

UNITED STATES OF AMERICA  
BEFORE FEDERAL TRADE COMMISSION

COMMISSIONERS: Jon Leibowitz, Chairman  
William E. Kovacic  
J. Thomas Rosb  
Edith Ramirez  
Julie Brill

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In the Matter of )  
)  
Universal Appliances, Kitchens, and Baths, Inc., )  
d/b/a universal-akb.com, )  
a corporation. )  
\_\_\_\_\_ )

DOCKET NO.

COMPLAINT

The Federal Trade Commission ("FTC" or "Commission"), having reason to believe that Universal Appliances, Kitchens, and Baths, Inc., d/b/a universal-akb.com ("Respondent"), a corporation, has violated provisions of the Rule Concerning Disclosures Regarding Energy Consumption and Water Use of Certain Home Appliances and Other Products Under the Energy Policy and Conservation Act, 16 C.F.R. Part 305 ("Appliance Labeling Rule"), and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent Universal Appliances, Kitchens, and Baths, Inc., d/b/a universal-akb.com is a California corporation with its principal office or place of business at 12050 Ventura Boulevard, Suite B-105, Studio City, CA 91604. Respondent maintains

“catalog” to provide in that catalog either the EnergyGuide label for the product prepared in accordance with the Appliance Labeling Rule or the following information: (a) the product’s capacity; (b) the product’s estimated annual operating costs; and (c) a conspicuously placed statement explaining that operating costs will depend on utility rates and use. 16 C.F.R. § 305.20(a) Failure to include the required information constitutes a violation of the Appliance Labeling Rule. *Id.*

#### RESPONDENT’S VIOLATIONS OF THE APPLIANCE LABELING RULE

4. Respondent is a retailer as defined in the Appliance Labeling Rule. 16 C.F.R. § 305.2(f).
5. Respondent’s website, website [www.universal-akb.com](http://www.universal-akb.com), consists of printed material disseminated over the Internet, which for each covered product contains the terms of sale, retail price, and instructions for ordering from which a retail consumer can order the covered product. Thus, the webpages for each covered product are “catalogs” as defined in the Appliance Labeling Rule. *Id.* § 305.2(h).
6. Through its website, Respondent has advert