



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Division of Advertising Practices

February 27, 2018

Andrew P. Bridges, Esq.
Fenwick & West LLP
555 California Street
12th Floor
San Francisco, CA 94104

Re: Labdoor, Inc., FTC File No. 182-3003

Dear Mr. Bridges:

As you know, the staff of the Federal Trade Commission's Division of Advertising Practices has conducted an investigation into advertising by your client, Labdoor, Inc., for possible violations of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, in connection with its dietary supplement rating and ranking service. The staff's investigation followed a referral from the National Advertising Division of the Council of Better Business Bureaus ("NAD") after Labdoor declined to participate in NAD's self-regulatory process.

Upon careful review of this matter, including non-public information submitted to the staff, we have determined not to recommend enforcement action at this time. In coming to this conclusion, we considered a number of factors related to resource allocation and enforcement priorities, as well as the nature of any FTC Act violation and the type and severity of any consumer injury.

This action is not to be construed as a determination that a violation of law did not occur, 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, appearing to read "Devin W. Domond".

Devin W. Domond
Chief of Staff
Division of Advertising Practices

cc: Laura Brett, Director, NAD