

IN THE MATTER OF  
ROBERT C. OBERLIN, TRADING AS RESEARCH  
PRODUCTS CO.

COMPLAINT, FINDINGS, AND ORDER IN REGARD TO THE ALLEGED VIOLATION  
OF SEC. 5 OF AN ACT OF CONGRESS APPROVED SEPT. 26, 1914

*Docket 3863. Complaint, Aug. 5, 1939—Decision, Sept. 18, 1939*

Where an individual engaged in sale and distribution of various medicinal preparations to purchasers in various other States and in the District of Columbia; in advertisements which he disseminated through the mails, through newspapers, and periodicals of general circulation, and through circulars and other printed or written matter distributed among the various States, and through various other means, and which were intended and likely to induce purchase of his preparations—

- (a) Represented, as aforesaid, that certain preparations thus offered, but not actually sold, and known as "Dupree Pills," "Dupree Double Strength Pills," and "Dr. Gordon's Special Formula Double Strength Pills," constituted cures or remedies for delayed menstruation and competent and effective treatments therefor, and that said preparations were safe and harmless, facts being they were not cures or remedies for said condition, did not constitute competent or effective treatments therefor, and were not safe and harmless, in that they contained extract cotton root bark, extract black hellebore, oil tansy, powdered aloes, oil savin, and ergotin in quantities sufficient to cause serious and irreparable injury to health if taken as prescribed in said advertisements or under such conditions as are customary or usual;
- (b) Failed to reveal, in advertisements disseminated with respect thereto, that use of said preparations, under conditions prescribed in said advertisements or under conditions such as are customary or usual, might result in serious or irreparable injury to health;
- (c) Represented that his medicinal preparation known as "Van Dyke Dutch Brand Haarlem Oil Capsules" was a cure or remedy for and had therapeutic value in treatment of rheumatism, sleeplessness, nervousness, or pains in the back, and would serve to flush poisons out of the kidneys or bladder, facts being it was not a competent and effective remedy for any of said ailments or conditions or competent or effective treatment therefor, and would not accomplish results claimed as above set forth; and
- (d) Represented that use of his preparation known as "Dr. Gordon's Vitam-Perles" or "Vitamin E Perles" was a competent or effective remedy or cure for, and had therapeutic value in the treatment of the conditions known as lack of ambition, loss of strength, loss of blood or anemia, or run-down condition, facts being it was not a competent or effective remedy for any of said ailments, had no potency as such tonic or stimulant, and was not a cure or remedy for various conditions above set forth;

With effect of misleading and deceiving substantial portion of purchasing public into erroneous and mistaken belief that such false statements, representations, and advertisements were true, and to induce substantial

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portion of said public, because of such belief, to purchase his said preparations:

*Held*, That such acts and practices, under the circumstances set forth, were all to the prejudice of the public and constituted unfair and deceptive acts and practices in commerce.

*Mr. W. L. Pack* for the Commission.

## COMPLAINT

Pursuant to the provisions of the Federal Trade Commission Act and by virtue of the authority vested in it by said act, the Federal Trade Commission, having reason to believe that Robert C. Oberlin, an individual trading as Research Products Co., hereinafter referred to as respondent, has violated the provisions of said act, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, hereby issues its complaint, stating its charges in that respect as follows:

PARAGRAPH 1. Respondent, Robert C. Oberlin, is an individual trading under the name of Research Products Co. with his office and principal place of business at 3170 Berkshire Road, Cleveland Heights, Ohio. Respondent is now and for more than 1 year last past has been engaged in the sale and distribution of various medicinal preparations in commerce among and between the various States of the United States and in the District of Columbia. Respondent causes said preparations, when sold, to be transported from his place of business in the State of Ohio to purchasers thereof located in various other States of the United States and in the District of Columbia. At all times mentioned herein respondent has maintained a course of trade in said medicinal preparations in commerce among and between the various States of the United States and in the District of Columbia.

PAR. 2. In the course and conduct of his aforesaid business the respondent has disseminated and is now disseminating and has caused and is now causing the dissemination of false advertisements concerning his said preparations by the United States mails, by insertions in newspapers and periodicals having a general circulation, and also in circulars and other printed or written matter, all of which are distributed in commerce among and between the various States of the United States and by other means in commerce as "commerce" is defined in the Federal Trade Commission Act, for the purpose of inducing and which are likely to induce directly or indirectly the purchase of said preparations; and has disseminated and is now disseminating and has caused and is now causing the dissemination of false advertisements concerning his said preparations by various

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means for the purpose of inducing and which are likely to induce, directly or indirectly, the purchase of said preparations in commerce as "commerce" is defined in the Federal Trade Commission Act.

PAR. 3. Among the preparations so sold and distributed by the respondent are certain medicinal preparations for the relief of delayed menstruation known as Dupree Pills, Dupree Double Strength Pills, and Dr. Gordon's Special Formula Double Strength Pills. Among and typical of the false representations contained in the advertisements disseminated and caused to be disseminated as aforesaid with respect to said preparations known as Dupree Pills, Dupree Double Strength Pills, and Dr. Gordon's Special Formula Double Strength Pills are the following:

Ladies end delay. Speedy results in overdue, difficult, abnormal delays. Regular package \$2.00. Double strength \$3.00. Super-double strength \$4.00. Research Products Co., Box 3522, Cleveland Heights, Ohio.

Ladies delayed—remarkably speedy action overdue abnormal delays. Satisfaction or money back. \$1.00. Research Products, Box 3522, Cleveland, Ohio.

While the aforesaid medicinal preparations are not specifically named in said advertisements the preparations so advertised are in fact the preparations known as Dupree Pills and Dupree Double Strength Pills and Dr. Gordon's Special Formula Double Strength Pills.

PAR. 4. By the use of the representations hereinabove set forth and other representations similar thereto not specifically set out herein, respondent represents that his said medicinal preparations known as Dupree Pills and Dupree Double Strength Pills and Dr. Gordon's Special Formula Double Strength Pills are cures or remedies for delayed menstruation and competent and effective treatments therefor and that said preparations are safe and harmless.

PAR. 5. In truth and in fact said preparations are not cures or remedies for delayed menstruation and do not constitute competent or effective treatments therefor. Moreover, said preparations are not safe and harmless, in that they contain extract cotton root bark, extract black hellebore, oil tansy, powdered aloes, oil savin, and ergotin in quantities sufficient to cause serious and irreparable injury to health if taken as prescribed in said advertisements or under such conditions as are customary or usual.

The use of said preparations under the conditions prescribed in said advertisements or under such conditions as are customary or usual may result in gastrointestinal disturbances such as catharsis, nausea, and vomiting with pelvic congestion, congestion of the uterus leading to excessive uterine hemorrhage, and in those cases where any of said preparations are used to interfere with the normal course

of pregnancy may result in uterine infection with extension to other pelvic and abdominal structures and even the blood stream, causing the condition known as septicemia or blood poisoning. The use of said preparations might also produce a very severe circulatory condition by the constriction of the blood vessels and contraction of the involuntary muscles, often with poisonous effects upon the human system and tending to cause abortion in some instances, and may result in severe toxic conditions such as hemorrhagic diarrhea and in some instances producing a gangrenous condition in the lower limbs, resulting possibly either in loss of limbs or in other serious and irreparable injury to health.

PAR. 6. In addition to the representations hereinabove set forth, the respondent is also engaged in the dissemination of false advertisements in that said advertisements fail to reveal that the use of said preparations under conditions prescribed in said advertisements or under such conditions as are customary or usual may result in serious or irreparable injury to health.

PAR. 7. Another of the medicinal preparations advertised, sold, and distributed by the respondent as aforesaid is a certain preparation known as "Van Dyke Dutch Brand Haarlem Oil Capsules." Among and typical of the false representations contained in the advertisements disseminated and caused to be disseminated by respondent with respect to said preparations are the following:

Prostate Kidney Bladder and Rheumatism Sufferers.—Remarkably prompt action for your disorders by our Improved Special. Low cost. Send for free sample of our Improved Special. Research Products Co. Box 3522, Cleveland, Ohio.

Kidney Bladder Rheumatism Sufferers.—Are you worried with sleeplessness, nervousness, gland weakness and prostate trouble. Getting up nights. Pain in back. Learn how to flush poisons out of kidney, bladder, etc. Send for copy "Amazing News" free. Research Products Co., Box 3522, Cleveland, Ohio.

While the said preparation is not specifically named in the foregoing advertisements, the preparation so advertised is in fact the preparation known as Van Dyke Dutch Brand Haarlem Oil Capsules.

PAR. 8. By the use of the representations hereinabove set forth and other representations similar thereto not specifically set out herein, respondent represents that his said medicinal preparation known as Van Dyke Dutch Brand Haarlem Oil Capsules is a cure or remedy for prostate, kidney, and bladder ailments, and for rheumatism, sleeplessness, nervousness, gland weakness, pains in the back, and a competent and effective treatment therefor. Respondent also represents

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that said preparation is an effective means of flushing poisons out of the kidney and bladder.

PAR. 9. In truth and in fact, said preparation is not a competent and effective remedy for any of said ailments. Its use will not serve to remedy any ailments of the prostate gland or the kidneys or bladder, nor is said preparation a cure or remedy for rheumatism or for sleeplessness, nervousness or pains in back, and is not a competent or effective treatment therefor, nor will the use of said preparation serve to flush poisons out of the kidney or bladder.

PAR. 10. A further medicinal preparation advertised, sold and distributed by respondent as aforesaid is a certain preparation known as "Dr. Gordon's Vitam-Perles" or "Vitamin E. Perles." Among and typical of the false representations contained in the advertisements disseminated and caused to be disseminated by respondent with respect to said preparation are the following:

Vitamin E. Perles. A potent tonic and nerve stimulant for male and female. Month's supply \$1. Research Products Co., Box 3522, Cleveland Heights, Ohio.

Dr. Gordon's Vitam-Perles. Pure cold-pressed wheat embryo oil rich in Vitamin E. Indications: lack of ambition, loss of strength, lack of blood or anemia and rundown condition.

PAR. 11. By the use of said representations and other representations similar thereto, not specifically set out herein, respondent represents that his said preparation known as "Dr. Gordon's Vitam-Perles" or "Vitamin E Perles" is a potent tonic and nerve stimulant for male and female and that said preparation is a remedy or cure for lack of ambition, loss of strength, lack of blood or anemia, and run-down condition.

In truth and in fact, said preparation is not a competent or effective remedy for any of said ailments. It has no potency as a tonic or nerve stimulant for either male or female, nor is it a cure or remedy for lack of ambition, loss of strength, loss of blood or anemia, or run-down condition.

PAR. 12. The use by the respondent of the foregoing false, deceptive, and misleading statements and representations disseminated as aforesaid has had and now has the capacity and tendency to, and does, mislead and deceive a substantial portion of the purchasing public into the erroneous and mistaken belief that such false statements, representations, and advertisements are true, and to induce a substantial portion of the purchasing public, because of such erroneous and mistaken belief, to purchase respondent's medicinal preparations.

PAR. 13. The aforesaid acts and practices of the respondent as herein alleged are all to the prejudice and injury of the public, and constitute unfair and deceptive acts and practices in commerce within the intent and meaning of the Federal Trade Commission Act.

#### REPORT, FINDINGS AS TO THE FACTS, AND ORDER

Pursuant to the provisions of the Federal Trade Commission Act, the Federal Trade Commission, on August 5, 1939, issued and on August 8, 1939, served its complaint in this proceeding upon respondent Robert C. Oberlin, trading as Research Products Co., charging him with the use of unfair and deceptive acts and practices in commerce in violation of the provisions of said act. On August 25, 1939, the respondent filed his answer, in which answer he admitted all the material allegations of fact set forth in said complaint, except an allegation as to the sale of certain products hereinafter referred to in paragraph 3, and waived all intervening procedure and further hearing as to said facts. Thereafter the proceeding regularly came on for final hearing before the Commission on the said complaint and answer thereto, and the Commission having duly considered the matter and being now fully advised in the premises, finds that this proceeding is in the interest of the public and makes this its findings as to the facts and its conclusion drawn therefrom:

#### FINDINGS AS TO THE FACTS

PARAGRAPH 1. Respondent, Robert C. Oberlin, is an individual trading under the name of Research Products Co., with his office and principal place of business at 3170 Berkshire Road, Cleveland, Ohio. Respondent is now and for more than 1 year last past has been engaged in the sale and distribution of various medicinal preparations in commerce among and between the various States of the United States, and in the District of Columbia. Respondent causes said preparations, when sold, to be transported from his place of business in the State of Ohio to purchasers thereof located in various other States of the United States, and in the District of Columbia. At all times mentioned herein respondent has maintained a course of trade in said medicinal preparations in commerce among and between the various States of the United States, and in the District of Columbia.

PAR. 2. In the course and conduct of his aforesaid business the respondent has disseminated and is now disseminating and has caused and is now causing the dissemination of false advertisements concerning his said preparations by the United States mails, by insertions

in newspapers and periodicals having a general circulation, and also in circulars and other printed or written matter, all of which are distributed in commerce among and between the various States of the United States, and by other means in commerce, as "commerce" is defined in the Federal Trade Commission Act, for the purpose of inducing, and which are likely to induce, directly or indirectly, the purchase of said preparations; and has disseminated and is now disseminating and has caused and is now causing the dissemination of false advertisements concerning his said preparations by various means for the purpose of inducing and which are likely to induce, directly or indirectly the purchase of said preparations in commerce, as "commerce" is defined in the Federal Trade Commission Act.

PAR. 3. Among said medicinal preparations are certain preparations for the relief of delayed menstruation known as "Dupree Pills," "Dupree Double Strength Pills," and "Dr. Gordon's Special Formula Double Strength Pills." Respondent has not made any actual sales of these preparations. Among and typical of the false representations contained in the advertisements disseminated and caused to be disseminated as aforesaid with respect to said preparations known as "Dupree Pills," "Dupree Double Strength Pills," and "Dr. Gordon's Special Formula Double Strength Pills" are the following:

Ladies end delay. Speedy results in overdue, difficult, abnormal delays. Regular package \$2.00. Double Strength \$3.00. Super-double strength \$4.00. Research Products Co., Box 3522, Cleveland Heights, Ohio.

Ladies delayed—remarkably speedy action overdue abnormal delays. Satisfaction or money back. \$1.00. Research Products, Box 3522, Cleveland, Ohio.

While the aforesaid medicinal preparations are not specifically named in said advertisements, the preparations so advertised are in fact the preparations known as "Dupree Pills," "Dupree Double Strength Pills," and "Dr. Gordon's Special Formula Double Strength Pills."

PAR. 4. By the use of the representations hereinabove set forth and other representations similar thereto not specifically set out herein, respondent represents that his said medicinal preparations known as "Dupree Pills," "Dupree Double Strength Pills," and "Dr. Gordon's Special Formula Double Strength Pills" are cures or remedies for delayed menstruation and competent and effective treatments therefor, and that said preparations are safe and harmless.

PAR. 5. In truth and in fact said preparations are not cures or remedies for delayed menstruation and do not constitute competent or effective treatments therefor. Moreover, said preparations are not safe and harmless, in that they contain extract cotton root bark, extract black hellebore, oil tansy, powdered aloes, oil savin, and ergotin

in quantities sufficient to cause serious and irreparable injury to health if taken as prescribed in said advertisements or under such conditions as are customary or usual.

The use of said preparations under the conditions prescribed in said advertisements or under such conditions as are customary or usual may result in gastrointestinal disturbances such as catharsis, nausea, and vomiting with pelvic congestion, congestion of the uterus leading to excessive uterine hemorrhage, and in those cases where any of said preparations are used to interfere with the normal course of pregnancy may result in uterine infection with extension to other pelvic and abdominal structures and even the blood stream, causing the condition known as septicemia or blood poisoning. The use of said preparations might also produce a very severe circulatory condition by the constriction of the blood vessels and contraction of the involuntary muscles, often with poisonous effects upon the human system and tending to cause abortion in some instances, and may result in severe toxic conditions such as hemorrhagic diarrhea and in some instances producing a gangrenous condition in the lower limbs, resulting possibly either in loss of limbs or in other serious and irreparable injury to health.

PAR. 6. In addition to the representations hereinabove set forth, the respondent is also engaged in the dissemination of false advertisements in that said advertisements fail to reveal that the use of said preparations under conditions prescribed in said advertisements or under such conditions as are customary or usual may result in serious or irreparable injury to health.

PAR. 7. Another of the medicinal preparations advertised, sold, and distributed by the respondent as aforesaid, is a certain preparation known as "Van Dyke Dutch Brand Haarlem Oil Capsules." Among and typical of the false representations contained in the advertisements disseminated and caused to be disseminated by respondent with respect to said preparation are the following:

Prostate Kidney Bladder and Rheumatism Sufferers.—Remarkably prompt action for your disorders by our Improved Special. Low cost. Send for free sample of our Improved Special. Research Products Co., Box. 3522, Cleveland, Ohio.

Kidney Bladder Rheumatism Sufferers.—Are you worried with sleeplessness, nervousness, gland weakness and prostate trouble. Getting up nights. Pain in back. Learn how to flush poisons out of kidney, bladder, etc. Send for copy "Amazing News" free. Research Products Co., Box 3522, Cleveland, Ohio.

While the said preparation is not specifically named in the foregoing advertisements, the preparation so advertised is in fact the preparation known as "Van Dyke Dutch Brand Haarlem Oil Capsules."

PAR. 8. By the use of the representations hereinabove set forth and other representations similar thereto not specifically set out herein, respondent represents that his said medicinal preparation known as "Van Dyke Dutch Brand Haarlem Oil Capsules" is a cure or remedy for prostate, kidney, and bladder ailments, and for rheumatism, sleeplessness, nervousness, gland weakness, pains in the back, and a competent and effective treatment therefor. Respondent also represents that said preparation is an effective means of flushing poisons out of the kidneys and bladder.

PAR. 9. In truth and in fact, said preparation is not a competent and effective remedy for any of said ailments. Its use will not serve to remedy any ailments of the prostate gland or the kidneys or bladder, nor is said preparation a cure or remedy for rheumatism or for sleeplessness, nervousness or pains in the back, and is not a competent or effective treatment therefor, nor will the use of said preparation serve to flush poisons out of the kidneys or bladder.

PAR. 10. A further medicinal preparation advertised, sold, and distributed by respondent as aforesaid is a certain preparation known as "Dr. Gordon's Vitam-Perles" or "Vitamin E. Perles." Among and typical of the false representations contained in the advertisements disseminated and caused to be disseminated by respondent with respect to said preparation are the following:

Vitamin E. Perles. A potent tonic and nerve stimulant for male and female. Month's supply \$1. - Research Products Co., Box 3522, Cleveland Heights, Ohio.

Dr. Gordon's Vitam-Perles. Pure cold-pressed wheat embryo oil rich in Vitamin E. Indications: Lack of ambition, loss of strength, lack of blood or anemia and rundown condition.

PAR. 11. By the use of said representations and other representations similar thereto, not specifically set out herein, respondent represents that his said preparation known as "Dr. Gordon's Vitam-Perles" or "Vitamin E. Perles" is a potent tonic and nerve stimulant for male and female and that said preparation is a remedy or cure for lack of ambition, loss of strength, lack of blood or anemia, and run-down condition.

In truth and in fact, said preparation is not a competent or effective remedy for any of said ailments. It has no potency as a tonic or nerve stimulant for either male or female, nor is it a cure or remedy for lack of ambition, loss of strength, loss of blood or anemia, or run-down condition.

PAR. 12. The use by the respondent of the foregoing false, deceptive, and misleading statements and representations disseminated as aforesaid has had and now has the capacity and tendency to, and does, mislead and deceive a substantial portion of the purchasing

public into the erroneous and mistaken belief that such false statements, representations, and advertisements are true, and to induce a substantial portion of the purchasing public because of such erroneous and mistaken belief, to purchase respondent's medicinal preparations.

#### CONCLUSION

The aforesaid acts and practices of the respondent as herein found are all to the prejudice of the public and constitute unfair and deceptive acts and practices in commerce, within the intent and meaning of the Federal Trade Commission Act.

#### ORDER TO CEASE AND DESIST

This proceeding having been heard by the Federal Trade Commission upon the complaint of the Commission and the answer of respondent, in which answer respondent admits all the material allegations of fact set forth in said complaint, except an allegation as to the sale of certain products, and states that he waives all intervening procedure and further hearing as to said facts, and the Commission having made its findings as to the facts and conclusion that said respondent has violated the provisions of the Federal Trade Commission Act.

*It is ordered*, That the respondent, Robert C. Oberlin, an individual trading as Research Products Co., his agents, representatives, and employees, directly or through any corporate or other device, do forthwith cease and desist from:

Disseminating or causing to be disseminated any advertisement by means of the United States mails or in commerce, as "commerce" is defined in the Federal Trade Commission Act, by any means, for the purpose of inducing or which is likely to induce, directly or indirectly, the purchase of medicinal preparations now designated by the name of "Dupree Pills," "Dupree Double Strength Pills," "Dr. Gordon's Special Formula Double Strength Pills," "Van Dyke Dutch Brand Haarlem Oil Capsules," "Dr. Gordon's Vitam-Perles," and "Vitamin E. Perles," or any other medicinal preparation or preparations composed of substantially similar ingredients or possessing substantially similar therapeutic properties, whether sold under the same name or any other name or names, or disseminating, or causing to be disseminated, any advertisement by any means, for the purpose of inducing, or which is likely to induce, directly or indirectly, the purchase in commerce, as "commerce" is defined in the Federal Trade Commission Act, of said medicinal preparations, which advertisements represent, directly or through implication.

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1. That the use of said preparations known as "Dupree Pills," "Dupree Double Strength Pills," and "Dr. Gordon's Special Formula Double Strength Pills" is a competent, safe, and scientific treatment for delayed menstruation and that their use will have no ill effects upon the human body, or which advertisements fail to reveal that the use of such preparations may result in serious and irreparable injury to the health of the user.

2. That the use of the preparation known as "Van Dyke Dutch Brand Haarlem Oil Capsules" is a cure or remedy for or has any therapeutic value in the treatment of rheumatism, sleeplessness, nervousness, or pains in the back, or that the use of said preparation will serve to flush poisons out of the kidneys or bladder.

3. That the use of the preparation known as "Dr. Gordon's Vitam-Perles" or "Vitamin E. Perles" is a competent or effective remedy or cure for, or that it has any therapeutic value in the treatment of the conditions known as lack of ambition, loss of strength, loss of blood or anemia, or run-down condition.

*It is further ordered,* That the respondent shall, within 10 days after service upon him of this order, file with the Commission an interim report in writing stating whether he intends to comply with this order, and if so, the manner and form in which he intends to comply; and that within 60 days after the service upon him of this order said respondent shall file with the Commission a report in writing setting forth in detail the manner and form in which he has complied with this order.

## Complaint

## IN THE MATTER OF

JOSEPH A. VILLONE, TRADING AS EXCELSIOR HAT  
WORKS

COMPLAINT, FINDINGS, AND ORDER IN REGARD TO THE ALLEGED VIOLATION  
OF SEC. 5 OF AN ACT OF CONGRESS APPROVED SEPT. 20, 1914

*Docket 2046. Complaint, Aug. 4, 1939<sup>1</sup>—Decision, Sept. 19, 1939*

Where an individual engaged in manufacture of hats from old, worn, and used felt hat bodies purchased by him and so treated and processed, through cleaning, steaming, ironing, and shaping, and fitting same with new trimmings, sweat bands, and size labels, that they had the appearance of new products made from felts which had never been worn or used—

Sold said hats, with appearance aforesaid, and with no label, marking, or designation stamped thereon to indicate to purchasing public that they were in fact made from old, worn, and previously used bodies, cleaned and renovated as above set forth, to jobbers, wholesalers, and retailers, who resold said articles to purchasing public without disclosing facts aforesaid, and under such circumstances as to indicate that they were in fact new, and failed, through use of words "Made Over Hat," under such terms as "De Luxe Quality" or "Style Distinctive" or similar words, to disclose to purchasers that articles in question were made from old, worn, or previously used bodies, as distinguished from products made from shop-worn bodies, or newly manufactured felts, which had never been worn or used;

With effect of misleading and deceiving substantial number of members of purchasing public into erroneous and mistaken belief that said products were made from new and unused material or from new, but shop-worn, hat bodies which had never been worn or used, and into purchase of substantial number thereof because of such erroneous and mistaken belief:

*Held*, That such acts and practices, under the circumstances set forth, were all to the prejudice of the public and constituted unfair and deceptive acts and practices in commerce.

*Mr. Robert Mathis, Jr.* for the Commission.

*Mr. Louis R. Kagan*, of Jersey City, N. J., for respondent.

## AMENDED AND SUPPLEMENTAL COMPLAINT

Pursuant to the provisions of the Federal Trade Commission Act, and by virtue of the authority vested in it by said act, the Federal Trade Commission, having reason to believe that Joseph A. Villone, an individual trading as Excelsior Hat Works, hereinafter referred to as respondent, has violated the provisions of said act, and it appearing to the Commission that a proceeding by it in respect thereof

<sup>1</sup> Amended and supplemental.