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**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAUREN BUSCH,

Defendant.

Case No. _____

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

Plaintiff, the United States of America, acting upon notification and authorization to the Attorney General by the Federal Trade Commission (“FTC”), pursuant to Section 16(a)(1) of the FTC Act, 15 U.S.C. § 56(a)(1), for its Complaint alleges:

1. Plaintiff brings this action under Sections 5(a)(1), 5(m)(1)(A), 12, 13(b), and 16(a)(1) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 45(a)(1), 45(m)(1)(A), 52, 53(b), and 56(a)(1), and Section 1401 of the COVID-19 Consumer Protection Act of the

2021 Consolidated Appropriations Act (“CCPA”), Pub. L. No. 116-260, § 1401, 134 Stat. 1182, 3275-76 (2020), which authorize Plaintiff to seek, and the Court to order, permanent injunctive relief, civil penalties, and other relief for Defendant’s acts or practices in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52, and Section 1401 of the CCPA.

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), 1345, and 1355.

3. Venue is proper in this District under 28 U.S.C. § 1391(b)(1), (b)(2), (c)(1), and 15 U.S.C. § 53(b).

DEFENDANT

4. Defendant Lauren Busch (“Defendant”) is a former Registered Nurse. Until February 2022, Defendant was a distributor for doTERRA International, LLC (“doTERRA”), a Utah-based multi-level marketing company that sells essential oils, supplements, and other products. Defendant held the rank of doTERRA Diamond at the time her doTERRA distributorship was terminated. Defendant resides in this district, and, in connection with the matters alleged herein, transacts or has transacted business in this District and throughout the United States.

COMMERCE

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

DEFENDANT’S BUSINESS ACTIVITIES

6. Defendant promoted doTERRA products and business opportunities through numerous means, including through: her website <https://www.holisticesentials.org/>; social media accounts at https://www.instagram.com/holisticesentials_/, <https://www.instagram.com/lauren.n.Busch/>, <https://www.facebook.com/holisticesentialsteam>, <https://www.facebook.com/lauren.busch.90>, and <https://www.youtube.com/c/JohnandLaurenBusch>; and online webinars. Defendant has represented that certain doTERRA essential oil and supplement products (“doTERRA Products”) are effective in preventing and treating Coronavirus Disease 2019 (“COVID-19”).

7. Defendant organized a series of eight webinars featuring doTERRA distributor presenters who were current or former health-care practitioners, scheduled to take place weekly between January 12 and March 2, 2022. Defendant heavily promoted these webinars on her website and social media accounts, providing information to enable people to register and join the webinars on Zoom. The first three webinars – on January 12, 19, and 26, 2022 – were all titled “The Path Forward: Protocols for the Current Climate.”

8. Defendant moderated the first webinar on January 12, 2022, which had approximately 500 participants. In Defendant’s opening remarks – which preceded remarks from

other doTERRA distributors claiming that specific doTERRA Products could prevent, treat, or cure COVID-19, including long-haul COVID, in both adults and children – Defendant stated:

“Tonight, what we’re discussing is solutions that you can have in your home, protocols that have been found to be completely effective and amazing by practitioners who are actually working with patients who are struggling right now and that they have been very successful with....

Tonight is just about solutions. It’s about coming together and talking about things that we know work, things that you can do right now. And so tonight, the layout is we’re going to discuss a little bit about prevention, we’re going to talk a little bit about treatment, we’re going to talk about post-COVID issues and we’re going to talk about recovery for those of you or people that you may love or know that may have struggled from vaccine reactions.”

9. Defendant was a presenter at the January 19, 2022 webinar, during which she explained that her background was as a medical ICU step-down nurse and stated:

a. “If you have a doTERRA wholesale account, go into the kits and collections. Guess what? There’s one named Immune Support. I mean, a lot of the things that we’re going to talk about right now, doTERRA has already put them together in bundles for you, where you save even more. So go check those out. So some of the things that you want to have on hand as you’re stepping up support – maybe you feel like something might – might be brewing in you right now, these are the things that you should be bumping up.

So your LLV [Lifelong Vitality Pack] ... if you’re not eating a healthy diet, if you’re already dealing with deficiencies, or if you’re dealing with a disease process, the four of each bottle a day is not enough. I know some of you are like, I can’t swallow it. Yes, you can. You can swallow another capsule if it means you will maintain your health, I promise.

