

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

**COMMISSIONERS:**       **Joseph J. Simons, Chairman**  
                                  **Noah Joshua Phillips**  
                                  **Rohit Chopra**  
                                  **Rebecca Kelly Slaughter**  
                                  **Christine S. Wilson**

**In the Matter of**

**SHORE TO PLEASE VACATIONS LLC, a limited liability company, and**

**ROBERT AARON STEPHENS, individually and as manager of SHORE TO PLEASE VACATIONS LLC.**

**DOCKET NO.**

**COMPLAINT**

The Federal Trade Commission, having reason to believe that Shore to Please Vacations LLC and Robert Aaron Stephens, individually and as owner and manager of Shore to Please Vacations LLC (collectively, “Respondents”), have violated the Consumer Review Fairness Act of 2016, and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent Shore to Please Vacations LLC (“STP”) is a Nevada limited liability company, registered to do business in Florida, with its principal office or place of business at 8033 West Sunset Boulevard, #1079, West Hollywood, California 90046. STP has advertised and rented to the public, via VRBO.com (a/k/a “Vacation Rental by Owner”), Rosemary Beach, Florida vacation properties owned by Respondent Robert Aaron Stephens.
2. Respondent Robert Aaron Stephens is the owner and manager of STP. Individually or in concert with others, he controlled or participated in the acts and practices of STP, including the acts and practices alleged in this complaint. His principal office or place of business is the same as that of

### **Course of Conduct**

4. From June 2017 through at least August 2017, Respondents used, in their form contracts offered to prospective customers in the course of renting vacation properties, the following provision in the “Disclaimers” paragraph:

By signing below, you agree not to defame or leave negative reviews (includes any review or comment deemed to be negative by a Shore to Please Vacations LLC officer or member, as well as any review less than a “5 star” or “absolute best” rating) about this property and/or business in any print form or on any

