

IN THE MATTER OF

CONTINENTAL GOWN CLEANING SERVICE, INC., ET AL.

CONSENT ORDER, ETC., IN REGARD TO ALLEGED VIOLATION OF
SEC. 5 OF THE FEDERAL TRADE COMMISSION ACT

Docket 9287. Complaint, May 20, 1998--Decision, Sept. 8, 1999

This consent order, among other things, prohibits the New York-based advertisers and distributors of the Zurcion Method of cleaning and other cleaning or preservation methods from providing any labels or tags that misrepresent the Zurcion Method as the only safe and effective cleaning method or providing any means that violate the Care Labeling Rule. In addition, the consent order prohibits the respondents from making any representations regarding the safety or efficacy of any cleaning or preservation method, service, company, or product, unless the respondents possess and rely upon competent and reliable scientific evidence to substantiate the representation.

Participants

For the Commission: *Constance Vecellio, Edwin Rodriguez, Mary Engle, Elaine Kolish and Genevieve Fu.*

For the respondents: *Jeff Morgenstern and Ira Furman, Freeport, N.Y.*

COMPLAINT

The Federal Trade Commission, having reason to believe that Continental Gown Cleaning Service, Inc., Nationwide Gown Cleaning Service, Inc., Prestige Gown Cleaning Service, Inc. (also doing business as Prestige Gown Service, Inc.), Gown Cleaning Service, Inc., and Jonathan Ashley, Ltd., corporations, and Lewis Weissman and Gary Marcus, individually and as officers of the corporations ("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. Respondents Continental Gown Cleaning Service, Inc., Nationwide Gown Cleaning Service, Inc., Prestige Gown Cleaning Service, Inc. (also doing business as Prestige Gown Service, Inc.), Gown Cleaning Service, Inc., and Jonathan Ashley, Ltd., are New York corporations with their principal offices or places of business at 189-07 Union Turnpike, Flushing, New York.

2. Respondent Lewis Weissman is an officer of the corporate respondents. Individually or in concert with others, he formulates, directs, controls, or participates in the policies, acts, or practices of the corporations, including the acts or practices alleged in this complaint. His principal office or place of business is the same as that of the corporate respondents.

3. Respondent Gary Marcus is an officer of the corporate respondents. Individually or in concert with others, he formulates, directs, or controls the policies, acts, or practices of the corporations, including the acts or practices alleged in this complaint. His principal office or place of business is the same as that of the corporate respondents.

4. Respondents have advertised, offered for sale, and sold to the public a drycleaning service for the cleaning and preservation of wedding gowns and other formal wear by use of a process referred to by respondents as the "Zurcion Method." No cleaners other than respondents offer to the public a cleaning process referred to as the "Zurcion Method."

5. The acts and practices of respondents alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the Federal Trade Commission Act.

6. The Commission's Trade Regulation Rule Concerning the Care Labeling of Textile Wearing Apparel ("Care Labeling Rule" or "Rule"), 16 CFR Part 423, promulgated by the Commission on December 9, 1971, was amended by the Commission in 1983 under Section 18 of the Federal Trade Commission Act. The amended Rule became effective on January 2, 1984, and since that date has remained in full force and effect. The Care Labeling Rule requires that manufacturers and importers of textile wearing apparel attach care labels to such apparel that is offered for sale to consumers.

7. In connection with the advertising, offering for sale, and sale of respondents' drycleaning service, respondents have provided, to manufacturers or importers of wedding gowns and other formal wear, care labels to be affixed to such garments. These manufacturers and importers include, but are not limited to, Mori Lee, Inc., Ilissa Bridals, Ltd., and Alyce Designs, Inc. One or more of these care labels have been used by these companies. The care labels provided by respondents to such manufacturers and importers contain the following statements:

- A. "Dryclean Only by Zurcion Method, Prestige,
1-800-292-GOWN, Manufacturers Guaranteed Processing."
- B. "Dryclean Only by Zurcion Method, Nation-wide,
1-800-242-GOWN guarantee processing."
- C. "Dryclean Only by Zurcion Method Continental
1-800-441-GOWN Made in U.S.A."
- D. "Dryclean Only by Zurcion Method Continental
1-800-441-GOWN Manufacturers Guaranteed Processing."

8. The care labels described in paragraph 7 do not comply with the requirements of the Care Labeling Rule for reasons including, but not limited to, the following:

A. Section 423.6(b)(2)(i) of the Rule requires: "If a drycleaning instruction is included on the label, it must also state at least one type of solvent that may be used. However, if all commercially available types of solvent can be used, the label need not mention any types of solvent." The care labels provided by respondents contain a drycleaning instruction but fail to state at least one type of solvent that may be used on the garment. Typically, the care labels provided by respondents were intended for and have been affixed to garments on which all commercially available types of solvents cannot be used without damage to the garment, which means the label must state a type of solvent that can be used without damage. The use of these labels on such garments by manufacturers or importers constitutes a violation of this section of the Rule.

B. Section 423.6(b)(2)(ii) of the Rule requires: "If there is any part of the drycleaning procedure which consumers or drycleaners can reasonably be expected to use that would harm the product..., the label must contain a warning to this effect." The care labels provided by respondents contain a drycleaning instruction but fail to provide warnings (*e.g.*, "short cycle" or "cabinet dry cool") against parts of the normal drycleaning procedure that might harm the types of garments for which these labels were provided. The use of these labels on such garments by manufacturers or importers constitutes a violation of this section of the Rule.

C. Section 423.6(c) of the Rule requires that a manufacturer or importer "establish a reasonable basis for care information" on labels attached to its garments. A reasonable basis must include "reliable evidence that the product...was harmed when cleaned by methods

warned against on the label." The care labels provided by respondents, which state "Dryclean Only by Zurcion Method," were used by various manufacturers or importers of wedding gowns and other formal wear, including, but not limited to, Mori Lee, Inc., Ilissa Bridals, Ltd., and Alyce Designs, Inc., who did not possess reliable evidence that all cleaning methods other than that used by respondents would harm the garments to which respondents' care labels were attached. The use of these labels on such garments constitutes a violation of this section of the Rule.

9. Through the means described in paragraph 7, respondents have furnished manufacturers or importers of wedding gowns and other formal wear with the means and instrumentalities to engage in violations of the Care Labeling Rule, as described in paragraph 8. Pursuant to Section 18(d)(3) of the Federal Trade Commission ("FTC") Act, a violation of the Care Labeling Rule constitutes a violation of Section 5 of the FTC Act.

10. In connection with the distribution of the care labels described in paragraph 7 to manufacturers or importers of wedding gowns and other formal wear, and in connection with the marketing of their cleaning and preservation services to consumers, respondents have disseminated or have caused to be disseminated promotional materials for the Zurcion Method, including but not necessarily limited to the attached Exhibits A through F. These materials contain the following statements:

A. THE FEDERAL TRADE COMMISSION'S CARE LABELING RULE STATES THAT A MANUFACTURER MUST SEW IN OR AFFIX A LABEL INSIDE THE GARMENT GIVING CARE INSTRUCTIONS ON A PERMANENT LABEL THAT WILL ALLOW THE CONSUMER TO HAVE "ORDINARY USE AND ENJOYMENT" OF THE ARTICLE.

THE FEDERAL TRADE COMMISSION RULE ALSO STATES THAT THERE MUST BE AT LEAST ONE METHOD OF CARE PROCEDURES THAT IS DESCRIBED ON THE AFFIXED CARE LABEL. THIS IS FOR THE DRYCLEANER OR FOR THE PERSON THAT IS SERVICING THE ARTICLE, SO THAT THE ARTICLE WILL RECEIVE THE PROPER CARE AND TREATMENT FOR WEAR OR FOR PURPOSES OF STORAGE.

THE ZURCION* METHOD IS A METHOD THAT IS WIDELY USED BY THE BRIDAL AND FORMAL WEAR INDUSTRY. THIS TYPE OF PROCESSING IS A SPECIALIZED METHOD WHICH REGULAR DRYCLEANERS CANNOT USE FOR REGULAR GARMENT CARE, FOR SEVERAL REASONS WHICH ARE 1) SPECIALIZED PROCESSING

EQUIPMENT NEEDED FOR ZURCION SOLVENTS 2)-SOLVENT COST FACTOR (SOLVENT MADE FROM PURE CHEMICAL COMPOUNDS NOT INDUSTRIAL) 3)-SPECIAL TRAINING NEEDED TO HANDLE ZURCION FLUIDS 4)-NOT AVAILABLE TO THE GENERAL DRYCLEANER ONLY TO OUR COMPANY.

THE CARE LABELING INSTRUCTIONS IN EVERY GARMENT HAVE TO BE FOLLOWED AS FAR AS CARE PROCEDURES ARE CONCERNED ACCORDING TO THE FEDERAL TRADE COMMISSION, THEREFORE IF A GOWN HAS THE LABEL AFFIXED THAT STATES DRYCLEAN BY ZURCION METHOD, THE CLEANER IS COMPELLED TO CLEAN AND SERVICE THE GOWN AS STATED BY THE MANUFACTURER. IF THE CLEANER IGNORES THE CARE LABEL OR SERVICES THE GOWN BY REGULAR DRYCLEANING PROCEDURES HE IS RESPONSIBLE FOR WHAT EVER DAMAGE IS INCURRED BY HIS METHODS.

SUMMARY IF FOR ANY REASON A GOWN IS DAMAGED BY A DRYCLEANER WITH THE ZURCION LABEL AFFIXED IN THE GOWN DO NOT HESITATE TO CONTACT OUR COMPANY. WE WILL SUPPLY YOU WITH A FACT SHEET FROM OUR COMPANY AND THE FEDERAL TRADE COMMISSION EXPLAINING THE FEDERAL TRADE COMMISSION'S LABELING ACT, AND IF THE ARTICLE SHOULD NEED ANALYSIS WE WILL SUPPLY YOU WITH A COMPLETE ANALYSIS REPORT.

CONCLUSION - IF ANY CLEANER CLEANS A WEDDING OR EVENING GOWN WITH ANY OTHER METHOD THAN THE ONE DESCRIBED HE (THE CLEANER) RUNS THE RISK OF DAMAGING THE GOWN AND HAS TO BY LAW COMPENSATE FOR THE DAMAGE OR LOSS OF THAT ARTICLE.

-----REMEMBER-----

ZURCION - IT'S GUARANTEED

*PATENTED METHOD (Exhibit A).

B. FROM THE CONSUMER PROTECTION DIVISION:

* WARNING * WARNING * WARNING * WARNING * WARNING *
BEWARE * BEWARE * BEWARE * BEWARE *

PLEASE BEWARE OF FALSE ADVERTISEMENTS AND MISLEADING STATEMENTS MADE BY OTHER GOWN CLEANING AND PRESERVATION SERVICES:

AT NATIONWIDE GOWN CLEANING SERVICE, WE ARE THE SPECIALISTS OF THE BRIDAL AND FORMAL WEAR INDUSTRY. WE ARE THE ONLY GOWN CLEANING COMPANY THAT IS RECOMMENDED BY 54 OF THE WORLDS [sic] LARGEST BRIDAL GOWN AND FORMAL WEAR MANUFACTURERS. NO OTHER CLEANER OR SO CALLED SPECIALIST CAN MAKE THIS STATEMENT.

...

DON'T BE MISLEAD [sic] BY DRYCLEANERS WHO CLAIM TO HAVE THE KNOWLEDGE OF CLEANING YOUR FINE APPAREL. ONLY SEND YOUR FINE APPAREL TO THE ONE PLACE THAT HAS PROVEN TO LIVE UP TO IT'S [sic] RELIABLE REPUTATION.

DON'T BE MISLEAD [sic] BY PRICE - REMEMBER THE SAYING "YOU GET WHAT YOU PAID FOR". TRUST YOUR FINE APPAREL TO THE PEOPLE WHO HAVE THE KNOW-HOW ON CLEANING YOUR WEDDING GOWN AND/OR FORMAL WEAR.

PLEASE FOLLOW THE CARE LABEL INSTRUCTION INSIDE YOUR GARMENTS. (Exhibit B).

C. PLEASE BE AWARE THAT THERE ARE REGULAR DRY-CLEANERS THAT TRY TO IMITATE OUR SERVICE, BUT THEY CAN NOT IMITATE OUR ZURCION PROCESS OR METHOD. BEWARE OF THE SO CALLED GOWN SPECIALIST, IT COULD PROVE TO BE DISASTROUS.

CONTINENTAL IS THE ONLY GOWN CLEANING AND PRESERVATION SERVICE TO BE RECOMMEND [sic] BY OVER 80% OF THE BRIDAL AND FORMAL WEAR INDUSTRY BY USING THE PATENTED ZURCION METHOD. (Exhibit C).

D. There is only one cleaning method that has proven to be safe on all gowns and formal wear. It's the ZURCION METHOD, 71 bridal and formal wear manufactures [sic] can't be wrong. (Exhibit D).

E. THE TRUE FACTS ABOUT ZURCION -- SPECIAL REPORT

...
FACT: ZURCION IS THE SAFEST METHOD THAT IS USED TODAY FOR CLEANING AND PROCESSING GOWNS AND FORMAL WEAR.

...
FACT: NATIONWIDE IS THE ONLY GOWN CLEANER IN THE UNITED STATES THAT ONLY PROCESS [sic] GOWNS AND FORMAL WEAR, SIMPLY BECAUSE IT IS A SPECIALIZED ITEM THAT SHOULD BE PROCESSED BY A SPECIALIZED COMPANY WITH A SPECIALIZED METHOD (ZURCION).

FACT: DON'T BE FOOLED BY CON ARTISTS THAT TELL YOU THEY HAVE A SPECIAL PROCESS CALLED WETCLEANING. THE DEFINITION OF WETCLEANING IS TO WASH AS PRESCRIBED IN SOAP AND WATER. BEWARE OF THESE CLAIMS THEY ARE GRABBING FOR STRAWS. (Exhibit E).

F. OUR PRESERVATION PROCESS IS SO UNIQUE, WE OFFER A GUARANTEE THAT YOUR GOWN WILL BE AS FRESH AND LOVELY ON HER WEDDING DAY AS IT WAS ON YOURS....

REMEMBER, WE GUARANTEE THE PROCESS. (Exhibit F).

11. Through the means described in paragraph 10, including but not necessarily limited to Exhibit A, respondents have represented, expressly or by implication, that the labels described in paragraph 7 comply with the requirements of the Care Labeling Rule.

12. For the reasons set forth in paragraph 8, the labels distributed by respondents are in violation of the requirements of the Care Labeling Rule. Therefore, the representation set forth in paragraph 11 was and is false or misleading.

13. Through the means described in paragraphs 7 and 10, respondents have represented, expressly or by implication, that:

A. The Zurcion Method is patented.

B. The Zurcion Method is the only safe and effective method for cleaning and preserving wedding gowns and other formal wear, including but not limited to those garments to which the labels described in paragraph 7 are attached.

C. Respondents are the only cleaners that are capable of providing safe and effective cleaning and preservation of wedding gowns and other formal wear, including but not limited to those garments to which the labels described in paragraph 7 are attached.

14. In truth and in fact:

A. The Zurcion Method is not patented.

B. The Zurcion Method is not the only safe and effective method for cleaning and preserving wedding gowns and other formal wear, including but not limited to those garments to which the labels described in paragraph 7 are attached.

C. Respondents are not the only cleaners that are capable of providing safe and effective cleaning and preservation of wedding gowns and other formal wear, including but not limited to those garments to which the labels described in paragraph 7 are attached.

Therefore, the representations set forth in paragraph 13 were, and are, false or misleading.

15. Through the means described in paragraphs 7 and 10, respondents have represented, expressly or by implication, that they possessed and relied upon a reasonable basis that substantiated the representations set forth in paragraphs 11 and 13, at the time the representations were made.

16. In truth and in fact, respondents did not possess and rely upon a reasonable basis that substantiated the representations set forth in paragraphs 11 and 13, at the time the representations were made. Therefore, the representation set forth in paragraph 15 was, and is, false or misleading.

17. In connection with the marketing of their cleaning and preservation services to consumers, respondents have disseminated or have caused to be disseminated promotional materials for the Zurcion method, including but not necessarily limited to the attached

Exhibits F through H. These materials contain the following statements:

A. Our preservation process is so unique, we offer a guarantee that your gown will be as fresh and lovely on her wedding day as it was on yours....

Remember, We Guarantee the Process. (Exhibit F).

B. But **Continental** has a No-Fault Cleaning Process that absolutely GUARANTEES the processing of gowns. . . .

Continental cleans thousands of gowns every month and we have NEVER ruined one! (Exhibit G).

C. Remember, We Guarantee the Process. (Exhibit H).

18. Through the means described in paragraph 17, respondents have represented, expressly or by implication, that there are no material limitations or conditions that apply to respondents' guarantee of the Zurcion process. In truth and in fact, a consumer who has sent a garment to respondents for cleaning and preservation cannot examine the garment to determine whether it has been satisfactorily cleaned and preserved because the garment is returned to the consumer in a sealed container with a printed warranty that includes a warning to the consumer not to break the seal or the container in any manner. The warranty further states that if the garment is to be reused, it must first be returned to respondents, in its sealed container, so that respondents can "unpreserve" the garment and that failure to adhere to these instructions will invalidate respondents' warranty of their service. Thus, the consumer cannot examine the garment serviced by respondents to determine whether the garment has been satisfactorily cleaned, and cannot reuse the garment, without first returning the garment for further processing by the respondents. Respondents have failed to disclose these conditions or limitations to consumers in promotional materials. These facts would be material to consumers in their purchase of respondents' cleaning and preservation service. The failure to disclose these facts, in light of the representations made, was, and is, a deceptive practice.

19. The acts and practices of respondents as alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

By the Commission, Commissioner Swindle voting in the affirmative but dissenting from the inclusion of Part III of the Notice Order.

EXHIBIT A

METHOD AND USE OF ZURCION

CARE LABELING INSTRUCTIONS

THE FEDERAL TRADE COMMISSION'S CARE LABELING RULE STATES THAT A MANUFACTURER MUST SEW IN OR AFFIX A LABEL INSIDE THE GARMENT GIVING CARE INSTRUCTIONS ON A PERMANENT LABEL THAT WILL ALLOW THE CONSUMER TO HAVE "ORDINARY USE AND ENJOYMENT" OF THE ARTICLE.

THE FEDERAL TRADE COMMISSION RULE ALSO STATES THAT THERE MUST BE AT LEAST ONE METHOD OF CARE PROCEDURES THAT IS DESCRIBED ON THE AFFIXED CARE LABEL. THIS IS FOR THE DRY CLEANER OR FOR THE PERSON THAT IS SERVICING THE ARTICLE, SO THAT THE ARTICLE WILL RECEIVE THE PROPER CARE AND TREATMENT FOR WEAR OR FOR PURPOSES OF STORAGE.

THE ZURCION METHOD IS A METHOD THAT IS WIDELY USED BY THE BRIDAL AND FORMAL WEAR INDUSTRY. THIS TYPE OF PROCESSING IS A SPECIALIZED METHOD WHICH REGULAR DRYCLEANERS CANNOT USE FOR REGULAR GARMENT CARE, FOR SEVERAL REASONS WHICH ARE 1) SPECIALIZED PROCESSING EQUIPMENT NEEDED FOR ZURCION SOLVENTS 2) -SOLVENT COST FACTOR (SOLVENT MADE FROM PURE CHEMICAL COMPOUNDS NOT INDUSTRIAL) 3) -SPECIAL TRAINING NEEDED TO HANDLE ZURCION FLUIDS 4) -NOT AVAILABLE TO THE GENERAL DRYCLEANER ONLY TO OUR COMPANY.

THE CARE LABELING INSTRUCTIONS IN EVERY GARMENT HAVE TO BE FOLLOWED AS FAR AS CARE PROCEDURES ARE CONCERNED ACCORDING TO THE FEDERAL TRADE COMMISSION, THEREFORE IF A GOWN HAS THE LABEL AFFIXED THAT STATES DRYCLEAN BY ZURCION METHOD, THE CLEANER IS COMPELLED TO CLEAN AND SERVICE THE GOWN AS STATED BY THE MANUFACTURER. IF THE CLEANER IGNORES THE CARE LABEL OR SERVICES THE GOWN BY REGULAR DRYCLEANING PROCEDURES HE IS RESPONSIBLE FOR WHAT EVER DAMAGE IS INCURRED BY HIS METHODS.

SUMMARY--IF FOR ANY REASON A GOWN IS DAMAGED BY A DRYCLEANER WITH THE ZURCION LABEL AFFIXED IN THE GOWN DO NOT HESITATE TO CONTACT OUR COMPANY. WE WILL SUPPLY YOU WITH A FACT SHEET FROM OUR COMPANY AND THE FEDERAL TRADE COMMISSION EXPLAINING THE FEDERAL TRADE COMMISSION'S LABELING ACT, AND IF THE ARTICLE SHOULD NEED ANALYSIS WE WILL SUPPLY YOU WITH A COMPLETE ANALYSIS REPORT.

CONCLUSION- IF ANY CLEANER CLEANS A WEDDING OR EVENING GOWN WITH ANY OTHER METHOD THAN THE ONE DESCRIBED HE (THE CLEANER) RUNS THE RISK OF DAMAGING THE GOWN AND HAS TO BY LAW COMPENSATE FOR THE DAMAGE OR LOSS OF THAT ARTICLE.

-----REMEMBER-----

ZURCION-IT'S GUARANTEED

*PATENTED METHOD

EXHIBIT A

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Complaint

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EXHIBIT B



FROM THE CONSUMER PROTECTION DIVISION:

* WARNING * WARNING * WARNING * WARNING * WARNING *

BEWARE * BEWARE * BEWARE * BEWARE *

PLEASE BEWARE OF FALSE ADVERTISEMENTS AND MISLEADING
STATEMENTS MADE BY OTHER GOWN CLEANING AND PRESERVATION
SERVICES:

AT NATIONWIDE GOWN CLEANING SERVICE, WE ARE THE SPECIALISTS
OF THE BRIDAL AND FORMAL WEAR INDUSTRY. WE ARE THE ONLY GOWN
CLEANING COMPANY THAT IS RECOMMENDED BY 54 OF THE WORLD'S
LARGEST BRIDAL GOWN AND FORMAL WEAR MANUFACTURERS. NO OTHER
CLEANER OR SO CALLED SPECIALIST CAN MAKE THIS STATEMENT.

YOU PURCHASE YOUR FORMAL WEAR AND WEDDING GOWNS AT SPECIALTY
STORES. THIS IS WHY WE ARE AVAILABLE TO YOU.

WE ARE NOT JUST A STANDARD DRY CLEANER. WE DO NOT CLEAN ANY
KIND OF "REGULAR" GARMENTS. WE WILL ONLY CLEAN AND/OR
PRESERVE YOUR WEDDING GOWN AND FORMAL ATTIRE.

DON'T BE MISLEAD BY DRY CLEANERS WHO CLAIM TO HAVE THE
KNOWLEDGE OF CLEANING YOUR FINE APPAREL. ONLY SEND YOUR FINE
APPAREL TO THE ONE PLACE THAT HAS PROVEN TO LIVE UP TO IT'S
RELIABLE REPUTATION.

DON'T BE MISLEAD BY PRICE - REMEMBER THE SAYING "YOU GET
WHAT YOU PAID FOR". TRUST YOUR FINE APPAREL TO THE PEOPLE
WHO HAVE THE KNOW-HOW ON CLEANING YOUR WEDDING GOWN AND/OR
FORMAL WEAR.

PLEASE FOLLOW THE CARE LABEL INSTRUCTION INSIDE YOUR
GARMENTS.

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EXHIBIT B

451

Complaint

EXHIBIT C



Continental Gown Cleaners, Inc.

For Those Who Demand Excellence!
2965 Blue Point Court, Wantagh, N.Y. 11793
1-800-441-GOWN

DELUXE PROMOTIONAL PACKAGE
=====

When accepting CONTINENTAL GOWN SERVICE'S PROMOTION PACKAGE, you are accepting the best package in the industry. We, at CONTINENTAL, feel that just showing a picture of a bridal chest to a bride is not enough. The consumer wants to know exactly what she is getting for her money. We supply you with these promotional aids free of charge.

- 1). One mini gold bridal chest for display purposes.
- 2). SALES LEAFLETS: These leaflets explain the process that the gown goes through in laymen terms so that there is little explaining on your part. Plus a toll free 800 number for information that you or your bride might want to obtain.

WARNING.....WARNING.....WARNING.....WARNING

PLEASE BE AWARE THAT THERE ARE REGULAR DRY-CLEANERS THAT TRY TO IMITATE OUR SERVICE, BUT THEY CAN NOT IMITATE OUR ZURCION PROCESS OR METHOD. BEWARE OF THE SO CALLED GOWN SPECIALIST. IT COULD PROVE TO BE DISASTROUS.
CONTINENTAL IS THE ONLY GOWN CLEANING AND PRESERVATION SERVICE TO BE RECOMMEND BY OVER 80% OF THE BRIDAL AND FORMAL WEAR INDUSTRY BY USING THE PATENTED ZURCION METHOD.

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EXHIBIT C

Complaint

128 F.T.C.

EXHIBIT D

*Continental Gown Cleaners, Inc.*

For Those Who Demand Excellence!
2965 Blue Point Court, Wantagh, N.Y. 11793
1-800-441-GOWN

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C). When a gown is received by CONTINENTAL GOWN CLEANERS the gown is immediately analyzed to determine what the problem is and analyzed as to how the problem came about. At which time a complete analysis report goes out to you the manufacturer, the consumer, the Bridal Shop and last but not least the cleaner.

This procedure is the most applicable way of settling any claims and keeps your Bridal accounts happy knowing that you have every angle of your business covered.

In recent months so called copy cat gown cleaning services have tried to duplicate our expert service, don't be fooled by these fly by night services. There is only one cleaning method that has proven to be safe on all gowns and formal wear. It's the ZURICON METHOD, 71 bridal and formal wear manufactures can't be wrong.

Remember, integrity and caring but most of all reputation.

If you would like to see one of representatives to discuss complete details of our service at no cost or obligation just call us at 1-800-441-GOWN. Over 700,000 customers are pleasantly satisfied with our service that must say something for integrity and reputation.

Looking forward to hearing from you.

Very truly yours,

Lewis Weissman
CONTINENTAL GOWN CLEANERS, INC.

00071

THERE WILL ALWAYS BE IMITATORS
THERE IS ONLY ONE CONTINENTAL!
THE ONE TO TRUST

EXHIBIT D

EXHIBIT E

THE TRUE FACTS ABOUT ZURCION
SPECIAL REPORT

FACT: ZURCION IS RECOMMENDED BY 76 OF THE WORLDS MOST PRESTIGIOUS GOWN AND FORMAL WEAR MANUFACTURES.

FACT: ZURCION IS THE SAFEST METHOD THAT IS USED TODAY FOR CLEANING AND PROCESSING GOWNS AND FORMAL WEAR.

FACT: THE ZURCION METHOD HAS NEVER DAMAGED A WEDDING GOWN OR FORMAL GOWN.

FACT: UNLIKE OTHER CLEANING COMPOUNDS, ZURCION IS NOT AVAILABLE TO ANY REGULAR DRYCLEANER.

FACT: ZURCION IS A TRADE MARKED METHOD THAT HAS BEEN APPROVED BY THE UNITED STATES PATENT AND TRADE MARK OFFICE UNDER REG. NO. 1,582,960.

FACT: WHEN DEALING WITH ANY GOWN SERVICE THAT GIVES YOU CREDENTIALS CHECK THEM OUT FULLY. DON'T ALWAYS BELIEVE WHAT YOU HEAR.

FACT: ZURCION HAS BEEN RECOGNIZED BY THE INTERNATIONAL FABRICARE INSTITUTE (FABRIC NEWS DIGEST OCTOBER 1990).

FACT: OTHER GOWN CLEANERS WHO ARE ACTUALLY REGULAR DRYCLEANERS WHO PROCESS REGULAR EVERYDAY WEARING APPAREL TRY TO SUBSIDIZE THERE CLEANING STORES WITH GOWN CLEANING. THEY LEAD YOU TO BELIVE THAT GOWN CLEANING IS THERE ONLY BUSINESS, WHEN IT'S JUST A SIDE LINE.

FACT: NATIONWIDE IS THE ONLY GOWN CLEANER IN THE UNITED STATES THAT ONLY PROCESS GOWNS AND FORMAL WEAR, SIMPLY BECAUSE IT IS A SPECIALIZED ITEM THAT SHOULD BE PROCESSED BY A SPECIALIZED COMPANY WITH A SPECIALIZED METHOD (ZURCION).

FACT: DON'T BE FOOLED BY CON ARTISTS THAT TELL YOU THEY HAVE A SPECIAL PROCESS CALLED WETCLEANING. THE DEFINITION OF WETCLEANING IS TO WASH AS PRESCRIBED IN SOAP AND WATER. BEWARE OF THESE CLAIMS THEY ARE GRABBING FOR STRAWS.

FACT: NATIONWIDE GOWN CLEANERS INC, HAS A PROCESS THAT IS REGARDED AS A TRADE SECRET SO THAT THE LEVEL OF QUALITY AND REPUTATION CAN BEST BE SERVED TO YOU THE CONSUMER.

FACT: NATIONWIDE GOWN CLEANER INC, IS AND ALWAYS WILL BE THE MOST REPUTABLE AND DISTINGUISHED GOWN CLEANER IN THE BRIDAL INDUSTRY ALWAYS THERE TO SERVE YOU THE CONSUMER WITH INTEGRITY.

FACT: NATIONWIDE GOWN CLEANERS INC. WILL ALWAYS STAND ABOVE THE REST WITH HONESTY, INTEGRITY AND QUALITY. THIS IS OUR PLEDGE TO YOU.

Complaint

128 F.T.C.

EXHIBIT F



A Fable ...

"The Ravages of Time"

When grandmother got married she was a lovely bride in her gown of fine hand made lace. Everyone told her how beautiful she looked in her delicate gown. After the wedding, she thoughtfully decided to save her gown and veil for her daughter to wear some day. But Continental wasn't available then so she folded her gown with loving care in tissue paper and moth flakes and placed it tenderly in the bottom of her cedar chest. When it was time for the lovely gown to be worn by her daughter, she found it had discolored and the beautiful lace was ruined.

The moral of the story: Don't trust your wedding gown to home methods or ordinary dry cleaning, they can't prevent the ravages of time but Continental Gown Cleaners can.

Your antique gowns can be cleaned and restored to a like-new finish.

What a Lovely Bride, What a Lovely Gown

Cleaning Gowns is our only Business.

Cherish this moment in your special memories and in a very special way Continental will preserve your beautiful gown.

For more than forty years we have been preserving fine delicate gowns so they retain all the beauty they had on that special day. After the gown has been cleansed and carefully treated to resist soil, dust, and moisture, we pack it in a sealed contained (with a window for you and your daughter to enjoy its lasting beauty).

Our preservation process is so unique, we offer a guarantee that your gown will be as fresh and lovely on her wedding day as it was on yours.

Preserve your wedding gown today.

To Enjoy Forever

The Professionals

Continental is recommended by
the World's Leading Wedding Gown Manufacturers

FOR BEST RESULTS, SEND GOWN OR CALL

Continental
Gown Cleaners, Inc.

Flushing, NY • Dallas, TX • Campbell, CA

1-800-441-GOWN

Free Pick-Up Worldwide

Remember, We Guarantee the Process

Exhibit F
200.2

451

Complaint

EXHIBIT G

FACT: Continental Gown Cleaners, Inc. is the only leading gown cleaners and restorers in the nation and is the choice of the bridal industry.

FACT: The average cleaner will not clean a gown that is glued up or that has glued or pearlized beading. But-Continental has a No-Fault Cleaning Process that absolutely GUARANTEES the processing of gowns. With our Fabric Analysis Department we examine and analyze gowns.

FACT: Continental cleans thousands of gowns every month and we have NEVER ruined one! So why take chances with so called safe methods. trust the choice of the bridal gown industry and here's why:

Continental is geared for gown processing. We utilize the most modern equipment in the industry. With expert technicians trained to handle the cleaning and processing of delicate gowns.

The average cleaner uses a regular dry cleaning machine used for every day dry cleaning. To clean one or two gowns a month, he cannot be expected to alter his methods.

CONTINENTAL USES SPECIALIZED:

Gown processing units
Trained personnel
Chemical formulas for different gowns
Finishing equipment

An Average Cleaner with:
Average cleaning equipment
Average personnel
Average spotting techniques

If you have any questions, please feel free to call our toll-free numbers:
New York call: 718-468-1992 • Outside New York call: 1-800-441-GOWN

FACT: We appreciate your interest in Continental Gown Cleaners, Inc., the choice of the Bridal Industry.

THE STORY BEHIND YOUR WEDDING GOWN

As soon as your wedding gown is received at Continental, we begin a long and timely procedure to insure that your gown is given the finest care:

STEP ONE: Your gown is carefully analyzed to determine the type of care required.

STEP TWO: The gown is thoroughly soaked in a special formulated solution designed to:

- A). Rid the garment of all perspiration
- B). Remove all hem soil
- C). Surface all stains for easy removal
- D). Whiten the fabric

STEP THREE: The gown is cleansed in special fluids. It is then submerged in to a preservative. The preservative is formulated to resist moisture, soil, dust, and to reflect some harmful light rays.

STEP FOUR: Your gown is then air dried and pressed and placed in a box designed for wedding gowns.

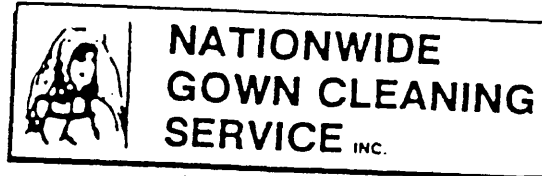
At Continental we take the time to make it right! Exhibit G ends

Complaint

128 F.T.C.

EXHIBIT H

FOR BEST RESULTS CALL



New York, NY

Dallas, TX

Campbell, CA

1-800-242-GOWN**REMEMBER
WE GUARANTEE THE PROCESS****Free Pick Up Worldwide**

MEMBER OF B.M.A.A.

00057

DECISION AND ORDER

The Federal Trade Commission having issued its complaint charging the respondents named in the caption hereof with violation of Section 5(a) of the Federal Trade Commission Act, as amended, and the respondents having been served with a copy of that complaint, together with a notice of contemplated relief; and

The respondents, their attorneys, and counsel for the Commission having thereafter executed an agreement containing a consent order, an admission by the respondents of all the jurisdictional facts set forth in the complaint, a statement that the signing of said agreement is for settlement purposes only and does not constitute an admission by respondents of facts, other than jurisdictional facts, or of violations of law as alleged in the complaint issued by the Commission.

The Secretary of the Commission having thereafter withdrawn this matter from adjudication in accordance with Section 3.25(c) of its Rules; and

The Commission having considered the matter and having thereupon accepted the executed consent agreement and placed such agreement on the public record for a period of sixty (60) days, now in further conformity with the procedure prescribed in Section 3.25(f) of its Rules, the Commission hereby makes the following jurisdictional findings and enters the following order:

1. Respondents Continental Gown Cleaning Service, Inc., Nationwide Gown Cleaning Service, Inc., Prestige Gown Cleaning Service, Inc. (also doing business as Prestige Gown Service, Inc.), Gown Cleaning Service, Inc., and Jonathan Ashley, Ltd., are New York corporations with their principal offices or places of business at 189-07 Union Turnpike, Flushing, New York.

2. Respondent Lewis Weissman is an officer of the corporate respondents. Individually or in concert with others, he formulates, directs, controls, or participates in the policies, acts, or practices of the corporations, including the acts or practices alleged in this complaint. His principal office or place of business is the same as that of the corporate respondents.

3. Respondent Gary Marcus is an officer of the corporate respondents. Individually or in concert with others, he formulates, directs, or controls the policies, acts, or practices of the corporations, including the acts or practices alleged in this complaint. His principal

office or place of business is the same as that of the corporate respondents.

4. The Federal Trade Commission has jurisdiction of the subject matter of this proceeding and of the respondents, and the proceeding is in the public interest.

ORDER

DEFINITIONS

For purposes of this order, the following definitions shall apply:

1. "*Care Labeling Rule*" shall mean the Federal Trade Commission's Trade Regulation Rule Concerning the Care Labeling of Textile Wearing Apparel, 16 CFR Part 423, or as the Rule may hereafter be amended.

2. Unless otherwise specified, "*respondents*" shall mean Continental Gown Cleaning Service, Inc., Nationwide Gown Cleaning Service, Inc., Prestige Gown Cleaning Service, Inc. (also doing business as Prestige Gown Service, Inc.), Gown Cleaning Service, Inc., and Jonathan Ashley, Ltd., corporations, their successors and assigns and their officers; Lewis Weissman and Gary Marcus, individually and as officers of the corporations; and each of the above's agents, representatives and employees.

3. "*Commerce*" shall mean commerce as defined in Section 4 of the Federal Trade Commission Act, 15 U.S.C. 44.

4. "*Clearly and prominently*" shall mean as follows:

A. In an advertisement communicated through an electronic medium (such as television, video, radio, and interactive media such as the Internet and online services), the disclosure shall be presented simultaneously in both the audio and video portions of the advertisement. Provided, however, that in any advertisement presented solely through video or audio means, the disclosure may be made through the same means in which the ad is presented. The audio disclosure shall be delivered in a volume and cadence sufficient for an ordinary consumer to hear and comprehend it. The video disclosure shall be of a size and shade, and shall appear on the screen for a duration, sufficient for an ordinary consumer to read and comprehend it. In addition to the foregoing, in interactive media the disclosure shall also be unavoidable and shall be presented prior to the consumer incurring any financial obligation.

B. In a print advertisement, promotional material, or instructional manual, the disclosure shall be in a type size and location sufficiently noticeable for an ordinary consumer to read and comprehend it, in print that contrasts with the background against which it appears. In multipage documents, the disclosure shall appear on the cover or first page.

C. On a product label, the disclosure shall be in a type size and location on the principal display panel sufficiently noticeable for an ordinary consumer to read and comprehend it, in print that contrasts with the background against which it appears.

The disclosure shall be in understandable language and syntax. Nothing contrary to, inconsistent with, or in mitigation of the disclosure shall be used in any advertisement or on any label.

5. "*Competent and reliable scientific evidence*" shall mean tests, analyses, research, studies, or other evidence based on the expertise of professionals in the relevant area, that has been conducted and evaluated in an objective manner by persons qualified to do so, using procedures generally accepted in the profession to yield accurate and reliable results.

6. "*Manufacturer's or importer's written statement of reasonable basis*" shall mean a written statement in the form attached as Appendix A signed by an authorized officer of the manufacturer or importer that produces the garments or products to which the statement relates, describing the reasonable basis for a particular care instruction, warning or other representation.

7. "*Solvent*" shall mean any common organic solvent that is commercially available for purchase for use in drycleaning.

I.

It is ordered, That respondents, directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, promotion, offering for sale, sale, or distribution of the Zurcion Method of cleaning and preservation or of any garment cleaning or preservation method, service, or product in or affecting commerce, shall not provide to retail or wholesale stores or to manufacturers or importers of textile wearing apparel subject to the Commission's Care Labeling Rule, the means and instrumentalities to violate the Federal Trade Commission Act and/or the Care

Labeling Rule, including without limitation, providing any labels or tags that:

(A) Fail, when the label or tag requires or recommends drycleaning, to state at least one type of solvent that may be used without damage to dryclean the garment to which the label or tag is to be attached, unless all solvents can be used without damage; or

(B) Fail to provide warnings about parts of the normal drycleaning process or the normal washing process (as these processes are described in the Care Labeling Rule) that may harm the garment to which the label or tag is to be attached or others being washed or drycleaned with it; or

(C) Warn against the use of washing or drycleaning (as described in the Care Labeling Rule), or against the use of professional wetcleaning, when no warning is needed; or

(D) Violate the Care Labeling Rule, including without limitation, in the manner described in subparts (A), (B), and (C) of this Part; or

(E) State "Dryclean Only by Zurcion Method" or otherwise misrepresent that the Zurcion Method is the only cleaning method that can be used safely and effectively to clean the garments to which the labels or tags are to be attached; or

(F) Represent that respondents are the only cleaners who can clean the garments to which the labels or tags are to be attached;

Provided that, for any and all labels or tags provided by respondents that include care instructions, respondents must possess and rely upon the manufacturer's or importer's written statement of reasonable basis to substantiate the care instructions.

For purposes of this Part, labels and tags are defined as written material provided by respondents for purposes of attachment to textile wearing apparel that is offered for sale to consumers.

II.

It is further ordered, That respondents, directly or through any corporation, subsidiary, division, or other device (including without limitation providing materials or information intended for use or distribution by others), in connection with their advertising, promotion, offering for sale, sale, or distribution of any garment cleaning or preservation method, service, or product in or affecting

commerce, shall not make any misrepresentations regarding the Care Labeling Rule or compliance with the Care Labeling Rule.

III.

It is further ordered, That respondents, directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, promotion, offering for sale, sale, or distribution of the Zurcion Method of cleaning or preservation or any other method of cleaning or preservation, in or affecting commerce, shall not misrepresent in any manner, expressly or by implication, that such method is patented.

IV.

It is further ordered, That respondents, directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, promotion, offering for sale, sale, or distribution of any garment cleaning or preservation method, service, company or product in or affecting commerce, shall not make any representation, in any manner, expressly or by implication, regarding the comparative or absolute safety or efficacy of any cleaning or preservation method, service, company, or product, unless the representation is true and, at the time it is made, respondents possess and rely upon competent and reliable evidence, which when appropriate shall be competent and reliable scientific evidence, that substantiates the representation.

V.

It is further ordered, That respondents, directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, promotion, offering for sale, sale, or distribution of a garment cleaning or preservation service in or affecting commerce, shall not make any representation, in any manner, expressly or by implication, that such service is guaranteed or warranted, unless they disclose, clearly and prominently, and in close proximity to the representation, any material limitation or condition on the guarantee or warranty, including, but not limited to the fact, if true, that an item preserved by respondents must be kept sealed in the special preservation container and if opened for inspection must be returned for reboxing within thirty (30) days.

VI.

It is further ordered, That respondents Continental Gown Cleaning Service, Inc., Nationwide Gown Cleaning Service, Inc., Prestige Gown Cleaning Service, Inc., Prestige Gown Service, Inc., Gown Cleaning Service, Inc., and Jonathan Ashley, Ltd., and their successors and assigns, and respondents Lewis Weissman and Gary Marcus, shall, within sixty (60) days after the date of service of this order, send by first class certified mail, return receipt requested, to (a) all garment manufacturers or importers to whom respondents have provided Zurcion labels or promotional materials since January 1, 1996, and (b) as many as possible of respondents' customers identified during discovery for whom addresses can be found, a notice, in the form attached as Appendix B, informing the recipient of this order and that the recipient should cease all use of the Zurcion labels and promotional materials. No information other than that contained in Appendix B shall be included with the mailing, nor shall any other material be transmitted with it.

VII.

It is further ordered, That respondents Continental Gown Cleaning Service, Inc., Nationwide Gown Cleaning Service, Inc., Prestige Gown Cleaning Service, Inc., Prestige Gown Service, Inc., Gown Cleaning Service, Inc., and Jonathan Ashley, Ltd., and their successors and assigns, and respondents Lewis Weissman and Gary Marcus, in any communication with persons other than manufacturers or importers regarding the cleaning or preservation of garments to which labels stating "Dryclean Only by Zurcion Method" or substantially similar instructions have been attached prior to the date of issuance of this order, shall disclose that other cleaning methods may be safely and effectively used, shall instruct the person to contact the manufacturer or importer to obtain cleaning instructions, and shall provide information about how to contact the manufacturer or importer. The disclosures required by this Part VII may be made using the statement attached as Appendix C.

VIII.

It is further ordered, That respondents Continental Gown Cleaning Service, Inc., Nationwide Gown Cleaning Service, Inc., Prestige Gown Cleaning Service, Inc., Prestige Gown Service, Inc.,

Gown Cleaning Service, Inc., and Jonathan Ashley, Ltd., and their successors and assigns, and respondent Lewis Weissman, for five (5) years after the date of issuance of this order, shall maintain and upon request make available to the Federal Trade Commission for inspection and copying business records demonstrating their compliance with the terms and provisions of this order, including but not limited to:

A. All advertisements and promotional materials for any garment cleaning or preservation method, service, or product offered for sale by respondents;

B. All materials that were relied upon in disseminating any representation covered by this order;

C. All tests, reports, studies, surveys, demonstrations, or other evidence in their possession or control that contradict, qualify, or call into question any representation covered by this order, or the basis relied upon for the representation, including complaints and other communications with consumers or with governmental or consumer protection organizations; and

D. All materials provided by respondents to manufacturers, importers, retailers, or wholesalers of textile wearing apparel.

Respondent Gary Marcus shall comply with the provisions of this Part VIII if at any time during the five (5) years after the date of issuance of this order he owns or controls a majority interest in any of the corporate respondents, or in any business involving or connected with the advertising, promotion, offering for sale, sale, or distribution of any garment cleaning or preservation method, service, or product.

IX.

It is further ordered, That respondents Continental Gown Cleaning Service, Inc., Nationwide Gown Cleaning Service, Inc., Prestige Gown Cleaning Service, Inc., Prestige Gown Service, Inc., Gown Cleaning Service, Inc., and Jonathan Ashley, Ltd., and their successors and assigns, and respondents Lewis Weissman and Gary Marcus shall deliver a copy of this order to all current and future principals, officers, directors, and managers, and to all current and future employees, agents, and representatives having responsibilities with respect to the subject matter of this order, and shall secure from

each such person a signed and dated statement acknowledging receipt of the order. Respondents shall deliver this order to current personnel within sixty (60) days after the date of service of this order, and to future personnel within thirty (30) days after the person assumes such position or responsibilities.

X.

It is further ordered, That respondents Continental Gown Cleaning Service, Inc., Nationwide Gown Cleaning Service, Inc., Prestige Gown Cleaning Service, Inc., Prestige Gown Service, Inc., Gown Cleaning Service, Inc., and Jonathan Ashley, Ltd., and their successors and assigns, shall notify the Commission at least thirty (30) days prior to any change in the corporation(s) that may affect compliance obligations arising under this order, including but not limited to a dissolution, assignment, sale, merger, or other action that would result in the emergence of a successor corporation; the creation or dissolution of a subsidiary, parent, or affiliate that engages in any acts or practices subject to this order; the proposed filing of a bankruptcy petition; or a change in the corporate name or address. Provided, however, that, with respect to any proposed change in the corporation(s) about which respondents learn less than thirty (30) days prior to the date such action is to take place, respondents shall notify the Commission as soon as is practicable after obtaining such knowledge. All notices required by this Part shall be sent by certified mail to the Associate Director, Division of Enforcement, Bureau of Consumer Protection, Federal Trade Commission, Washington, D.C.

XI.

It is further ordered, That, for a period of ten (10) years after the date of issuance of this order:

(a) Respondent Lewis Weissman shall notify the Commission of the discontinuance of his current business or employment, or of his affiliation with any new business or employment; and

(b) Respondent Gary Marcus shall notify the Commission of his affiliation with any new business or employment involving or connected with the advertising, promotion, offering for sale, sale, or distribution of any garment cleaning or preservation method, service, or product.

