

Communication from Public

Name: Alex Burns

Date Submitted: 11/06/2025 07:11 PM

Council File No: 25-1180

Comments for Public Posting: I am submitting this statement to raise concerns about deceptive digital tactics that have harmed consumers and local laundromats in Los Angeles. The attached PDF includes both a written letter and a federal lawsuit detailing how these practices allegedly misled customers and redirected business away from trusted, unaffiliated providers. I respectfully urge the Council to consider the policy recommendations outlined, which aim to protect LA's small business community and ensure fair online representation.
— Alex Burns, Owner, Life Without Laundry P.S. Thank you for all the hard work you all do. I am sure it's not easy being a public servant, and I'm truly grateful to live in Los Angeles. You all play a role in making this city what it is — and I appreciate that deeply.

Protecting LA's Small Businesses from Deceptive Online Practices

Dear Honorable Members of the Los Angeles City Council,

For the past fifteen years, I have proudly operated Life Without Laundry, a business that provides pickup and drop-off laundry and dry cleaning services through local laundromats in the Greater Boston area (since 2009) and, more recently, Los Angeles (since 2017).

I'm writing to raise concerns about the deceptive use of competitor trademarks and search engine optimization techniques by a major competitor, Rinse, Inc. Based on publicly available information and court filings, Rinse appears to have used the names of unaffiliated businesses on its website to give the impression that they were Rinse "affiliates," when in fact they were direct competitors. As a result, consumers who searched for their trusted local cleaner may have unintentionally signed up for Rinse services.

The tactics in question allegedly included:

- Creating almost 700+ subpages on the Rinse.com website featuring the names of unaffiliated laundromats and dry cleaners across the United States (primarily small family-owned businesses);
- Labeling these subpages as "search engine optimization" pages in the site's backend code;
- Using structured data (schema) to signal to Google that these independent competitors were "branch locations" of Rinse — in apparent violation of platform guidelines;
- Triggering search results that made it appear these businesses were affiliated with Rinse;
- Redirecting users who clicked on those results to a Rinse-hosted page rather than to the actual business;
- Displaying "Arrange a Pickup" buttons next to the competitor's name on each subpage;
- Routing consumer inquiries to Rinse, not to the competitor;
- Enrolling those users into Rinse's services; and
- Delivering services through Rinse without notifying — or compensating — the named businesses.

These practices, if unchecked, represent a structural disadvantage for small businesses. Many lack the financial resources to litigate such cases on their own, and class action remedies are often unavailable due to the individualized nature of damages and causation. Regulatory intervention is needed.

I respectfully ask your office to consider the following policy reforms:

- Amend federal, state, and local unfair competition laws to explicitly prohibit practices like those described above;

- Authorize the disgorgement of profits gained from such deceptive tactics;
- Prohibit the misuse of schema markup in website code when it violates search engine guidelines; and
- Require companies to notify any competitor whose name they intend to use on their website at least one week in advance, allowing time to raise objections with the appropriate Attorneys General.

I would welcome the opportunity to speak with you or your staff about these issues and potential reforms.

Thank you for your time and consideration.

Sincerely,

Alex Burns

Managing Member

Life Without Laundry, LLC

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

Life Without Laundry, LLC
Plaintiff,

v.

Rinse, Inc.
Defendant.

Civil Action No. 1:25-cv-12339

FIRST AMENDED COMPLAINT

Plaintiff, Life Without Laundry, LLC (“Life Without Laundry”), brings this action against Rinse, Inc. (“Rinse”) for, *inter alia*, trademark infringement, false advertising and unfair competition under Mass. Gen. Laws ch. 93A. By this Complaint, Life Without Laundry seeks, *inter alia*, preliminary and permanent injunctive relief, actual damages, profits, trebled damages, exemplary damages, attorneys’ fees and costs, and alleges as follows:

INTRODUCTION

1. Life Without Laundry is a laundry and dry cleaning delivery service which originated in Boston, Massachusetts. It is a direct competitor to defendant Rinse. Rinse grew its laundry and dry cleaning delivery service through use of unfair business practices and infringement. Specifically, Rinse engaged in a thorough and deceptive marketing and advertising campaign for four years based on it fraudulently

purporting to pick up and deliver dry cleaning and laundry for customers at their established favorite vendor. In fact, Rinse worked with very few of those laundromats and dry cleaners, but used their names on its website to fraudulently suggest that pick up and deliveries would occur at a customer's favorite service provider. Rinse used the trademarks and locations of over 700 'mom and pop' laundromats and dry cleaners in 13 cities to suggest that Rinse would pick up and deliver to customers' established favorite vendors. In fact, Rinse sent laundry and dry cleaning to their own substandard facilities.

2. Rinse's website had pages identifying regions of Boston, San Francisco Bay area, New York, Los Angeles, D.C. Metro area, Chicago, Toronto, Boston, Dallas, Austin, New Jersey, Seattle, San Jose, and Portland and listing all or substantially all dry cleaners and laundromats in such locations. A customer would go to a competitor's subpage on the Rinse website and click a deceptive "schedule pickup" button which only engaged Rinse, and (with a few exceptions) did not deliver to or pickup from the local laundromat or dry cleaner identified by their registered or common law marks.
3. Once a customer clicked "schedule pickup" for a particular laundromat or dry cleaner, they would be asked to sign up on Rinse's phone application. Since Rinse customers would use Rinse's application with a default setting, all repeat delivery business intended for the customer's favorite laundromat and dry cleaner would be misdirected to Rinse going forward.
4. Rinse even engaged in public relations efforts to market and advertise it "saving" mom-and-pop laundromats and service providers. Rinse founder Ajay Prakash spoke admiringly of his parents' laundromat. Meanwhile, Rinse was

commandeering the goodwill of mom-and-pop stores Mr. Prakash claimed to care about so much.

5. In the process, Rinse was greatly harming their mom-and pop competitors' reputations by providing poor service, as evidenced by Yelp and Better Business Bureau reviews of Rinse. By comparison, Life Without Laundry had excellent reviews, as did most of the "mom and pop" stores.
6. Rinse knowingly, purposely and fraudulently engaged in this campaign. It used "local business" schema in its website coding. This mis-identified Rinse's mom-and-pop competitors as "local affiliates" of Rinse so that Google and other search engines would mis-identify them as local branches of Rinse. Rinse even named each subpage falsely identifying each small competitor as a local affiliate the "SEO Competitor Page" in HTML code viewable on the Rinse website.
7. Rinse identified Life Without Laundry as a laundromat in Boston. Rinse used Life Without Laundry's registered mark to mis-identify it and misappropriate its goodwill. Rinse's infringement facilitated customer confusion and misleading search results. Over time, Rinse stole innumerable leads from Life Without Laundry, leading to mounting actual damages and lost profits to Life Without Laundry. Rinse also wrongfully became an industry leader in dry cleaning and delivery services through industry-wide infringement of marks and false advertising.
8. Life Without Laundry and innumerable mom-and-pop stores have been victimized by Rinse's intentionally deceptive campaign. For this reason, Life Without Laundry seeks lost profits, actual, exemplary, trebled, and statutory damages, and disgorgement, in this case. Life Without Laundry contends its damages are in excess of \$30,000,000, or in an amount to be proven at trial.

PARTIES

9. Life Without Laundry is a Massachusetts limited liability company with its principal place of business located at 602 Washington St., Dedham, Massachusetts. Life Without Laundry is a pickup and delivery-based laundry and dry-cleaning service that caters to customers in the greater Boston, Massachusetts and Los Angeles, California areas.
10. Upon information and belief, Rinse is a corporation organized under Delaware law, with its principal office of business located at 1000 Brannan St., Suite 100, San Francisco, California. Rinse is a laundry and dry-cleaning pickup and delivery service. Rinse markets and sells its services in Massachusetts, California and other cities in the United States through the Rinse.com website (“Website”).

JURISDICTION AND VENUE

11. This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331 and 1338(a) and (b), and has supplemental jurisdiction over the state law and common law causes of action pursuant to 28 U.S.C. § 1367.
12. This Court has personal jurisdiction over Rinse because Rinse does business in Massachusetts, and upon information and belief, markets and sells infringing services in Massachusetts.
13. Venue is proper under 28 U.S.C. § 1391(b) and (c).

INTRODUCTIONS, FACTS AND ANALYSIS

Life Without Laundry, Its Services and Intellectual Property

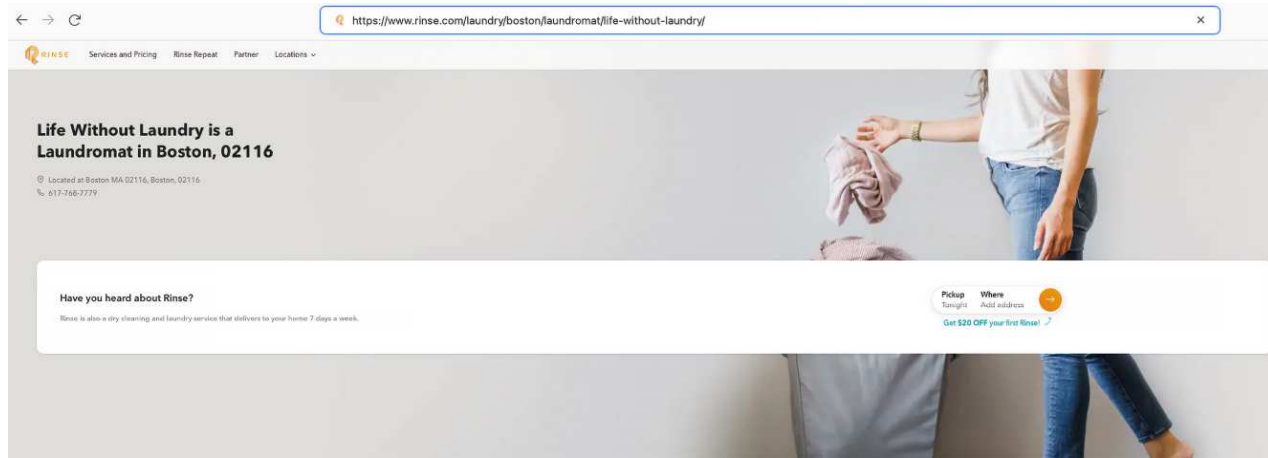
14. Since first entering commerce in 2009, Life Without Laundry has used the very same name and has developed a strong reputation for excellent pick-up and delivery laundry and dry-cleaning services, particularly in the Boston, Massachusetts and Los Angeles County, California markets. Life Without Laundry does not operate brick-and-mortar laundromats or dry cleaners available to the public.
15. To protect the substantial goodwill associated with its services, Life Without Laundry filed a section 1(b) trademark application on September 24, 2010, for the “Life Without Laundry” service mark, in connection with “laundry pick-up and delivery services.” A registration certificate was issued on September 18, 2012. (Registration No. 85137517) (“Registered Mark”).
16. Life Without Laundry first used the Registered Mark in commerce on October 12, 2009, and has been using it in commerce continuously since then. The Registered Mark has since been acknowledged as incontestable.

Rinse’s Service and Infringement of Life Without Laundry’s Registered Mark

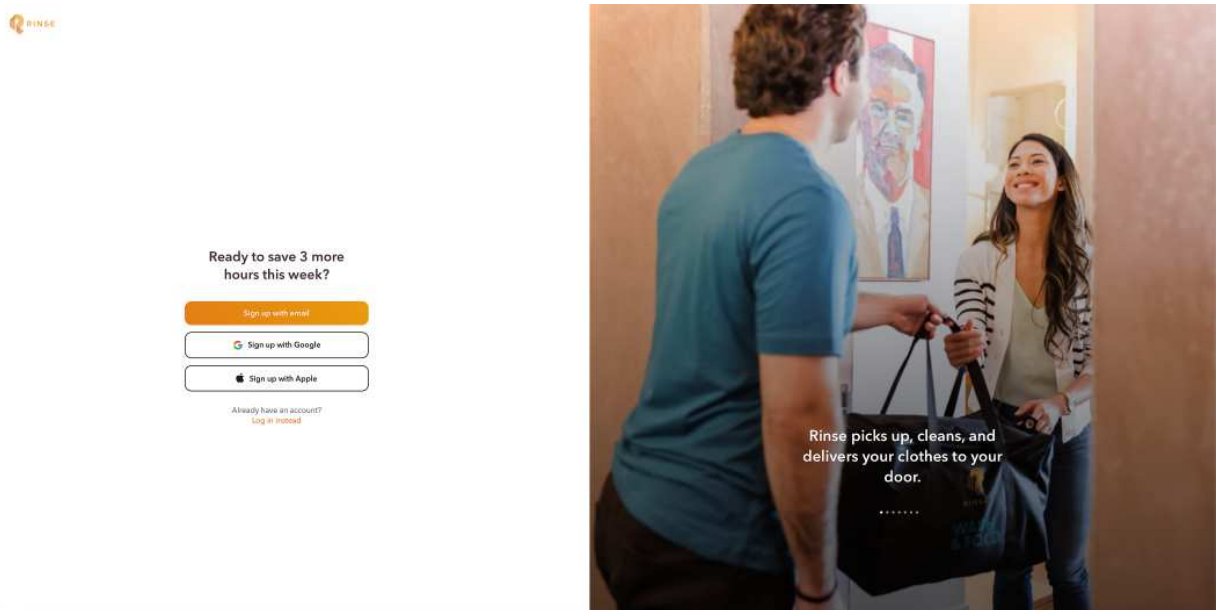
17. Rinse markets and sells its pick-up and delivery laundry and dry-cleaning services in Boston, Massachusetts, Los Angeles, California, San Francisco Bay area; New York; D.C. Metro area, Chicago, Toronto, Boston, Dallas, Austin, New Jersey, Seattle, San Jose, and Portland through its Website.
18. Rinse and Life Without Laundry are direct competitors providing delivery of laundry and dry cleaning.
19. Rinse engaged in unauthorized use of the Registered Mark, in its entirety, in connection with pickup and delivery laundry and dry-cleaning services.

20. Rinse's reviews on Yelp! and the Better Business Bureau are woefully bad. To make up for its poor reputation with consumers, Rinse traded on the goodwill of Life Without Laundry by misusing its Registered Mark on Rinse's Website.
21. Commencing in late-2020, Rinse began using the LIFE WITHOUT LAUNDRY MARK with the specific intent of misleading the public about the nature of Life Without Laundry's services, and with the intent to misappropriate Life Without Laundry's customers, prospective customers, and goodwill.
22. Specifically, in or about September 2020, Rinse began listing "Life Without Laundry" on its Website.
23. Rinse also uses or used "Life Without Laundry" in its local business schema, to deceive search engines into categorizing Life Without Laundry as a local affiliate of Rinse.
24. When a Website user clicks or clicked on the link for "Life Without Laundry," he or she is or was taken to a page stating, "Life Without Laundry is a Laundromat in Boston, 02116" <https://www.rinse.com/laundry/boston/laundromat/life-without-laundry/> ("Boston Life Without Laundry Rinse Page"). The user can or could "schedule a pickup" on this page, which suggests or suggested to the users in the 02116 ZIP code that Rinse will or would take their laundry to a nearby "laundromat" named "Life Without Laundry." In fact, Life Without Laundry does not operate a

laundromat or dry cleaner but only a delivery service.



