



UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

Bureau of Consumer Protection  
Division of Advertising Practices

April 24, 2008

**VIA FEDERAL EXPRESS**

Kendall W. Harrison, Esq.  
Godfrey & Kahn  
One East Main Street  
P.O. Box 2719  
Madison, WI 53701-2719

*Re: Fashion Angels Enterprises, FTC Matter No. 082 3097*

Dear Mr. Harrison:

As you are aware, the staff of the Federal Trade Commission has conducted an investigation into whether M&G Partners, LLP, d/b/a Fashion Angels Enterprises (Fashion Angels or the company) has violated the FTC's Children's Online Privacy Protection Rule (COPPA Rule), 16 C.F.R. § 312, in connection with its operation of the websites, [www.fashionangels.com](http://www.fashionangels.com) and [www.fashionangelsenterprises.com](http://www.fashionangelsenterprises.com). In pertinent part, the COPPA Rule requires operators of websites directed to children under 13 years of age, or that have actual knowledge that they are collecting personal information online from such children, to provide notice of their information practices to parents and to obtain verifiable parental consent prior to collecting, using, or disclosing personal information from children under 13. In addition, the staff investigated whether Fashion Angels may be making deceptive representations regarding its "negative ion infused" fashion bracelets for girls, in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45(a).

Upon review of this matter, we have determined not to recommend enforcement action at this time. Among the factors we considered are that, in connection with Fashion Angels' online "FA Fan Club," fashion design contests, and "comments" form, you collected personal information only from a small number of children. In response to the staff's inquiry, Fashion Angels deactivated these online activities, and, for the present, has determined not to collect any personal information from children as those terms are defined under COPPA. You have indicated that, should you reactivate the fan club, design contests, or comments form in the future, you intend to limit the information you collect online, and to design and operate the Fashion Angels websites in a manner that complies with the COPPA Rule, including revising your posted privacy policies to ensure that they accurately reflect your information collection practices, and informing parents of your information practices and their rights under COPPA.

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With respect to the fashion bracelets, you have indicated that you have discontinued all advertising, and have removed all product packaging, so that claims about “negative ion infusion” no longer are being made.

This action is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require.

Very truly yours,

A handwritten signature in cursive script that reads "Mary K. Engle". The signature is written in black ink and is positioned above the printed name.

Mary Koebel Engle  
Associate Director