



UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
NORTHEAST REGION

One Bowling Green  
Suite 318  
New York, NY 10004  
(212) 607-2829

William H. Efron  
Acting Regional Director

May 18, 2012

Brian Davis, President  
Green Genius, LLC  
1575 Delucchi Lane, Suite #225  
Reno, NV 89502

Re: Green Genius, LLC, FTC File No. 102-3193

Dear Mr. Davis:

The staff of the Federal Trade Commission's Northeast Regional Office has conducted an investigation into whether Green Genius, LLC ("Green Genius") violated Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, in connection with the advertising and promotion of the company's "Biodegradable Plastic Trash Bags." Our inquiry focused on whether Green Genius possessed adequate substantiation for its express and implied claims that its plastic trash bags were, *inter alia*, biodegradable and made with recycled content.

Upon careful review of this matter, including non-public information submitted to the staff, we have determined not to recommend an enforcement action at this time. Among the factors we considered were the company's decision to stop selling Green Genius "Biodegradable Plastic Trash Bags" and the fact that the Green Genius website is no longer accessible to consumers.

Our decision not to pursue an enforcement 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 warrant.

Very truly yours,

A handwritten signature in blue ink that reads "William H. Efron / D.W.D.".

William H. Efron