

**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**

**EASYBUTTER, LLC, a limited liability  
company, also doing business as Hempme,**

**and**

**MICHAEL SOLOMON, individually and as an  
officer and owner of EASYBUTTER, LLC and  
PET HELP, LLC.**

**DOCKET NO.**

**COMPLAINT**

The Federal Trade Commission, having reason to believe that EasyButter, LLC., a limited liability company, and Michael Solomon, individually and as officer and owner of EasyButter, LLC (collectively, “Respondents”), have 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 EASYBUTTER, LLC (“EasyButter”) is a Florida limited liability company

4. Cannabidiol (“CBD”) is a substance naturally occurring in, and that can be extracted from, the hemp plant, *cannabis sativa*. Respondents have advertised, promoted, offered for sale, sold, and distributed products containing CBD (“CBD Products”) that are intended for human use. These CBD Products are “food” and/or “drugs,” within the meaning of Sections 12 and 15 of the Federal Trade Commission Act.

5. Consumers can purchase Respondents’ CBD products by calling (833) 743-6763 or by ordering online at [www.hempmeCBD.com](http://www.hempmeCBD.com).

6. Respondents’ CBD products are offered for human and animal consumption and topical application in a variety of products, including oils, creams, hemp shea butter, bath bombs, lip balms, gummies, hemp tabs, honey sticks, lozenges, and assorted pet products.

7. These products are sold to consumers under the names: “Hempme Hemp Shea Butter;” “Hempme Facial Moisturizer;” “Hempme Hemp Repair RX Pain;” “Hempme CBD Gummy Bears;” “Hempme Hemp Gummies;” “Hempme CBD Tablets;” “Hempme CBD Organic Gummy;” “Hempme CBD Sugarfree Gummy;” “Hempme Gummy Worms;” “Hempme Energy Lemon Haze Terpene Hemp Lozenges;” “Hempme Relax Grape/Grand Daddy Purp Terpene Hemp Lozenges;” “Hempme CBD Honey Sticks;” “Hempme Hemp Oil;” “Hempme Roll On Menthol Temple Massage;” “Hempme CBD Massage Oil;” “Hempme Cinnamon Hemp Oil;” “Hempme Blueberry Hemp Oil;” “Hempme Peppermint Hemp Oil;” “Hempme Peach Hemp Oil;” “Hempme Strawberry Hemp Oil;” “Hempme Citrus Skin Care Pump;” “Hempme Pre-Rolled Tube (Strawberry);” “Hempme Pre-Rolled Tube (Pineapple);” “Hempme Pre-Rolled Tube (Kush);” “Hempme Strawberry CBD Oil Cartridge;” “Hempme Blueberry CBD Oil Cartridge;” “CBD Disposable Vapor Pen (Relax);” “CBD Disposable Vapor Pen (Energy);” “Hempme Bubble Gum CBD Oil Cartridge;” “Hempme Watermelon CBD Oil Cartridge;” “Hempme Fruit Punch CBD Oil Cartridge;” and “Hempme Pineapple CBD Oil Cartridge.”

8. Respondent



- viii. “CBD is commonly known to alleviate ailments related to mental diseases such as: Epilepsy Depression Bipolar.”

**Count I**  
**False or Unsubstantiated Efficacy Claims**

11. In connection with the advertising, marketing, promotion, offering for sale, or sale of CBD products, including through the means described in Paragraph 10, Respondents have represented, directly or indirectly, expressly or by implication, that their CBD products prevent diabetes and treat acne, AIDS, autism, bipolar disorder, cancer, depression, epilepsy, PTSD, seizures, and substance abuse.

12. The representations set forth in Paragraph 11 are false or misleading or were not  
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