

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

COMMISSIONERS: **Joseph J. Simons, Chairman**
 Noah Joshua Phillips
 Rohit Chopra
 Rebecca Kelly Slaughter
 Christine S. Wilson

In the matter of

**EASYBUTTER, LLC, a limited liability
company, also doing business as Hempme,**

and

**MICHAEL SOLOMON, individually and as an
officer and owner of EASYBUTTER, LLC and
PET HELP, LLC.**

DOCKET NO.

COMPLAINT

The Federal Trade Commission, having reason to believe that EasyButter, LLC., a limited liability company, and Michael Solomon, individually and as officer and owner of EasyButter, 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 EASYBUTTER, LLC (“EasyButter”) is a Florida limited liability company with its principal place of business at 1289 Clint Moore Rd, Boca Raton, FL 33487.
2. Respondent MICHAEL SOLOMON (“Solomon”) is an owner and President of EasyButter and is the owner. Individually or in concert with others, Michael Solomon controlled or had the authority to control, or participated in the acts and practices of EasyButter, including the acts and practices set forth in this Complaint. His principal office or place of business is the same as that of EasyButter.
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.

Respondents’ Marketing of CBD Products

4. Cannabidiol (“CBD”) is a substance naturally occurring in, and that can be extracted from, the hemp plant, *cannabis sativa*. Respondents have advertised, promoted, offered for sale, sold, and distributed products containing CBD (“CBD Products”) that are intended for human use. These CBD Products are “food” and/or “drugs,” within the meaning of Sections 12 and 15 of the Federal Trade Commission Act.

5. Consumers can purchase Respondents’ CBD products by calling (833) 743-6763 or by ordering online at www.hempmeCBD.com.

6. Respondents’ CBD products are offered for human and animal consumption and topical application in a variety of products, including oils, creams, hemp shea butter, bath bombs, lip balms, gummies, hemp tabs, honey sticks, lozenges, and assorted pet products.

7. These products are sold to consumers under the names: “Hempme Hemp Shea Butter;” “Hempme Facial Moisturizer;” “Hempme Hemp Repair RX Pain;” “Hempme CBD Gummy Bears;” “Hempme Hemp Gummies;” “Hempme CBD Tablets;” “Hempme CBD Organic Gummy;” “Hempme CBD Sugarfree Gummy;” “Hempme Gummy Worms;” “Hempme Energy Lemon Haze Terpene Hemp Lozenges;” “Hempme Relax Grape/Grand Daddy Purp Terpene Hemp Lozenges;” “Hempme CBD Honey Sticks;” “Hempme Hemp Oil;” “Hempme Roll On Menthol Temple Massage;” “Hempme CBD Massage Oil;” “Hempme Cinnamon Hemp Oil;” “Hempme Blueberry Hemp Oil;” “Hempme Peppermint Hemp Oil;” “Hempme Peach Hemp Oil;” “Hempme Strawberry Hemp Oil;” “Hempme Citrus Skin Care Pump;” Hempme Pre-Rolled Tube (Strawberry);” “Hempme Pre-Rolled Tube (Pineapple);” “Hempme Pre-Rolled Tube (Kush);” “Hempme Strawberry CBD Oil Cartridge;” “Hempme Blueberry CBD Oil Cartridge;” “CBD Disposable Vapor Pen (Relax);” “CBD Disposable Vapor Pen (Energy);” “Hempme Bubble Gum CBD Oil Cartridge;” “Hempme Watermelon CBD Oil Cartridge;” “Hempme Fruit Punch CBD Oil Cartridge;” and “Hempme Pineapple CBD Oil Cartridge.”

8. Respondents represent, directly or indirectly, expressly or by implication through their websites and in product labels depicted on their websites that Respondents’ CBD products prevent diabetes or treat or cure a variety of ailments, including AIDS, acne, autism, bipolar disease, cancer, depression, epilepsy, post-traumatic stress disorder (PTSD), and seizures.

9. Respondents charge consumers \$12.95 to \$305.95 for Respondents’ CBD products, plus shipping and handling.

Respondents’ Advertising and Marketing

10. Since at least January 2018, to induce consumers to purchase their products, Respondents have disseminated or caused to be disseminated advertisements and promotional materials. Respondents have promoted CBD products through the website www.hempmeCBD.com and social media. These advertisements and promotional materials have contained the following representations or statements, among others:

A. From Respondents' website, www.HempMeCBD.com, captured on January 6, 2020:

i. **"A Real Life-Saver**

Doctors have just recently been able to truly study [CBD's] effects on the human bod (sic), and its ability to alleviate the symptoms of conditions ranging from AIDS to seizures is showing incredible results. CBD's anti-psychotic properties can help with people's mental health issues. People suffering from PTSD, Anxiety & Depression have seen major improvements from consistent doses of the compound, and Doctors around the world are beginning to recommend CBD over prescription medications."

ii. "Also, in a recent study, Israeli research has shown an 80% success rate in reducing problematic behavior in children with Autism using CBD."

iii. "It is theorized that the reason CBD has such a positive effect could be because of its impact on cannabinoid receptors inside the brain of someone with Autism. CBD appears to 'open' these receptors' pathways to allow molecules to act on them. These pathways were previously closed off by the condition."

iv. "Depression is an emotional cause of sleeping challenges. Also, lack of enough sleep can cause depression. Sleep deprivation also makes one agitated, tense and irritable and the effects can be overwhelming. Since depression is rooted in the nervous system, it's often caused by chemical imbalance. According to Dr. Charles Raison, CNN's mental health expert, CBD oil can restore the chemical imbalance and help in dealing with depression, leading to improved sleep."

v. "Some of the top health benefits of CBD oil has been known to cure are seizures, anxiety, depression, and cancer-related symptoms. It has even been proven to aid in substance abuse treatment and diabetes prevention."

vi. "Also it has a profound effect on helping people dealing with: Acne, Stomach illness, Even cancer symptoms."

vii. "CBD has a profound effect on helping people dealing with . . . cancer symptoms"

- viii. “CBD is commonly known to alleviate ailments related to mental diseases such as: Epilepsy Depression Bipolar.”

Count I
False or Unsubstantiated Efficacy Claims

11. In connection with the advertising, marketing, promotion, offering for sale, or sale of CBD products, including through the means described in Paragraph 10, Respondents have represented, directly or indirectly, expressly or by implication, that their CBD products prevent diabetes and treat acne, AIDS, autism, bipolar disorder, cancer, depression, epilepsy, PTSD, seizures, and substance abuse.

12. The representations set forth in Paragraph 11 are false or misleading or were not substantiated at the time the representations were made.

Count II
False Establishment Claims

13. In connection with the advertising, marketing, promotion, offering for sale, or sale of CBD products, including through the means described in Paragraph 10, Respondents have represented, directly or indirectly, expressly or by implication, that:

- A. tests or studies prove that their CBD products treat autism; and
- B. doctors recommend CBD over prescription medications for depression and PTSD.

14. In fact, tests or studies do not prove that CBD treats autism, and doctors do not recommend CBD over prescription medications for depression and PTSD. Therefore, the making of the representations set forth in Paragraph 13 are false or misleading.

Violations of Sections 5 and 12

15. 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 _____, 20 __, has issued this Complaint against Respondents.

By the Commission.

April J. Tabor
Acting Secretary

SEAL: