



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Division of Advertising Practices

October 27, 2020

Via Electronic Mail (lbrett@bbbn.org)

Laura Brett, Esq.  
Vice President  
National Advertising Division  
112 Madison Avenue, 3<sup>rd</sup> Floor  
New York, NY 10016

Re: Advertising by MASK, LLC for Spotless Blemishes & Oily Skin Soothing CBD Sheet Mask

Dear Ms. Brett:

We have reviewed the National Advertising Division's referral of MASK, LLC (the "advertiser") regarding advertising claims for Spotless Blemishes & Oily Skin Soothing CBD Sheet Mask. This referral arose out of NAD's monitoring program. We understand that when NAD opened its case, the advertiser had made claims that its cosmetic product would treat acne and psoriasis; in fact, the original brand name of the mask at issue was "Spotless & Acne Psoriasis Sheet." After being contacted by NAD, the advertiser voluntarily modified certain claims, including changing the brand name of its mask to "Spotless Blemishes & Oily Skin Soothing CBD Sheet Mask." However, NAD referred the matter to the Federal Trade Commission after the advertiser declined to confirm that it would comply with other recommendations set forth in NAD's Decision.

Upon careful review of this referral, we have determined not to take additional action at this time. In reaching this conclusion, we considered a number of factors including enforcement priorities, resource allocation, the nature of any FTC Act violation, and the type and severity of any consumer injury.

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The staff's decision to forego a formal investigation at this time is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require. The FTC appreciates your referral and the opportunity to continue to assist in supporting the NAD.

Very Truly Yours,

*s/ Carolyn L. Hann*

Carolyn L. Hann  
Chief of Staff for Advertising Practices