

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

**COMMISSIONERS: Maureen K. Ohlhausen, Acting Chairman  
Terrell McSweeney**

	)	
<b>In the Matter of</b>	)	
	)	
<b>iSPRING WATER SYSTEMS, LLC</b>	)	<b>Docket No. C-4611</b>
<b>a limited liability company.</b>	)	
	)	
	)	

**COMPLAINT**

The Federal Trade Commission, having reason to believe that iSpring Water Systems, LLC, a limited liability company (“Respondent”), has 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 iSpring Water Systems, LLC (“iSpring”), also doing business as 123filter.com, is a Georgia limited liability company with its principal office or place of business at 3020 Trotters Parkway, Alpharetta, GA 30004.
2. Respondent advertises, labels, offers for sale, and distributes products to consumers, including, but not limited to, water filtration systems and parts. Respondent advertises these products primarily online, including, but not limited to, on its own website 123filter.com, and through third-party websites including, but not limited to, amazon.com, overstock.com, sears.com, and homedepot.com. Respondent offers for sale, sells, and distributes its products throughout the United States.
3. The acts and practices of Respondent alleged in this complaint have been in or affecting commerce, as “commerce” is defined in Section 4 of the Federal Trade Commission Act.
4. Respondent has disseminated or has caused to be disseminated advertisements and promotional materials for its products, including, but not necessarily limited to, the attached Exhibits A-C. These materials contain the following statements, among others:
  - A. “Built in USA Legendary brand of water filter” (Exhibit A, 123filter.com web advertisement);
  - B. “Built in USA” (Exhibit B, search result demonstrating instances phrase occurs on 123filter.com website);

C. “Built in USA” (Exhibit C, amazon.com, sears.com, walmart.com, and purwaterfilter.org product listings).

5. In numerous instances, including, but not limited to, the promotional materials shown in Exhibits A-C, Respondent has represented, expressly or by implication, that its products, including, but not limited to, water filtration systems and parts, are all or virtually all made in the United States.

6. In fact, in many instances, Respondent’s products are wholly imported. In other instances, Respondent sources significant inputs to its products from overseas.

7. Therefore, Respondent’s express or implied representations that its products are made in the United States deceive consumers.

**COUNT I (False or Unsubstantiated Representation)**

8. In connection with the manufacturing, labeling, advertising, promotion, offering for sale, sale, or distribution of its products, Respondent has represented, directly or indirectly, expressly or by implication, that such products, including, but not limited to, water filtration systems and parts, are all or virtually all made in the United States.

9. In fact, in many instances, Respondent’s products are wholly imported. In other instances, Respondent sources significant inputs to its products overseas. Therefore, the representation set forth in Paragraph 8 is false or misleading, or was not substantiated at the time the representation was made.

**VIOLATION OF SECTION 5**

10. The acts and practices of Respondent, as alleged in this complaint, constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

**THEREFORE**, the Federal Trade Commission, this sixth day of April, 2017, has issued this Complaint against Respondent.

By the Commission.

Donald S. Clark  
Secretary

SEAL: