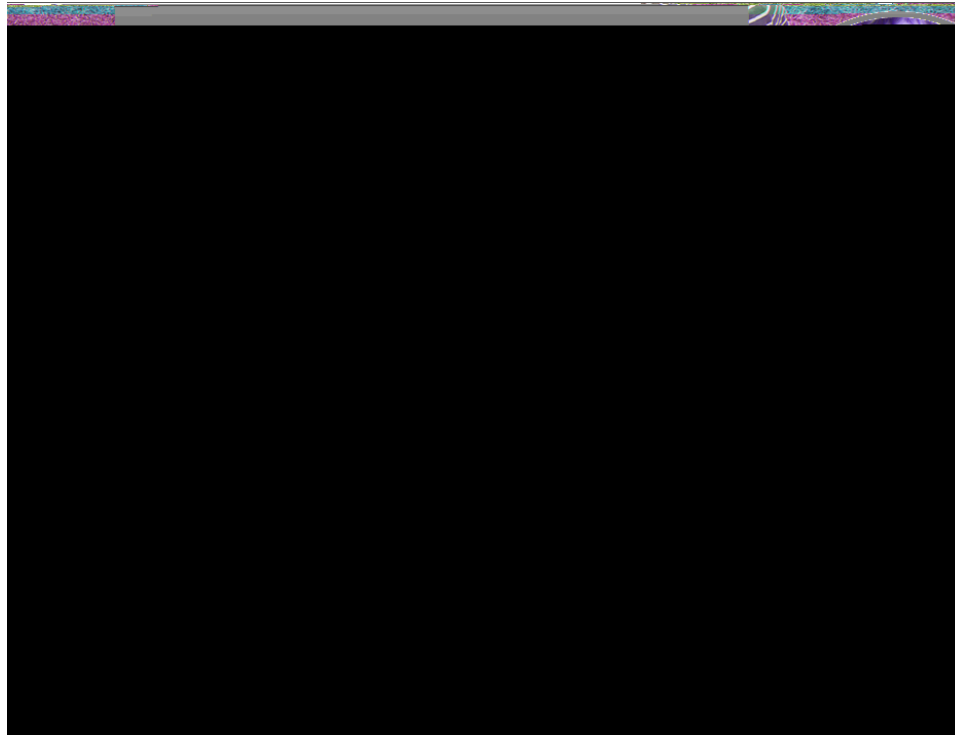


1623080

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



(Exhibit G, Brochure.)

b.

Why Lullaby Paints.
for your baby's health, safety & wellbeing

Safe for baby and mom
SAFE TO APPLY AND BE AROUND. Our specially formulated paints provide the highest safety by standard. No compromise on quality.

Paint Coverage Per Gallon
1 Gallon Lullaby Paints 560 sq. ft.

Non-toxic
THERE'S GODDAMN NOTHING in our paint. No lead, no VOCs. We are the safest paint company, providing the highest standards for your baby.

Help reduce asthma, allergy, MCS
PREVENTIVE MEASURES. Developed with chemicals which have been shown to cause asthma, allergies and eczema in children.

8 Collections Each with 4 Colors
Designer colors coordinated into color palettes.

Match Colors
We match other paint samples and colors.

Furniture, Bedding and Fabric
Have a furniture, bedding and fabric that's safe, premium and beautiful.

Peace of mind.

Printed and reformatted for your convenience. For more information, visit www.lullabypaints.com.
To Learn More Ask a Sales Associate about us.

(Exhibit F, Brochure.)

c. The World's Finest Baby Safe Paint! (Exhibit J, www.lullabypaints.com).

- d. There's no good reason why a premium quality, hard wearing, beautiful paint needs to contain toxic chemicals. Know how we know that? At Lullaby Paints, after years of development, we have proven it. We are pioneers in paint-making and extremely proud of our final product: the safest paint available. Newborn baby-safe. Pregnant mom-safe. Safe enough for kids to paint with.

- x Award Winning
- x Tested and Certified.

For twenty five years, ECOS and Air Pure Paints have been sought out by people with multiple chemical sensitivities, concerned pregnant mothers, the environmentally conscious, corporations committed to sustainability, and the general public who care. Now manufactured in the US, these products are available for discerning customers who are equally committed to the health of the environment. (Exhibit N, Print Ad.)

Count I
Unsubstantiated Claims

8. In connection with the advertising, promotion, offering for sale, or sale of Lullaby and ECOS Paints, Respondent has represented, directly or indirectly, expressly or by implication, that:
 - a. Lullaby and ECOS Paints are VOC-free.
 - b. Lullaby and ECOS Paints will not emit any chemical or substance, including VOCs, that causes material harm to consumers, including sensitive populations such as babies, pregnant women, and allergy and asthma sufferers.
 - c. Lullaby and ECOS Paints have been tested and proven to be safe.
9. The representations set forth in Paragraph 8 were not substantiated at the time the representations were made.

Count II
Means and Instrumentalities

10. Respondent has distributed promotional materials, including the statements and depictions contained in Exhibits A through Q to independent retailers. In so doing, Respondent has provided them with the means and instrumentalities for the commission of deceptive acts or practices.

Violations of Section 5

11. The acts and practices of Respondent 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.

THEREFORE, the Federal Trade Commission this _____ day of _____, 201_, has issued this Complaint against Respondent.

By the Commission.

SEAL:

Donald S. Clark
Secretary