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Attorneys for Plaintiff
 UNITED STATES OF AMERICA

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

 Plaintiff,

 v.

 APITOR TECHNOLOGY CO., LTD.,
 a corporation,
 Defendant.

Case No. 3:25-cv-07363

**JOINT MOTION FOR ENTRY OF
 PROPOSED STIPULATED ORDER FOR
 PERMANENT INJUNCTION, CIVIL
 PENALTY JUDGMENT, AND OTHER
 RELIEF**

Plaintiff, the United States of America, and Defendant, Apitor Technology Co., Ltd., (herein,
 “the Parties”), have resolved all issues in this matter by the Proposed Stipulated Order for Permanent

Injunction, Civil Penalty Judgment, and Other Relief, attached as Exhibit A (“Stipulated Proposed Order”), signed at pages 15 through 17. The Parties submit that good cause exists for the Court to enter the Stipulated Proposed Order. Specifically, the Proposed Stipulated Order will provide just relief on the allegations in the Complaint, including appropriate safeguards to prevent future violations of the Federal Trade Commission Act, 15 U.S.C. § 41 *et seq.* Defendant Apitor Technology Co., Ltd. neither admits nor denies the allegations in the Complaint but supports entry of the Stipulated Proposed Order to avoid the time and expense of litigation. A statement by the Federal Trade Commission setting forth its reasons for settlement is attached as Exhibit B.

In light of this agreed-upon resolution of this action, the Parties respectfully request that the Court enter the Stipulated Proposed Order.

Dated: September 2, 2025

FOR DEFENDANT:

/s/ Zhen Jessica Li
 Zhen Jessica Li, Esq.
 BlueSparkles LLC
 Counsel for Defendant
 Apitor Technology Co., Ltd.

Respectfully submitted,

FOR PLAINTIFF:

THE UNITED STATES OF AMERICA:

BRETT A. SHUMATE
 Assistant Attorney General
 JORDAN C. CAMPBELL
 Deputy Assistant Attorney General
 SARMAH KHOJASTEH
 Senior Counsel, Civil Division

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 Acting Director,
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 DAVID G. CROCKETT, JR.
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ATTESTATION

In compliance with Civil L.R. 5-1(i)(3), I attest that I have obtained concurrence in the filing of this document from each of the other signatories.

DATED: September 2, 2025

By: /s/ Sapna Mehta
SAPNA MEHTA
Assistant United States Attorney

EXHIBIT A

BRETT A. SHUMATE, Assistant Attorney General
JORDAN C. CAMPBELL, Deputy Assistant Attorney General
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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APITOR TECHNOLOGY CO., LTD.,
a corporation,

Defendant.

Case No. 3:25-cv-07363

**[PROPOSED] STIPULATED ORDER
FOR PERMANENT INJUNCTION,
CIVIL PENALTY JUDGMENT, AND
OTHER RELIEF**

Plaintiff, the United States of America, acting upon notification from the Federal Trade Commission (“Commission” or “FTC”), filed its Complaint for Permanent Injunction, Civil Penalty Judgment, and Other Relief (“Complaint”), for a permanent injunction, civil penalties, and other relief in this matter, pursuant to Sections 5(m)(1)(A) and 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 45(m)(1)(A), 53(b), Sections 1303(c) and 1306(d) of the Children’s Online Privacy Protection Act of 1998 (“COPPA”), 15 U.S.C. §§ 6502(c), 6505(d), and the Children’s Online Privacy Protection Rule (“COPPA Rule”), 16 C.F.R. part 312 (attached as Appendix A). Defendant has waived service of the summons and the Complaint. Plaintiff and Defendant stipulate to the entry of this Stipulated Order for Permanent Injunction, Civil Penalty Judgment, and Other Relief (“Order”) to resolve all matters in dispute in this action between them.

THEREFORE, IT IS ORDERED as follows:

FINDINGS

1. This Court has jurisdiction over this matter.
2. The Complaint charges that Defendant violated Section 5 of the FTC Act, 15 U.S.C. § 45, and the COPPA Rule, 16 C.F.R. part 312, by collecting and disclosing children’s geolocation data without providing notice to parents and obtaining verifiable parental consent.
3. Defendant neither admits nor denies any of the allegations in the Complaint, except as specifically stated in this Order. Only for purposes of this action, Defendant admits the facts necessary to establish jurisdiction.
4. Defendant waives any claim that it may have under the Equal Access to Justice Act, 28 U.S.C. § 2412, concerning the prosecution of this action through the date of this Order, and agrees to bear its own costs and attorney fees.
5. Defendant and Plaintiff waive all rights to appeal or otherwise challenge or contest the validity of this Order.

DEFINITIONS

For the purpose of this Order, the following definitions apply:

1 A. **“Affected User”** means a user of Defendant’s mobile application for Android or a
2 Parent of such user.

3 B. **“Child”** means an individual under the age of 13.

4 C. **“Clear(ly) and conspicuous(ly)”** means that a required disclosure is easily
5 noticeable (i.e., difficult to miss) and easily understandable by reasonable consumers, including
6 in all of the following ways:

7 1. In any communication that is solely visual or solely audible, the disclosure
8 must be made through the same means through which the communication is presented.
9 In any communication made through both visual and audible means, such as a television
10 advertisement, the disclosure must be presented simultaneously in both the visual and
11 audible portions of the communication even if the representation requiring the disclosure
12 is made in only one means.

13 2. A visual disclosure, by its size, contrast, location, the length of time it
14 appears, and other characteristics, must stand out from any accompanying text or other
15 visual elements so that it is easily noticed, read, and understood.

16 3. An audible disclosure, including by telephone or streaming video, must be
17 delivered in a volume, speed, and cadence sufficient for reasonable consumers to easily
18 hear and understand it.

19 4. In any communication using an interactive electronic medium, such as the
20 Internet or software, the disclosure must be unavoidable.

21 5. The disclosure must use diction and syntax understandable to reasonable
22 consumers and must appear in each language in which the representation that requires the
23 disclosure appears.

24 6. The disclosure must comply with these requirements in each medium
25 through which it is received, including all electronic devices and face-to-face
26 communications.

27 7. The disclosure must not be contradicted or mitigated by, or inconsistent
28 with, anything else in the communication.

8. When the representation or sales practice targets a specific audience, such as children, the elderly, or the terminally ill, “reasonable consumers” includes members of that group.

D. “**Collects**” or “**Collection**” means the gathering of any Personal Information from a Child by any means, including but not limited to:

1. Requesting, prompting, or encouraging a Child to submit Personal Information online;

2. Enabling a Child to make Personal Information publicly available in identifiable form; or

3. Passive tracking of a Child online.

E. “**Defendant**” means Apitor Technology Co., Ltd., and its successors and assigns.

F. “**Delete**” means to remove Personal Information such that it is not maintained in retrievable form and cannot be retrieved in the normal course of business.

G. “**Disclose**” or “**Disclosure**” means, with respect to Personal Information:

1. The Release of Personal Information Collected by an Operator from a Child in identifiable form for any purpose, except where an Operator provides such information to a Person who provides Support for the Internal Operations of the Website or Online Service; and

2. Making Personal Information Collected by an Operator from a Child publicly available in identifiable form by any means, including but not limited to a public posting through the Internet, or through a personal home page or screen posted on a website or online service; a pen pal service; an electronic mail service; a message board; or a chat room.

H. “**Internet**” means collectively the myriad of computer and telecommunications facilities, including equipment and operating software, which comprise the interconnected world-wide network of networks that employ the Transmission Control Protocol/Internet Protocol, or

any predecessor or successor protocols to such protocol, to communicate information of all kinds by wire, radio, or other methods of transmission.

I. **“Online Contact Information”** means an email address or any other substantially similar identifier that permits direct contact with a Person online, including but not limited to an instant messaging user identifier, a voice over internet protocol (“VOIP”) identifier, or a video chat user identifier.

J. **“Operators”** means any Person who operates a website located on the Internet or an online service and who Collects or maintains Personal Information from or about the users of or visitors to such website or online service, or on whose behalf such information is Collected or maintained, or offers products or services for sale through that website or online service, where such website or online service is operated for commercial purposes involving commerce among the several States or with one or more foreign nations; in any territory of the United States or in the District of Columbia, or between any such territory and another such territory or any State or foreign nation; or between the District of Columbia and any State, territory, or foreign nation.

Personal Information is Collected or maintained on behalf of an Operator when:

1. It is Collected or maintained by an agent or service provider of the Operator; or

2. The Operator benefits by allowing another Person to collect Personal Information directly from users of such website or online service.

K. **“Parent”** includes a legal guardian.

L. **“Person”** means any individual, partnership, corporation, trust, estate, cooperative, association, or other entity.

