

UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION

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In the Matter of		)	
		)	
PRINCE LIONHEART, INC.		)	
a corporation, and		)	
		)	DOCKET NO.
THOMAS E. McCONNELL,		)	
individually and as President		)	
of the corporation.		)	
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**COMPLAINT**

The Federal Trade Commission, having reason to believe that Prince Lionheart, Inc., a corporation, and Thomas E. McConnell, individually and as President of the corporation (“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 Prince Lionheart, Inc., is a California corporation with its principal office or place of business at 2421 South Westgate Road, Santa Maria, California 93455.
2. Respondent Thomas E. McConnell is President of the corporation. Individually or in concert with others, he formulates, directs, or controls the policies, acts, or practices of the corporation, including the acts or practices alleged in this complaint. His principal office or place of business is the same as that of Prince Lionheart, Inc.
3. 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.
4. Respondents have manufactured, advertised, labeled, offered for sale, sold, and distributed to the public an Electronic Mosquito Repeller called the “Love Bug.”
5. Respondents have disseminated or have caused to be disseminated advertisements for the Electronic Mosquito Repeller or “Love Bug,” including but not necessarily limited to the attached Exhibits A and B. These advertisements contain the following statements:

A. **“Electronic Mosquito Repeller**  
Helps protect your Baby from WEST NILE VIRUS! Repels mosquitoes effectively without the mess of costly sprays or lotions, and without potential danger to infants. The Electronic Mosquito Repeller emits a safe, barely audible tone that emulates the sound of a dragonfly’s wing beat – the mosquito’s mortal enemy! Clips to strollers, playpens, carriers, car seats and more!”  
[<http://www.princelionheart.com>, 8/26/03, Exhibit A]

B. **“LOVE BUG  
KEEPS MOSQUITOES AWAY FROM BABY!**

- Love Bug repels mosquitoes by electronically duplicating the wingbeat of the dragonfly – the mosquito’s mortal enemy!
- The safe, low-level tone is barely audible to humans, but mosquitoes hear it loud and clear and run for cover.
- Clip Love Bug to a stroller or playyard and watch the mosquitoes scatter! Effective within a 20 - 30 foot radius.
- Love bug emits a safe, barely audible tone that emulates the sound of a dragonfly’s wingbeat (mosquitoes HATE dragonflies!).
- Love Bug is as effective as costly sprays or lotions but without the mess and potential danger to infants with skin sensitive to strong chemicals.”  
[product package, Exhibit B]

6. Through the means described in Paragraph 5, respondents have represented, expressly or by implication, that:

- A. The Electronic Mosquito Repeller or “Love Bug” effectively repels mosquitoes from a baby.
- B. The Electronic Mosquito Repeller or “Love Bug” is an effective alternative to the use of chemical products formulated to repel mosquitoes.
- C. Use of the Electronic Mosquito Repeller or “Love Bug” protects babies against contracting the West Nile virus.

7. In truth and in fact:
  - A. The Electronic Mosquito Repeller or “Love Bug” does not effectively repel mosquitoes from a baby.
  - B. The Electronic Mosquito Repeller or “Love Bug” is not an effective alternative to the use of chemical products formulated to repel mosquitoes.
  - C. Use of the Electronic Mosquito Repeller or “Love Bug” does not protect babies against contracting the West Nile virus.

Therefore, the representations set forth in Paragraph 6 were, and are, false or misleading.

8. Through the means described in Paragraph 5, respondents have represented, expressly or by implication, that they possessed and relied upon a reasonable basis that substantiated the representations set forth in Paragraph 6, at the time the representations were made.

9. In truth and in fact, respondents did not possess and rely upon a reasonable basis that substantiated the representations set forth in Paragraph 6, at the time the representations were made. Therefore, the representation set forth in Paragraph 8 was, and is, false or misleading.

10. The acts and practices of respondents as alleged in this complaint constitute unfair or deceptive acts or practices, and the making of false advertisements, in or affecting commerce in violation of Sections 5(a) and 12 of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this     day of             , 2004, has issued this complaint against respondents.

By the Commission.

Donald S. Clark  
Secretary

SEAL: