

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

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

In the Matter of

THE ERICKSON MARKETING GROUP INC.,
a corporation, d/b/a ROCKY MOUNTAIN
SUNSCREEN.

DOCKET NO. C-4583

COMPLAINT

The Federal Trade Commission, having reason to believe that The Erickson Marketing Group Inc., a corporation, 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 The Erickson Marketing Group, also doing business as Rocky Mountain Sunscreen, is a Colorado corporation with its principal office or place of business at 15 of the Federal Trade Commission Act.
3. The acts and practices 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 advertised Face Stick SPF 60 All Natural Sunscreen and Face Stick SPF 60 Kids All Natural Sunscreen on the Internet. These products retail for \$7.99.
5. Respondent has disseminated or caused to be disseminated advertisements for Face Stick SPF 60 All Natural Sunscreen and Face Stick SPF 60 Kids All Natural Sunscreen, including but not necessarily limited to the attached exhibit A. These materials contain the following statements

Natural Face Stick

A. True to form, Rocky Mountain Sunscreen offers superior protection in an all natural

THEREFORE, the Federal Trade Commission ~~the~~ ^{six}th day of July, 2016 has issued this Complaint against ~~Es~~ Respondent.

By the Commission.

Donald S. Clark
Secretary

SEAL: