September 16, 2014

George Coleman
State of Connecticut


Dear Mr. Coleman:

Thank you for commenting on the Federal Trade Commission’s proposed consent agreement in the above-referenced proceeding. The Commission has placed your comment on the public record pursuant to Rule 4.9(b)(6)(ii) of the Commission’s Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and has given it serious consideration.

Although you expressed support for the proposed consent agreement, you commented that it should also require the immediate removal of Lice Shield products from the market. After consideration of your comment, the Commission has determined that the relief set forth in the consent agreement is appropriate and sufficient to remedy the violations alleged in the complaint.

The Commission’s proposed complaint in this matter challenges advertising claims made by Lornamead as deceptive. If Lornamead violates the proposed order by making deceptive claims, including claims on product packaging, it would be liable for civil penalties of up to $16,000 per violation, pursuant to Section 5(1) of the FTC Act, 15 U.S.C. § 45(1). Thus, the Commission’s action involves what advertising claims are made, not whether the product can be marketed. As is the case with all Commission orders, Commission staff will closely monitor Lornamead’s future activities to determine whether any violations occur.

Accordingly, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without modification. The final Decision and Order and other relevant materials are available from the Commission’s website at http://www.ftc.gov. It helps the Commission’s analysis to hear from a variety of sources, and we thank you again for your comment.

By direction of the Commission, Commissioner McSweeny not participating.

Donald S. Clark
Secretary