Black pepper, a massive anti-inflammatory oil. Black pepper is so incredibly powerful....

You understanding these little things that Kelly and I are sharing with you right now, they can save lives, but you need to know....

Anyways, black pepper, aromatic science. You can click on the oil. Black pepper – look at all the powerful research on the power of black pepper essential oil, right?

Glutathione, another amazing, amazing tool.

DDR Prime is – just like LLV should be part of your daily routine, DDR Prime should be a nonnegotiable, especially with all the exposures we have in this world beyond just what's going on with COVID.

Turmeric, guys, turmeric is like – it's a fad right now.... We have a form of turmeric that has a 96 percent bioavailability. That's pretty much unheard of.... We're actually able to take those amazing – that curcumin and the tumerones and they're actually able to be utilized by the body to do all the powers that it can with reducing inflammation in the body.

And this – this virus, it – it thrives in inflammation. And we often look at like, whoa, somebody has these symptoms and somebody has these symptoms and, yeah, it's different variants and it's going to attack a little bit differently, but it thrives in the place that we have the most inflammation, and people see symptoms that are very different because those are where their body is inflamed.

PB Assist Junior or PB Assist Plus – PB Assist Junior for the kids, we'll talk about in a minute – 70 percent to 80 percent of your immune system is in your gut. That's the food you eat, that's the things you drink, that's the complete lack of an immune system. If you've taken antibiotics, you have to restore – you have to restore your immune system. You have to put those good bacteria back in there so the bad bacteria don't get out of whack.

When the bad bacteria get out of whack, guess what? It makes your body incredibly vulnerable to viruses and other pathogens that come in, because it's like, ugh, I'm trying to deal with what's going on down here, I can't handle one more thing, you deal with it up there, and your body's like, oh, but you're the immune system, I'm not really sure what I'm supposed to do, and then we get ill, right?

Same thing with On Guard Plus. This is On Guard Oil plus black pepper plus melissa. It has all these extra amazing oils in it, right, and this makes it really easy for you not to be like let me just figure out my own little formula, right? It's already done for you. But, again, when we're already feeling something brewing, one to two capsules a day, it's not enough. It's time to up it. Maybe you're taking two capsules every three hours instead, right, and using these.

Also, like just throwing this out because of what Kelly shared, I just had family fly into town. So guess what? In the car, On Guard spray is getting sprayed everywhere, there's On Guard wipes in there, right? I'm telling everybody put the oils in your hand, it's time to breathe it in. We're going to make sure those pathways are clear before we go hugging and snuggling on the grandkids, right? There are amazing things that we can do to set our body up for success."

[Defendant made these statements as a slide titled "When you need to step up support" was displayed. This slide included labeled depictions of several doTERRA Products, including LLV (Lifelong Vitality Pack), black pepper essential oil, DDR Prime, Turmeric Dual Chamber Capsules, PB Assist, and On Guard Softgels.]

- b. "Lifelong Vitality, at least a full dose daily. You can up it from there, especially when something's brewing.

Two to four of the doTERRA Turmeric Dual Capsules; four if you're over 175 pounds. Two drops of black pepper essential oil. I did that with a little bit of honey just recently. It was really wonderful. So that's a great way to get your black pepper in you. Two doTERRA On Guard Softgels twice a day. You can increase it to three times a day. Two doTERRA DDR Prime Softgels daily; four of the PB Assist Probiotics daily...."

[Defendant made these statements as a slide titled "When you need to step up support" was displayed. This slide included the following text:

- "Foundational with doTERRA Life Long Vitality vitamins (full dose daily)

- 2-4 doTERRA Turmeric Dual Chamber Capsules (4 for >175lbs) + 2 drops blk pepper EO
 - 2 doTERRA OnGuard Softgels twice daily (can increase to 3 2x daily for >175lbs)
 - 2 doTERRA DDR Prime Softgels daily
 - 4 doTERRA PB Assist probiotic daily...
 - 2 doTERRA Copaiba Softgels nightly and 1 by day for anxious feelings...
 - 2 doTERRA Serenity Softgels for sleep support.”]
- c. “So I love the simplicity that essential oils provide. And I think sometimes when we look at – but this is a really, big, scary thing that we – we undermine the importance of utilizing our essential oils. Again, just like Kelly mentioned earlier, massive amount of research on eucalyptus right now. So some things that I would be reaching for on a daily basis if I felt like I might be coming under the weather, eucalyptus is one of them.

Simply, in our household, it’s really easy. When my kids are in the shower, usually there’s at least two at a time, two girls, two boys, two girls, taking time in the shower, I’m just going around shower to shower in the house and throwing eucalyptus in the back of the shower. It’s a really easy way to kind of steam it in.

If we need a little bit more intense support, a steam mug. You take a coffee mug, you fill it about halfway with boiling water. If you have a child, you need to be monitoring them, obviously, boiling water. And you put in your oils, right?

Things like Breathe, things like eucalyptus, tulsi basil, Air X. I love using lemon. I love putting On Guard in there. Guys, there have been moments that I have put oregano in there. I will tell you that that is very wicked feeling, but it’s what I needed to knock out whatever was going on in my sinus cavity.

So simply eucalyptus, frankincense, On Guard, these are all amazing. It steams up. You just throw a towel over your head and you’re just kind of breathing it in. If you have a little one, please help them to keep their eyes closed. You’re going to also prefer to have your eyes closed as well. It’s not going to feel good....

A diffuser should be going in every room of your house. That is a simple, easy, daily routine that is protective, that is supportive,

easy, and you can rotate between Breathe – it’s not a coincidence that doTERRA brings things out like Holiday Joy and Holiday Peace in the wintertime. Diffuse them. There’s a very good reason why they came out at the time of year that they came out. Northern Escape, things like that.

Abode. Purify. Use all the oils. Rotate between them. They all have amazing properties, and being able to rotate between these powerful tools is such a beautiful gift. And I will tell you, the last tip in our house, every single day, I add oils to the air filters of my home. One, it cleans out whatever’s floating through my house, and I have a lot of people in my house so I need the air as clean as possible, right?”

[Defendant made these statements as a slide titled “When you need to step up support” was displayed. This slide included the text “The Steam Mug breathe eucalyptus tuls basil air x”; a depiction of doTERRA Breathe Respiratory Drops; a depiction of a diffuser and a bottle of doTERRA essential oil; and labeled depictions of Abode, Eucalyptus, and Purify doTERRA essential oils.]

- d. “Gargling, I love how people wanted to make fun of this last week, that we said use mouthwash and everything’s all better. That’s most definitely not what we said. But being aware that where a virus tends to replicate and thrive in the body, including oral and nasal passages, and cleaning out those pathways so it doesn’t have a place to breed is incredibly important.

So by no means am I saying that doTERRA’s On Guard mouthwash is going to cure COVID. But I am telling you if you know that this virus likes to hang out up your nose and in your mouth and it likes to replicate really fast right there, why would we not get that cleaned out of our mouth and our nose. And diffusing is a great way to do it. I mean, oils right in the hand, breathe in and I’m killing off what’s sitting and trying to thrive inside my nasal passages, right?

Immune Honey, this is a great way to give it to kids, obviously older than one, but kids like honey and that’s an easy way to be able to get oils in them. So this is a great recipe that Dr. Wong shared last week....

So the recipe that Dr. Wong – Tina Wong shared, it says ten drops of each in the honey. It is ten drops of frankincense, ten drops of lemon, ten drops of On Guard, ten drops of tea tree, and a half a cup of honey. And for five days, you can add in the ten drops of oregano. Obviously, for little ones, that might be a little bit much, but for us adult ones, that’s great. But only five days with it – with the oregano in it. So maybe you want to make yourself up two batches and then you can give yourself a break in between.”

[Defendant made these statements as a slide titled “When you need to step up support” was displayed. This slide included a recipe for “Immune Honey” and the text:

- “Steam mug as needed (don’t be afraid to add other oils like lemon, frank, ginger, melissa) ...
- Gargle 4x per day with onguard mouthwash
- Diffuse abode, onguard with additional eucalyptus around the home
- Support for airways: Breathe blend, breathe stick, breathe drops
- Support for the throat: Immune honey, gargle with OG mouthwash + can add 1 drop of oregano + clove for intense throat support...
- Epsom Salt baths with deep blue, air x, lavender...”]