M. **“Personal Information”** means individually identifiable information about an individual Collected online, including:

1. A first and last name;

2. A home or other physical address including street name and name of a city or town;

3. Online Contact Information;

4. A screen or user name where it functions in the same manner as Online Contact Information;

5. A telephone number;

6. A Social Security number;

7. A persistent identifier that can be used to recognize a user over time and across different websites or online services. Such persistent identifier includes but is not limited to a customer number held in a cookie, an Internet Protocol (“IP”) address, a processor or device serial number, or unique device identifier;

8. A photograph, video, or audio file where such file contains a Child’s image or voice;

9. Geolocation information sufficient to identify street name and name of a city or town; or

10. Information concerning the Child or the Parents of that Child that the Operator Collects online from the Child and combines with an identifier described in this definition.

N. **“Release of Personal Information”** means the sharing, selling, renting, or transfer of Personal Information to any Third Party.

O. **“Support for the Internal Operations of the Website or Online Service”** means:

1. Those activities necessary to:

a. Maintain or analyze the functioning of the website or online service;

b. Perform network communications;

c. Authenticate users of, or personalize the content on, the website or online service;

d. Serve contextual advertising on the website or online service or cap the frequency of advertising;

e. Protect the security or integrity of the user, website, or online service;

f. Ensure legal or regulatory compliance; or

g. Fulfill a request of a Child as permitted by Section 312.5(c)(3) and (4) of the COPPA Rule (attached as Appendix A);

2. So long as the information Collected for the activities listed in paragraphs (1)(a)–(g) of this definition is not used or Disclosed to contact a specific individual, including through behavioral advertising, to amass a profile on a specific individual, or for any other purpose.

P. **“Third Party”** means any Person who is not:

1. An Operator with respect to the Collection or maintenance of Personal Information on the website or online service; or

2. A Person who provides Support for the Internal Operations of the Website or Online Service and who does not use or Disclose information protected under 16 C.F.R. part 312 (attached as Appendix A) for any other purpose.

Q. **“Verifiable Parental Consent”** means making any reasonable effort (taking into consideration available technology) to ensure that before Personal Information is Collected from a Child, a Parent of the Child:

1. Receives notice of the Operator’s Personal Information Collection, use, and Disclosure practices; and

2. Authorizes any Collection, use, and/or Disclosure of the Personal Information, using a method reasonably calculated, in light of available technology, to ensure that the Person providing consent is the Child’s Parent.

R. **“Website or Online Service Directed to Children”** means a commercial website or online service, or portion thereof, that is targeted to Children.

1. In determining whether a website or online service, or a portion thereof, is directed to Children, the Commission will consider its subject matter, visual content, use

1 of animated characters or Child-oriented activities and incentives, music or other audio
2 content, age of models, presence of Child celebrities or celebrities who appeal to
3 Children, language or other characteristics of the website or online service, as well as
4 whether advertising promoting or appearing on the website or online service is directed to
5 Children. The Commission will also consider competent and reliable empirical evidence
6 regarding audience composition and evidence regarding the intended audience.

7 2. A website or online service shall be deemed directed to Children when it
8 has actual knowledge that it is Collecting Personal Information directly from users of
9 another Website or Online Service Directed to Children.

10 3. A website or online service that is directed to children under the criteria
11 set forth in paragraph (1) of this definition, but that does not target Children as its
12 primary audience, shall not be deemed directed to Children if it:

13 a. Does not Collect Personal Information from any visitor prior to
14 Collecting age information; and

15 b. Prevents the Collection, use, or Disclosure of Personal Information
16 from visitors who identify themselves as under age 13 without first complying
17 with the notice and parental consent provisions of 16 C.F.R. part 312.

18 4. A website or online service shall not be deemed directed to Children
19 solely because it refers or links to a commercial Website or Online Service Directed to
20 Children by using information location tools, including a directory, index, reference,
21 pointer, or hypertext link.

22 ORDER

23 I. INJUNCTION CONCERNING THE COLLECTION OF 24 PERSONAL INFORMATION FROM CHILDREN

25 IT IS ORDERED that Defendant and Defendant's officers, agents, employees, and
26 attorneys, and all other Persons in active concert or participation with any of them, who receive
27 actual notice of this Order, whether acting directly or indirectly, in connection with being an
28 Operator of any Website or Online Service Directed to Children or of any website or online

1 service with actual knowledge that it is Collecting or maintaining Personal Information from a
2 Child, are hereby permanently restrained and enjoined from:

3 A. Failing to make reasonable efforts, taking into account available technology, to
4 ensure that a Parent of a Child receives direct notice of Defendant's practices with regard to the
5 Collection, use, or Disclosure of Personal Information from Children, including notice of any
6 material change in the Collection, use, or Disclosure practices to which the Parent has previously
7 consented, unless the COPPA Rule (attached as Appendix A), provides an exception to
8 providing such notice;

9 B. Failing to post a Clear and Conspicuous link to an online notice of Defendant's
10 information practices with regard to Children on the home or landing page or screen of its
11 website or online service, and at each area of the website or online service where Personal
12 Information is Collected from Children, unless the COPPA Rule (attached as Appendix A),
13 provides an exception to providing such notice;

14 C. Failing to obtain Verifiable Parental Consent before any Collection, use, or
15 Disclosure of Personal Information from Children, including consent to any material change in
16 the Collection, use, or Disclosure practices to which the Parent has previously consented, unless
17 the COPPA Rule (attached as Appendix A), provides an exception to obtaining Verifiable
18 Parental Consent;

19 D. Failing to Delete a Child's Personal Information at the request of a Parent;

20 E. Retaining Personal Information Collected online from a Child for longer than
21 reasonably necessary to fulfill the purpose for which the information was Collected; and

22 F. Violating the COPPA Rule (attached as Appendix A).

23 **II. INJUNCTION CONCERNING CHILDREN'S PERSONAL**
24 **INFORMATION PREVIOUSLY COLLECTED**

25 IT IS FURTHER ORDERED that Defendant and Defendant's officers, agents,
26 employees, and attorneys, and all other Persons in active concert or participation with any of
27 them, who receive actual notice of this Order, within 60 days of entry of this Order, must:

1 A. Delete all Personal Information that is associated with any Affected User, unless
2 Defendant has provided direct notice and obtained Verifiable Parental Consent.

3 B. Provide a written statement to the Commission, sworn under penalty of perjury,
4 that:

5 1. Describes all processes through which Defendant provided direct notice
6 and sought to obtain Verifiable Parental Consent for any users covered by this Section;

7 2. Identifies the total number of users for whom (a) direct notice was
8 provided; (b) Defendant obtained Verifiable Parental Consent; (c) Verifiable Parent
9 Consent was affirmatively declined; and (d) no response was provided;

10 3. Describes in detail any Personal Information Defendant retains, the basis
11 for such retention, and, as applicable, the specific government agency, law, regulation, or
12 court order that requires such retention; and

13 4. Confirms that all Personal Information required to be Deleted by this
14 Section has been Deleted.

15 **III. MONETARY JUDGMENT AND SUSPENSION**

16 IT IS FURTHER ORDERED that:

17 A. Judgment in the amount of Five Hundred Thousand Dollars (\$500,000) is entered
18 in favor of Plaintiff against Defendant as a civil penalty.

19 B. The judgment is suspended subject to the Subsections below.

20 C. The Commission's and Plaintiff's agreement to the suspension of the judgment is
21 expressly premised upon the truthfulness, accuracy, and completeness of Defendant's sworn
22 financial statements and related documents (collectively, "financial representations") submitted
23 to the Commission, namely: the Financial Statement of Defendant Apitor Technology Co., Ltd.
24 signed on _____, including the attachments.

25 D. The suspension of the judgment will be lifted as to Defendant if, upon motion by
26 the Commission or Plaintiff, the Court finds that Defendant failed to disclose any material asset,
27 materially misstated the value of any asset, or made any other material misstatement or omission
28 in the financial representations identified above.

1 E. If the suspension of the judgment is lifted, the judgment becomes immediately
 2 due as to that Defendant in the amount specified in Subsection A above (which the parties
 3 stipulate only for purposes of this Section represents the amount of the civil penalty for the
 4 violations alleged in the Complaint), less any payment previously made pursuant to this Section,
 5 plus interest computed from the date of entry of this Order.

6 F. Defendant relinquishes dominion and all legal and equitable right, title, and
 7 interest in all assets transferred pursuant to this Order and may not seek the return of any assets.

8 G. The facts alleged in the Complaint will be taken as true, without further proof, in
 9 any subsequent civil litigation by or on behalf of the Commission, including in a proceeding to
 10 enforce its rights to any payment or monetary judgment pursuant to this Order.

11 H. Defendant acknowledges that its United States Employer Identification Number,
 12 Social Security Number, or other Taxpayer Identification Number (“TIN”), if any, must be
 13 submitted to Plaintiff within 7 days of entry of this Order. The Commission and Plaintiff may
 14 use any such TIN for reporting and other lawful purposes, including collecting on any delinquent
 15 amount arising out of this Order in accordance with 31 U.S.C. § 7701.

