UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Rebecca Kelly Slaughter, Acting Chair

Noah Joshua Phillips Rohit Chopra Christine S. Wilson

In the Matter of

GENNEX MEDIA LLC, a limited liability company, also d/b/a Brandnex, BrandStrong, PMGOA, and Promotional Manufacturing Group of America; and

DOCKET NO. C-4741

AKIL KURJI, individually and as an officer of GENNEX MEDIA LLC.

COMPLAINT

The Federal Trade Commission, having reason to believe that Gennex Media LLC, a limited liability company also d/b/a Brandnex, BrandStrong, PMGOA, and Promotional Manufacturing Group of America, and Akil Kurji, individually and as an officer of Gennex Media LLC (collectively, "Respondents"), have violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

- 1. Respondent Gennex Media LLC ("Gennex"), also doing business as Brandnex, BrandStrong, PMGOA, and Promotional Manufacturing Group of America, is a Texas limited liability company with its principal office or place of business at 4771 Sweetwater Blvd. #241, Sugar Land, TX 77479.
- 2. Respondent Akil Kurji ("Kurji") is Gennex's sole officer and shareholder. Individually or in concert with others, he controlled or had the authority to control, or participated in the acts and practices of Gennex, including the acts and practices alleged in this complaint. His principal office or place of business is the same as that of Gennex.
- 3. At all times material to this Complaint, Kurji has been responsible for Gennex's ongoing operations. Kurji's responsibilities include, but are not limited to: creating content for the Brandnex.com website; approving changes to the Brandnex.com website; creating content for social media posts; approving all social media content; and creating and approving content for YouTube.

- 4. At all times material to this Complaint, Kurji was responsible for the contracts between Gennex and its suppliers, including overseas suppliers.
- 5. The acts and practices of Respondents alleged in this Complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the Federal Trade Commission Act.
- 6. Since at least 2012, Respondents have advertised, offered for sale, sold, and distributed customizable promotional products to consumers, including, but not limited to, wristbands, lanyards, temporary tattoos, and buttons.
- 7. Respondents have sold their promotional products on their websites including, but not limited to, brandnex.com and pmgoa.com, as well as on third-party sales platforms such as amazon.com.
- 8. Respondents have disseminated or have caused to be disseminated advertisements and promotional materials for customizable promotional products, including but not necessarily limited to the attached Exhibits A through D. These materials contain the following statements and depictions:

A. "Made in USA"





(Exhibit A, Brandnex website)

B. "MADE IN USA"

SUPPORT USA JOBS. WE DO! WADE IN OVER 100 EMPLOYEES AND THEY ARE ALL AMERICAN WE STAND WITH OUR COUNTY

(Exhibit B, Brandnex Price List)

C. "Made in USA" and "USA MADE."



(Exhibit C, Brandnex Facebook Header)

D. "... MANUFACTURED RIGHT HERE IN AMERICA!"



(Exhibit D, Brandnex YouTube Video).

- 9. In numerous instances, including, but not limited to, the promotional materials referenced in Paragraph 8, Respondents have represented, expressly or by implication, that their customizable promotional products are all or virtually all made in the United States.
- 10. In fact, in numerous of these instances, Respondents' customizable promotional products are wholly imported from China.
- 11. In some cases, Respondents' products ship directly from Chinese manufacturers to consumers, without even passing through a U.S. facility controlled by Respondents.
- 12. Therefore, Respondents' express or implied representations that their customizable promotional products are all or virtually all made in the United States deceive consumers.
- 13. Despite knowing that, in numerous instances, Respondents' customizable promotional products are wholly imported from China, Kurji formulated or approved the promotional materials referenced in Paragraph 8.

Count I False or Unsubstantiated Representation – Made in USA

14. In connection with the advertising, promotion, offering for sale, or sale of customizable promotional products, Respondents have represented, directly or indirectly, expressly or by implication, that such products, including the materials and subcomponents used to make such products, are all or virtually all made in the United States.

15. In fact, in numerous instances, Respondents' customizable promotional products are wholly imported or incorporate significant imported materials or subcomponents. Therefore, the representation set forth in paragraph 14 is false or misleading, or was not substantiated at the time the representation was made.

Violations of Section 5

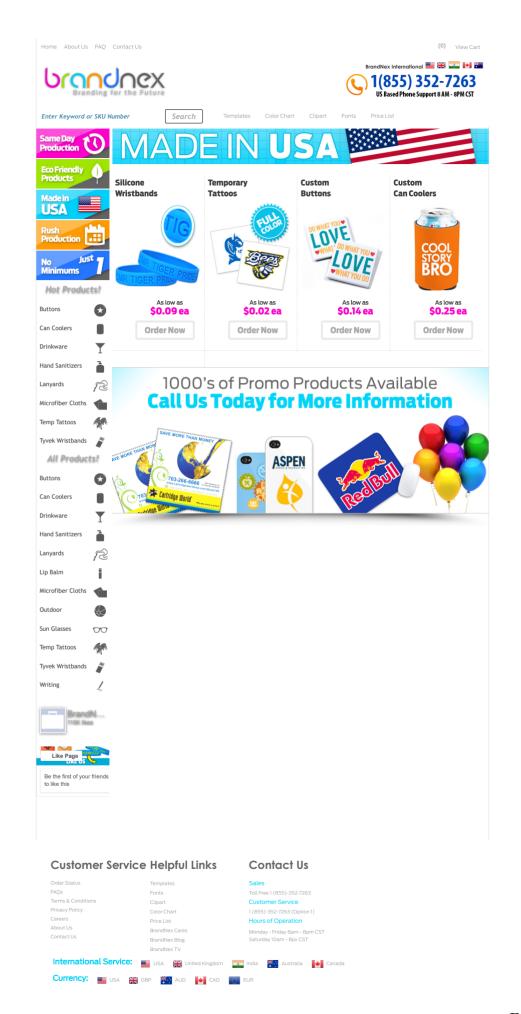
16. The acts and practices of Respondents as alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this ninth day of April, 2021, has issued this Complaint against Respondents.

By the Commission.

April J. Tabor Secretary

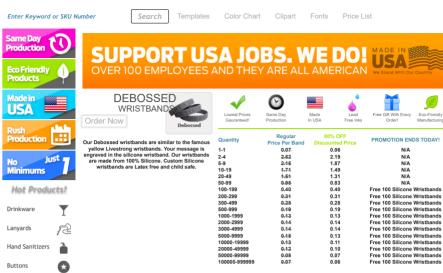
SEAL:



Home About Us FAQ Contact Us (0) View Cart







Temp Tattoos SCREEN PRINTED WRISTBANDS Can Coolers Order Now Microfiber Cloths













Quantity	Regular Price Per Band	80% OFF Discounted Price	PROMOTION ENDS TODAY!
1-1	0.08	0.07	N/A
2-4	2.62	2.28	N/A
5-9	2.55	2.22	N/A
10-19	2.55	2.22	N/A
20-29	1.53	1.33	N/A
30-49	1.53	1.33	N/A
50-74	0.78	0.68	N/A
75-99	0.77	0.67	N/A
100-199	0.44	0.38	Free 100 Silicone Wristbands
200-299	0.44	0.38	Free 100 Silicone Wristbands
300-499	0.44	0.38	Free 100 Silicone Wristbands
500-999	0.23	0.20	Free 100 Silicone Wristbands
1000-1999	0.15	0.13	Free 100 Silicone Wristbands
2000-4999	0.14	0.12	Free 100 Silicone Wristbands
5000-99999	0.10	0.09	Free 100 Silicone Wristbands
4000000000	0.10	0.00	F 400 Ollissons Wilstands











Tyvek Wristbands All Products! Drinkware

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Outdoor Hand Sanitizers Y

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INK INJECTED/COLOR FILLED

WRISTBANDS

Lowest Prices Gauranteed!









PROMOTION EN



Eco-Friendly Manufacturing	
IDS TODAY!	





Order Now



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arkla	300-499
	500-999
	1000-49
	5000-99
Color Filled	10000-9
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silicone	

10-19	2.65	2.30
20-49	2.53	2.20
50-74	1.18	1.03
75-99	1.12	0.97
100-199	0.78	0.68
200-299	0.46	0.40
300-499	0.46	0.40
500-999	0.37	0.32
1000-4999	0.23	0.20
5000-9999	0.16	0.14
10000-99999	0.15	0.13
100000-999999	0.10	0.09

Free	100	Silicone	Wristbands
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Free	100	Silicone	Wristbands









Embossed Silicone Rubber Bracelets are used to a an extra edge to their silicone wristband. The worr and/or logos on the embossed wristbands are raise from the wristband. This is the opposite effect of it Debossed rubber bracelets. The words are not engraved but are raised from the surface of the custom silicone wristband.





80% OFF

0.06 1.73 1.08 0.93 0.48 0.36 0.23 0.14 0.13 0.10 0.10 0.13 0.10







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50-74	1.24
75-99	1.07
100-199	0.55
200-299	0.41
300-499	0.41
500-999	0.26
1000-1999	0.16
2000-4999	0.15
5000-9999	0.12
10000-19999	0.12
20000-49999	0.15
50000-99999	0.12
100000-999999	0.07

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PROMOTION ENDS TODAY

COLOR COATED WRISTBANDS

Order Now

















50-99	2.40	2.09	N/A
100-249	1.07	0.93	Free 100 Silicone Wristbands
250-499	0.98	0.85	Free 100 Silicone Wristbands
500-999	0.94	0.82	Free 100 Silicone Wristbands
1000-1999	0.62	0.54	Free 100 Silicone Wristbands
2000-4999	0.54	0.47	Free 100 Silicone Wristbands
5000-9999	0.39	0.34	Free 100 Silicone Wristbands
10000-99999	0.26	0.23	Free 100 Silicone Wristbands
100000-999999	0.25	0.22	Free 100 Silicone Wristbands

Being the pioneer behind the Color Coat (Dual Layer) silicone wristbands in the industry. Our R&D team designed this type of silicone bracelet for our clients that needed the extra edge so their message really stands out.





1 Inch Debossed wristbands are similar to the Livestrong wristbands. Your message is engraved in the silicone wristband. Our wristbands are made from 100% Silicone. Custom Silicone wristbands are Latex free and child safe.

Lowest Prices	
Gauranteed!	











Poquiar	90% OFF	
Price Per Band	Discounted Price	PROMOTION ENDS TODAY!
22.93	19.94	N/A
10.28	8.94	N/A
6.27	5.45	N/A
5.11	4.44	N/A
4.26	3.70	N/A
3.22	2.80	N/A
0.90	0.78	Free 100 Silicone Wristbands
0.44	0.38	Free 100 Silicone Wristbands
0.38	0.33	Free 100 Silicone Wristbands
0.26	0.23	Free 100 Silicone Wristbands
0.25	0.22	Free 100 Silicone Wristbands
0.25	0.22	Free 100 Silicone Wristbands
0.22	0.19	Free 100 Silicone Wristbands
	22.93 40.28 6.27 5.41 4.26 3.22 0.90 0.44 0.38 0.26 0.26	Price Per Band Discounted Price 22.93 19.94 10.28 8.94 6.27 5.45 4.44 4.26 3.70 0.78 0.78 0.38 0.38 0.38 0.38 0.36 0.22 0.36 0.22 0.36 0.22 0.36 0.22

1 INCH SCREEN PRINTED



Our 1 linch Screen print wristbands are one of our top sellers. Your message and/or Logo will stand out from the rest of the limprinting options we offer. Our printing technology allows us to print with incredible detail at the highest quality manufacturing standas and the lowest prices you can find in the market.

