

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

TEAMI, LLC, a limited liability company,

ADI HALEVY, a/k/a Adi Arezzini, individually
and as an officer of TEAMI, LLC, and

YOGEV MALUL, individually and as an officer
of TEAMI, LLC,

Defendants.

Case No. 8:20-cv-518

**COMPLAINT FOR PERMANENT
INJUNCTION AND OTHER
EQUITABLE RELIEF**

Plaintiff, the Federal Trade Commission (“FTC”), for its Complaint alleges:

1. The FTC brings this action under Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b), to obtain permanent injunctive relief, rescission or reformation of contracts, restitution, the refund of monies paid, disgorgement of ill-gotten monies, and other equitable relief for Defendants’ acts or practices in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a), 52, in connection with the labeling, advertising, marketing, distribution, and sale of numerous Teami brand tea products that purportedly provide various health benefits and Teami brand tea-based skincare products.

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345.

3. Venue is proper in this District under 28 U.S.C. § 1391(b)(1), (b)(2), (c)(1), (c)(2), and (d), and 15 U.S.C. § 53(b).

PLAINTIFF

4. The FTC is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce. The FTC also enforces Section 12 of the FTC Act, 15 U.S.C. § 52, which prohibits false advertisements for food, drugs, devices, services, or cosmetics in or affecting commerce.

5. The FTC is authorized to initiate federal district court proceedings, by its own attorneys, to enjoin violations of the FTC Act and to secure such equitable relief as may be appropriate in each case, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies. 15 U.S.C. § 53(b).

DEFENDANTS

6. Defendant Teami, LLC (“Teami”) is a Florida limited liability company with its principal place of business at 10801 Endeavor Way, Suite A, Seminole, Florida 33777. Teami transacts or has transacted business in this District and throughout the United States.

7. At all times material to this Complaint, acting alone or in concert with others, Teami has advertised, marketed, distributed, or sold Teami teas and skincare products to consumers throughout the United States.

8. Defendant Adi Halevy (“Halevy”), also known as Adi Arezzini, is the Chief Executive Officer, a co-founder, and a fifty percent owner of Teami. At all times material to this Complaint, acting alone or in concert with others, she has formulated, directed, controlled, had

the authority to control, or participated in the acts and practices of Teami, including the acts and practices set forth in this Complaint. She is responsible for Teami product branding, copywriting, and the approval of each product page on Defendants' website, www.teamiblends.com (the "Teami website"). Defendant Halevy has appeared in Teami product advertising. She also personally evaluates the ingredients that compose each of Teami's products to determine what benefits each ingredient has alone or in conjunction with other ingredients, reviews literature related to each ingredient, and creates samples of each product, which she tests herself for taste and efficacy. In addition, Defendant Halevy is responsible for the development and approval of Teami's social media policy, disseminating the social media policy throughout the company, and providing instructions to staff on its implementation. Defendant Halevy resides in this District and, in connection with the matters alleged herein, transacts or has transacted business in this District and throughout the United States.

9. Defendant Yogev Malul ("Malul") is the Creative Director, a co-founder, and a fifty percent owner of Teami. At all times material to this Complaint, acting alone or in concert with others, he has formulated, directed, controlled, had the authority to control, or participated in the acts and practices of Teami, including the acts and practices set forth in this Complaint. He is responsible for the development and selection of each product Teami offers, as well as the Teami website and graphic design of each product page. He also personally evaluates the ingredients that compose each of Teami's products to determine what benefits each ingredient has alone or in conjunction with other ingredients, reviews literature related to each ingredient, and creates samples of each product, which he tests himself for taste and efficacy. Defendant

Malul resides in this District and, in connection with the matters alleged herein, transacts or has transacted business in this District and throughout the United States.

COMMERCE

10. At all times material to this Complaint, Defendants have maintained a substantial course of trade in or affecting commerce, as “commerce” is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

DEFENDANTS’ BUSINESS ACTIVITIES

11. Since 2014, Defendants have advertised, offered for sale, sold, and distributed Teami tea products. These include Teami Profit tea, Teami Alive tea, Teami Relax tea, Teami Skinny tea, and Teami Colon tea. Teami Skinny tea and Teami Colon tea are sold together in a bundle called the Teami 30 Day Detox Pack. Defendants have also advertised, offered for sale, sold, and distributed Teami skincare products including the Teami Green Tea Blend Detox Mask and Teami Soothe Tea Infused Facial Oil. In addition to advertising Teami products on the Teami website, Defendants have paid celebrities, including Kylie Jenner and Demi Lovato, and other influencers to promote them on Instagram and other social media.

12. Teami Profit tea contains green tea, peppermint leaf, goji berries, red dates, roselle, nettle leaf, and lingzhi ganoderma. Teami Alive tea contains green tea, lemongrass, honey, and ginger. Teami Relax tea contains peppermint, yarrow, lemongrass, lavender flower, chamomile, orange peel, and valerian root. Teami Skinny tea contains oolong tea, yerba mate, lotus leaf, lime leaf extract, ginger root, rhubarb root, and jiao gulam. Teami Colon tea contains sienna leaf and root, hawthorn berry extract, lotus leaf, lime leaf and extract, psyllium husk seed, phaseolus calcaratus seed, rhubarb root, poria cocos stem bark, and valerian root.

13. Defendants sell their Teami teas and skincare products on the Teami website. On the website, packages of Teami Profit tea, which contain thirteen servings, cost \$29.99; packages of Teami Alive tea, which contain fifteen tea bags, cost \$19.99; packages of Teami Relax, which contain thirteen servings, cost \$29.99; Teami 30 Day Detox Packs cost \$49.99; jars of Teami Green Tea Blend Detox Mask cost \$29.99; and bottles of Teami Soothe Tea Infused Facial Oil cost \$39.99. Defendants sell most of their Teami teas and skincare products on www.amazon.com. Selected Teami products are also available at retailers nationwide, including Vitamin World and Ulta Beauty.

14. Defendants disseminate or cause to be disseminated advertisements for Teami Profit tea, Teami Alive tea, Teami Relax tea, and the Teami 30 Day Detox Pack. Advertisements for Teami products include, but are not necessarily limited to, the attached Exhibits 1 through 14. These materials contain the following statements and depictions, among others:

A. Teami Profit Tea

1. Excerpts from the Teami Profit product page of the Teami website; captured on November 6, 2018

**Teami Profit
DESCRIPTION**

Your body is your temple and deserves to profit from all that nature has to offer. Natural tea allows the body to rejuvenate from the inside out, gaining a strong internal foundation. For centuries, tea has been used in alternative medicine to treat everything from cancer to constipation. The human body needs to have all the necessary vitamins and minerals in order to protect itself from infection and illness.

The ingredients in Teami Profit have been shown to:

....

- Fights [sic] against cancerous cells

(Exhibit 1, portion of Teami Profit product page on the Teami website).

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