

# **Exhibit A**

172 3033

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

**COMMISSIONERS: Maureen K. Ohlhausen, Acting Chairman  
Terrell McSweeney**

	)	
<b>In the Matter of</b>	)	
	)	<b>Docket No. C-4611</b>
<b>iSPRING WATER SYSTEMS, LLC</b>	)	
<b>a limited liability company.</b>	)	<b>DECISION AND ORDER</b>
	)	
	)	

**DECISION**

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

Respondent and BCP thereafter executed an Agreement Containing Consent Order (“Consent Agreement”). The Consent Agreement includes: 1) a statement by Respondent that it neither admits nor denies any of the allegations in the Complaint, except as specifically stated in this Decision and Order, and that only for purposes of this action, it admits 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 Respondent has 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 the comment received from an interested person pursuant to Commission Rule 2.34, 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. Respondent is a Georgia limited liability company with its principal office or place of business at 3020 Trotters Parkway, Alpharetta, GA 30004.
2. The Commission has jurisdiction over the subject matter of this proceeding and over the Respondent, and the proceeding is in the public interest.

### **ORDER**

#### **Definitions**

For purposes of this Order, the following definitions apply:

- A. “Clear(ly) and conspicuous(ly)” means that a required disclosure is difficult to miss (i.e., easily noticeable) and easily understandable by ordinary consumers, including in all of the following ways:
  1. In any communication that is solely visual or solely audible, the disclosure must be made through the same means through which the communication is presented. In any communication made through both visual and audible means, such as a television advertisement, the disclosure must be presented simultaneously in both the visual and audible portions of the communication even if the representation requiring the disclosure (“triggering representation”) is made through only one means.
  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.
  3. An audible disclosure, including by telephone or streaming video, must be delivered in a volume, speed, and cadence sufficient for ordinary consumers to easily hear and understand it.
  4. In any communication using an interactive electronic medium, such as the Internet or software, the disclosure must be unavoidable.
  5. On a product label, the disclosure must be presented on the principal display panel.
  6. The disclosure must use diction and syntax understandable to ordinary consumers and must appear in each language in which the triggering representation appears.
  7. The disclosure must comply with these requirements in each medium through which it is received, including all electronic devices and face-to-face communications.
  8. The disclosure must not be contradicted or mitigated by, or inconsistent with, anything else in the communication.

9. When the representation or sales practice targets a specific audience, such as children, the elderly, or the terminally ill, “ordinary consumers” includes reasonable members of that group.
- B. “Made in the United States” shall mean any representation, express or implied, that a product or service, or a specified component thereof, is of U.S.-origin, including, but not limited to, a representation that such product or service is “made,” “manufactured,” “built,” or “produced” in the United States, or any other U.S.-origin claim.
- C. “Respondent” means iSpring Water Systems, LLC, also doing business as 123filter.com, and their successors and assigns.

## Provisions

### I.

#### PROHIBITED MISREPRESENTATIONS

**IT IS ORDERED** that Respondent, and Respondent’s officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, in connection with the manufacturing, labeling, advertising, promotion, offering for sale, sale, or distribution of any water filtration system or associated parts and accessories, or any other product or service, must not make any representation, expressly or by implication, that a product or service is Made in the United States unless:

- A. The final assembly or processing of the product occurs in the United States, all significant processing that goes into the product occurs in the United States, and all or virtually all ingredients or components of the product are made and sourced in the United States; or
- B. A Clear and Conspicuous qualification appears immediately adjacent to the representation that accurately conveys the extent to which the product contains foreign parts, ingredients, and/or processing.

### II.

#### SUBSTANTIATION

**IT IS FURTHER ORDERED** that Respondent, Respondent’s officers, agents, servants, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, in connection with promoting or offering for sale any product or service, shall not make any representation, in any manner, expressly or by implication, regarding the country of origin of any product or service unless the representation is true, not misleading, and at the time it is made, Respondent possesses and relies upon a reasonable basis for the representation.

**III.**  
**ACKNOWLEDGMENTS OF THE ORDER**

**IT IS FURTHER ORDERED** that Respondent obtain acknowledgments of receipt of this Order:

- A. Respondent, within 10 days after the effective date of this Order, must submit to the Commission an acknowledgment of receipt of this Order sworn under penalty of perjury.
- B. For 20 years after the issuance date of this Order, Respondent must deliver a copy of this Order to: (1) all 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 Respondent delivered a copy of this Order, 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 Respondent make timely submissions to the Commission:

- A. One year after the issuance date of this Order, Respondent must submit a compliance report, sworn under penalty of perjury, in which 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 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; (d) describe in detail whether and how Respondent is in compliance with each Provision of this Order, including a discussion of all of the changes 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.
- B. Respondent must submit a compliance notice, sworn under penalty of perjury, within 14 days of any change in the following: (a) any designated point of contact; or (b) the structure of Respondent or any entity that Respondent has any ownership interest in or controls directly or indirectly that may affect compliance obligations arising under this Order, including: creation, merger, sale, or dissolution of the entity or any subsidiary, parent, or affiliate that engages in any acts or practices subject to this Order.

- C. Respondent must submit notice of the filing of any bankruptcy petition, insolvency proceeding, or similar proceeding by or against Respondent within 14 days of its filing.
- D. Any submission to the Commission required by this Order to be sworn under penalty of perjury must be true and accurate and comply with 28 U.S.C. § 1746, such as by concluding: “I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on: \_\_\_\_\_” and supplying the date, signatory’s full name, title (if applicable), and signature.
- E. Unless otherwise directed by a Commission representative in writing, all submissions to the Commission pursuant to this Order must be emailed to DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to: Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The subject line must begin: In re iSpring Water Systems, LLC.

**V.  
RECORDKEEPING**

**IT IS FURTHER ORDERED** that Respondent must create certain records for 20 years after the issuance date of the Order, and retain each such record for 5 years, unless otherwise specified below. Specifically, Respondent must create and retain the following records:

- A. Accounting records showing the revenues from all goods or services sold;
- B. Personnel records showing, for each person providing services in relation to any aspect of the Order, whether as an employee or otherwise, that person’s: name; addresses; telephone numbers; job title or position; dates of service; and (if applicable) the reason for termination;
- 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. All records necessary to demonstrate full compliance with each provision of this Order, including all submissions to the Commission;
- E. A copy of each unique advertisement or other marketing material making a representation subject to this Order; and

- F. 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 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.

## VI. COMPLIANCE MONITORING

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

- A. Within 10 days of receipt of a written request from a representative of the Commission, Respondent must: submit additional compliance reports or other requested information, which must be sworn under penalty of perjury, and produce records for inspection and copying.
- B. For matters concerning this Order, representatives of the Commission are authorized to communicate directly with Respondent. Respondent must permit representatives of the Commission to interview anyone affiliated with Respondent who has agreed to such an interview. The interviewee may have counsel present.
- C. The Commission may use all other lawful means, including posing through its representatives as consumers, suppliers, or other individuals or entities, to Respondent or any individual or entity affiliated with Respondent, without the necessity of identification or prior notice. Nothing in this Order limits the Commission's lawful use of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1.

## VII. ORDER EFFECTIVE DATES

**IT IS FURTHER ORDERED** that this Order is final and effective upon the date of its publication on the Commission's website ([ftc.gov](http://ftc.gov)) as a final order. This Order will terminate on April 6, 2037, or 20 years from the most recent date that the United States or the Commission files a complaint (with or without an accompanying settlement) in federal court alleging any violation of this Order, whichever comes later; *provided, however*, that the filing of such a complaint will not affect the duration of:

- A. Any Provision in this Order that terminates in less than 20 years; and
- B. This Order if such complaint is filed after the Order has terminated pursuant to this Provision.

*Provided, further,* that if such complaint is dismissed or a federal court rules that the Respondent did not violate any provision of the Order, and the dismissal or ruling is either not appealed or upheld on appeal, then the Order will terminate according to this Provision as though the complaint had never been filed, except that the Order will not terminate between the date such complaint is filed and the later of the deadline for appealing such dismissal or ruling and the date such dismissal or ruling is upheld on appeal.

By the Commission.

Donald S. Clark  
Secretary

SEAL:  
ISSUED: April 6, 2017

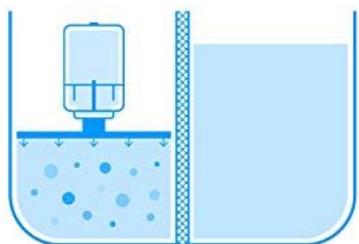
# **Exhibit B**



The booster pump addresses the problem of low water pressure at the source, bringing the pressure going into the membrane up to the ideal level. In doing so, the booster pump optimizes every aspect of the reverse osmosis process from production speed to drain ratio.

Our products are testing annually by the WQA and are certified to remove 97.2% of harmful contaminants that commonly appear in municipal and well water. All filters, tanks, tubing and other water-contacting parts are manufactured to comply strictly with FDA and SDF/ANSI standards for safety and water quality resulting in the coveted WQA Gold Seal certification. (TW1812-75, WQA, 2018)

Designed and crafted in USA, the RCC7 line is America's favorite brand of water filtration systems. All of our systems go through rigorous testing for air leaks, pressure and cycle resistance to maintain our own premium quality and high performance standards.



**DON'T WASTE THE FULL POTENTIAL**

### Precision Performance

The RCC7P is a pressure-boosted, multi-layered filter system that provides optimal protection against over 1,000 different types of contaminants, including arsenic, asbestos, chlorine, hormones, fluoride, lead, mercury, sodium, bacteria, giardia, viruses and more. Boosting the water pressure improves the performance of the Reverse Osmosis filter stage increasing water production speed and reducing waste water. This is essential when the home water pressure is low (below 40 PSI).

Featuring some of the longest lasting filters in the industry, the filtration system consists of 5 filter stages, each one designed to progressively remove contaminants and improve water quality:

3 Pre-filters pre-treat the incoming water:

- Polypropylene (PP) sediment filter.
- 5-micron granular activated charcoal (GAC) filter.
- Carbon block (CTO) filter.

These three pre-filters remove large contaminants and protect the RO membrane from chemicals like chlorine and chloramines. The combination of both GAC and CTO filters in the 2nd and 3rd stages provides greater protection against harmful chemicals than CTO alone.

- The heart of the system is the state-of-the art Reverse Osmosis (RO) filter that removes contaminants down to 0.001 microns – 100 times smaller than other types of filters.

- Fine GAC final filter provides final polishing before the purified water is delivered to the faucet.

Unlike passive boosters, the RCC7P electric booster pump ensures reliable, consistent performance regardless of pressure variations. This allows the RCC7P to achieve up to 50% faster tank fill rates with up to 50% less water waste.

The end result is bottled-water quality, with no hardness and no sodium.



[View larger](#)

### WQA Gold Seal Certified Contaminants Rejection Rates (2018)

Passed the most rigorous testing requirements. (NSF/ANSI Standards for Reverse Osmosis Drinking Water Treatment Systems)

- Arsenic
- Barium
- Cadmium
- Chloramine
- Copper
- Fluoride
- Lead
- Iron
- Lead
- Manganese
- Radium (226/228)
- And more

# **Exhibit C**

Amazon.com: reverse osmosis water filter

Secure https://www.amazon.com/iSpring-RCC7-Filtration-Softener-Certified/dp/B003XELTTG/ref=sr\_1\_5?ie=UTF8&qid=1530110927&sr=8-5&keywords=ispring+rcc7

Deliver to Washington 20001

Departments Your Amazon.com Today's Deals Gift Cards Registry Sell Treasure Truck Help

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Tools & Home Improvement Best Sellers Deals & Savings Gift Ideas Power & Hand Tools Lighting & Ceiling Fans Kitchen & Bath Fixtures Smart Home Shop by Room Launchpad

gifts Find the perfect gift under \$20 Shop now

Back to search results for "ispring rcc7"

**• \$45 Value Faucet**  
Heavy-duty brushed nickel drinking faucet.

**• Complete 5 Filter Set**  
PP Sediment, GAC granular activated carbon, and CTO carbon block pre-filters, RO membrane, and inline post carbon filter.

**• Pressurized Storage Tank**  
3.2 gallon tank with food grade butyl diaphragm.

**ONLY USING PREMIUM COMPONENTS INDEPENDENTLY TESTED AND CERTIFIED AGAINST NSF/ANSI STANDARDS**

**DESIGNED CRAFTED**

**WQA GOLD SEAL CERTIFIED SYSTEM**

**• Leak-free Fittings and 4-color Tubing Set**  
Quick fittings connection with colorful tubings for easy installation.

**• Feed Water Adapter**

**• ASO Valve**  
Shuts the system off when the tank is full to conserve water.

iSpring

### iSpring RCC7 High Capacity Under Sink 5-Stage Reverse Osmosis Drinking Water Filtration System and Ultimate Water Softener- WQA Gold Seal Certified

Be the first to review this item | 1000+ answered questions

Price: **\$185.39 & FREE Shipping** [Details](#)

Installation options: **Expert Assembly excluded** [More options](#)

Without expert installation	Expert replacement installation +\$161.39
-----------------------------	--

[See more](#)

- High Capacity Reverse Osmosis water filtration for safer, healthier water. This under sink mounted water filter and water softener removes up to 99% of over 1,000 contaminants, including lead (removes up to 98% of lead), chlorine, fluoride, arsenic, hormones, asbestos, calcium, sodium, bacteria, giardia, viruses and more.
- Experience clean, safe, good-tasting water every time you turn on the faucet. Enjoy crystal clear ice cubes, fresher tea and coffee, better tasting foods, healthier baby formula – even better than most bottled water.
- Premium quality components, certified "Gold" (highest ranking) by the Water Quality Association (WQA) against NSF/ANSI standard 58, to ensure high reliability and low maintenance for many years to come.
- Easy, do-it-yourself installation, typically in a couple of hours with industry-leading help just a phone call away. Fits under a standard kitchen sink, with all parts included and clear, well-organized instructions and videos. For leak-free installation, simply push tubing ½ inch deep into quick-fitting connectors and lock - no threading pipes needed.
- Features beautiful European-designed brushed nickel all-metal faucet and clear see-through 1st stage housing.

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\$185.39

**& FREE Shipping** [Details](#)

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Ships from and sold by Amazon.com. Gift-wrap available.

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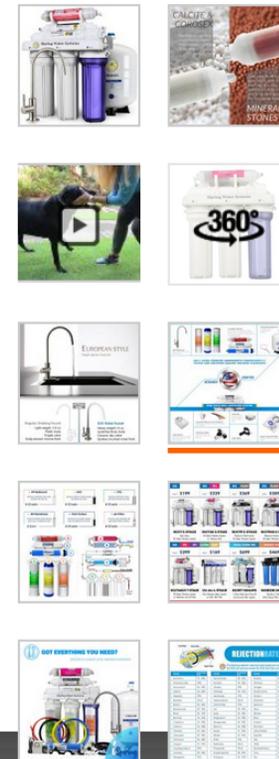
**Buy Used**  
\$133.95

 <p>• <b>\$45 Value Faucet</b> Heavy-duty brushed nickel drinking faucet</p>	 <p>• <b>Complete 6 Filter Set</b> PP Sediment, GAC granular activated carbon, and CTO carbon block pre-filters, RO membrane, inline post carbon filter, and mineral alkaline filter.</p> 	<p>• <b>Pressurized Storage Tank</b> 3.2 gallon tank with food grade butyl diaphragm</p> 	
<p><b>ONLY USING PREMIUM COMPONENTS INDEPENDENTLY TESTED AND CERTIFIED AGAINST NSF/ANSI STANDARDS</b></p> <div style="display: flex; justify-content: center; align-items: center;"> <div style="margin-right: 20px;"><i>DESIGNED</i></div>  <div style="margin-left: 20px;"><i>CRAFTED</i></div> </div>  <p><b>WQA GOLD SEAL CERTIFIED SYSTEM</b></p>			
 <p>• <b>Water Detector</b> When water comes in contact with the metal prongs, a loud alarm will sound.</p>	 <p>• <b>Leak-free Fittings and 4-color Tubing Set</b> Quick fittings connection with colorful tubings for easy installation</p>	 <p>• <b>ASO Valve</b> Shuts the system off when the tank is full to conserve water.</p>	 <p>• <b>Spare O-rings and Fittings</b> Backup materials should they ever be needed.</p>



# ISPRING WQA Gold Seal 6-Stage with Alkaline Re-M Filter 75GPD Under Sink Reverse Osmosis Drinking Water Filtration System

 <p>• \$45 Value Faucet Heavy-duty brushed nickel drinking faucet.</p>		<p>• <b>Complete 6 Filter Set</b> PP Sediment, GAC granular activated carbon, and CTO carbon block pre-filters, RO membrane, inline post carbon filter, and mineral alkaline filter.</p> 	<p>• <b>Pressurized Storage Tank</b> 3.2 gallon tank with food grade butyl diaphragm.</p> 
<p><b>ONLY USING PREMIUM COMPONENTS INDEPENDENTLY TESTED AND CERTIFIED AGAINST NSF/ANSI STANDARDS</b></p>			
<p><b>DESIGNED</b>  <b>CRAFTED</b></p> <p><b>WQA GOLD SEAL CERTIFIED SYSTEM</b></p>			
 <p>• <b>Water Detector</b> When water comes in contact with the metal prongs, a loud alarm will sound.</p>	<p>• <b>Leak-free Fittings and 4-color Tubing Set</b> Quick fitting connection with colorful tubing for easy installation.</p> 	<p>• <b>ASO Valve</b> Shuts the system off when the tank is full to conserve water.</p> 	<p>• <b>Spare O-rings and Fittings</b> Backup materials should they ever be needed.</p> 



Feedback

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**4.8 Year Faucet**  
 Heavy duty brushed nickel drinking faucet

**Complete 7 Filter Set**  
 1x Sediment, 1x10 micron activated carbon, and 1x10 micron CB2 post filter. 100 replacements along with 100 rubber feet. Includes optional line and UV filter.

**Pressurized Storage Tank**  
 2.2 gallon tank with food grade BPA free material

**ONLY USING PREMIUM COMPONENTS INDEPENDENTLY TESTED AND CERTIFIED AGAINST NSF/ANSI STANDARDS**

**DESIGNED CRAFTED**

**WQA GOLD SEAL CERTIFIED SYSTEM**

**Water Detector**  
 Detects water leaks in contact with the metal prongs. A trust alarm with sounds.

**Leak-Free Fittings and 4-color Tubing Set**  
 Quick fittings connection with colorful tubing for easy installation.

**ABO Valve**  
 Blocks the water off when the tank is full to conserve water.

**Feed Water Adapter**  
 2 way tee adapter fits both 1/2" and 3/8" cold water line.

**Secure O-rings and Fittings**  
 Backup materials. WQA Gold Seal Pay over for months.

**Drain Saddle**  
 Connects drain tube to drain pipe.

### iSpring RCC7AK-UV Under Sink 7-Stage Reverse Osmosis Drinking Water Filtration System with Alkaline Filter and UV Sterilizer

★★★★★ 10 Reviews #4 of 268 in Water Treat...

Today \$305<sup>49</sup>  
As low as \$28/month with Klarna.

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Quantity: 1

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Warranty Included: 3 year Limited Manufacturer

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Receive product notifications for this item, and also receive other email-exclusive savings.

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“ Crystal clear water very happy with this system  
 ★★★★★ [See All Reviews \(10\)](#)

# **Exhibit D**



Exhibit D