendants have labeled, advertised, marketed, promoted, distributed, or sold MSA 30X, a small, rechargeable electronic wearable sound amplifier product. Defendants have offered MSA 30X for approximately \$29.95 plus \$7.95 shipping and handling for one device, a charging base, cleaning brush, and five silicone tips. At times, they have offered buy-one-get-one pricing that included two devices, two charging stations, two cleaning brushes, and ten silicone tips for approximately \$29.95 or \$19.95 plus \$15.90 shipping and handling. At the time of ordering, Defendants have offered consumers extra recharging stations for approximately \$6.95 each.

13. Hearing loss is estimated to affect millions of Americans, particularly older persons. However, hearing aids are costly, are not covered by traditional Medicare and most insurance plans, and require consultation with a licensed professional. Consequently, only a fraction of people with age-related hearing loss wear hearing aids.

14. Since at least 2012, Defendants have marketed MSA 30X directly to consumers from websites, including [msa30x.com](http://msa30x.com), [msa30xsale.com](http://msa30xsale.com), [buymsa30x.com](http://buymsa30x.com), and [compramsa30x.com](http://compramsa30x.com), the last of which is a Spanish-language website. They also have marketed MSA 30X directly to consumers via television advertisements that contain a toll-free telephone number for placing orders. Many such advertisements are either two minutes or one minute in duration. Both longer and shorter ads contain at least some of the claims challenged in this Complaint, including “hear better now” and “hear up to 30 times better.” At least one such television advertisement – which is referenced below in Paragraph 16.A and Exhibit A – also has appeared prominently on the home pages of some of Defendants’ websites.

15. Through 2016, Defendants spent approximately \$3 million to advertise MSA 30X. Their TV advertisements aired on broadcast and cable channels throughout the United States. Consumers viewing Defendants’ websites and TV advertisements could purchase directly from Defendants or from third-party retailers such as CVS, Walgreens, and Walmart.

16. To induce consumers to purchase MSA 30X, Defendants have disseminated or have caused to be disseminated advertisements, including, but not limited to, the attached Exhibits A through C. Many versions of Defendants’ television advertisements feature visibly older persons demonstrating the device; moreover, the most prominent persons with dialogue

(other than the Announcer) in such ads are visibly older persons. Many of Defendants' two-minute advertisements combine oral statements set forth in Paragraph 16.A, with depictions of use in social settings or varied ambient sound and noise conditions.

**A. Dialogue in two-minute video advertisements<sup>1</sup>**

Announcer: Listen up for an amazing offer that can change the way you hear.

Female: I'm sorry, I didn't hear you. Can you repeat that?

Announcer: Frustrated with your hearing?

Male: What did he say?

Announcer: Well, hear better now.

Announcer: Introducing the fully rechargeable MSA 30X, a revolutionary device that features the latest micro sound amplification technology that can barely be seen. Independently tested to help you hear up to 30 times better. It turns ordinary hearing into extraordinary hearing. MSA 30X works by capturing and amplifying soundwaves; yet, its lightweight, ergo-acoustic design is discreet. It form fits in and around either ear.

Male: I forget I'm even wearing it.

Announcer: And MSA 30X is powerful. Hear clearly in restaurants. Never miss another word on TV or at the movies.

Male: My wife complains that I have the volume up on the TV too loud.

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<sup>1</sup> Defendants briefly display an inconspicuous disclaimer in some or all of their television advertisements, stating "The MSA 30X Sound Amplifier is not a substitute for a hearing aid or intended for use by hearing impaired people. The FDA advises anyone who suspects hearing loss to seek evaluation by a health care professional." A similar inconspicuous disclaimer appears on some or all of Defendants' websites.

Female: And I didn't want to be in the same room with him.

Male: Now, I can hear everything clearly.

Announcer: Simply adjust the volume as you desire. Other units use so many batteries, and they're difficult to change. But the MSA 30X is completely rechargeable. Simply plug it into the wall.

Female: I tried other devices that had batteries, but they were always such a pain to change and so costly. But this is rechargeable, so I figure I save hundreds a year.

Announcer: Bulky sound amplifiers can cost hundreds, but try MSA 30X for just \$59.95 and we'll include a cleaning brush and five comfort tips. But, wait, in this special TV offer, we'll cut the price in half. Now you can hear up to 30 times better for just \$29.95. But there's even more. We'll double the offer free. Just pay additional processing and handling. Wear them both, or give one to a loved one. Did you hear that? That's two MSA 30Xs for just \$29.95. The MSA 30X Hear Better Now Offer. Get two for just \$29.95.

Female: All I can say is just try it. It could change your life.

[DVD manually lodged herewith as **Exhibit A**, containing video file GTV012717-00000009.wmv, an ad with the above dialogue, received from Defendants]

**B. Excerpt from www.msa30x.com, msa30xsale.com, buymasa30x.com homepages (attached as Exhibit B)**

Don't be embarrassed by large, unsightly amplifiers. MSA 30X® is a discrete sound amplifier that is lightweight and comfortable. The clear tubing of MSA 30X® fits the contour of the ear making it almost invisible. Enjoy a movie or show without missing a word, have conversations with friends in a crowded restaurant without struggling to hear them all while being confident in your appearance. MSA 30X® is so small it's barely visible!

**C. Excerpt from www.compramsa30x.com (attached as Exhibit C)**

Olvídese de pasar vergüenza por culpa de amplificadores aparatosos y antiestéticos. MSA 30X® es un discreto amplificador de sonido ligero y cómodo. Los tubos transparentes de MSA 30X® se ajustan al contorno de la oreja, haciéndolo prácticamente invisible. Disfrute en el cine o en el teatro, sin perderte una palabra, converse con amigos en un restaurante lleno sin dificultades para oírlos a todos, guardando la confianza en su apariencia. ¡MSA 30X® es tan pequeño que apenas es visible!

[An English-language translation of this excerpt is attached as **Exhibit C.1.**]

17. Through 2017, Defendants sold 2,981,070 MSA 30X devices, including direct sales and wholesales, generating total sales less refunds of \$47,203,036.

**VIOLATIONS OF THE FTC ACT**

18. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits “unfair or deceptive acts or practices in or affecting commerce.”

19. Misrepresentations or deceptive omissions of material fact constitute deceptive acts or practices prohibited by Section 5(a) of the FTC Act.

20. Section 12 of the FTC Act, 15 U.S.C. § 52, prohibits the dissemination of any false advertisement in or affecting commerce for the purpose of inducing, or which is likely to induce, the purchase of food, drugs, devices, services, or cosmetics. For the purposes of



Section 12 of the FTC Act, Defendants' MSA 30X is a "device" as defined in Sections 15(b) and (c) of the FTC Act, 15 U.S.C. § 55(b), (c).

## **COUNT I**

### **FALSE OR UNSUBSTANTIATED EFFICACY CLAIMS**

21. Through the means described in Paragraph 16, Defendants have represented, directly or indirectly, expressly or by implication, that MSA 30X:

- A. allows users who have trouble hearing to hear clearly when watching television at a moderate volume;
- B. helps users hear up to 30 times better; and
- C. allows users who have trouble hearing to hear clearly without missing a word, whether watching television, enjoying a movie or show, or in crowded places such as restaurants.

22. The representations set forth in Paragraph 21, above, are false or misleading or were not substantiated at the time the representations were made.

23. Therefore, the making of the representations as set forth in Paragraph 21, above, constitutes a deceptive act or practice, and the making of false advertisements, in or affecting commerce in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

## **COUNT II**

### **FALSE ESTABLISHMENT CLAIM**

24. Through the means described in Paragraph 16, above, Defendants have represented, directly or indirectly, expressly or by implication, that independent studies prove that MSA 30X helps users hear up to 30 times better.

25. In fact, independent studies do not prove that MSA 30X helps users hear up to 30 times better.

26. Therefore, the representation set forth in Paragraph 24 is false or misleading, and constitutes a deceptive act or practice and the making of false advertisements, in or affecting commerce, in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

### **CONSUMER INJURY**

27. Consumers have suffered and will continue to suffer substantial injury as a result of Defendants' violations of the FTC Act. In addition, Defendants have been unjustly enriched as a result of their unlawful acts or practices. Absent injunctive relief by this Court, Defendants are likely to continue to injure consumers, reap unjust enrichment, and harm the public interest.

### **THIS COURT'S POWER TO GRANT RELIEF**

28. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to grant injunctive and such other relief as the Court may deem appropriate to halt and redress violations of any provision of law enforced by the FTC. The Court, in the exercise of its equitable jurisdiction, may award ancillary relief, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies, to prevent and remedy any violation of any provision of law enforced by the FTC.

### **PRAYER FOR RELIEF**

29. Wherefore, Plaintiff FTC, pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), and the Court's own equitable powers, requests that the Court:


- A. Enter a permanent injunction to prevent future violations of the FTC Act by Defendants;

- B. Award such relief as the Court finds necessary to redress injury to consumers resulting from Defendants' violations of the FTC Act, including, but not limited to, rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies; and
- C. Award Plaintiff the costs of bringing this action, as well as such other and additional relief as the Court may determine to be just and proper.

Respectfully submitted,

ALDEN F. ABBOTT  
Acting General Counsel

Dated: 5/2/18



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MICHAEL J. DAVIS (Special Bar A5501005)  
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Federal Trade Commission  
Division of Advertising Practices  
600 Pennsylvania Ave., N.W., Suite CC-10528  
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(202) 326-3259 (Fax)

Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

JS 44 (Rev. 06/17) FLSD Revised 06/01/2017

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.) NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

I. (a) PLAINTIFFS Federal Trade Commission

DEFENDANTS Global Concepts Limited, Inc., also dba Global TV Concepts, Ltd.; GCL Product Holdings LLC; MSA

(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Broward (IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Michael J. Davis and Kristin M. Williams, FTC, 600 Pennsylvania Ave., N.W., Suite CC-10528, Washington, D.C. 20580, 202-326-2458, -2619

E. Colin Thompson, Smolker, Bartlett, Loeb, Hinds & Thompson, P.A., 100 N. Tampa St., Ste. 2050, Tampa, FL 33602, 813-223-3888

(d) Check County Where Action Arose: MIAMI-DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff Federal Question (U.S. Government Not a Party)
2 U.S. Government Defendant Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State PTF DEF 1 1
Citizen of Another State 2 2
Citizen or Subject of a Foreign Country 3 3
Incorporated or Principal Place of Business In This State 4 4
Incorporated and Principal Place of Business In Another State 5 5
Foreign Nation 6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Grid of categories for nature of suit: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding 2 Removed from State Court 3 Re-filed (See VI below) 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation Transfer 7 Appeal to District Judge from Magistrate Judgment 8 Multidistrict Litigation - Direct File 9 Remanded from Appellate Court

VI. RELATED/ RE-FILED CASE(S) (See instructions): a) Re-filed Case YES NO b) Related Cases YES NO JUDGE: DOCKET NUMBER:

VII. CAUSE OF ACTION Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity): 15 USC § 45(a) deceptive acts in commerce LENGTH OF TRIAL via days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE DATE May 2, 2018 SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY RECEIPT # AMOUNT IFP JUDGE MAG JUDGE

**Complaint  
Exhibit A**

**DVD Manually Lodged**

**Complaint**  
**Exhibit B**



**MSA** **30X**<sup>®</sup>  
Sound Amplifier

Lightweight, Comfortable,  
and Rechargeable  
**Discrete Sound Amplifier**



Order  
Español  
CLICK A

Buy 1, Get 1  
**FREE!**  
\* Just pay additional \$7.95 P&H

**\$29<sup>95</sup>**

**Order Now**

Order Today And You'll  
Get All This:

- 2 MSA 30X® Ear Pieces
- 2 Recharging Stations
- 10 Silicone Tips
- 2 Cleaning Brushes

**30 times sound  
amplification**

ONLY **0.3**  
OUNCES!

**Features & Benefits:**

- Lightweight & comfortable - only 0.3 ounces!
- Small size is barely visible
- Rechargeable - no more batteries!
- Fits right or left ear
- Adjustable volume control
- FDA Listed

Rechargeable MSA 30X  
will save you **HUNDREDS**  
per year on batteries!

**About the MSA 30X® Sound Amplifier:**



Don't be embarrassed by large, unsightly amplifiers. MSA 30X® is a discrete sound amplifier that is lightweight and comfortable. The clear tubing of MSA 30X® fits the contour of the ear making it almost invisible. Enjoy a movie or show without missing a word, have conversations with friends in a crowded restaurant without struggling to hear them all while being confident in your appearance. MSA 30X® is so small it's barely visible!



Small and Perfectly Contoured!

**This Offer Is NOT AVAILABLE In Stores!**  
**Fill Out the Form Below to Order Your MSA 30X® Sound Amplifier Now!**

**STEP 1**  
Select your offer

How many "Buy 1, Get 1 FREE" offers would you like?  
(2 units per offer)

Qty: 1  Buy 1, Get 1 FREE

**STEP 2**  
Premium Offer/Upgrade

Yes, please upgrade my MSA 30X® Recharging Station to the Rapid Charger to charge in half the time for just \$6.95 each!

Yes  No

**STEP 3**  
Review your order

Item	Quantity
MSA 30X - BOGO OFFER	1
Sub Total:	\$ 29.95
Processing & Handling:	\$ 15.90
State Tax:	\$ 0.00
Order Total:	\$ 45.85

**STEP 4**  
Enter your credit card information

VISA    

\*Card Number:

\*Expiration Date: 01 - Jan  2017

\*CVV2:  What is CVV2?

**STEP 5**  
Enter your billing information

\*Full Name:

\*Address:

\*Phone:

\*Email:

Check if your shipping address is different than your billing address

\*Indicates Required Field



Guarantee Your Purchase with Insurance Shipping Insurance

No  Yes \$1.99



# Discrete Sound Amplifier



- ▶ 2 MSA 30X\* Ear Pieces
- ▶ 2 Recharging Stations
- ▶ 10 Silicone Tips
- ▶ 2 Cleaning Brushes



\*Just pay additional \$7.95 P&H





**OFFER DETAILS:**

When ordering today, you will receive the MSA 30X™ Ear Piece, Recharging Station, 5 Silicone Tips and Cleaning Brush for just \$29.95 + \$7.95 P&H, plus we will include a 2nd MSA 30X™ set for FREE, just cover the additional \$7.95 P&H. Upgrade your Recharging Station to the Rapid Charger and charge your MSA 30X® in half the time for just \$6.95 per Recharging Station!

30 DAY MONEY BACK GUARANTEE (minus P&H). \*\*An additional \$9.95 P&H is added for items sent to Guam, Puerto Rico, Hawaii, US Virgin Islands and Alaska. Sales Tax May Apply

The MSA 30X Sound Amplifier is not a substitute for a hearing aid or intended for use by hearing impaired people. The FDA advises anyone who suspects hearing loss to seek evaluation by a health care professional.

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**MSA** **30X**<sup>®</sup>  
Sound Amplifier

Lightweight, Comfortable,  
and Rechargeable  
**Discrete Sound Amplifier**



Order  
Español  
CLIC A

Buy 1, Get 1  
**FREE!**  
\* Just pay additional \$7.95 P&H


**\$29<sup>95</sup>**

**Order Now**


Order Today And You'll  
Get All This:

- 2 MSA 30X® Ear Pieces
- 2 Recharging Stations
- 10 Silicone Tips
- 2 Cleaning Brushes

**30 times sound  
amplification**



ONLY  
**0.3**  
OUNCES

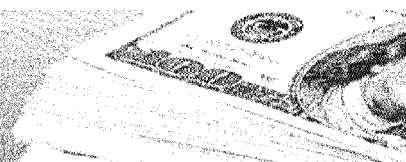


**Features & Benefits:**

- Lightweight & comfortable - only 0.3 ounces!
- Small size is barely visible
- Rechargeable - no more batteries!
- Fits right or left ear
- Adjustable volume control
- FDA Listed



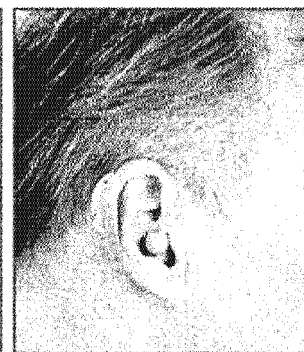
Rechargeable MSA 30X<sup>®</sup>  
will save you **HUNDREDS**  
per year on batteries!



### About the MSA 30X<sup>®</sup> Sound Amplifier:



Don't be embarrassed by large, unsightly amplifiers. MSA 30X<sup>®</sup> is a discrete sound amplifier that is lightweight and comfortable. The clear tubing of MSA 30X<sup>®</sup> fits the contour of the ear making it almost invisible. Enjoy a movie or show without missing a word, have conversations with friends in a crowded restaurant without struggling to hear them all while being confident in your appearance. MSA 30X<sup>®</sup> is so small it's barely visible!



Small and Perfectly Contoured!

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(2 units per offer)

Qty: 1  Buy 1, Get 1 FREE

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Premium Offer/Upgrade

Yes, please upgrade my MSA 30X® Recharging Station to the Rapid Charger to charge in half the time for just \$6.95 each!

Yes  No

**STEP 3**  
Review your order

Item	Quantity
MSA 30X - BOGO OFFER	1
Sub Total:	\$ 29.95
Processing & Handling:	\$ 15.90
State Tax:	\$ 0.00
Order Total:	\$ 45.85

**STEP 4**  
Enter your credit card information

VISA

\*Card Number:

\*Expiration Date: 01 - Jan  2017

\*CVV2:  What is CVV2?

**STEP 5**  
Enter your billing information

\*Full Name:

\*Address:

\*Phone:

\*Email:

Check if your shipping address is different than your billing address

\*Indicates Required Field



Guarantee Your Purchase with Insurance Shipping Insurance

No  Yes \$1.99



# Discrete Sound Amplifier



- ▶ 2 MSA 30X\* Ear Pieces
- ▶ 10 Silicone Tips
- ▶ 2 Recharging Stations
- ▶ 2 Cleaning Brushes



\*Just pay additional \$7.95 P&H





**OFFER DETAILS:**

When ordering today, you will receive the MSA 30X™ Ear Piece, Recharging Station, 5 Silicone Tips and Cleaning Brush for just \$29.95 + \$7.95 P&H, plus we will include a 2nd MSA 30X™ set for FREE, just cover the additional \$7.95 P&H. Upgrade your Recharging Station to the Rapid Charger and charge your MSA 30X® in half the time for just \$6.95 per Recharging Station!

30 DAY MONEY BACK GUARANTEE (minus P&H). \*\*An additional \$9.95 P&H is added for items sent to Guam, Puerto Rico, Hawaii, US Virgin Islands and Alaska. Sales Tax May Apply

The MSA 30X Sound Amplifier is not a substitute for a hearing aid or intended for use by hearing impaired people. The FDA advises anyone who suspects hearing loss to seek evaluation by a health care professional.

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Lightweight, Comfortable,  
and Rechargeable  
Discrete Sound Amplifier









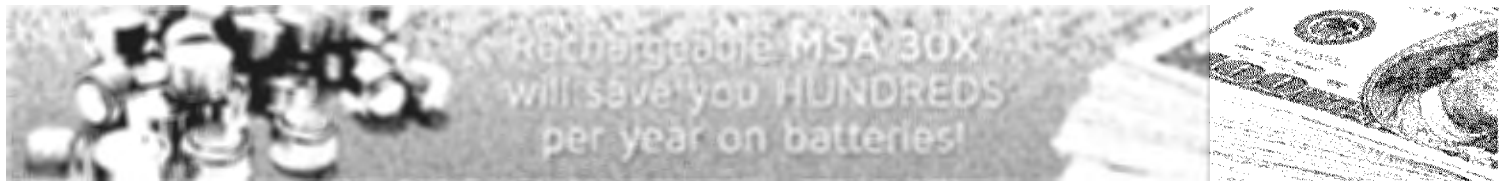
Order Today And You'll  
Get All This

-  2 MSA 30X® Ear Piece
-  2 Recharging Station
-  10 Silicone Tips
-  2 Cleaning Brush



### Features & Benefits

-  Lightweight & comfortable - only 0.3 ounces!
-  Small size is barely visible
-  Rechargeable - no more batteries!
-  Fits right or left ear
-  Adjustable volume control
-  FDA Listed



### About the MSA 30X® Sound Amplifier:



Don't be embarrassed by large, unsightly amplifiers. MSA 30X® is a discrete sound amplifier that is lightweight and comfortable. The clear tubing of MSA 30X® fits the contour of the ear making it almost invisible. Enjoy a movie or show without missing a word, have conversations with friends in a crowded restaurant without struggling to hear them all while being confident in your appearance. MSA 30X® is so small it's barely visible!



