



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Division of Advertising Practices

March 22, 2018

Laura Brett, Esq., Director
National Advertising Division
112 Madison Avenue, 3rd Floor
New York, NY 10016

Re: Advertising for Perfect Prime Anti-Aging Face Serum

Dear Ms. Brett:

Thank you for your letter referring an NAD monitoring case involving Perfect Prime's advertising for Perfect Prime Anti-Aging Face Serum. Your referral indicates that Perfect Prime represents that its face serum can increase collagen, reduce wrinkles, promote elasticity, and remove other visible signs of aging. Your letter states that the challenged advertising also includes a purported endorsement from Oprah Winfrey. Your referral also mentions that NAD questioned whether Perfect Prime's advertising is clearly identified as commercial and not editorial content. You indicate that you initially challenged nearly identical claims for another product with similar promotional images and that you had to send inquiries to multiple companies in an effort to notify the marketer behind the challenged advertising. Because you did not receive a substantive response to your inquiries, you referred this matter to the Federal Trade Commission for our review.

Upon careful review of this matter, we have determined not to take FTC action at this time. In coming to this conclusion, we considered a number of factors related to resource allocation and enforcement priorities, as well as the nature of any FTC Act violation, the type and severity of any consumer injury, and the likelihood of preventing future unlawful conduct and securing consumer redress or other relief.

We will forward your referral to our Consumer Response Center to have it entered into Consumer Sentinel, our secure, online database available to more than 2,000 civil and criminal law enforcement agencies in the U.S. and abroad. The Commission is grateful for the NAD's role in offering a voluntary forum to address practices that may violate your guidelines and the principles of the FTC Act. We fully support the NAD's self-regulatory process, and we sincerely appreciate your referral and the opportunity to continue to assist in supporting NAD.

Very truly yours,

A handwritten signature in black ink, appearing to read "Devin W. Domond".

Devin W. Domond
Chief of Staff for Advertising Practices