

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of

Miniclip S.A., a corporation

FILE NO. 192 3129

AGREEMENT CONTAINING  
CONSENT ORDER

The Federal Trade Commission ("Commission") has conducted an investigation of certain acts and practices of Miniclip S.A. ("Proposed Respondent"). The Commission's Bureau of Consumer Protection ("BCP") has prepared a draft of an administrative Complaint ("draft Complaint"). BCP and Proposed Respondent individually or through its duly authorized officers enter into this Agreement Containing Consent Order ("Consent Agreement") to resolve the allegations in the attached draft Complaint through a proposed Decision and Order to present to the Commission, which is also attached and made a part of this Consent Agreement.

IT IS HEREBY AGREED by and between Proposed Respondent and BCP that:

1. Proposed Respondent Miniclip S.A. is a Swiss corporation with its principal office or place of business at 18 Faubourg de l'Hôpital, 2000 Neuchâtel, Switzerland.
2. Proposed Respondent neither admits nor denies any of the allegations in the Complaint except as specifically stated in the Decision and Order. Only for purposes of its action, Proposed Respondent admits the facts necessary to establish jurisdiction.
3. Proposed Respondent waives:
  - A. Any further procedural steps;
  - B. The requirement that the Commission's Decision contain a statement of findings of fact and conclusions of law; and
  - C. All rights to seek judicial review of the Decision.
4. This Consent Agreement will not beco

appropriate, or issue and serve its Complaint (in such form as the circumstances may require) and decision in disposition of the proceeding, which may include an Order. *See* Section 2.34 of the Commission's Rules, 16 C.F.R. § 2.34 ("Rule 2.34").

5. If this agreement is accepted by the Commission, and if such acceptance is not subsequently withdrawn by the Commission pursuant to Rule 2.34, the Commission may, without further

**MINICLIP, S.A.**

**FEDERAL TRADE COMMISSION**

By: \_\_\_\_\_

Craig Dixon  
Chief Financial Officer

Date: \_\_\_\_\_

By: \_\_\_\_\_

Ryan M. Mehm  
Jonah Fabricant  
Attorneys  
Bureau of Consumer Protection

**APPROVED:**

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Mark Eichorn  
Assistant Director  
Division of Privacy and Identity Protection

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Maneesha Mithal  
Associate Director  
Division of Privacy and Identity Protection

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Andrew Smith  
Director  
Bureau of Consumer Protection

Date: \_\_\_\_\_

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Jennifer Archie  
Latham & Watkins LLP  
Attorney for Proposed Respondent