Small and Perfectly Contoured!

**STEP 1**

How many "Buy 1, Get 1 FREE" offers would you like?

(2 units per offer)

Qty: 1 Buy 1, Get 1 FREE

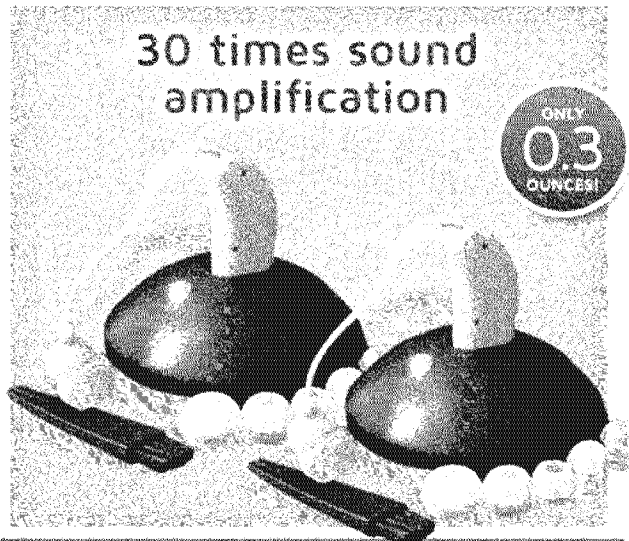
Lightweight, Comfortable,  
 and Rechargeable  
**Discrete Sound Amplifier**



**STEP 2**

Review your order

Item	Quantity
MSA 30X - BUY ONE GET ONE	1
Sub Total:	\$ 19.95
Processing & Handling:	\$ 15.90
State Tax: <small>State Zip Code</small>	\$ 0.00
Order Total:	\$ 35.85



**STEP 3**

Enter your credit card information



\*Card Number:

\*Expiration Date: 01 - Jan 2017

\*CVV2:  [What is CVV2?](#)

Buy 1, Get 1  
**FREE!** \$19<sup>95</sup>  
+\$7.95 P&H

- ✓ 2 MSA 30X\* Ear Pieces
- ✓ 10 Silicone Tips
- ✓ 2 Recharging Stations
- ✓ 2 Cleaning Brushes

**STEP 4**

Enter your billing information

\*Full Name:

\*Address:

\*Phone:

\*Email:



\*Just pay additional \$7.95 P&H

Check if your shipping address is different than your billing address

\*Indicates Required Field



Online Shipping Insurance Services, Inc.

Guarantee Your Purchase with Insurance Shipping Insurance

No  Yes \$1.99



**OFFER DETAILS:**

When ordering today, you will receive the MSA 30X® Ear Piece, Recharging Station, 5 Silicone Tips and Cleaning Brush for just \$19.95 + \$7.95 P&H, plus we will include a 2nd MSA 30X® set for FREE, just cover the additional \$7.95 P&H.

30 DAY MONEY BACK GUARANTEE (minus P&H).

\*\*An additional \$9.95 p&h is added for items sent to Guam, Puerto Rico, Hawaii, US Virgin Islands and Alaska.

Sales Tax May Apply

The MSA 30X® Sound Amplifier is not a substitute for a hearing aid or intended for use by hearing impaired people. The FDA advises anyone who suspects hearing loss to seek evaluation by a health care professional.

[Home](#) | [Customer Service](#) | [Privacy Policy](#) | [Shipping](#) | [Returns](#) | [Security](#) | [Sitemap](#) | [Order Now](#)

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**Complaint**  
**Exhibit C**





Ligero, cómodo,  
y Recargable

Discreto amplificador de sonido



Order  
Engl  
CLICK

Compre 1, ¡llévese 1  
**GRATIS!**  
\*dependiendo los gastos de envío adicionales.

