

**UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION**

**COMMISSIONERS:**      **Edith Ramirez, Chairwoman**  
                                 **Maureen K. Ohlhausen**  
                                 **Terrell McSweeney**

**In the Matter of**

**BEYOND COASTAL, a limited liability company.**

DOCKET NO.

**COMPLAINT**

The Federal Trade Commission, having reason to believe that Beyond Coastal, a limited liability company, 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 Beyond Coastal is a Utah limited liability company with its principal office or place of business at 2424 South 2570 West, Salt Lake City, Utah 84119.
2. Respondent has advertised, labeled, offered for sale, sold, and distributed products to consumers, including Natural Sunscreen SPF 30. This sunscreen product is a “drug” 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. Respondent advertises Natural Sunscreen SPF 30 on the Internet. This product retails for \$6.99.
5. Respondent has disseminated or has caused to be disseminated advertisements for Natural Sunscreen SPF 30, including but not necessarily limited to the attached Exhibit A.
  - A.

**Count I**  
**False Claim**

6. In connection with the advertising, labeling, promotion, offering for sale, or sale of Natural Sunscreen SPF 30, Respondent has represented, directly or indirectly, expressly or by implication, that the product is a “100% natural” sunscreen.

7. In fact, Sunscreen SPF 30 is not “100% natural” because it contains or contained