UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Edith Ramirez, Chairwoman

Maureen K. Ohlhausen Terrell McSweeny

In the Matter of

BEYOND COASTAL, a limited liability company.

DOCKET NO. C-4585

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. Beyond Coastal's "Natural Sunscreen SPF 30" webpage states the product is a:

100% natural sunscreen

Exhibit A, Internet webpage www.beyondcoastal.com/category/natural-formulas/natural20(t)-215-4(b)-)]TJ 2.59ra

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,