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Quantity	Regular Price Per Band	80% OFF Discounted Price	PROMOTION ENDS TODAY!
1-4	26.38	22.94	N/A
5-9	17.47	15.19	N/A
10-19	9.42	8.19	N/A
20-49	7.12	6.19	N/A
50-74	2.92	2.54	N/A
75-99	2.82	2.45	N/A
100-199	0.90	0.78	Free 100 Silicone Wristbands
200-299	0.84	0.73	Free 100 Silicone Wristbands
300-499	0.67	0.58	Free 100 Silicone Wristbands
500-999	0.61	0.53	Free 100 Silicone Wristbands
1000-1999	0.49	0.43	Free 100 Silicone Wristbands
2000-4999	0.44	0.38	Free 100 Silicone Wristbands
5000-19999	0.41	0.36	Free 100 Silicone Wristbands
20000-49999	0.36	0.31	Free 100 Silicone Wristbands
50000-999999	0.35	0.30	Free 100 Silicone Wristbands

1 INCH INK INJECTED WRISTBANDS





Our 1 Inch Ink Injected Wristbands also known as Color Filled wristbands are simply debossed silicone wristbands with a color ink injected into the engraved letres. If you want the extra WOW factor this silicone wristband is for you.

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Quantity	Regular Price Per Band	80% OFF Discounted Price	PROMOTION ENDS TODAY!
1-4	22.93	19.94	N/A
5-9	10.28	8.94	N/A
10-19	9.13	7.94	N/A
20-49	7.98	6.94	N/A
50-74	6.83	5.94	N/A
75-99	6.27	5.45	N/A
100-199	1.25	1.09	Free 100 Silicone Wristbands
200-299	0.90	0.78	Free 100 Silicone Wristbands
300-499	0.78	0.68	Free 100 Silicone Wristbands
500-999	9.68	0.59	Free 100 Silicone Wristbands
1000-1999	0.56	0.49	Free 100 Silicone Wristbands
2000-4999	0.54	0.47	Free 100 Silicone Wristbands
5000-9999	0.49	0.43	Free 100 Silicone Wristbands
10000-99999	0.47	0.41	Free 100 Silicone Wristbands
000000 000000	0.46	0.40	Eron 100 Silicono Wriethande

1 INCH EMBOSSED WRISTBANDS



Our 1 Inch Embossed Silicone Rubber Bracelets are used to add an extra edge to their silicone wristband. The words and/or logos on the embossed wristbands are raised from the wristband. This is the opposite effect of the Debossed rubber bracelets. The words are not engraved but are raised from the surface of the custom silicone wristband.

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Quantity	Regular Price Per Band	80% OFF Discounted Price	PROMOTION ENDS TODAY!
1-4	28.67	24.93	N/A
5-9	11.43	9.94	N/A
10-19	10.28	8.94	N/A
20-49	9.13	7.94	N/A
50-74	7.98	6.94	N/A
75-99	7.42	6.45	N/A
100-199	1.15	1.00	Free 100 Silicone Wristbands
200-299	0.78	0.68	Free 100 Silicone Wristbands
300-499	0.68	0.59	Free 100 Silicone Wristbands
500-999	0.59	0.51	Free 100 Silicone Wristbands
1000-1999	0.45	0.39	Free 100 Silicone Wristbands
2000-4999	0.44	0.38	Free 100 Silicone Wristbands
5000-9999	0.38	0.33	Free 100 Silicone Wristbands
10000-19999	0.37	0.32	Free 100 Silicone Wristbands
20000-99999	0.36	0.31	Free 100 Silicone Wristbands
100000-999999	0.35	0.30	Free 100 Silicone Wristbands

A \$10 shipping / handling fee applies to 100 Free Wristbands with Half Inch Wristbands order or \$16 shipping / handling fee applies to 100 Free Wristbands with One Inch Wristbands order. Valid with Standard Production and Regular Shipping only. The Free Wristbands must have identical size and messages (including fonts and artworks). Additional colors, options and rush services cost extra. Offer sub-like supplies last. **Please note that pricing reflects orders that are all one size, adult or youth. An additional \$40.00 applies to orders which combine both sizes.

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