**\$29<sup>95</sup>**

**GRATIS!**

con **DE**

Pida hoy y recibirá todo esto:

- 2 MSA 30X™ Unidades Auditivas
- 2 Estaciones de recarga
- 10 Adaptadores de silicona
- 2 Cepillos de limpieza

**Amplificación de sonido 30X**

**SOLO 0.3 ONZAS!**

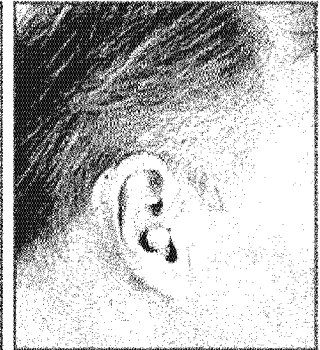
**Características y Ventajas:**

- Ligero y cómodo - ¡solo 0.3 onzas!
- Muy pequeño, apenas visible
- Recargable - ¡divídese de las pilas!
- Se adapta a ambas orejas
- Volumen ajustable
- Homologado por la FDA.

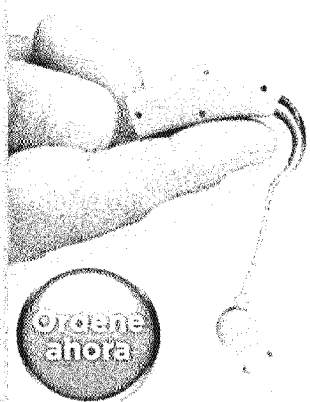
MSA 30X® le hará ahorrar cientos de dólares al año en pilas!

**Acerca del amplificador de sonido MSA 30X :**

Olvídese de pasar vergüenza por culpa de amplificadores aparatosos y antiestéticos. MSA 30X® es un discreto amplificador de sonido ligero y cómodo. Los tubos transparentes de MSA 30X® se ajustan al contorno de la oreja, haciéndolo prácticamente invisible. Disfrute en el cine o en el teatro, sin perderte una palabra, converse con amigos en un restaurante lleno sin dificultades para oírlos a todos, guardando la confianza en su apariencia. ¡MSA 30X® es tan pequeño que apenas es visible!



Pequeño y perfectamente adaptado al contorno



**¡Esta oferta NO ESTÁ DISPONIBLE en tiendas!**  
**Rellene el siguiente formulario o teléfono 1-877-811-9165 para solicitar su amplificador de sonido MSA 30X™ ahora!**

¿Cuántos quiere?

1

y Recargable

### Discreto Amplificador de Sonido

#### Inserte la información de su tarjeta de crédito:

VISA    

\*Tipo: Visa

\*Número de tarjeta:

\*Fecha de Caducidad: 01 - Jan  2017

\*CVV2:  [¿Qué es esto?](#)



#### Inserte su información de facturación:

\*Nombre:

\*Apellido/s:

\*Dirección:

Dirección 2:

\*Ciudad:

\*País: País

\*Estado: Estado

\*Código postal:

\*Teléfono:

\*Correo electrónico:

Marque esta casilla si su dirección de envío es distinta de su dirección de facturación

\*Indicates Required Field



- 2 MSA 30X® unidades auditivas
- 5 Adaptadores de silicona
- 2 Estaciones de recarga
- 2 Cepillos de limpieza



\*solo pagará los gastos de envío

#### DETALLES DE LA OFERTA:

Si hace su pedido hoy, recibirá el MSA 30X®, una estación de recarga, 5 adaptadores de silicona y un cepillo de limpieza por solo 29.95 dólares + 7.95 dólares de gastos de envío, además añadiremos un 2º MSA 30X® totalmente GRATIS, solo tendrá que abonar los 7.95 dólares de gastos de envío extra. GARANTÍA DE DEVOLUCIÓN DE DINERO DURANTE 30 DÍAS (gastos de envío no incluidos) \*\*Para envíos a Guam, Puerto Rico, Hawii, Islas Vírgenes de los Estados Unidos y Alaska se cobrarán 10 dólares adicionales Se podrá aplicar el IVA

[Home](#) | [Servicio al cliente](#) | [Política de privacidad](#) | [Envío](#) | [Devoluciones](#) | [Seguridad](#) | [Mapa del sitio](#) | [Ordene ahora](#)

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**Complaint**  
**Exhibit C.1**

1 OFFICIAL TRANSCRIPT PROCEEDING

2 FEDERAL TRADE COMMISSION

3

4

5 MATTER NO. 1623225

6

7 TITLE MSA 30X SOUND AMPLIFIER

8

9 DATE PRINTED: DATE UNKNOWN

10 TRANSLATED: DECEMBER 27, 2017

11

12 PAGES 1 THROUGH 10

13

14

15 MSA 30X SOUND AMPLIFIER SPANISH ADVERTISEMENT

16 ENGLISH TRANSLATION

17 Bates Number GTV012717-0000053 and Bates Number GTV012717-000054

18 (Attached as Exhibit A)

19

20

21

22

23

24

25 For The Record, Inc. (301) 870-8025 - [www.ftrinc.net](http://www.ftrinc.net) - (800) 921-5555

1       **FIRST PAGE OF MSA 30X SPANISH ADVERTISEMENT (cont'd.)**

2

3       **2c.** Characteristics and Advantages:

4           Light and comfortable - only .3 ounces!

5           Very small, barely visible

6           Rechargeable - forget about batteries!

7           Adapts to both ears

8           Adjustable volume

9           Listed by the FDA

10

11       **3.** MSA 30X will save you hundreds of dollars a year

12           in batteries!

13

14       **4a.** About the MSA 30X sound amplifier:

15

16       **4b.** Forget about embarrassment because of bulky and

17           unsightly amplifiers. MSA 30X is a discreet

18           sound amplifier that is light and comfortable.

19           The transparent tubes of MSA 30X conform to the

20           contour of the ear, making it practically

21           invisible. Enjoy in the cinema or in the theater

22           without missing a word, converse with friends in

23           a full restaurant without difficulties to hear

24           them all, keeping confidence in your appearance.

25           MSA 30X is so small that it is barely visible!

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CERTIFICATE OF TRANSLATOR

I, Elizabeth M. Farrell, do hereby certify that the foregoing document was translated by me, and reduced to typewriting under my supervision; that I had no role in the writing of this material; and that it has been translated to the best of my ability given the quality and clarity of the printed media.

I further certify that I am neither counsel for, related to, nor employed by any of the parties to the action in which this document was translated; and further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of the action.

DATE: 12/27/2017

\_\_\_\_\_  
ELIZABETH M. FARRELL

For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555



1a.

1b.



# Recargable Discreto amplificador de sonido



Order  
Engl  
CLICK

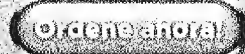
2a.

Compre 1, ¡llévese 1

## GRATIS!

\*pagando los gastos de envío adicionales.

# \$ 29<sup>95</sup>



Pida hoy y reciba todo esto

- 2 MSA 30X™ Unidades Auditivas
- 2 Estaciones de recarga
- 10 Adaptadores de silicona
- 2 Cepillos de limpieza

2b.

## Amplificación de sonido 30X



SOLO  
**0.3**  
ONZAS!



2c.

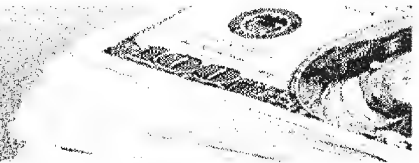
### Características y Ventajas

- Ligero y cómodo - ¡sólo 0.3 onzas!
- Muy pequeño, apenas visible
- Recargable - olvídense de las pilas!
- Se adapta a ambas orejas
- Volumen ajustable
- Homologado por la FDA

3.



MSA 30X® le hará ahorrar cientos de dólares al año en pilas!



4a.

Acerca del amplificador de sonido MSA 30X :

4b.

Olvídense de pasar vergüenza por culpa de amplificadores aparatosos y antiestéticos. MSA 30X® es un discreto amplificador de sonido ligero y cómodo. Los tubos transparentes de MSA 30X® se ajustan al contorno de la oreja, haciéndolo prácticamente invisible. Disfrute en el cine o en el teatro, sin perderte una palabra, converse con amigos en un restaurante lleno sin dificultades para oírlos a todos, guardando la confianza en su apariencia. ¡MSA 30X® es tan pequeño que apenas es visible!



4c.

¡Paga menos por hacer más! ¡Paga todo el beneficio!

5.

¡Esta oferta NO ESTÁ DISPONIBLE en tiendas!  
Rellene el siguiente formulario o teléfono 1-877-811-9165 para solicitar su amplificador de sonido MSA 30X™ ahora!