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UNITED STATES OF AMERICA
BEFORE THE FEDERA L TRADE COMMISSION

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

In the Matter of	)	
EMINENT, INC., d/b/a REVOLV E CLOTHING, a corporation.	)	DOCKET NO. C-4409

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 Eminent, Inc., d/b/a Revolve Clothing ("respondent"), has violated the provisions of the Federal Trade Commission Act, 15 U.S.C. ' 41 et seq, the Fur Products Labeling Act, 15 U.S.C. ' 69 et seq, and the Rules and Regulations Under the Fur Products Labeling Act, 16 C.F.R. Part 301, and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent Eminent, Inc., is a Delaware corporation with its principal office or place of business at 16800 Edwards Rd., Cerritos, CA 90703.

2. 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, 15 U.S.C. ' 44, and Section 2(j) of the Fur Products Labeling Act, 15 U.S.C. ' 69(j).

3. Respondent has advertised, offered for sale, sold, and distributed fur products, as that term is defined in Section 2(d) of the Fur Products Labeling Act, 15 U.S.C. ' 69(d). Respondent advertises and offers fur products for sale through its Internet site www.revolve.com.

4. Since approximately January 2, 2011, respondent disseminated, or caused to be disseminated, advertisements for fur products, including, but not limited to, an Australia Luxe Collective Nordic Angel Short Boot ("Nordic Boot") and a Marc Jacobs Runway Roebling Coat ("Runway Coat"). Respondent featured these products in the advertisements from www.revolve.com that are attached as Exhibit A. The

advertisements contained the following statements (emphasis added, except where otherwise noted):

a. For the Nordic Boot:

- $ Color [Grey, Beva, Brown, Chestnut, Black, Moon Gray]
- $ Suede upper with rubber sole
- $ Shell measures approx 13" in length
- $ Faux fur trim

b. For the Runway Coat:

- $ Color - Black Olive
- $ Shell: 100% poly
  Lining: 100% cotton
  Sherpa Lining: 100% poly
- $ Button front closure
- $ Zippered front pockets
- $ Front flap pockets
- $ Front welt pockets
- $ Cuffed sleeves
- $ Belted vest
- $ Faux fur trimmed hood
- $ Styled with Free People High Waisted [sic] Patch Pocket Flare Jean in Watch Tower [Emphasis in original]
- $ Styled with KORS Michael Kors Benet Bootie in Mushroom [Emphasis in original]

The Runway coat had an attached label stating that the product contained "real coyote fur trim."

5. Respondent also advertised on its website a Dakota Xan Fur Poncho and an Eryn Brinie Belted Faux Fur Vest as having faux fur. These products had attached labels stating that the products contained "real raccoon fur."

6. Respondent sold at least 158 units of the above-described products via its website for a total revenue of at least $32,750.

COUNT I

7. Through the means described in Paragraphs 4 and 5, respondent represented, expressly or by implication, that the fur in the products described in those Paragraphs was faux or fake.

8. In truth and in fact, the products described in Paragraphs 4 and 5 contained real fur. Therefore, the representations set forth in Paragraph 7 were false, deceptive, or misleading.

9. Respondent's practices, as alleged in this complaint, constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act, 15 U.S.C. ' 45(a), and false advertising in violation of Section 5(a)(5) of the Fur Products Labeling Act, 15 U.S.C. ' 69c(a)(5), and Sections 301.2(c) and 301.49 of the Rules and Regulations Under the Fur Products Labeling Act, 16 C.F.R. '' 301.2(c) and 301.49. Pursuant to Sections 3(a) and 3(c) of the Fur Products Labeling Act, 15 U.S.C. ' 69a(a) and 69a(c), the false advertising of fur products, within the meaning of the Fur Products Labeling Act and the Rules and Regulations Under the Fur Products Labeling Act, is unlawful and an unfair and deceptive act or practice, in commerce, under the Federal Trade Commission Act, 15 U.S.C. ' 41 et seq.

COUNT II

10. Through the means described in Paragraphs 4 and 5, respondent did not disclose the name of the animal, as set forth in the Fur Products Name Guide, 16 C.F.R. ' 301.0 that produced the fur in the products described in Paragraphs 4 and 5.

11. Respondent's practices, as alleged in this complaint, constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act, 15 U.S.C. ' 45(a), and false advertising in violation of Sections 5(a)(1) and 5(a)(5) of the Fur Products Labeling Act, 15 U.S.C. ' 69c(a)(1) and (5), and Sections 301.2(c) and 301.49 of the Rules and Regulations Under the Fur Products Labeling Act, 16 C.F.R. '' 301.2(c) and 301.49. Pursuant to Sections 3(a) and 3(c) of the Fur Products Labeling Act, 15 U.S.C. ' 69a(a) and 69a(c), the false advertising of fur products, within the meaning of the Fur Products Labeling Act and the Rules and Regulations Under the Fur Products Labeling Act, is unlawful and an unfair and deceptive act or practice, in commerce, under the Federal Trade Commission Act, 15 U.S.C. ' 41 et seq.

WHEREFORE, THE PREMISES CONSIDERED 26