

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. \_\_\_\_\_

**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 Sections 13(b) and 19 of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 53(b), 57b; and the FTC’s Trade Regulation Rule Concerning the Sale of Mail, Internet, or Telephone Order Merchandise (“MITOR” or the “Rule”), 16 C.F.R. Part 435, to obtain temporary, preliminary, and 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 Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), and in violation of MITOR, in connection with their scheme to take consumers’ money in the midst of the current pandemic by deceiving people into thinking that they are ordering urgently-needed cleaning and disinfecting supplies from websites owned by or affiliated with the manufacturers of well-known products. Not only are Defendants unconnected to these manufacturers, they never deliver the products. They take consumers’ money and disappear.

### **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)(2), (b)(3), (c)(2), (c)(3), 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 MITOR, 16 C.F.R. Part 435, which requires mail-, Internet-, or telephone-based sellers to have a reasonable basis for advertised shipping times, and, when sellers cannot meet promised shipping times, or in the absence of any promised shipping time, ship within 30 days, to provide buyers with the option to consent to a delay in shipping or to cancel their orders and receive a prompt refund.

5. The FTC is authorized to initiate federal district court proceedings, by its own attorneys, to enjoin violations of the FTC Act and MITOR, 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), 57b, and 16 C.F.R. Part 435.

### **DEFENDANTS**

6. Defendants' true identities and addresses are unknown to the Commission at this time. Through each of the websites identified by name in this Complaint, Defendants have falsely represented to the public that Defendants have a mailing address in this District at 2180 Barlow Rd., Hudson, OH 44236. Defendants have no true affiliation with that physical address, but they have listed it repeatedly on their deceptive websites in the course of their scheme. Defendants transact or have transacted business in this District and throughout the United States. At all times material to this Complaint, acting alone or in concert with others, Defendants have advertised or marketed themselves to consumers throughout the United States as sellers of well-known brands of cleaning and disinfecting products.

### **COMMERCE**

7. 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.

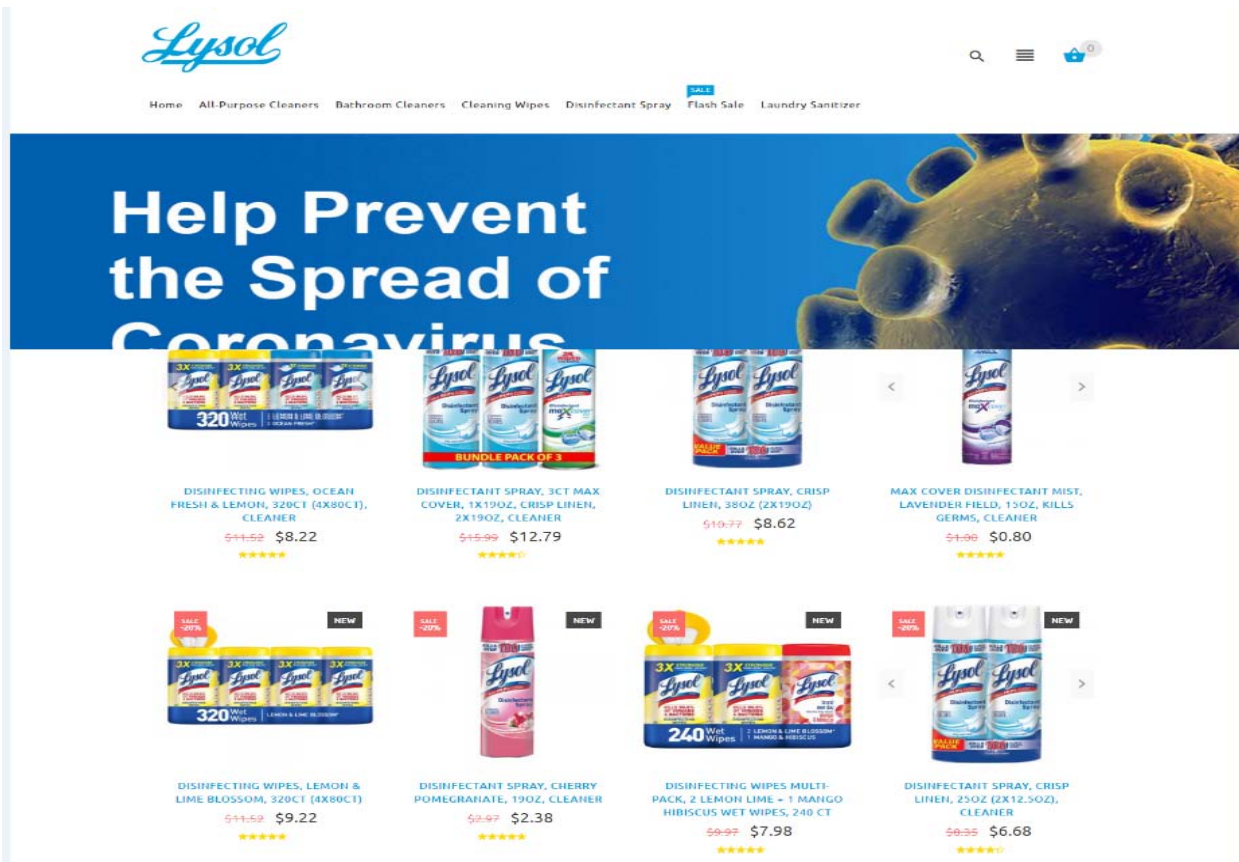
### **DEFENDANTS’ BUSINESS ACTIVITIES**

8. Since at least July 2020, during the global pandemic, Defendants have been scamming consumers urgently seeking cleaning and disinfecting products by tricking them into purchasing such products from Defendants’ counterfeit websites. Specifically, Defendants purport to sell Clorox and Lysol products. Defendants take consumers’ hard-earned money but never deliver the products.

9. To lure consumers, Defendants have used internet search engine, social media, and pop-up advertisements to bring consumers to their websites to order Clorox and/or Lysol cleaning and disinfecting products. These products have been in high demand due to the COVID-19 pandemic, and consumers may have difficulty finding them available for purchase in their local areas. Defendants have made express references to the pandemic in their marketing.

10. Defendants’ advertisements take consumers to websites designed to look as if Defendants are, or are affiliated with, the makers of Clorox or Lysol products. Images A and B, below, are excerpts from examples of Defendants’ website homepages. Screenshots of examples of Defendants’ website pages are attached as Exhibit A.

Image A: www.lysol-wipe.com Home Page



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