



Letter from Adore Me, Inc.

Laura Smith <lsmith@truthinadvertising.org>

Tue, May 3, 2016 at 12:39 PM

To: "Tsai, Jeff" [REDACTED]

Jeff,

Thank you for your letter. In it, you state that Adore Me strongly disagrees with our characterization of its marketing and business practices as "deceptive" or "illegal." As I'm sure you are aware, the failure to clearly and conspicuously disclose material terms of an offer is indeed a violation of both state and federal laws. See, e.g., Restore Online Shoppers' Confidence Act, 15 U.S.C. 8403; *Schneiderman v. Profinity, LLC and Family Savings, LLC*. And there can be no serious dispute that the terms we highlighted in our initial April 29th letter to Mr. Hermand-Waiche (i.e., advertised prices are only available VIP members; VIP members must take affirmative action every month in order to avoid recurring monthly charges; and the company will keep any accumulated unused store credit if members cancel their memberships) are material terms that are not appropriately disclosed.

You also state that my April 29th letter contains "a number of factual inaccuracies" but do not indicate what those alleged inaccuracies are. We take fact-checking of our legal actions seriously and under no circumstances do we want there to be any misstatements. As such, please let me know at your earliest convenience what factual inaccuracies you believe have been made. However, as I stated previously, if Adore Me does not fully correct the issues that are clearly outlined in my April 29th letter by the end of the week, we intend to notify appropriate state and federal authorities.

If you would like to discuss further, please do not hesitate to call me.

Sincerely,

Laura Smith
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