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11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13 WESTERN DIVISION

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 v.
17 LAI SYSTEMS, LLC, a limited liability
18 company,
19 Defendant.

Case No. 2:15-cv-9691

**COMPLAINT FOR CIVIL
PENALTIES, PERMANENT
INJUNCTION, AND OTHER
EQUITABLE RELIEF**

20

1 Plaintiff, the United States of America, acting upon notification and
2 authorization to the Attorney General by the Federal Trade Commission (“FTC” or
3 “Commission”) for its Complaint alleges:

4 1. Plaintiff brings this action under Sections 1303(c) and 1306(d) of the
5 Children’s Online Privacy Protection Act of 1998 (“COPPA”), 15 U.S.C. §§
6 6502(c) and 6505(d), and Sections 5(a)(1), 5(m)(1)(A), 13(b), and 16(a) of the
7 Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 45(a)(1), 45(m)(1)(A),
8 53(b), and 56(a) to obtain monetary civil penalties, a permanent injunction, and
9 other equitable relief for Defendant’s violations of the Commission’s Children’s
10 Online Privacy Protection Rule (“Rule” or “COPPA Rule”), 16 C.F.R. Part 312,
11 and Section 5 of the FTC Act.

12 **JURISDICTION AND VENUE**

13 2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§
14 1331, 1337(a), 1345 and 1355, and 15 U.S.C. §§ 45(m)(1)(A), 53(b), 56(a), and
15 57b.

16 3. Venue is proper in this district under 28 U.S.C. § 1391(b)-(c),
17 1395(a), and 15 U.S.C. § 53(b).

18 **DEFENDANT**

19 4. Defendant LAI Systems, LLC (“LAI”), d/b/a TapBlaze, is a California
20 company with its principal place of business at 11901 Santa Monica Boulevard,

1 Suite 507, Los Angeles, California 90025. LAI transacts or has transacted business
2 in this district and throughout the United States. At all times material to this
3 Complaint, acting alone or in concert with others, LAI has advertised, marketed,
4 distributed, or sold mobile applications (“apps”) to consumers throughout the
5 United States.

6 **COMMERCE**

7 5. At all times material to this Complaint, Defendant has maintained a
8 substantial course of trade in or affecting commerce, as “commerce” is defined in
9 Section 4 of the FTC Act, 15 U.S.C. § 44.

10 **THE CHILDREN’S ONLINE PRIVACY PROTECTION RULE**

11 6. Congress enacted COPPA in 1998 to protect the safety and privacy of
12 children online by prohibiting the unauthorized or unnecessary collection of
13 children’s personal information online by operators of Internet websites or online
14 services. COPPA directed the Federal Trade Commission to promulgate a rule
15 implementing COPPA. The Commission promulgated the COPPA Rule, 16 C.F.R.
16 Part 312, on November 3, 1999 under Section 1303(b) of COPPA, 15 U.S.C. §
17 6502(b), and Section 553 of the Administrative Procedure Act, 5 U.S.C. § 553.
18 The Rule went into effect in April 2000. The Commission promulgated revisions
19 to the Rule that went into effect on July 1, 2013.

20

1 7. The Rule applies to any operator of a commercial website or online
2 service directed to children that collects, uses, and/or discloses personal
3 information from children, or on whose behalf such information is collected or
4 maintained, and to any operator of a commercial website or online service that has
5 actual knowledge that it collects, uses, and/or discloses personal information from
6 children. Under the Rule, personal information is “collected or maintained on
7 behalf of an operator when . . . [t]he operator benefits by allowing another person
8 to collect personal information directly from users of” an online service. 16 C.F.R.
9 § 312.2.

10 8. The Rule requires operators to give notice to parents and obtain their
11 verifiable consent before collecting children’s “personal information” online. 16
12 C.F.R. §§ 312.4 and 312.5. The definition of “Personal Information” includes a
13 “persistent identifier that can be used to recognize a user over time and across
14 different Web sites or online services,” subject to certain exceptions not at issue in
15 this case. 16 C.F.R. § 312.2.

16 9. Among other things, the Rule requires that an operator meet specific
17 requirements prior to using or disclosing personal information, including, but not
18 limited to:

19 a. Posting a privacy policy on its website or online service providing
20 clear, understandable, and complete notice of its information practices,

1 including what information the website operator collects from children
2 online, how it uses such information, its disclosure practices for such
3 information, and other specific disclosures set forth in the Rule;

4 b. Providing clear, understandable, and complete notice of its
5 information practices, including specific disclosures, directly to parents; and

6 c. Obtaining verifiable consent prior to collecting, using, and/or
7 disclosing personal information from children.

8 **DEFINITIONS**

9 10. For purposes of this Complaint, the terms “child,” “collects,”
10 “collection,” “Commission,” “disclosure,” “Internet,” “operator,” “parent,”
11 “personal information,” “obtaining verifiable consent,” “third party,” and “website
12 or online service directed to children,” are defined as those terms are defined in
13 Section 312.2 of the Rule, 16 C.F.R. § 312.2.

14 **DEFENDANT’S BUSINESS PRACTICES**

15 11. Since 2012, Defendant has offered a number of mobile apps for
16 download from Apple’s App Store, Google Play, and the Amazon App store. The
17 apps include apps that are directed to children, such as My Cake Shop, My Pizza
18 Shop, Hair Salon Makeover, Friday Night Makeover, Marley the Talking Dog, and
19 Animal Sounds (“kids’ apps”). (See Exhibit A, copies of several kids’ apps’ initial
20 screens.) The apps send and/or receive information over the Internet, and thus are

1 online services pursuant to COPPA. These apps are free to download and play.
2 Revenues are generated through in-app advertising and in-app purchases.

3 12. Defendant is an “operator” as defined by the Rule, 16 C.F.R. § 312.2.

4 13. My Cake Shop, which has been available since at least 2013, is an app
5 in which users engage in simple play by creating images of cakes by tapping on
6 flashing ingredients to combine them in a bowl, baking, and decorating the cake.
7 The description of the app in Google Play described it as a “[f]un cooking game for
8 kids of all ages. With this free cake maker kids app, you can let your inner pastry
9 chef go wild” (*See* Exhibit B.)

10 14. My Pizza Shop, which has been available since at least 2013, is an
11 app in which users engage in simple play by creating images of pizzas by tapping
12 on flashing ingredients to combine them in a bowl, rolling out the dough, topping
13 and baking the dough, and then cutting the pizza. The description of the app in
14 Apple’s App Store states, “you can let your inner pizza hero go wild creating real
15 looking pizza.” (*See* Exhibit C.)

16 15. Hair Salon Makeover, which has been available since 2014, is an app
17 in which users engage in simple play by creating different hairstyles for animated
18 characters, some of which look like children. The description of the app in
19 Apple’s App Store states, “With Hair Salon Makeover, you get to scissor cut, curl,
20 color, and style the hair of customers and even a dog!” (*See* Exhibit D.)

1 16. Friday Night Makeover (advertised as Princess Makeover Salon and
2 sold as Makeover Party Friday in Apple’s App Store, and advertised as My
3 Fashion Design Makeover and sold as Makeover Party Friday in Google Play),
4 which has been available since 2014, is an app in which users create different looks
5 on animated characters through styling hair and makeup and choosing clothes and
6 accessories. The description of the app in Apple’s App Store states, “Be a fashion
7 designer and create the next fashion star!” (See Exhibit E.)

8 17. Marley the Talking Dog, which was available from at least 2013
9 through 2014, is an app in which users can record what they say and have it
10 mimicked back to them by the dog, give the dog a bone, make the dog dance or
11 nap, and swat bees away from the dog. The description of the app in Apple’s App
12 Store stated, “you can have your very own cute, cuddly puppy dog in the palm of
13 your hand.” (See Exhibit F.)

14 18. Animal Sounds, which was available from at least 2013 through 2014,
15 is an app in which images of animals and their sounds are automatically played as
16 a slideshow. The description of the app in the Amazon App store stated it is a
17 “learning game for toddlers” and it will “keep your child entertained at a
18 restaurant, during a long drive or while shopping.” (See Exhibit G.)

