

**UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION**

**COMMISSIONERS:**      **Edith Ramirez, Chairwoman**  
                                  **Julie Brill**  
                                  **Maureen K. Ohlhausen**  
                                  **Joshua D. Wright**  
                                  **Terrell McSweeney**

**In the Matter of**

**LORNAMEAD, INC.,  
a corporation.**

**DOCKET NO.**

**COMPLAINT**

The Federal Trade Commission, having reason to believe that Lornamead, Inc., a corporation (“respondent”), has violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent Lornamead, Inc., is a Delaware corporation with its principal office or place of business at 175 Cooper Avenue, Tonawanda, New York 14150.
2. Respondent has manufactured, advertised, labeled, offered for sale, sold, and distributed products to the public, including the “Lice Shield” product line. This line of products has embraced a number of products for use on hair or head gear, including: “Lice Shield Leave In Spray;” “Lice Shield Gear Guard;” and “Lice Shield Shampoo & Conditioner in 1.” Lice Shield products are “cosmetics” within the meaning of Sections 12 and 15 of the Federal Trade Commission Act.
3. The acts and practices of respondent alleged in this complaint have been in or affecting commerce, as “commerce” is defined in Section 4 of the Federal Trade Commission Act.
4. Lice Shield products are hair care products that contain citronella and other ingredients. Respondent promotes Lice Shield products as a way to avoid, or to reduce the risk of, getting head lice. All Lice Shield products are intended for use as deterrents, and they do not kill lice, kill lice eggs, or treat an infestation.
5. Respondent has disseminated or has caused to be disseminated advertisements for Lice Shield products including, but not necessarily limited to, the attached Exhibits A through H. These advertisements have contained the following statements and depictions:
  - A. Internet Banner Advertisement (Exhibit A)

Lice Shield: REPELS HEAD LICE: **The Best Way To Treat Lice? Avoid Getting Them!** [Depicts child dressed in knight's helmet with shield, wielding a sword, while cartoon lice bounce off helmet.]

B. Website Advertisement (Exhibit B)

**THE BEST WAY TO TREAT LICE IS TO AVOID GETTING THEM**

Introducing Lice Shield - a new line of hair care products demonstrated to repel lice while, at the same time, gently cleansing and conditioning hair. Specially formulated with a proprietary blend of natural oil extracts that repel lice, regular use of Lice Shield will dramatically reduce the likelihood your child will contract head lice when there is an outbreak.

**Don't Get Lice, Get Lice Shield.** [Depicts child dressed in knight's helmet with shield, wielding a sword, while cartoon lice bounce off helmet.]

C. Website Advertisement: FAQ's (Exhibit C)

**ITCHING FOR ANSWERS?**

...

**HOW EFFECTIVE IS LICE SHIELD AT HELPING TO REPEL HEAD LICE?** Scientific studies have shown that the use of Lice Shield Shampoo & Conditioner in 1 and Lice Shield Leave In Spray decreases the chance of lice infestation by over 80%.

D. Print Advertisement (Exhibit D)

**Don't Get Lice, Get Lice Shield.**

**AVOIDING IS BETTER THAN TREATING.**

Specially formulated with a proprietary blend of essential oils to repel lice, Lice Shield is remarkably effective, easy to use, and free of harmful pesticides.

Lice Shield products are scientifically proven to provide over 80% lice repellency, dramatically reducing a child's chance of catching lice during an outbreak.

**The Results**

| Treatment Arm                            | Repellency Rate | P-Value |
|--|-----------------|---------|
| Control (tap water) vs. Untreated        | --              | 0.29    |
| Lice Shield Shampoo vs. Untreated        | 53%             | 0.04    |
| Lice Shield Leave In Spray vs. Untreated | 86%             | <0.0001 |

***For best results, use both products in combination.***

School lice outbreaks are a fact of life, but now you can help reduce the risk of infestation.

- E. Print Advertisement (Exhibit E)

**The Best Way To Treat Lice Is To Avoid Getting Them.**

**Be Prepared with Lice Shield**

**Scientifically shown to repel head lice**

Reducing a child's chance of catching lice during an outbreak.

**Safe & pesticide free**

Formulated with a proprietary blend of essential oils to repel lice.

**Created with kids' scalps in mind**

A Shampoo and Leave In Spray, gentle enough to use every day, with a refreshing, clean fragrance. And, Gear Guard, a spray product developed specially for your child's possessions.

**Be Prepared with Lice Shield**

School lice outbreaks are a fact of life, but now you can reduce the risk of infestation.

**Don't Get Lice, Get Lice Shield.**

- F. Lice Shield Shampoo and Conditioner In 1 Product Label (Exhibit F)

[Front] **Lice Shield**

**REPELS HEAD LICE**

**Shampoo & Conditioner in 1**

...

[Back] **The best way to  
treat lice is to avoid  
getting them.**

...

For best results, use daily with Lice Shield Leave In Spray.

- G. Lice Shield Leave In Spray Product Label (Exhibit G)

[Front] **Lice Shield**  
**REPELS HEAD LICE**

**LEAVE IN SPRAY**

...

[Back] **The best way to  
treat lice is to avoid  
getting them.**

...

For best results, use daily after Lice Shield Shampoo & Conditioner in 1.

H. Lice Shield Gear Guard Product Label (Exhibit H)

[Front] *Now shield your stuff!*

**Lice Shield**  
**REPELS HEAD LICE**

***GEAR GUARD***

...

*-Use on hats, helmets, clothing*

...

[Back] **The best way to  
treat lice is to avoid  
getting them.**

**GEAR GUARD**

\*Specially formulated to help repel  
lice from all types of objects.

6. Through the means described in Paragraph 5, respondent has represented, expressly or by implication, that:
- A. When used as directed, Lice Shield products prevent head lice infestations;
  - B. When used as directed, Lice Shield products decrease the likelihood or chance of a head lice infestation by over 80%;
  - C. When used as directed, Lice Shield products dramatically reduce the likelihood or chance of a head lice infestation during an outbreak;

- D. When used as directed, Lice Shield products reduce the likelihood or chance of a head lice infestation during an outbreak;
  - E. Spraying Lice Shield Gear Guard on objects, such as hats or helmets, reduces the likelihood or chance of a head lice infestation; and
  - F. Lice Shield Shampoo & Conditioner In 1 and Lice Shield Leave In Spray are most effective when they are used together.
7. Through the means described in Paragraph 5, respondent has represented, expressly or by implication, that it possessed and relied upon a reasonable basis that substantiated the representations set forth in Paragraph 6, at the time the representations were made.
  8. In truth and in fact, respondent did not possess and rely upon a reasonable basis that substantiated the representations set forth in Paragraph 6, at the time the representations were made. Therefore, the representation set forth in Paragraph 7 was, and is, false or misleading.
  9. Through the means described in Paragraph 5, respondent has represented, expressly or by implication that scientific tests prove that, when used as directed, Lice Shield products significantly reduce the likelihood or chance of a head lice infestation.
  10. In truth and in fact, scientific tests do not prove that, when used as directed, Lice Shield products significantly reduce the likelihood or chance of a head lice infestation.
  11. The representation set forth in Paragraph 9 was, and is, false or misleading.
  12. The acts and practices of respondent as alleged in this complaint constitute deceptive acts or practices, and the making of false advertisements, in or affecting commerce in violation of Sections 5(a) and 12 of the Federal Trade Commission Act.

**THEREFORE**, the Federal Trade Commission this    day of    , 2014 has issued this complaint against respondent.

By the Commission.

Donald S. Clark  
Secretary

SEAL: