



April 29, 2016

**VIA OVERNIGHT MAIL AND EMAIL**

Morgan Hermand-Waiche  
Founder & Chief Executive Officer  
AdoreMe, Inc.  
485 7<sup>th</sup> Avenue, Suite 505  
New York, New York, 10018



Re: AdoreMe, Inc.'s Deceptive Advertising and Illegal Business Practices

Dear Mr. Hermand-Waiche:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. We have found that your company, AdoreMe, Inc., is engaged in a deceptive marketing campaign and illegal business practices.

Specifically, our investigation has revealed that AdoreMe's advertisements promote product prices that are only available to consumers who enroll in the company's VIP Membership, not consumers who elect to make a one-time purchase (if they are even able to do so), yet the ads do not clearly and conspicuously disclose this fact in violation of state and federal advertising laws.

Our investigation further discovered that AdoreMe uses a negative option offer in order to enroll consumers into its VIP Membership without clearly and conspicuously disclosing all the material terms and conditions, again in violation of state and federal laws. By way of example, one of the material terms that is not appropriately disclosed is the fact that consumers must take affirmative action within the first five days of every month in order to avoid recurring monthly charges.

Our investigation has also revealed that AdoreMe falsely tells consumers that such monthly charges can be used as store credit at anytime when, in reality, AdoreMe keeps consumers' accumulated unused store credit if they elect to cancel their VIP Memberships, though the company does not disclose this critical fact in any of its marketing materials. This practice not only violates state and federal truth in advertising

laws, but such wrongful taking of another's property may also violate state and federal criminal laws.

Finally, numerous consumers have reported encountering unnecessary hardship and difficulty when trying to cancel their AdoreMe VIP Memberships. The complaints, which number in the hundreds, report situations that suggest that AdoreMe's sole goal is to continue charging consumers on a monthly basis even if they have expressed a desire to terminate and do not want AdoreMe products.

Based on this information, we intend to notify appropriate state and federal authorities, including, but not limited to, the Federal Trade Commission and New York Attorney General's Office, that AdoreMe is engaged in deceptive and illegal practices, unless, by **May 6, 2016**, the company shows us that it has fully corrected the issues described above and has made every effort to alert AdoreMe customers and members of these issues.

Sincerely,



Laura Smith, Esq.  
Legal Director  
Truth in Advertising, Inc.  
lsmith@truthinadvertising.org