



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

Division of Advertising Practices

February 26, 2020

Via Electronic Mail (lbrett@bbbn.org)

Laura Brett, Esq.  
Vice President  
National Advertising Division  
112 Madison Avenue, 3<sup>rd</sup> Floor  
New York, NY 10016

Re: Advertising by Zero Gravity Skin for Perfectio medical devices

Dear Ms. Brett:

On December 5, 2019, the National Advertising Division referred to the Federal Trade Commission an NAD self-monitoring inquiry regarding advertising by Zero Gravity Skin ("Zero Gravity") for Perfectio, a line of medical devices purported to reduce fine lines and wrinkles and mitigate rosacea, among other things. Your referral indicated that Zero Gravity did not respond to NAD's inquiry, despite extensions granted by NAD. Accordingly, you referred this matter to the FTC for our review.

After we alerted Zero Gravity to NAD's referral to the FTC, the company agreed to engage with NAD. We understand from recent communications with your staff that Zero Gravity has actively cooperated with NAD.

Accordingly, it appears no additional FTC action is warranted at this time. Our decision is not to be construed as a determination that a violation has not occurred. The Commission reserves the right to take such further action as the public interest may require. The FTC fully supports 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 blue ink, appearing to read "Carolyn L. Hann".

Carolyn L. Hann  
Chief of Staff for Advertising Practices

cc: Daniel R. Aaronson, Benjamin, Aaronson, & Patanzo, P.A.