- e. “So I know for a lot of people, there’s a good amount of people that are actually getting diagnosed with Long Haul and, you know, for a virus that has done such a brilliant job at causing an immense amount of inflammation, for some people, that inflammation process doesn’t stop and it just – it just cascades into something a lot larger and it tends to work its way through the body.

So what are you going to do if the symptoms last a lot longer than they are for everybody else? And it’s the same things that we’ve been doing. LLV – and, again, you might need to up the dose.

Zendocrine Complex, we’re going to support your detoxification organs. DDR Prime, it’s an incredibly powerful oil. Again, regardless of – regardless of COVID, DDR Prime should be something that we all consider taking on a daily basis, and same thing with turmeric. We’re trying to calm our body down. It is overreacting. It’s – it’s over-fighting and there’s damage being left behind.

So what can we do to calm ourselves down, to calm our body systems down? I cannot speak highly enough of the Turmeric Duo

[sic] Caps. I'll talk about the CRS, but the Turmeric Duo [sic] Caps are amazing and, again, you can take more than one to two a day, just like we've been talking for some of the other protocols. You can up the amount that you're using every single day."

[Defendant made these statements as a slide titled "WELLNESS for Prolonged Support" was displayed. The slide included labeled depictions of several doTERRA Products, including LLV (Lifelong Vitality Pack, which includes xEO Mega, Microplex VMz, and Alpha CRS+), Zendocrine Complex, DDR Prime, and Turmeric Dual Chamber Capsules.]

- f. "Okay. So let's crank through the pediatrics. Guys, it's basically a repeat for adult, just in kid doses, right? So we have the kids' Omegas, the A to Z Chewables. I happen to love – there's some really great brands of other vitamins out there that I use in addition to our A to Z, especially a B and vitamin D, things like that – that spray. My kids love them, our vitamin C spray. So things like that, adding extras in for your kids, great. The On Guard Chewables, amazing. Same thing that we would tell you to use. PB Assist, kids PB Assist Jr. is amazing.

Oils to have on hand, Kelly already mentioned the power of Stronger. It's definitely an amazing oil for kids. It's great for adults, too. Frankincense every single day. That's going on my – it's going on my children's bodies, right?"

[Defendant made these statements as a slide titled "Pediatric Wellness + Immune Support" was displayed. This slide included labeled depictions of several doTERRA Products, including A-Z Chewables, IQ Mega, On Guard Chewables, PB Assist Jr, frankincense essential oil, and Stronger essential oil.]

- g. "LLV, there's a lot of cardiovascular and neurological issues that people are seeing post-vaccination. Again, I'm not telling you don't do it. I'm just telling you if you were to have a reaction, here are some things you can do, right? So LLV, kids Omegas, lots and lots of Omegas. In fact, for those who are dealing with post-vaccination reactions, you're going to quadruple the Omegas from our LLV. I can't – or you've got to find another Omega that you can add in. Omegas, you should be taking about 4,000 milligrams

to deal with the inflammatory process, especially neurological or cardiovascular.

Zendocrine Complex, this is an amazing one. Maybe you want to start with one or two, but you're going to work your way up. You might be taking six to eight of these a day. Turmeric Duo [sic] Cap, again, it's an inflammatory process....

The idea of a vaccine, the way that they work is they're telling your immune system to do something, and if the immune system wasn't prepared to do so, it's going to overreact. It's going to be the dog that bites you. How do we calm things back down? Turmeric Duo [sic] Caps are amazing. DDR Prime, amazing. Copaiba, amazing. They should be things that we're using every single day in much larger doses than we would on just a daily maintenance routine."

[Defendant made these statements as a slide titled "POST-VACCINATION SUPPORT BASICS" was displayed. This slide included labeled depictions of several doTERRA Products, including Lifelong Vitality Pack (which includes xEO Mega, Microplex VMz, and Alpha CRS+), Zendocrine Complex, Turmeric Dual Chamber Capsules, DDR Prime, and Copaiba Softgels.]

- h. "There's also amazing research on essential oils that inhibit the SARS-COVID-2 [sic] spike protein. And one of the things I like doing is if you just come into the abstract, it actually lists off what are some of the chemical compounds that do this, right?"

So monoterpenes – some of these should sound a little bit familiar, monoterpenes, cinnamaldehyde, carvacrol, geraniol, cinnamyl acetate, L-4-terpineol, thymol. These are things that are actually in several of our oils, right? So again, diffusing on a daily basis and getting those oils on, a powerful, powerful resource."

[Defendant made these statements as a slide titled "SUPPORT PROTOCOLS FOR POST VACCINATION" was displayed. This slide displayed the abstract from an article titled "Computational evaluation of major components from plant essential oils as potent inhibitors of SARS-CoV-2 spike protein."]

10. Defendant was one of several presenters at the third Zoom webinar in the series, on January 26, 2022. During this webinar, Defendant introduced herself as a former medical ICU nurse and made the following statements:

- a. “We all have medical backgrounds. I’ve given many vaccinations. I’m just wanting you to be realistic that if that is the choice that you have made and a reaction happened, we don’t want you to feel hopeless or helpless....

So if your decision was to get vaccinated or if you needed to because of a job or someone you loved and they are having a reaction or they had a reaction that they’re struggling with afterwards, we just want you to know that there’s a really great set of tools to have on hand and some things that are really supportive....

When we talk about adults, LLV, and I don’t know if this was mentioned or not already, our LLV was formulated to take an ideal healthy diet to ideal nutritional levels. That’s what it was formulated for. So someone’s already depleted – somebody’s already struggling with a massive inflammation process. You might have to take more than four of each of those capsules, especially your IQ Megas [sic]. Omegas are a very powerful anti-inflammatory and when we look at where the inflammation is following post-vaccination, it is cardiovascular and neurological, your two targeted areas. They also happen to be two areas that really love Omegas and Omegas can be incredibly powerful at soothing and calming and being incredibly supportive for.

So if it were me, I would be looking at the Omegas and I would probably be tripling the amount of Omegas that I was taking if not more, because Omegas are that powerful.

Zendocrine Complex, obviously, supporting the detoxification pathways, supporting the parts of your body system that deal with inflammation. We’ve actually seen a lot of recent stories about people who have had – even just having the virus itself, but also post-vaccination, it’s triggering type 2 diabetes. We want to support the organs that are all getting more inflamed. So Zendocrine Complex on a daily basis is amazing.

Can’t speak highly enough about the Turmeric Duo [sic] Caps. If you haven’t noticed, they have been mentioned at every part of this

presentation and that is because inflammation is the cause of most of the issues we see with both the disease process but also post-vaccination.

Turmeric. And I would be doing the same dosage that Eliza shared with you for while you're dealing with an active infection. We're going to also follow the exact same protocols for post-vaccination, right?

DDR Prime, again, throughout this entire presentation, we've talked about it, we cannot speak highly enough of it. This should be part of your daily regime.

And copaiba, again, another amazing essential oil that is incredibly powerful and targeted for cardiovascular and neurological issues. So amazing set of tools that we actually have on hand."

[Defendant made these statements as a slide titled "POST-VACCINATION SUPPORT BASICS" was displayed. This slide included labeled depictions of several doTERRA Products, including Lifelong Vitality Pack (which includes xEO Mega, Microplex VMz, and Alpha CRS+), Zendocrine Complex, Turmeric Dual Chamber Capsules, DDR Prime, and Copaiba Softgels.]

- b. "There was also a really great – research on different oils that are protein – yeah, spike protein inhibitors. So again, when we talk about diffusing, if you're just worried about exposure, period, diffusing couldn't be a more powerful tool. I took my kids out today just because I don't feel like bringing anything else into the house, we're using On Guard surface spray, using it on our hands, but I also have my kids put a drop or two of essential oil in their hands, take a deep breath.

So just like we talked about flushing out those nasal cavities, breathing in an essential oil either because it's diffused, because you have it in your hands, because I put it on my kids' chests and they tent it up like this. This is a great way to be very protective for your mucosal linings, for your – and for your airway, right?"

[Defendant made these statements as a slide titled "SUPPORT PROTOCOLS FOR POST VACCINATION" was displayed. This slide displayed the abstract from an article titled "Computational evaluation of major components from plant essential oils as potent inhibitors of SARS-CoV-2 spike protein."]