The notices required in this Part XI shall include respondents' new business address and telephone number and a description of the nature of the business or employment and their duties and responsibilities. All notices required by this Part shall be sent by certified mail to the Associate Director, Division of Enforcement, Bureau of Consumer Protection, Federal Trade Commission, Washington, D.C. 20580.

XII.

It is further ordered, That respondents Continental Gown Cleaning Service, Inc., Nationwide Gown Cleaning Service, Inc., Prestige Gown Cleaning Service, Inc., Prestige Gown Service, Inc., Gown Cleaning Service, Inc., and Jonathan Ashley, Ltd., and their successors and assigns, and respondents Lewis Weissman and Gary Marcus shall, within sixty (60) days after the date of service of this order, and at such other times as the Federal Trade Commission may require, file with the Commission a report, in writing, setting forth in detail the manner and form in which they have complied with this order. This report shall include, but shall not be limited to, a detailed description of the Zurcion Method of cleaning or preservation, any substantially similar method of cleaning or preservation, or any other specialized method of cleaning or preserving textile wearing apparel advertised by respondents, including the solvent(s) used in such method. Pursuant to Rule 4.9(c) of the Commission's Rules of Practice, respondents may designate material included in the report as confidential and request that it be withheld from the public record.

XIII.

This order will terminate on September 8, 2019, or twenty (20) years from the most recent date that the United States or the Federal Trade Commission files a complaint (with or without an accompanying consent decree) in federal court alleging any violation of the order, whichever comes later; provided, however, that the filing of such a complaint will not affect the duration of:

- A. Any Part in this order that terminates in less than twenty (20) years;
- B. This order's application to any respondent that is not named as a defendant in such complaint; and
- C. This order if such complaint is filed after the order has terminated pursuant to this Part.

Provided, further, that if such complaint is dismissed or a federal court rules that the respondent did not violate any provision of the order, and the dismissal or ruling is either not appealed or upheld on appeal, then the order will terminate according to this Part as though the complaint had never been filed, except that the order will not terminate between the date such complaint is filed and the later of the deadline for appealing such dismissal or ruling and the date such dismissal or ruling is upheld on appeal.

APPENDIX A

WRITTEN STATEMENT OF REASONABLE BASIS

1. This statement is being provided to [name of respondent] to satisfy the conditions of an Order of the Federal Trade Commission dated September 8, 1999. I have received a copy of this Order.

2. Attached to this statement is a copy of [label(s) or tag(s)] attached to garments manufactured or imported by [name of manufacturer or importer].

3. [Name of manufacturer or importer] possesses and relies upon a reasonable basis in accordance with the Federal Trade Commission's Care Labeling Rule, 16 C.F.R. Part 423, for the care instructions [or specify other representations] made on the attached [label or tag]. This reasonable basis consists of the following reliable evidence: [describe nature of evidence].

[NAME OF MANUFACTURER OR IMPORTER]

BY: _____
 [Name of authorized officer]
 [Title of officer]

DATE: _____

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Decision and Order

APPENDIX B

[Respondents' Letterhead]

Dear [name of manufacturer or importer]:

During the past several years you received garment labels, tags or other information materials about the Zurcion method of cleaning and preserving wedding gowns and other formal wear. We are providing this notice pursuant to the terms of a Consent Order that our company agreed to have entered by the Federal Trade Commission. A copy of the Consent Order is attached.

The Consent Order is the result of allegations by the Commission that our materials violated the Care Labeling Rule or were otherwise misleading. The labels, tags and other materials said "Dryclean Only by Zurcion Method," or words to that effect, or suggested that our company or cleaning methods are the only ones that could successfully clean certain garments. According to the Commission's Complaint, other cleaners and other methods may be able to clean and preserve these garments as well as we can. To comply with the Care Labeling Rule (found at 16 C.F.R. Part 423 or at www.ftc.gov) -- click on "Legal Framework" and then "FTC Regulations and Guides," or at www.access.gpo.gov/nara/cfr/waisidx/16cfr423v1.html), you should always take appropriate steps to determine what cleaning or preservation methods will work for your company's garments.

Under the terms of the Consent Order, we can no longer (among other things) use the labels, tags or other materials you have received from us. Accordingly, please stop using them and destroy the unused supply. To satisfy the Rule's requirements, you may want to recall and/or retag garments in distribution that include Zurcion labels.

For more information about the Care Labeling Rule, contact Steven Ecklund at the Federal Trade Commission, 202-326-2841 or secklund@ftc.gov.

Very truly yours,

Lewis Weissman
President

APPENDIX C

[You may use the following text to communicate the information required by Part VII of the Order. When dealing with drycleaners or retailers, the text may be modified to indicate that the order or inquiry is being made on behalf of a customer or customers, rather than by the customer directly. If there's any confusion about the message, the underlined text is to be the starting point for any further response.]

Since the manufacturer sewed a "Zurcion" label in your gown, it has been determined that other methods also may successfully and safely clean your gown.

We cannot provide the detailed cleaning instructions necessary for other cleaners to service your gown. If you want to consider other cleaners, contact the gown's manufacturer or importer for specific cleaning instructions. They will tell you if other cleaning methods exist and whether other cleaners may be able to follow the manufacturer's instructions.

If you don't know how to contact your gown's manufacturer or importer, we can help.

(If you know the manufacturer or importer's name, we can check a listing for their contact information.)

(If you don't know the name, look on your gown's label for the federal registered identification number or "RN" number. It will help us get the contact information for you.)

IN THE MATTER OF

FLEET FINANCE, INC., ET AL.

CONSENT ORDER, ETC., IN REGARD TO ALLEGED VIOLATION OF
THE TRUTH IN LENDING ACT, REGULATION Z AND THE
FEDERAL TRADE COMMISSION ACT*Docket C-3899. Complaint, Oct. 5, 1999--Decision, Oct. 5, 1999*

This consent order, among other things, requires Fleet Finance, Inc., and its successor companies to pay \$1.3 million in consumer redress and administrative costs, and prohibits the respondents from future violations of the Truth in Lending Act and from making various misrepresentations of credit costs and terms of home equity loans or any credit transaction.

Participants

For the Commission: *Carole Reynolds, Thomas Kane, Margaret Patterson and James Lacko.*

For the respondents: *Harold Shaw, King & Spalding, Washington, D.C.*

COMPLAINT

The Federal Trade Commission, having reason to believe that Fleet Finance, Inc., incorporated in Delaware ("Fleet Finance"), a corporation, and a related now-defunct corporation, Fleet Finance, Inc., which was incorporated in Rhode Island, have violated the provisions of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. 45-58, as amended, the Truth in Lending Act ("TILA"), 15 U.S.C. 1601-1667, as amended, and its implementing Regulation Z, 12 CFR 226, as amended, and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent Fleet Finance is a Delaware corporation with its principal office or place of business at 6 Executive Park Drive, Atlanta, Georgia.
2. Respondent Fleet Finance has engaged in the business of offering and extending "consumer credit" to the public and is a "creditor," as those terms are defined in the TILA and Regulation Z.