

UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION

COMMISSIONERS: Edith Ramirez, Chairman  
Julie Brill  
Maureen K. Ohlhausen  
Joshua D. Wright

	)	
In the Matter of	)	
	)	
DRJAYS.COM, INC.,	)	DOCKET NO. C-
a corporation.	)	
	)	

COMPLAINT

Pursuant to the provisions of the Federal Trade Commission Act, as amended, 15 U.S.C. § 41 et seq. and by virtue of the authority vested in it by said Act, the Federal Trade Commission ("Commission"), having reason to believe that Drays.com, Inc. ("respondent"), has violated the provisions of (iolated 8t uR0000 0tc (al Tra)Tj 28.2000 0.0000 TD (al Tra)Tj0000 r

4. From approximately January 2010 until approximately January 2012, respondent disseminated, or caused to be disseminated, advertisements for fur products, including, but not limited to, the advertisements for a Snorkel Jacket by Crown Holder ("Snorkel Jacket"), a Fur/Leather Vest by Knoles & Carter ("Fur/Leather Vest"), and a New York Subway Leather Bomber Jacket by United Fae ("Bomber Jacket") that are attached as Exhibit A. These advertisements are from respondent's website and contained the following statements (emphasis added)

a. The Snorkel Jacket with Fur-lined hood by Crown Holder features:

- Full zip-closure
- 6-pocket design
- 2-hidden pockets
- Faux fur-lined hood
- Epaulet straps on shoulders
- Cut and sewn logo patch on left sleeve
- Gold hardware through out [sic]
- Logo applique on left chest

b. The Fur/Leather Vest by Knoles and Carter features:

- Leather trims
- Faux fur on exterior
- Dual buckle closure on collar, zipper closure down front, with snap closure on bottom trim
- Satin interior

c. The NY Subway Leather Bomber Jacket (Detachable Hood) by United Fae features:

- Full zipper closure
- New York subway map embroidered throughout
- Detachable Hood with faux fur lining
- Multiple pockets
- Ribbed hem and cuffs
- True to size fit

Respondent sold at least 241 units of the above-described products via its website for a total revenue of at least \$19,062.

5. The Snorkel Jacket had an attached label stating that product contained "red raccoon fur."

6. In May 2012, respondent's website advertised at least one other product containing real fur. However, this advertisement, which is attached as Exhibit B, did not disclose the name of the animal that produced the fur.

#### COUNT I

7. Through the means described in Paragraph 4, respondent presented, expressly or by implication, that the fur in the Snorkel Jacket, the Leather Vest, and the Bomber Jacket was faux or fake.
8. In truth and in fact

WHEREFORE, THE PREMISES CONSIDERED, the Federal Trade Commission has caused this Complaint to be signed by its Secretary and its official seal to be here affixed, at Washington, D.C., this \_\_\_\_ day \_\_\_\_, 2013.

By the Commission.

Donald S. Clark  
Secretary

SEAL