16 **IV. ORDER ACKNOWLEDGMENTS**

17 IT IS FURTHER ORDERED that Defendant obtain acknowledgments of receipt of this
 18 Order:

19 A. Defendant, within 7 days of entry of this Order, must submit to the Commission
 20 an acknowledgment of receipt of this Order sworn under penalty of perjury.

21 B. For 5 years after entry of this Order, Defendant must deliver a copy of this Order
 22 to: (1) all principals, officers, directors, and LLC managers and members; (2) all employees
 23 having managerial responsibilities for conduct related to the subject matter of the Order and all
 24 agents and representatives who participate in conduct related to the subject matter of the Order;
 25 and (3) any business entity resulting from any change in structure as set forth in the Section titled
 26 Compliance Reporting. Delivery must occur within 7 days of entry of this Order for current
 27 personnel. For all others, delivery must occur before they assume their responsibilities.

28 C. From each individual or entity to which Defendant delivered a copy of this Order,

1 Defendant must obtain, within 30 days, a signed and dated acknowledgment of receipt of this
2 Order.

3 **V. COMPLIANCE REPORTING**

4 IT IS FURTHER ORDERED that Defendant make timely submissions to the
5 Commission:

6 A. One year after entry of this Order, Defendant must submit a compliance report,
7 sworn under penalty of perjury. Defendant must: (a) identify the primary physical, postal, and
8 email address and telephone number, as designated points of contact, which representatives of
9 the Commission and Plaintiff may use to communicate with Defendant; (b) identify all of
10 Defendant's businesses by all of their names, telephone numbers, and physical, postal, email, and
11 Internet addresses; (c) describe the activities of each business, including the goods and services
12 offered and the means of advertising, marketing, and sales; (d) describe in detail whether and
13 how Defendant is in compliance with each Section of this Order; and (e) provide a copy of each
14 Order Acknowledgment obtained pursuant to this Order, unless previously submitted to the
15 Commission.

16 B. For 10 years after entry of this Order, Defendant must submit a compliance
17 notice, sworn under penalty of perjury, within 14 days of any change in the following: Defendant
18 must report any change in: (a) any designated point of contact; or (b) the structure of any entity
19 that Defendant has any ownership interest in or controls directly or indirectly that may affect
20 compliance obligations arising under this Order, including: creation, merger, sale, or dissolution
21 of the entity or any subsidiary, parent, or affiliate that engages in any acts or practices subject to
22 this Order.

23 C. Defendant must submit to the Commission notice of the filing of any bankruptcy
24 petition, insolvency proceeding, or similar proceeding by or against Defendant within 14 days of
25 its filing.

26 D. Any submission to the Commission required by this Order to be sworn under
27 penalty of perjury must be true and accurate and comply with 28 U.S.C. § 1746, such as by
28 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: United States v. Apitor Technology Co., Ltd., FTC matter 2423058.

VI. RECORDKEEPING

IT IS FURTHER ORDERED that Defendant must create certain records for 10 years after entry of the Order, and retain each such record for 5 years. Specifically, Defendant 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, 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. Records of all consumer complaints and refund requests related to Defendant’s privacy practices, whether received directly or indirectly, such as through a third party, and any response; and
- D. All records necessary to demonstrate full compliance with each provision of this Order, including all submissions to the Commission.

VII. COMPLIANCE MONITORING

IT IS FURTHER ORDERED that, for the purpose of monitoring Defendant's compliance with this Order and any failure to transfer any assets as required by this Order:

A. Within 14 days of receipt of a written request from a representative of the Commission or Plaintiff, Defendant must: submit additional compliance reports or other requested information, which must be sworn under penalty of perjury; appear for depositions; and produce documents for inspection and copying. The Commission and Plaintiff are also authorized to obtain discovery, without further leave of court, using any of the procedures prescribed by Federal Rules of Civil Procedure 29, 30 (including depositions by remote means), 31, 33, 34, 36, 45, and 69.

B. For matters concerning this Order, the Commission and Plaintiff are authorized to communicate directly with Defendant. Defendant must permit representatives of the Commission and Plaintiff to interview any employee or other person affiliated with Defendant who has agreed to such an interview. The person interviewed may have counsel present.

C. The Commission and Plaintiff may use all other lawful means, including posing, through its representatives as consumers, suppliers, or other individuals or entities, to Defendant or any individual or entity affiliated with Defendant, 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.

VIII. RETENTION OF JURISDICTION

IT IS FURTHER ORDERED that this Court retains jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

SO ORDERED this ____ day of _____, 202__.

HON. MAXINE M. CHESNEY
UNITED STATES DISTRICT JUDGE
NORTHERN DISTRICT OF CALIFORNIA

1 **SO STIPULATED AND AGREED:**

2 **FOR PLAINTIFF:**

3 THE UNITED STATES OF AMERICA

4 BRETT A. SHUMATE

Assistant Attorney General

5 JORDAN C. CAMPBELL

Deputy Assistant Attorney General

6 SARMAD KHOJASTEH

Senior Counsel

7 Civil Division

8 LISA K. HSIAO

Acting Director

9 ZACHARY A. DIETERT

10 Assistant Director

11 /s/ David Crockett

12 DAVID G. CROCKETT, JR., Trial Attorney

DANIEL K. CRANE-HIRSCH, Senior Trial Attorney

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United States Attorney

19 Northern District of California

20 PAMELA T. JOHANN, Chief, Civil Division

21 Northern District of California

22 /s/ Sapna Mehta

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25 Northern District of California

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STIP. ORDER FOR PERM. INJUNCTION, CIV. PENALTY JUDGMENT & OTHER RELIEF

Case No. 3:25-cv-07363

1
2 Of Counsel, for the Federal Trade Commission:

3 SHINING J. HSU (Cal. Bar No. 317917)

4 EVAN ROSE (Cal. Bar No. 253478)

5 Attorneys

6 Federal Trade Commission

7 Western Region San Francisco

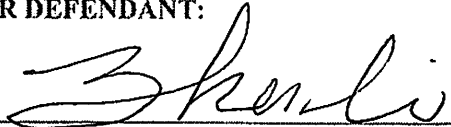
8 90 Seventh St., Suite 14-300

9 San Francisco, CA 94103

10 Phone: (415) 848-5100

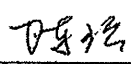
11 Email: shsu1@ftc.gov, erose@ftc.gov

1 **FOR DEFENDANT:**

2 
3 _____
4 Zhen Jessica Li, Esq.
5 BlueSparkles LLC
6 COUNSEL FOR DEFENDANT
7 APITOR TECHNOLOGY CO., LTD.

Date: 06/05/2025

8 **DEFENDANT: Apitor Technology Co., Ltd.**

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11 Chen Ling
12 President
13 Apitor Technology Co., Ltd.

Date: June 5, 2025

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STIP. ORDER FOR PERM. INJUNCTION, CIV. PENALTY JUDGMENT & OTHER RELIEF
Case No. _____

EXHIBIT B

REASONS FOR SETTLEMENT

This statement accompanies the [Proposed] Stipulated Order for Permanent Injunction, Civil Penalty Judgment, and Other Relief (“Order”) executed by defendant Apitor Technology Co., Ltd. (“Defendant”) in settlement of an action seeking injunctive relief, civil penalties, and other relief for Defendant’s alleged violations of the Children’s Online Privacy Protection Act of 1998 (“COPPA”), 15 U.S.C. §§ 6501–6506, the Children’s Online Privacy Protection Rule (“COPPA Rule”), 16 C.F.R. Part 312, and Section 5(a) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 45(a). The Order imposes injunctive relief and requires Defendant to pay \$500,000 as a civil penalty, which will be suspended in full due to Defendant’s inability to pay.

Pursuant to Section 5(m)(3) of the FTC Act, 15 U.S.C. § 45(m)(3), the Commission hereby sets forth its reasons for settlement by entry of the Order:

Based on the allegations contained in the Complaint and the factors set forth in Section 5(m)(1)(C) of the FTC Act, 15 U.S.C. § 45(m)(1)(C), the Commission believes that entry of the Order is appropriate and in the public interest.

First, the \$500,000 civil penalty and the injunctive provisions in the Order, including the provisions permanently enjoining Defendant from collecting personal information of children without notice and verifiable parental consent, constitute an effective means to ensure Defendant’s future compliance with the law and deter others from engaging in similar violations.

Second, the Order is consistent with past orders entered in cases involving similar violations of the FTC Act and the COPPA Rule.

Finally, with the entry of the Order, the time and expense of litigation against Defendant will be avoided.

For the foregoing reasons, the Commission believes that settlement by entry of the attached Order is justified and well within the public interest.