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7 **STATE OF WASHINGTON**
8 **KING COUNTY SUPERIOR COURT**

9 STATE OF WASHINGTON,
10
11 Plaintiff,
12 v.
13 RECOVERY WORLDWIDE, LLC,
14 Defendant.

NO.
COMPLAINT FOR INJUNCTIVE
AND OTHER RELIEF UNDER THE
CONSUMER PROTECTION ACT,
RCW 19.86

15
16 Plaintiff, State of Washington, by and through its attorneys Robert W. Ferguson,
17 Attorney General, and Logan Starr and Audrey Udashen, Assistant Attorneys General, bring
18 this action against Recovery Worldwide, LLC (Recovery Worldwide) for violations of the
19 Consumer Protection Act (CPA), RCW 19.86. The CPA prohibits unfair or deceptive acts or
20 practices in the conduct of trade or commerce. The State alleges the following on information
21 and belief:

22 **I. JURISDICTION AND VENUE**

23 1.1 The State files this complaint under the provisions of the Consumer Protection
24 Act, RCW 19.86.

25 1.2 The Attorney General is authorized under RCW 19.86.020, RCW 19.86.080, and
26 RCW 19.86.140 to enforce the CPA.

1 1.3 Recovery Worldwide engaged in the conduct set forth in this Complaint in whole
2 or in part in King County, Washington and elsewhere in the State of Washington.

3 1.4 Venue is proper in King County pursuant to RCW 4.12.020, RCW 4.12.025, and
4 Superior Court Civil Rule 82 because Recovery Worldwide transacts business in King County, and
5 committed the actions alleged in this Complaint in part in King County.

6 1.5 This Court has personal jurisdiction over Recovery Worldwide pursuant to RCW
7 4.28.180, RCW 4.28.185, and RCW 19.86.160 because the acts alleged have been committed in
8 this State.

9 1.6 This Court has subject matter jurisdiction over this Complaint under the laws of
10 the State of Washington pursuant to RCW 2.08.010.

11 **II. DEFENDANT**

12 2.1 Defendant Recovery Worldwide, LLC (Recovery Worldwide), is a Florida
13 limited liability company, with its principal place of business located at 121 South Orange
14 Avenue, Suite 1450, Orlando, FL 32801.

15 **III. NATURE OF TRADE AND COMMERCE**

16 3.1 Recovery Worldwide is now, and at all times relevant to this action, engaged in
17 trade or commerce within the meaning of RCW 19.86.020 by marketing its services to
18 Washington consumers.

19 3.2 Recovery Worldwide marketed to Washington consumers through its various
20 websites, which offer to provide Washington consumers assistance with locating substance
21 abuse treatment facilities that meet their individual needs.

22 **IV. FACTS**

23 4.1 Recovery Worldwide operates the addiction marketing websites
24 addictioncenter.com, alcoholrehabguide.org, rehabspot.com, opioidhelp.com, and
25 alcoholhelp.com (the Websites).
26

1 4.2 The Websites contain informational content about substance abuse treatment as well
2 as paid marketing for substance abuse treatment facilities. The Websites do not clearly and
3 conspicuously disclose to consumers which content is informational and which content is paid
4 advertising.

5 4.3 The Websites do not clearly and conspicuously disclose that they are owned by
6 Recovery Worldwide or that Recovery Worldwide provides marketing services for substance abuse
7 treatment facilities.

8 4.4 The Websites convey the impression to consumers that they offer neutral advice
9 regarding substance abuse treatment. For instance, the addictioncenter.com website states:
10 “Addiction Center connects you with the best drug and alcohol treatment centers in your area.
11 Regardless of where you live, we can help you find the perfect rehab.” The alcoholrehabguide.org
12 website states: “Contact us now to find the right rehab facility that fits your needs — we'll walk you
13 through the recovery process.” The rehabspot.com website encourages consumers to call to “get
14 help immediately enrolling into the right treatment center for you.” The opiodhelp.com website
15 describes itself as “an extensive resource and community for information and support for people
16 who have been affected by the prevalence of Opioids since 2019.” The alcoholhelp.com website
17 invites consumers to “[b]rowse resources and get connected to treatment that is right for you.”

18 4.5 The Websites prominently display toll-free numbers alongside text encouraging
19 consumers to call to speak to a “treatment professional,” a “treatment specialist,” or an “expert” to
20 learn about substance abuse treatment options.

21 4.6 When consumers call the Websites’ toll-free numbers, they are connected to a sales
22 representative for one of several substance abuse treatment facilities which have paid Recovery
23 Worldwide for the privilege of having those calls forwarded to them. Upon information and belief,
24 the sales representatives to whom calls are routed are not licensed addiction treatment providers.

25 4.7 Calls to the Websites’ toll-free numbers are routed via an algorithm according to the
26 number of calls or percentage of calls a treatment facility has purchased from Recovery Worldwide,

1 without regard to the quality of the treatment center, whether it would be a good fit for the consumer,
2 or whether the location is convenient for the consumer.

3 4.8 The Websites also contain pop-up windows that invite consumers to chat with a
4 “treatment professional,” a “treatment specialist,” or an “expert” about substance abuse treatment
5 options. A consumer who engages with the chat window is connected to a sales representative for
6 a substance abuse treatment facility which has paid Recovery Worldwide for those leads. Upon
7 information and belief, the sales representatives to whom these chats are routed are not licensed
8 addiction treatment providers.

