

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

ONE OR MORE UNKNOWN PARTIES  
DECEIVING CONSUMERS INTO MAKING  
PURCHASES THROUGH:

www.cleanyos.com,  
www.arlysol.com,  
www.broclea.com,  
www.cadclea.com,  
www.cleancate.com,  
www.cleankler.com,  
www.cleanula.com,  
www.clean-sale.com,  
www.clean-sell.com,  
www.clorox-sale.com,  
www.clorox-sales.com,  
www.cloroxstore.com,  
www.crlisol.com,  
www.elysol.com,  
www.littletoke.com,  
www.lybclean.com,  
www.lysoiclean.com,  
www.lysol-clean.com,  
www.lysol-cleaners.com,  
www.lysol-free.com,  
www.lysolsales.com,  
www.lysol-servicebest.com,  
www.lysol-sell.com,  
www.lysol-wipe.com, and  
www.thaclean.com,

Defendants.

Case No. \_\_\_\_\_

**PLAINTIFF'S MOTION FOR *EX*  
*PARTE* TEMPORARY  
RESTRAINING ORDER WITH  
ASSET FREEZE, AND ORDER TO  
SHOW CAUSE WHY A  
PRELIMINARY INJUNCTION  
SHOULD NOT ISSUE**

Pursuant to Federal Rule of Civil Procedure 65(b), Plaintiff Federal Trade Commission (“FTC”) moves the Court for an order granting an *Ex Parte* Temporary Restraining Order with Asset Freeze and Other Equitable Relief and for an Order to Show Cause Why a Preliminary Injunction Should Not Issue (“TRO”) against the Defendants.

As detailed in the Complaint, the Memorandum in Support of this Motion, and accompanying exhibits, the Defendants violate Section 5(a) of the Federal Trade Commission Act, 15 U.S.C. § 45(a), by misrepresenting through dozens of their deceptive websites: (a) that the Defendants are part of, affiliated with, or authorized to sell products on behalf of The Clorox Company and/or Reckitt Benckiser Group plc, the manufacturers of Clorox and Lysol cleaning and disinfecting products, and (b) that the Defendants will deliver the products consumers ordered from the websites. The Defendants also violate the FTC’s Trade Regulation Rule Concerning the Sale of Mail, Internet, or Telephone Order Merchandise (“MITOR”), 16 C.F.R. Part 435, by (a) failing to deliver products to consumer as promised, (b) when shipping is delayed, failing to offer consumers the opportunity to consent to the delay or to cancel their order, (c) when the Defendants failed to offer consumers the opportunity to consent to a shipping delay or to cancel their orders, failing to cancel those orders or provide a prompt refund, and (d) when the Defendants receive cancellation and refund requests from consumers pursuant to any option under MITOR, failing to deem those orders cancelled or provide a prompt refund.

The evidence shows that the Defendants have harmed thousands of consumers and that they intend to continue perpetrating their scam against Americans urgently seeking cleaning and disinfecting products during the Coronavirus Disease 2019 (COVID-19) Pandemic.

In the interest of immediately protecting consumers, the FTC seeks a TRO, which would temporarily accomplish, among other things, the following: (1) enjoin the Defendants from making misrepresentations to consumers and taking consumers' money; (2) suspend the websites and advertising accounts the Defendants use to carry out their scheme; (3) freeze the Defendants' assets and require an accounting; and (4) require the Defendants and third parties to preserve and produce records relating to the Defendants' identities, business practices, and finances. The TRO is necessary to stop the Defendants' unlawful conduct and to prevent the dissipation or concealment of assets and the destruction of evidence, thereby preserving the Court's ability to provide effective final relief.

Good cause exists for the Court to hear the FTC's Motion without notice to any of the Defendants, pursuant to Fed. R. Civ. P. 65(b). As explained in the Memorandum in Support and in the Rule 65 Certification of Plaintiff FTC Counsel, filed concurrently, because the Defendants have engaged in deliberate and ongoing actions to conceal their real identities and locations, attempts to provide notice to the Defendants would likely severely delay this matter, during which time the Defendants would continue their unlawful activities resulting in additional harm to American consumers. Moreover, providing advance notice of the proceedings to the Defendants would likely lead to the dissipation or concealment of assets, destruction of documents, or both. Such actions would cause immediate and irreparable damage to the FTC's efforts to secure assets, preserve evidence, and ultimately to protect the public.

This Court has the power to immediately stop the Defendants' pernicious scam. For the reasons set forth in its filings, the FTC respectfully asks the Court to issue an *ex parte* TRO

against the Defendants. A Memorandum in Support of this Motion with accompanying exhibits and a Proposed *ex parte* TRO are attached.

Respectfully submitted,

Dated: November 4, 2020

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FEDERAL TRADE COMMISSION