19 19. Pursuant to Section 312.2 of the Rule, the determination of whether an
20 app is directed to children depends on factors such as the subject matter, visual

1 content, language, and use of animated characters or child-oriented activities and
2 incentives. An assessment of these factors demonstrates that LAI's kids' apps are
3 directed to children under the age of 13. For example, LAI's kids' apps contain
4 brightly colored, animated characters including dogs and children (*see e.g.* Exhibit
5 H, examples from Hair Salon Makeover and Marley the Talking Dog) and involve
6 only simple play. Their subject matter, which includes creating images of cakes
7 and pizzas, playing dress up, hair styling, and learning animal sounds, would be
8 highly appealing to children. (*See e.g.* Exhibit I, examples from My Cake Shop
9 and My Pizza Shop; Exhibit J, example from Hair Salon Makeover.) In addition,
10 as described above in Paragraphs 13-18 and as shown in Exhibits B-G, the
11 language used to describe the apps in the app stores is simple and would be
12 appealing to a child under age 13, and in some instances identified children as their
13 target audience.

14 20. Through the kids' apps, Defendant allowed third party advertising
15 networks to collect personal information in the form of persistent identifiers, in
16 order to serve targeted advertising on the app based on users' activity over time
17 and across sites. Defendant did not inform these third-party advertising networks
18 that the apps are directed to children and did not instruct or contractually require
19 the advertising networks to refrain from targeted advertising. Nor did Defendant
20

1 provide the required notices or obtain the required parental consent described in
2 Paragraph 9.

3 **VIOLATION OF THE CHILDREN’S ONLINE PRIVACY PROTECTION**

4 **RULE**

5 **Count I**

6 21. Defendant operates online services directed to children, including
7 through the kids’ apps, which collect personal information from children under age
8 13.

9 22. In numerous instances since July 1, 2013, in connection with the acts
10 and practices described above, personal information from children younger than
11 age 13 was collected on behalf of Defendant in violation of the Rule. Defendant
12 thus violated the Rule by:

13 a. Failing to provide notice on Defendant’s online services of the
14 information it collects, or is collected on its behalf, online from
15 children, how such information is used, and its disclosure
16 practices, among other required content, in violation of Section
17 312.4(d) of the Rule, 16 C.F.R. § 312.4(d);

18 b. Failing to provide direct notice to parents of the information
19 Defendant collects, or information that has been collected on
20 Defendant’s behalf, online from children, how such information

1 is used, and its disclosure practices for such information, among
2 other required content, in violation of Section 312.4(b) of the
3 Rule, 16 C.F.R. § 312.4(b); and

4 c. Failing to obtain verifiable parental consent before any
5 collection or use of personal information from children, in
6 violation of Section 312.5(a)(1) of the Rule, 16 C.F.R. §
7 312.5(a)(1). Therefore, Defendant has violated the Rule, 16
8 C.F.R. Part 312.

9 23. Pursuant to Section 1303(c) of COPPA, 15 U.S.C. § 6502(c), and
10 Section
11 18(d)(3) of the FTC Act, 15 U.S.C. § 57a(d)(3), a violation of the Rule constitutes
12 an unfair or deceptive act or practice in or affecting commerce, in violation of
13 Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

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

15 24. Defendant violated the Rule as described above with the knowledge
16 required by Section 5(m)(1)(A) of the FTC Act, 15 U.S.C. § 45(m)(1)(A).

17 25. Each collection, use, or disclosure of a child's personal information in
18 which Defendant violated the Rule in one or more of the ways described above
19 constitutes a separate violation for which Plaintiff seeks monetary civil penalties.

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Respectfully submitted,

Dated: December 17, 2015

**FOR THE FEDERAL TRADE
COMMISSION:**

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**FOR PLAINTIFF
THE UNITED STATES OF AMERICA:**

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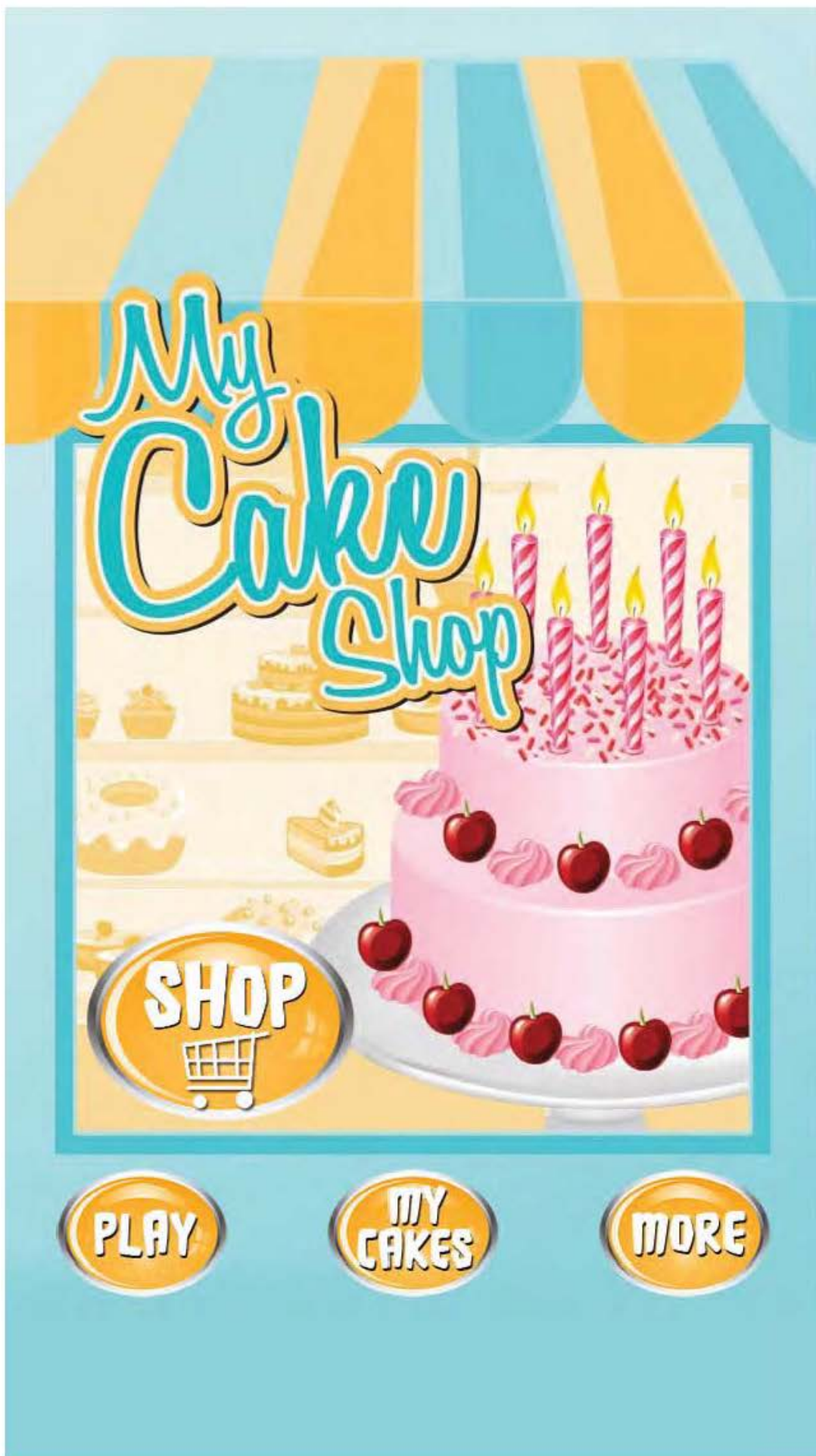
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Exhibit A









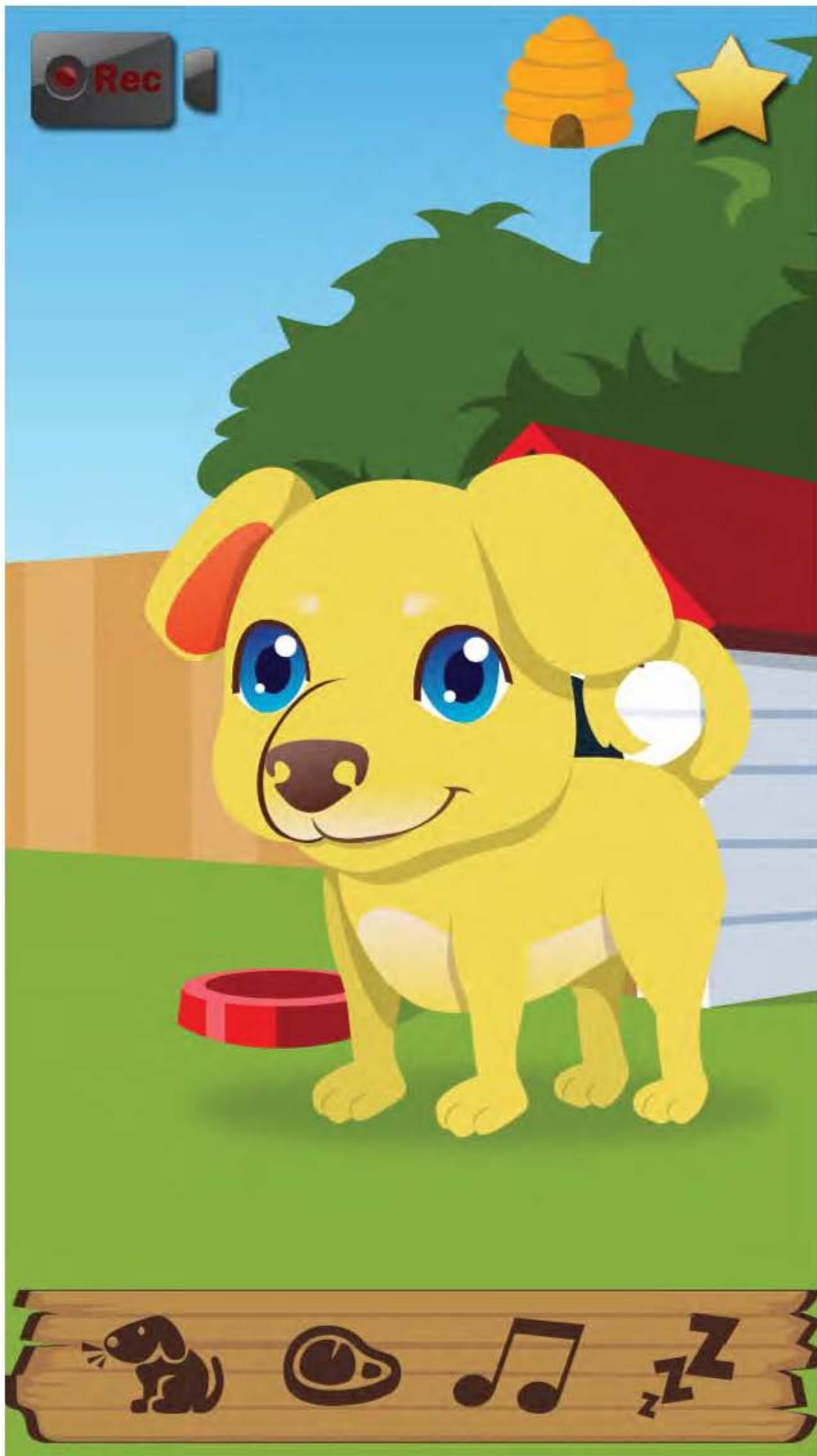


Exhibit B

Categories ▾ | Home | Top Charts | New Releases






Cake Maker Shop - Cooking Game

TapBlaze · July 30, 2014
Family

Installed

 This app is compatible with your device. Offers in-app purchases

★★★★☆ (8,394)

 +14200 including You



Description

★★★★★ "Hi I love this game even my kids love it:-)"
 ★★★★★ "Wow if I could I would give this game 10000000 stars!"
 ★★★★★ "Love it!!! Simple, fun and free!!! Great game for everyone!!!!"

Make a cake now with the FREE My Cake Shop app! The best free cake maker game and cooking game app for your Android phone. Make someone smile today - Decorate a cake and send it to them for their Happy Birthday or other occasion!

Fun cooking game for kids of all ages. With this free cake maker kids app, you can let your inner pastry chef go wild creating birthday cakes, sports cakes, wedding cakes, ice cream cakes and any other cake you can dream of. The best part is after you make your cake, you can eat it too! In addition, show off your cake boss skills to your family and friends via Facebook, Twitter, email, SMS, and more.

My Cake Shop is the best cake making, cake decorating game and cooking game available for your Android phone. Here are just some of the awesome and unique features of this cake maker app:

- NEW! Add a message to your cake - now you can write "Happy Birthday" or anything else and make someone smile!
- Choose from six different cake shapes.
- Add ingredients and whisk them together.
- Bake your cake.
- Over 12 different cake stands to choose from.
- Over 10 different cake frostings.
- Over 150 different cake decorations including sprinkles, flowers, chocolates, candy, fruits, lollipops, and toppers to decorate your cake with.
- Birthday candles for making Happy Birthday Cakes.
- Ability to "Undo" decorations, so you can fix any cake decorating mistakes.
- Save your cake to view or share later.
- Share via Facebook, Twitter, email, SMS and more.
- Eat your cake!
- Continued improvement of this app, please send us feedback or suggestions.

>>> Don't Wait, Download Now and Start Decorating! <<<

This game is appropriate for toddlers, children and even adults who like cooking, making and serving or just eating cakes.

Exhibit C

My Pizza Shop – Pizza Maker Game

[View More by This Developer](#)

By LAI SYSTEMS, LLC

Open iTunes to buy and download apps.



[View in iTunes](#)

This app is designed for both iPhone and iPad

Free

Category: Games
Updated: Feb 16, 2015
Version: 1.2
Size: 54.9 MB
Language: English
Seller: LAI SYSTEMS, LLC
© TapBlaze
Rated 4+

Compatibility: Requires iOS 6.0 or later. Compatible with iPhone, iPad, and iPod touch. This app is optimized for iPhone 5.

Customer Ratings

Current Version:
★★★★ 32 Ratings
All Versions:
★★★★ 4449 Ratings

Top In-App Purchases

1. Unlock All \$3.99
2. Unlock More Toppi... \$1.99
3. Unlock More Decor... \$1.99

More by LAI SYSTEMS, LLC



Description

Fun pizza maker game for pizza lovers. With this pizza maker app, you can let your inner pizza hero go wild creating real looking pizza. The best part is after you make your pizza, you can eat it too!

[LAI SYSTEMS, LLC Web Site](#) [My Pizza Shop – Pizza Maker Game Support](#)

What's New in Version 1.2

- * iOS 8 compatible.
- * Fixed several bugs reported by players.

Screenshots

iPhone | iPad



Exhibit D

Hair Salon Makeover – Cut, Curl, Color, Style Hair

[View More by This Developer](#)

By LAI SYSTEMS, LLC

Open iTunes to buy and download apps.



[View in iTunes](#)

⊕ This app is designed for both iPhone and iPad.

Free

Category: Games
 Updated: Feb 15, 2015
 Version: 1.7
 Size: 55.1 MB
 Language: English
 Seller: LAI SYSTEMS, LLC
 © TapBlaze
 Rated 4+

Compatibility: Requires iOS 6.0 or later. Compatible with iPhone, iPad, and iPod touch. This app is optimized for iPhone 5.

Customer Ratings

Current Version:
 ★★★★★ 32 Ratings
 All Versions:
 ★★★★★ 484 Ratings

Top In-App Purchases

- | | |
|-------------------------|--------|
| 1. Unlock All | \$9.99 |
| 2. Unlock Hair Dyes | \$1.99 |
| 3. Unlock Karina | \$1.99 |
| 4. Unlock Kris | \$1.99 |
| 5. Unlock Hair Clips | \$1.99 |
| 6. Unlock Glasses | \$1.99 |
| 7. Unlock Hats | \$1.99 |
| 8. Unlock Neck Acces... | \$1.99 |

[More by LAI SYSTEMS](#)

Description

Run your own Hair Salon! Customers are looking for a new hair style and you are the one to give them the haircut of their dreams! With Hair Salon Makeover, you get to scissor cut, curl, color, and style the hair of customers and even a dog! Best yet, the hairstyle is completely up to you! From hair color, braids, ponytails to mustaches the character's style is in your control.

[LAI SYSTEMS, LLC Web Site](#) ▶ [Hair Salon Makeover – Cut, Curl, Color, Style Hair Support](#) ▶

What's New in Version 1.7

New Icon!

Screenshots

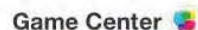
iPhone | iPad



Exhibit E

TapMakeover | Princess Makeover Salon

By LAI SYSTEMS, LLC



View More by This Developer

Open iTunes to buy and download apps.



View in iTunes

This app is designed for both iPhone and iPad

Free

Category: Games
 Updated: Feb 15, 2015
 Version: 1.5
 Size: 83.5 MB
 Languages: Bokmål, Norwegian, Catalan, Czech, Danish, Dutch, En, Finnish, French, German, Greek, Hebrew, Hu, Italian, Japanese, Ko, Polish, Portuguese, Romanian, Russian, Simplified Chinese, Slovak, Spanish, Swedish, Traditional Chinese, Turkish
 Seller: LAI SYSTEMS, LLC
 © TapBlaze
 Rated 4+

Compatibility: Requires iOS 6.0 or later. Compatible with iPhone, iPad, and iPod touch. This app is optimized for iPhone 5.

Customer Ratings

Current Version:
 ★★★★★ 6 Ratings
 All Versions:
 ★★★★★ 129 Ratings

Top In-App Purchases

1. Unlock All Items \$4.99
2. Unlock All Dresses \$0.99
3. Unlock All Purses \$0.99
4. Unlock All Eyeshad... \$0.99
5. Unlock All Hairstyles \$0.99
6. Unlock All Shoes \$0.99
7. Unlock All Separates \$0.99
8. Unlock All Head Pie... \$0.99
9. Unlock All Earrings \$0.99
10. Unlock All Necklaces \$0.99

More by LAI SYSTEMS, LLC



My Pizza Shop - Pizza Maker...
 View in iTunes

Description

New, Free Fashion Makeover Game: Be a fashion designer and create the next fashion star! With TapMakeover you get to run the show. Kate is getting ready for her Friday night party and it is up to you to help her in your fashion boutique. From makeup to clothing, Kate's makeover is entirely up to you. Princess or geek chic, her style is in your control. Use your creativity and come up with the next fashion trend and be the ultimate fashionista!

Don't Wait, Download Now and Start Styling!

ABOUT TAPBLAZE

Our vision is to build an enduring franchise that gamers will still be excited about decades from now. At TapBlaze, we strive to develop high-quality, creative games that people of all ages will find entertaining, educational, fun, and useful. We believe our attention to detail, commitment to player satisfaction, and expertise in the mobile space will make our games stand out.

For the Latest Updates and Learn More About Us, Follow Us On:

- Facebook: <https://www.facebook.com/tapblaze>
- Twitter: <https://twitter.com/TapBlaze>
- Instagram: <http://instagram.com/tapblaze>
- YouTube: <https://www.youtube.com/user/TapBlazeGames>
- Website: <http://www.tapblaze.com/about/>

LAI SYSTEMS, LLC Web Site TapMakeover | Princess Makeover Salon Support

What's New in Version 1.5

iOS 8 Updates

Screenshots

iPhone | iPad



Exhibit F

Marley The Talking Dog

By LAI SYSTEMS, LLC

Open iTunes to buy and download apps.

Game Center 

[View More by This Developer](#)



[View in iTunes](#)

 This app is designed for both iPhone and iPad

Free

Category: Games
 Updated: Apr 11, 2013
 Version: 1.2
 Size: 31.4 MB
 Language: English
 Seller: LAI SYSTEMS, LLC
 © TapBlaze
 Rated 4+

Compatibility: Requires iOS 5.0 or later. Compatible with iPhone, iPad, and iPod touch. This app is optimized for iPhone 5.

Customer Ratings

Current Version:
 ★★★★★ 69 Ratings
 All Versions:
 ★★★★★ 155 Ratings

Top In-App Purchases

1. Start with 8 Lives \$0.99
2. Remove ADs \$1.99

More by LAI SYSTEMS, LLC



My Cake Shop HD - Cake Mak...
[View In iTunes](#)

Description

Marley the Talking Dog needs to find a new home! Download Marley now and make him a happy puppy dog. If you ever wanted to have your own talking puppy dog, this is the app for you.

With Marley the Talking Dog app, you can now have your very own cute, cuddly puppy dog in the palm of your hand. Marley loves to be petted and loves to play fetch with his favorite bone. If Marley gets bored, he will fall asleep. Wake him up and play his favorite music to watch him dance!

[LAI SYSTEMS, LLC Web Site](#) [Marley The Talking Dog Support](#)

What's New in Version 1.2

New, fun mini-game added. Stop the bees from stinging Marley!

Screenshots

iPhone | iPad



Exhibit G

amazon Try Prime Your Amazon.com Today's Deals Gift Cards Sell Help

Shop by Department - Search Apps & Games animal sounds tapblaze Go Hello, Sign in Your Account Try Prime Wish List Cart

Appstore for Android Best Sellers Deals New Releases Fire Tablet Apps Fire TV Apps Fire Phone Apps Games Amazon Coins Your Apps & Devices

Apps & Games > Education

Animal Sounds
by TapBlaze
Rated: [Guidance Suggested](#)
★★★★★ (25 customer reviews)

Price: **FREE**
Sold by: Amazon Digital Services, Inc.
Available instantly

TEST DRIVE NOW
instantly on your computer

Try this app right now on your computer. You control the app with your mouse and keyboard to experience it like you would on your phone. Test drive this app before you buy.
[How does this work?](#)

Get this app
Please sign in before purchasing ([Why?](#))
Sign in
How buying works
[Redeem a gift card or promotion code & view balance](#)
Add to Wish List

Share

By placing your order, you agree to our [Terms of Use](#)

Product Details

ASIN: B0085Y7KZG
Release Date: May 24, 2012
Rated: [Guidance Suggested](#) This app may include dynamic content. [What's this?](#)
Average Customer Review: ★★★★★ (25 customer reviews)
 Would you like to [give feedback on images](#) or [tell us about a lower price?](#)

Product Features

- Animal sounds learning game for toddlers.
- Over 20 high quality animal images and sounds.
- The name of the animal is spoken out in perfect, clear ENGLISH by a female teacher.
- Animal images and sounds are automatically played as a slide show.
- Click on the animal name or animal sound button to hear the sound again.

Product Description

Animal sounds learning game for toddlers. Fun, simple app for toddlers to learn about different animals, their names and their sounds. Over 20 high quality animal images and sounds. Unlike other animal sound apps, the name of the animal is also spoken out in perfect, clear ENGLISH by a female teacher.

Play together while spending quality time or use this app in an "emergency" to keep your child entertained at a restaurant, during a long drive or while shopping.

Animal images and sounds are automatically played as a slide show. Either click on the animal name or animal sound button to hear the sound again. Flip back or forth to change animal images.

"Animal Sounds Academy" contains images and sounds of over 20 animals including:

Bird, cat, chicken, cow, deer, dog, donkey, duck, elephant, fox, frog, giraffe, horse, lion, monkey, panda, pig, rabbit, sheep, and tiger. More animal images and sounds are in the works.

Exhibit H





Exhibit I



[Redacted advertisement]



[Redacted advertisement]



Exhibit J

