

**UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION**

**Relief-Mart, Inc.,** ) **AGREEMENT CONTAINING**  
 ) **CONSENT ORDER**  
          **a corporation.** )

The Federal Trade Commission has conducted an investigation of certain acts and practices of Relief-Mart, Inc. (“Proposed Respondent”). Proposed Respondent, having been represented by counsel, is willing to enter into an agreement containing a consent order resolving the allegations contained in the attached draft complaint. Therefore,

**IT IS HEREBY AGREED** by and between Proposed Respondent, by its duly authorized officers, and counsel for the Federal Trade Commission that:

1. Proposed Respondent is a California corporation b. The requirement that the Commission’s decision conform with the facts of fact and conclusions of law; and
  - c. All rights to seek judicial review or otherwise to challenge the order entered pursuant to this agreement.
  
4. This agreement shall not become part of the public record of the Commission until it is accepted by the Commission. If this agreement is accepted by the Commission together with the draft complaint, will be placed on the public record for 30 days and information about it publicly released. The Commission thereafter may withdraw its acceptance of this agreement and so notify Proposed Respondent. Proposed Respondent will take such action as it may consider appropriate, or issue and serve such order (in whatever form as the circumstances may require) and decision in disposition of the matter.

5. This agreement is for settlement purposes only and Proposed Respondent neither admits nor denies the allegations in the draft complaint, other than jurisdictional facts, merely by entering into this agreement.

6. This agreement contemplates that, if it is accepted by the Commission, and if such acceptance is not subsequently withdrawn by the Commission pursuant to the provisions of Section 2.34 of the Commission's Rules, the Commission may, without further notice to Proposed Respondent, (1) issue its complaint corresponding in form and substance with the attached draft complaint and its decision containing the following order in disposition of the proceeding, and (2) make information about it public. When so entered, the order shall have the same force and effect and may be altered, modified, or set aside in the same manner and within the same time provided by statute for other orders. The order shall become final upon service. Delivery of the complaint and the decision and order to Proposed Respondent's address as stated in this agreement by any means specified in Section 4.4(a) of the Commission's Rules shall constitute service. Proposed Respondent waives any right it may have to any other manner of service. The complaint may be used in construing the terms of the order. No agreement, understanding, representation, or interpretation not contained in the order or in the agreement may be used to vary or contradict the terms of the order.

7. Proposed Respondent has read the draft complaint and consent order. It understands that it may be liable for civil penalties in the amount provided by law and other appropriate relief for each violation of the order after it becomes final.

## **ORDER**

### **DEFINITIONS**

For purposes of this order, the following definitions shall apply:

1. Unless otherwise specified, "Respondent" shall mean Relief-

A. VOCs have not been intentionally added to the product;

unless the representation is true, not misleading, and, at the time it is made, Respondent possesses

notices required by this Part shall be emailed to DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to: Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The subject line must begin: "Relief-Mart, Inc., File No. \_\_\_\_."

**VI.**

IT IS FURTHER ORDERED that Respondent and its successors and assigns, within sixty (60) days after the date of service of this order, shall file with the Commission a true and accurate report, in writing, setting forth in detail the manner and form of its own compliance with this order. Within ten (10) days of receipt of written notice from a representative of the Commission, it shall submit additional true and accurate written reports.

**VII.**

This order will terminate twenty (20) years from the date of its issuance, or twenty (20) years from the most recent date that the United States or the Federal Trade Commission files a complaint (with or without an accompanying consent decree) in federal court alleging any violation of the order, whichever comes later; provided, however, that the filing of such a complaint will not affect the duration of:

- A. Any Part in this order that terminates in less than twenty (20) years;
- B. This order's application to any Respondent that is not named as a defendant in such complaint; and
- C. This order if such if such i 3] hoh o0.59r ihe or-10(r)3(ee)-6(f)3( ih( i)-2(f)lt)3(ee)-6t EMC

filed and the later of the deadline for appealing such dismissal or ruling and the date such dismissal or ruling is upheld on appeal.

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2013

RELIEF-MART, INC.

By: \_\_\_\_\_  
RICK SWARTZBURG  
CEO  
\_\_\_\_\_ Date

\_\_\_\_\_ Date  
JEFFREY R. RICHTER  
Counsel for Relief-Mart, Inc.

\_\_\_\_\_  
ROBIN MOORE  
Counsel for Federal Trade Commission  
\_\_\_\_\_ Date

\_\_\_\_\_  
THOMAS GOODHUE  
Counsel for Federal Trade Commission  
\_\_\_\_\_ Date

**APPROVED:**