9 4.9 The Websites do not clearly and conspicuously disclose that Recovery Worldwide
10 only routes calls and chats to substance abuse treatment facilities that have paid for those leads.
11 Moreover, the Websites do not advise consumers of the purely commercial relationship between
12 Recovery Worldwide and the treatment facilities it promotes on the Websites.

13 4.10 Several of the Websites also feature directories of substance abuse treatment
14 facilities by location. The only treatment facilities listed in these directories are those that have paid
15 Recovery Worldwide for those listings. The Websites do not clearly and conspicuously disclose
16 that these directories are paid advertisements for treatment centers.

17 4.11 Recovery Worldwide also sent more than 50 email communications to various
18 Washington state and local governmental entities in an effort to obtain links to the Websites on
19 those governmental entities’ public-facing websites. These communications present the websites as
20 neutral resources that help consumers find the best treatment options for their individual needs.

21 4.12 Recovery Worldwide’s communications to Washington governmental entities
22 failed to disclose that Recovery Worldwide is a marketing company that sells the patient leads it
23 collects through the Websites to substance abuse treatment facilities that pay for that privilege. The
24 communications also fail to disclose that the Websites’ treatment center directories contain listings
25 only for treatment facilities that have paid Recovery Worldwide to advertise on its Websites.
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3 **V. FIRST CAUSE OF ACTION**
4 **Unfair and Deceptive Acts in Violation of the Consumer Protection Act, RCW 19.86**

5 5.1 Plaintiff realleges Paragraphs 1.1 through 4.12 and incorporates them as if set
6 forth fully herein.

7 5.2 Recovery Worldwide engaged in deceptive conduct by creating and operating
8 websites that had the capacity to deceive a substantial number of consumers in Washington.

9 5.3 Recovery Worldwide created a deceptive net impression that the Websites are
10 neutral resources for information about addiction treatment rather than paid advertising for
11 addiction treatment facilities, by engaging in the actions alleged in the Complaint, including but
12 not limited to:

13 a. Misrepresenting the nature of the services provided by the Websites,
14 including by informing consumers that the Websites will connect consumers with the “best”
15 treatment facilities, with treatment facilities that meet consumers’ individual needs, or with
16 treatment facilities in locations convenient for those consumers;

17 b. Failing to adequately disclose which content on the Websites is
18 informational and which content is paid advertising;

19 c. Failing to adequately disclose to consumers that the directories on the
20 Websites contain only listings for treatment facilities that have paid for their inclusion; and

21 d. Sending misleading communications to Washington governmental
22 entities which did not disclose that the Websites function as paid advertisements for substance
23 abuse treatment facilities.

24 5.4 Recovery Worldwide engaged in “trade” or “commerce” within the meaning of
25 the Consumer Protection Act, RCW 19.86.010(2), by marketing its services to Washington
26 consumers.

1 5.5 Recovery Worldwide's unfair and deceptive acts and practices have affected the
2 public interest and are likely to continue without relief from this Court.

3 5.6 Based on the above unfair and deceptive acts and practices, Plaintiff is entitled to
4 relief under the Consumer Protection Act, including injunctive relief and restitution pursuant to
5 RCW 19.86.080, civil penalties pursuant to RCW 19.86.140 of up to two thousand dollars
6 (\$2,000) per violation for each and every violation of RCW 19.86.020, and reimbursement of
7 the costs of this action, including reasonable attorneys' fees, pursuant to RCW 19.86.080.

8 **VI. PRAYER FOR RELIEF**

9 WHEREFORE, Plaintiff, STATE OF WASHINGTON, prays for relief as follows:

10 6.1 That the Court adjudge and decree that Recovery Worldwide has engaged in the
11 conduct complained of herein.

12 6.2 That the Court adjudge and decree that the conduct complained of constitutes unfair
13 or deceptive acts or practices in violation of the Consumer Protection Act, RCW 19.86.

14 6.3 That the Court issue a permanent injunction enjoining and restraining Recovery
15 Worldwide and its representatives, successors, assigns, officers, agents, servants, employees, and
16 all other persons acting or claiming to act for, on behalf of, or in active concert or participation with
17 Recovery Worldwide from continuing or engaging in the unlawful conduct complained of herein.

18 6.4 That the Court assess civil penalties, pursuant to RCW 19.86.140, of up to two
19 thousand dollars (\$2,000) per violation against Recovery Worldwide for each and every violation
20 of RCW 19.86.020 caused by the conduct complained of herein.

21 6.5 That the Court make such orders pursuant to RCW 19.86.080 as it deems
22 appropriate to provide for restitution to consumers of money or property acquired by Recovery
23 Worldwide as a result of the conduct complained of herein.

24 6.6 That the Court make such orders pursuant to RCW 19.86.080 to provide that
25 Plaintiff, State of Washington, have and recover from Recovery Worldwide the costs of this action,
26 including reasonable attorneys' fees.

1 6.7 That the Court order such other relief as it may deem just and proper.

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3 DATED this, the XX day of June, 2021.

4 ROBERT W. FERGUSON
5 Attorney General

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7 _____
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