11. At present, there is no published report of any well-controlled human clinical study to substantiate that any of the doTERRA Products referenced above: treat, prevent, reduce the risk or severity of, or cure COVID-19; treat, prevent, reduce the risk or severity of, or cure long-haul COVID-19; or counteract inflammation or other purported negative effects of COVID-19 vaccines.

12. Based on the facts and violations of law alleged in this Complaint, Plaintiff has reason to believe that Defendant is violating or is about to violate the FTC Act and the CCPA.

VIOLATIONS OF THE FTC ACT

13. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits “unfair or deceptive acts or practices in or affecting commerce.”

14. Misrepresentations or deceptive omissions of material fact constitute deceptive acts or practices prohibited by Section 5(a) of the FTC Act.

15. Section 12 of the FTC Act, 15 U.S.C. § 52, prohibits the dissemination of any false advertisement in or affecting commerce for the purpose of inducing, or which is likely to induce, the purchase of food, drugs, devices, services, or cosmetics. For the purposes of Section 12 of the FTC Act, 15 U.S.C. § 52, doTERRA Products are “drugs” as defined in Section 15(c) of the FTC Act, 15 U.S.C. § 55(c).

16. Enacted on December 27, 2020, the CCPA makes it unlawful, for the duration of the public health emergency declared on January 31, 2020 pursuant to Section 319 of the Public Health Service Act, for any person, partnership, or corporation to “engage in a deceptive act or practice in or affecting commerce in violation of Section 5(a) of the [FTC] Act (15 U.S.C. 45(a))

that is associated with . . . the treatment, cure, prevention, mitigation, or diagnosis of COVID-19.” CCPA § 1401(b)(1). As of the date of the filing of this Complaint, the public health emergency remains in effect.

17. The CCPA provides that “[a] violation of subsection (b) shall be treated as a violation of a rule defining an unfair or deceptive act or practice prescribed under Section 18(a)(1)(B) of the [FTC] Act (15 U.S.C. § 57a(a)(1)(B)).” CCPA § 1401(c)(1).

18. Section 5(m)(1)(A) of the FTC Act, 15 U.S.C. § 45(m)(1)(A), as modified by Section 4 of the Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461, as amended, and as implemented by 16 C.F.R. § 1.98(d), authorizes this Court to award monetary civil penalties for each violation of Section 5(a) of the FTC Act pursuant to the CCPA, 16 C.F.R. § 1.98(d).

COUNT ONE

19. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of doTERRA Products, including through the means described in Paragraphs 6-10 of this Complaint, Defendant has represented, directly or indirectly, expressly or by implication, that doTERRA Products:

- a. treat, prevent, reduce the risk or severity of, or cure COVID-19 in both adults and children;
 - b. treat, prevent, reduce the risk or severity of, or cure long-haul COVID-19;
- and

- c. counteract inflammation or other purported negative effects of COVID-19 vaccinations.

20. On or after December 27, 2020, Defendant made the representations set forth in Paragraph 19, which are associated with the prevention, mitigation, treatment, or cure of COVID-19.

21. The representations set forth in Paragraph 19 are false or misleading or were not substantiated at the time the representations were made.

22. Therefore, the making of the representations set forth in Paragraph 19 of this Complaint constitutes a deceptive act or practice and the making of false advertisements in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

23. Defendant committed the violations set forth in Paragraph 22 with the knowledge required by Section 5(m)(1)(A) of the FTC Act, 15 U.S.C. § 45(m)(1)(A).

CONSUMER INJURY

24. Consumers are suffering, have suffered, and will continue to suffer substantial injury as a result of Defendant's violations of the FTC Act. Absent injunctive relief by this Court, Defendant is likely to continue to injure consumers and harm the public interest.

PRAYER FOR RELIEF

Wherefore, Plaintiff requests that the Court:

- A. Enter a permanent injunction to prevent future violations of the FTC Act and the CCPA by Defendant;
- B. Award Plaintiff monetary civil penalties from Defendant for every violation of Section 5(a) of the FTC Act pursuant to the CCPA; and
- C. Award any additional relief as the Court determines to be just and proper.

Dated: January 5, 2023

Respectfully submitted,

FOR THE FEDERAL TRADE
COMMISSION:

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