25. Users who then attempted to schedule a “pickup” in conjunction with who they believe or believed to be Life Without Laundry or other listed service providers are or were taken directly to Rinse’s customer sign up page:



26. The “sign up page” in turn directs users to a smartphone based application which is structured so as to make new customers believe that their initial order and all

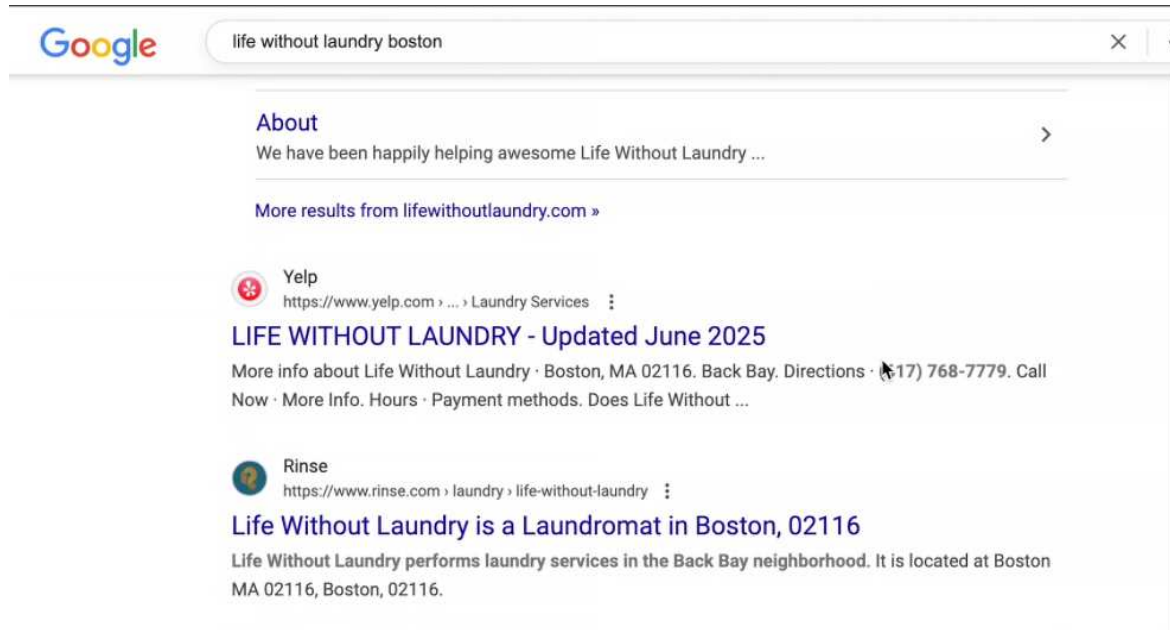
subsequent orders will be delivered to and returned from the customer's preferred 'mom and pop' vendor.

27. Life Without Laundry has established multiple instances of actual confusion resulting from Rinse's aforesaid practices, including calls asking, "are you Rinse?"
28. In addition to evidence of actual confusion, Rinse's use of Life Without Laundry's exact Registered Mark on its Website, its use of Life Without Laundry's Registered Mark to divert scheduled pick-ups to Rinse, and Rinse's misleading Website layout establish a likelihood of confusion.
29. It is extremely disparaging for Life Without Laundry's brand to be intentionally conflated with Rinse. Rinse has terrible customer reviews while Life Without Laundry's reviews are exceptional. When this action was filed Life Without Laundry had a 4.7 star ranking whereas Rinse had a 3.2-star ranking on Yelp.
30. Rinse is not accredited with Better Business Bureau due to its failure to respond to complaints.
31. Rinse uses or used the Registered Mark in connection with laundry and dry-cleaning services for the express purpose of trading on Life Without Laundry's delivery service and third party laundromats and dry cleaner's well-known and respected brands.
32. Rinse's infringing use of the Registered Mark in connection with laundry and dry-cleaning and delivery services is or was calculated to imply, falsely, that it provides its services through or in conjunction with Life Without Laundry.

Rinse's False Advertising and Unfair Competition Practices With Respect to Delivery
Services

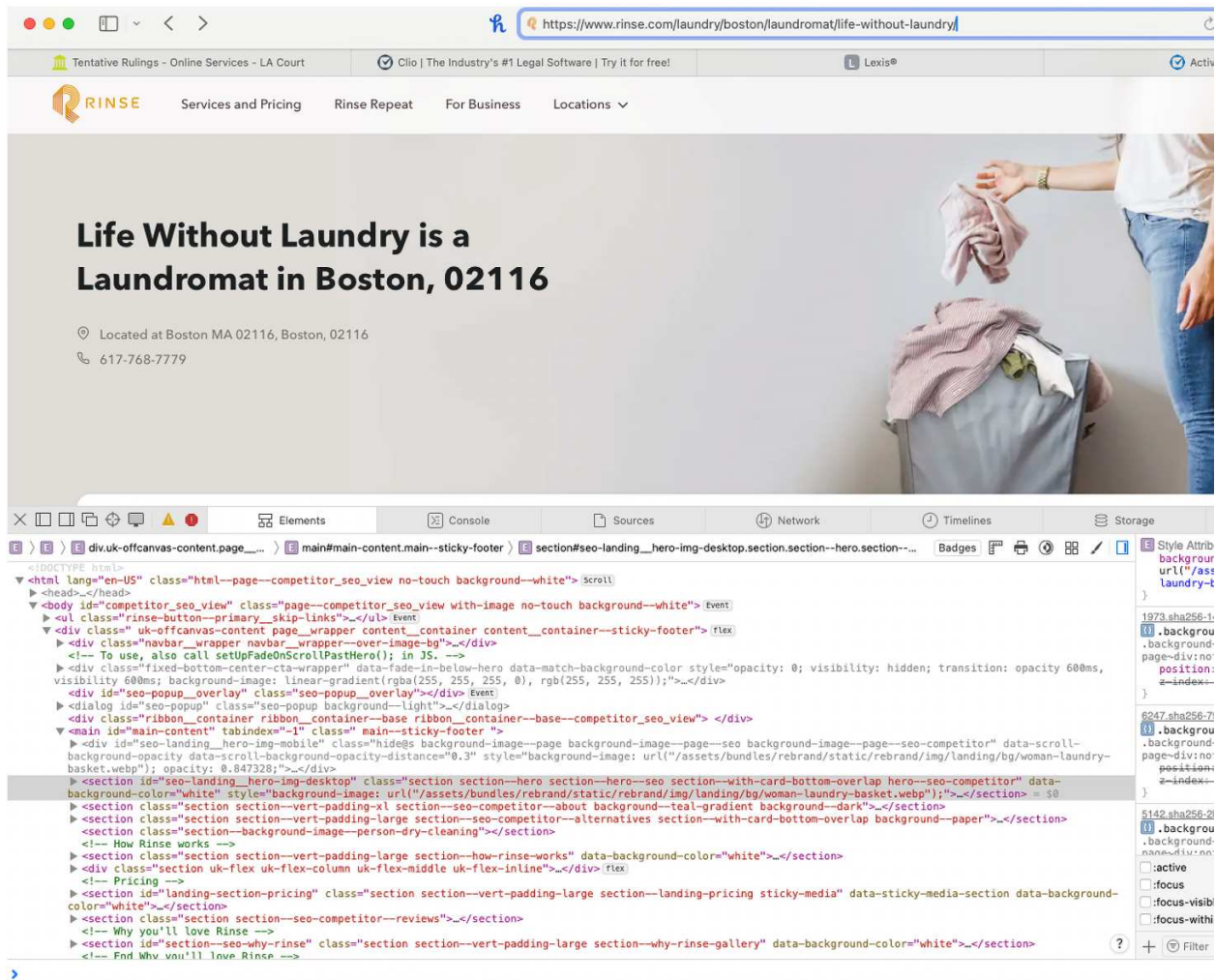
33. Rinse has engaged in false advertising and unfair competition in connection with pickup and delivery of laundry and dry-cleaning.
34. As a result of the practices alleged herein, Rinse built up a continuing customer base premised on false representations regarding an association between Rinse, on the one hand, and Life Without Laundry and at least 700 other Rinse competitors, on the other hand.
35. Beginning in late-2020, Rinse used the Registered Mark on its Website, listing Life Without Laundry as a laundromat in Boston.
36. Rinse also uses or used Life Without Laundry's Registered Mark in its "local business" schema to falsely represent to search engines and customers that Life without Laundry is affiliated with Rinse and is a brick-and-mortar laundromat where Website users can arrange laundry and dry-cleaning services to be performed and later delivered by Rinse.
37. Rinse's use of the Registered mark on its Website and in its "local business" schema has misled search engines and has generated inaccurate results on Google.
38. By falsely suggesting to search engines that numerous of its competitors are but specific locations for Rinse, Rinse has both misled search engines to identify competitors as local Rinse outlets in search results, and has generated artificially high rankings for Rinse in search results.

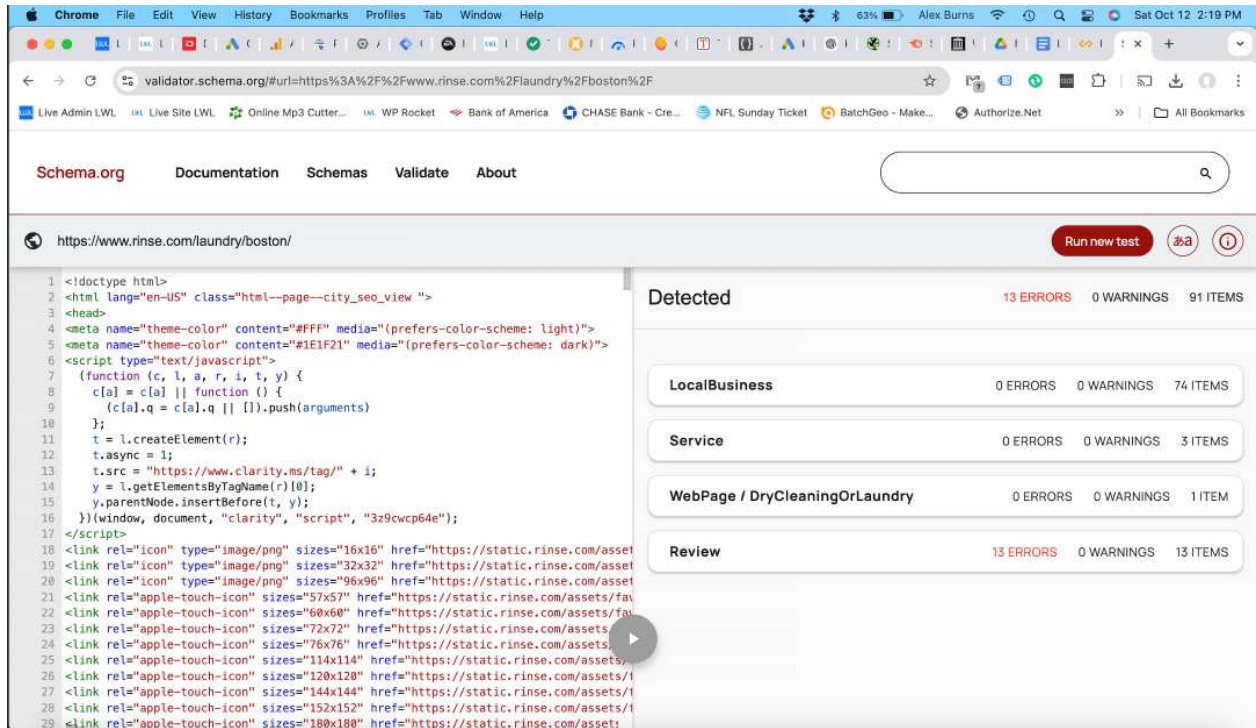
39. Upon searching for “life without laundry boston,” one of the top three Google results falsely indicates or indicated that Life Without Laundry is a brick-and-mortar location in Boston serving Rinse delivery customers:



40. Local business schemas are meant to tell a search engine what Rinse’s business is and what it offers. Per Google’s guidelines, “[a] particular physical business or branch of an organization. Examples of Local Business include a restaurant, a particular branch of a restaurant chain, a branch of a bank, a medical practice, a club, a bowling alley, etc.”).
41. Rinse engages or engaged in industry-wide deception and misappropriation of the goodwill of others, as Rinse has no affiliation with competitors it falsely suggested on the text of its Website, and through the misleading use of schema as its affiliates. As if to drive home the point, Rinse’s own code on the Life Without Laundry Boston Rinse Page describes or described it as “SEO Competitor Page” (“html-page

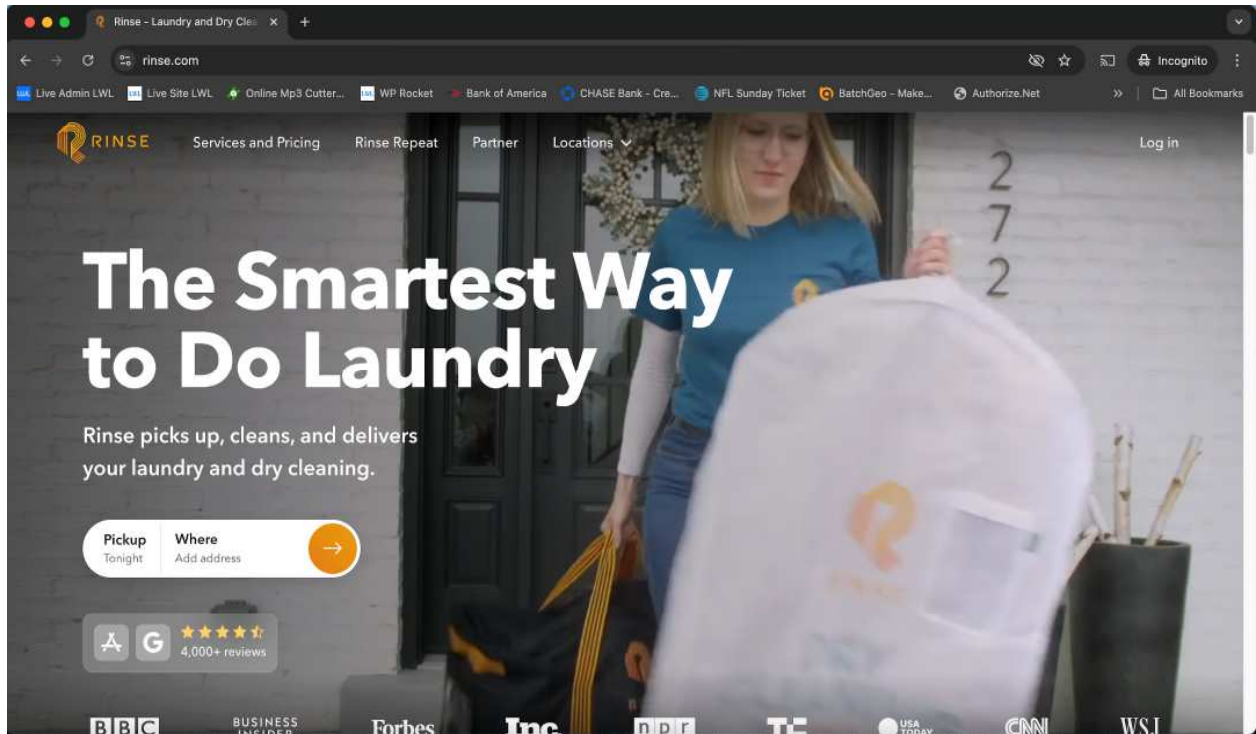
competitor_seo_view_”)



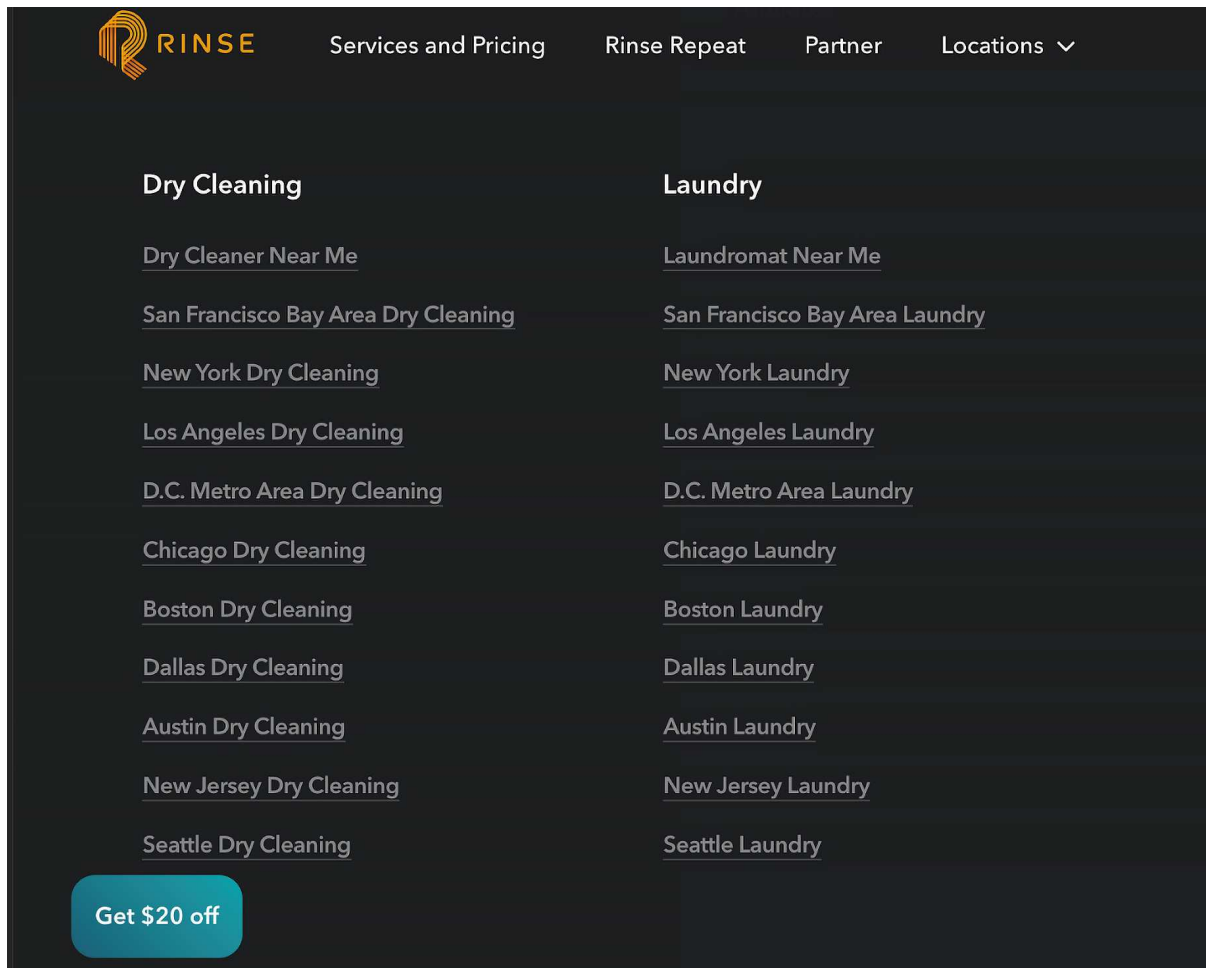


42. Rinse’s Website also specifically misrepresents or misrepresented and falsely

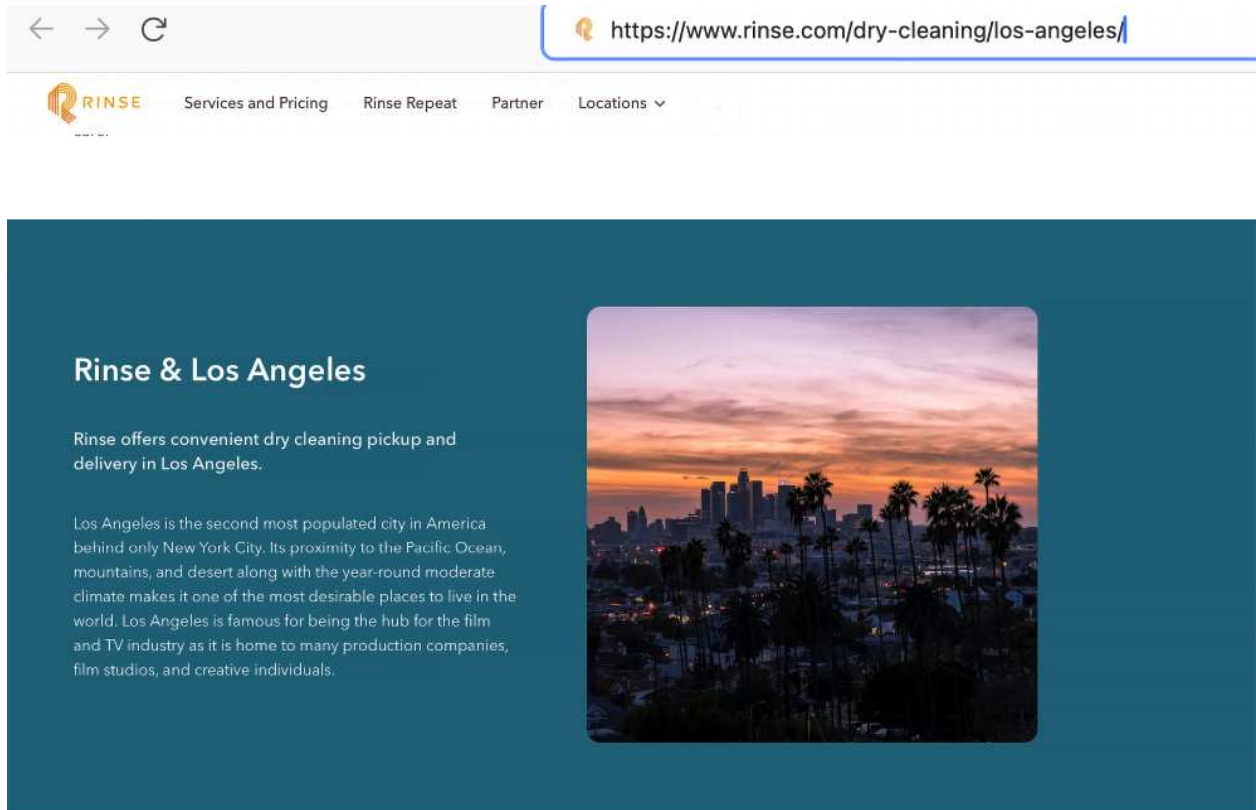
advertises or advertised to visitors that Life Without Laundry is affiliated with and performs services for Rinse. The Website’s home page describes its services as “The Smartest Way to Do Laundry. Rinse picks up, cleans and delivers your laundry and dry cleaning.”



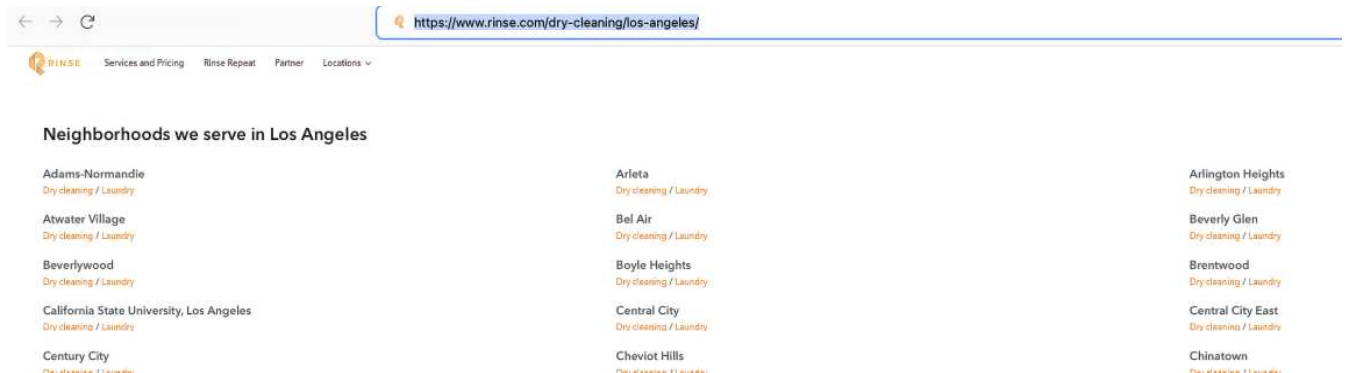
43. Rinse suggests or suggested that the laundromats and dry cleaners it works with are found at the bottom of its home page under lists identified as “Dry Cleaning” and “Laundry.” Each list identifies or identified links for Boston and Los Angeles Dry Cleaning and Laundry. The links lead or led users to further pages and links which ultimately and misleadingly present or presented Life Without Laundry and other third-party services providers as affiliates of Rinse.



44. When Rinse home page users click or clicked on the Dry Cleaning – Los Angeles Dry Cleaning Link at the bottom of the page, they are or were taken to Rinse’s “Los Angeles Dry Cleaning Delivery Service” page at <https://www.rinse.com/dry-cleaning/los-angeles/>. This page states or stated, “Rinse offers convenient dry-cleaning pickup and delivery in Los Angeles.”

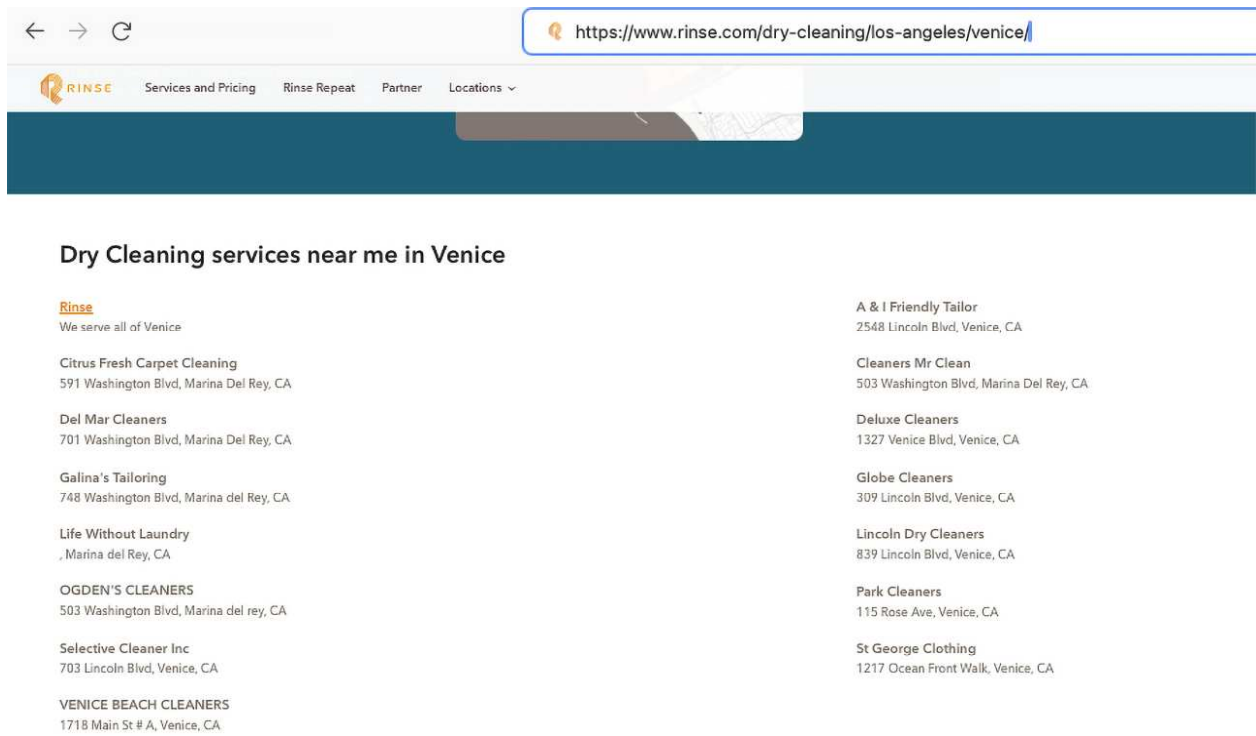


45. The Website lists or listed numerous Los Angeles City neighborhoods and neighboring jurisdictions under the heading “Neighborhoods we serve in Los Angeles” under which there is or was another heading for “Venice” with a link for “Dry cleaning / Laundry” beneath it.



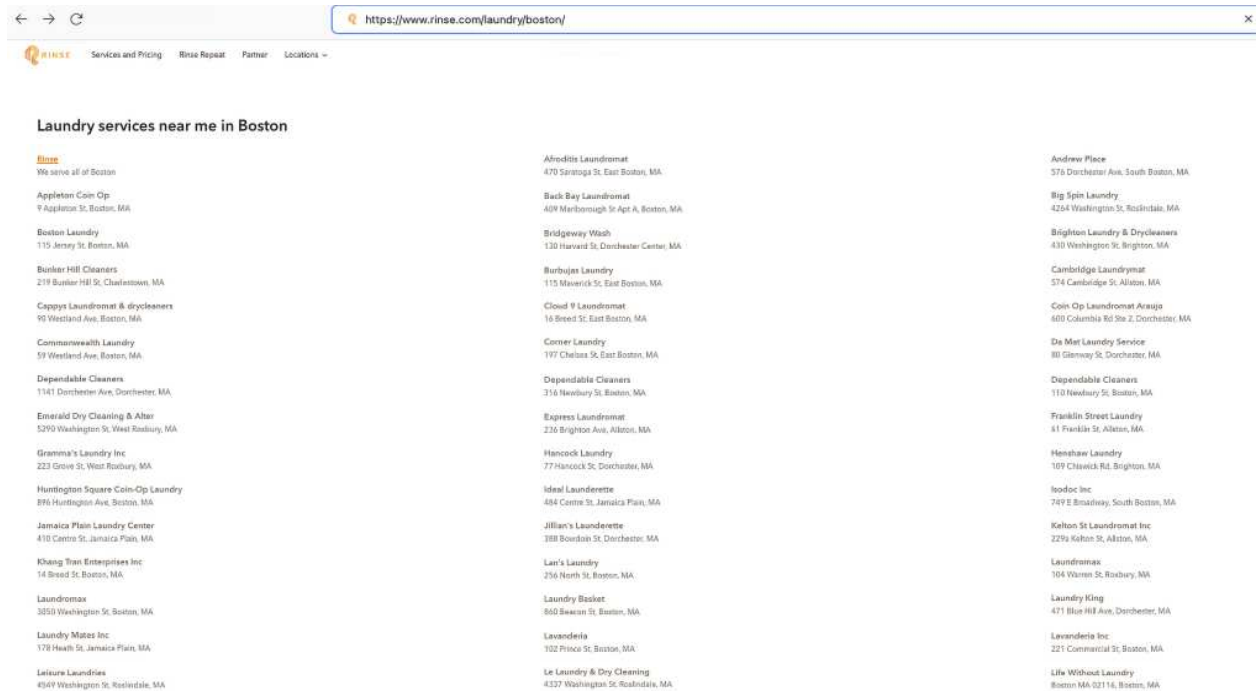
46. When a user clicks or clicked the link, they are or were taken to a page listing Life Without Laundry as a dry cleaner in Marina del Rey, CA.

<https://www.rinse.com/dry-cleaning/los-angeles/venice> (“LWOL Los Angeles Rinse Page”).



47. Rinse misleads or misled Website visitors to believe both that Life Without Laundry is an affiliate of Rinse and that it is a dry cleaner with a brick-and-mortar location as opposed to a laundry and dry-cleaning delivery service.

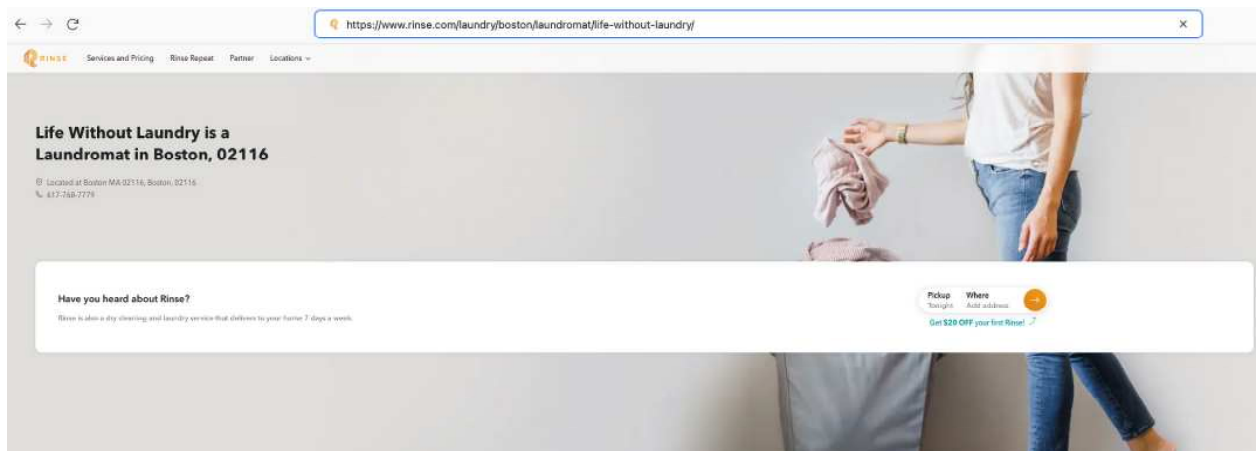
48. Rinse’s “Boston Laundry Delivery Service” lists or listed “Life Without Laundry” under a heading that states, “Laundry services near me in Boston.”



49. When a user clicks or clicked on that link, he or she is or was taken to a page stating,

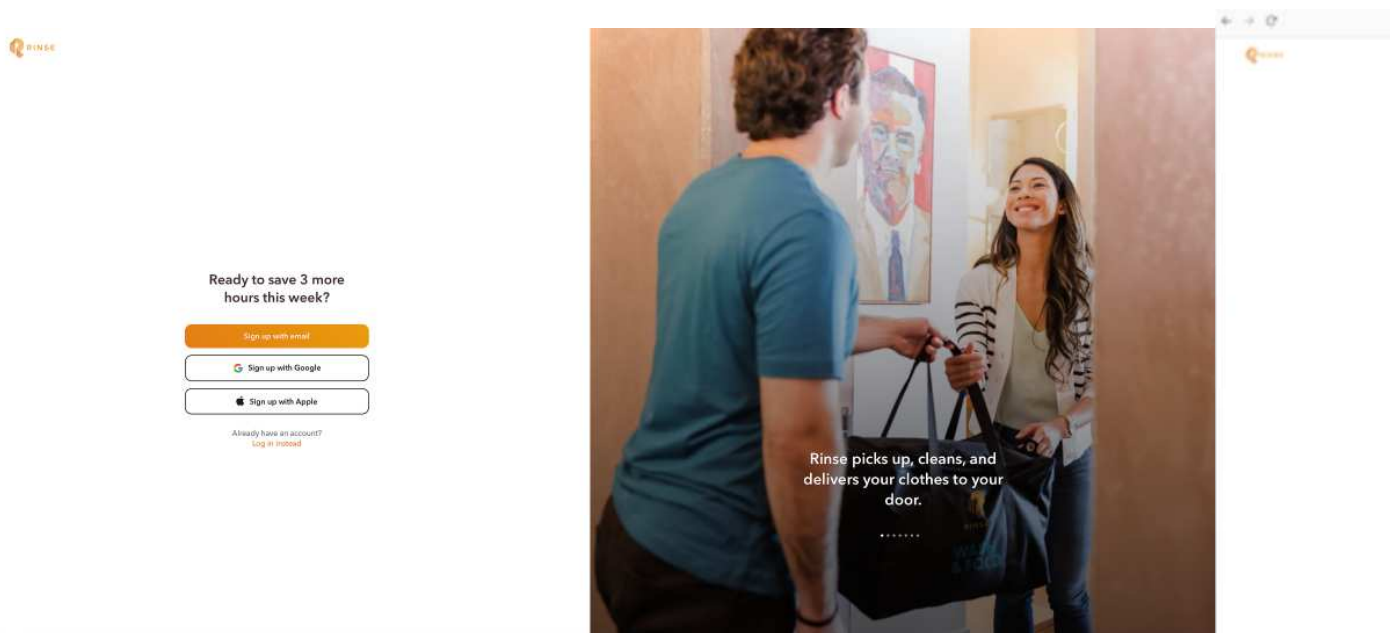
“Life Without Laundry is a Laundromat in Boston, 02116,” the Life Without Laundry Rinse Page.

50. The user can or could “schedule a pickup” on this page, which suggests or suggested to the users in 02116 ZIP code that Rinse would take their laundry to the nearby “laundromat” named “Life Without Laundry.”

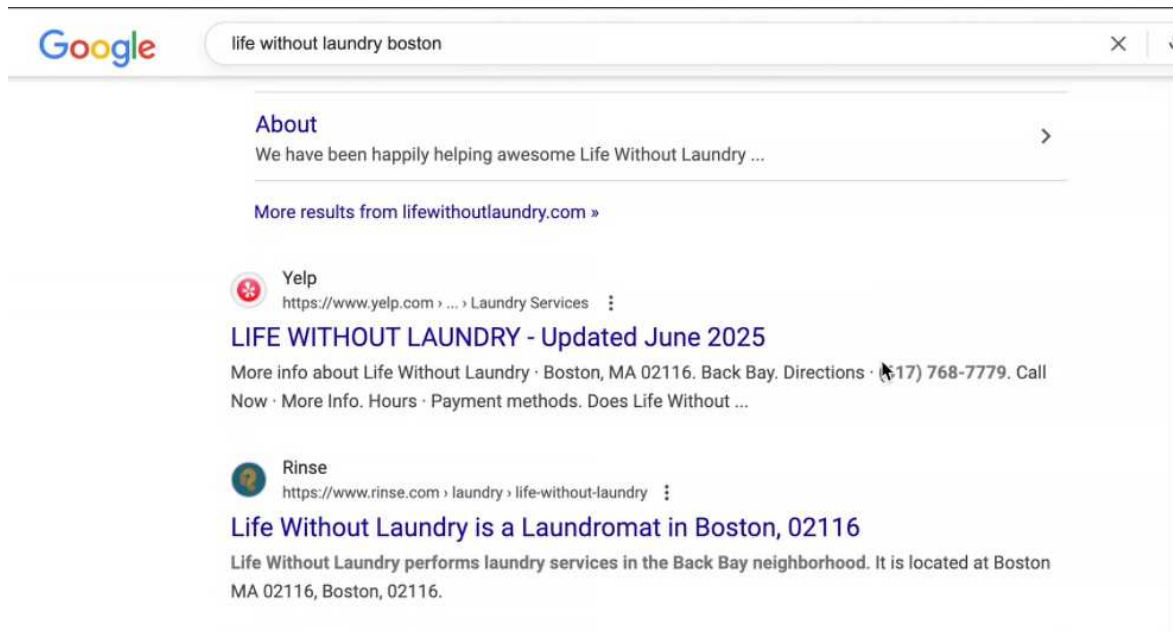


51. While fine print on this page suggests or suggested that Life Without Laundry is independent, the user is or was clearly urged to quickly arrange a delivery through Rinse to Life Without Laundry’s non-existent “laundromat” in ZIP code 02116, using a prominently placed “schedule a pickup” button.

52. When a user clicks or clicked “Pickup” on the Boston Life Without Laundry Rinse Page they are or were taken to Rinse’s customer sign up page:



53. Because Rinse’s website states or stated, “Life Without Laundry is a Laundromat in Boston, 02116,” such misdescription appears or appeared in search results for “Life Without Laundry Boston”:



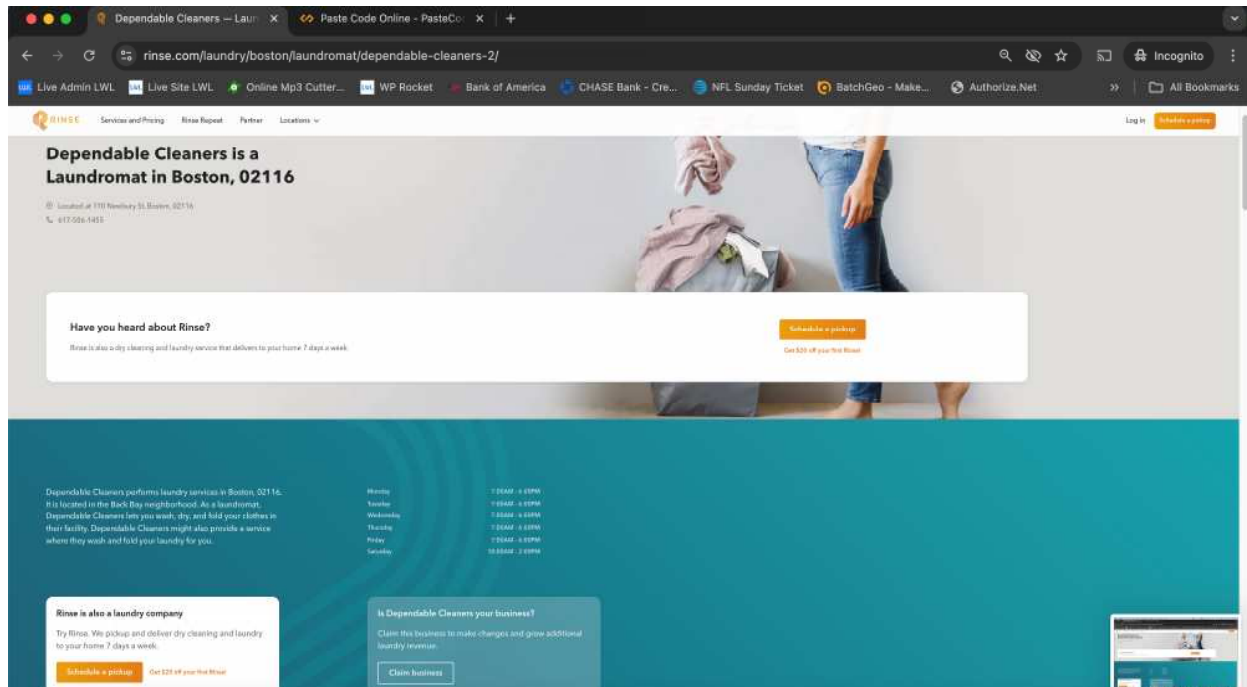
54. Rinse’s misleading use of Life Without Laundry’s Registered Mark on its Website, in its schema, and in search results constitute trademark infringement and are unfair and deceptive.

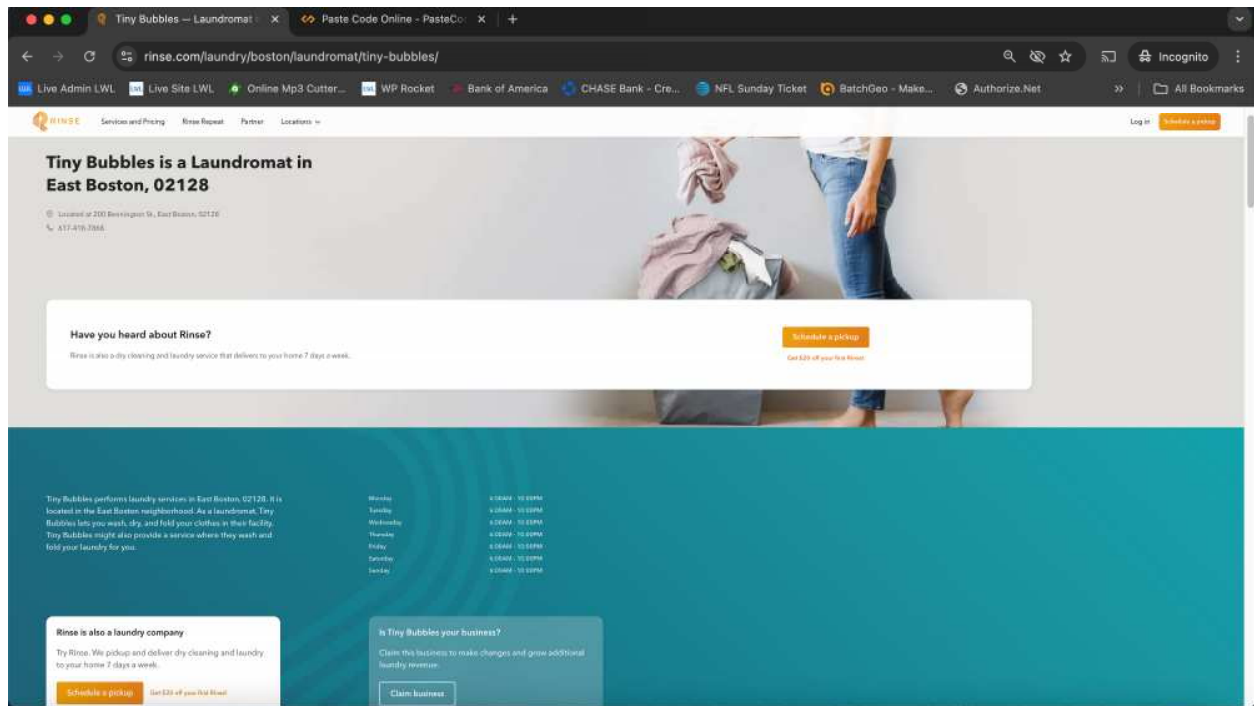
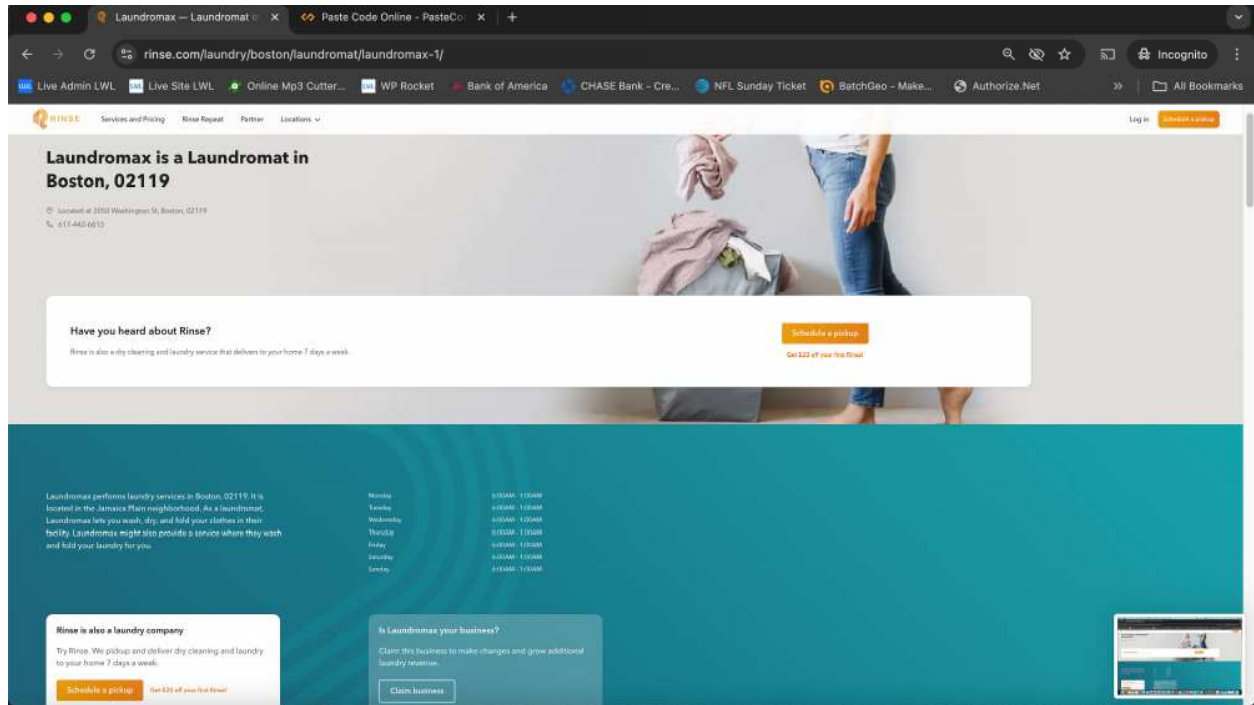
Rinse Falsely Suggested Over 700 Third Party, Mostly ‘Mom and Pop’ Laundromats and Dry Cleaners Were Local Affiliates of Rinse and Customers Could Use Rinse to “Schedule a Pickup” From Such Third Parties

55. Rinse misidentifies or misidentified innumerable competitor laundromats and dry cleaners as affiliates in the same manner as with Life Without Laundry: Rinse guided its site visitors starting from the Rinse.com homepage to subpages sorted by city, which in turn led to subpages using the names of over 700 mostly “mom and pop” competing laundromats and dry cleaners. Using misleading “schedule a pickup” pages, Rinse led web users to believe that after they signed up for the Rinse phone application, they would order through the site user’s preferred neighborhood

vendor. In fact, the laundry and dry cleaning was completed by Rinse in a sub-par fashion, misappropriating the goodwill of local laundromats and dry cleaners and allowing Rinse to pocket their profits. These practices led to Rinse occupying the space in laundry and dry cleaning delivery that should have been occupied by Life Without Laundry.

56. Rinse used the same directory as led to their fraudulent “Life Without Laundry Page” to steer users to the same misleading “schedule a pickup” page for “Dependable Cleaners,” “Laundromax,” and “Tiny Bubbles” in Boston:





57. Rinse used the same directory as led to their fraudulent “Life Without Laundry Page” to steer users to the same misleading “schedule a pickup” page for “California Coin Laundry,” “Coin Laundry C C Land,” and “Crown Cleaners” in Los Angeles:

California Coin Laundry — L... x +

rinse.com/laundry/los-angeles/laundromat/california-coin-laundry/

Live Admin LWL Live Site LWL Online Mp3 Cutter... WP Rocket Bank of America CHASE Bank - Cre... NFL Sunday Ticket BatchGeo - Make... Authorize.Net All Bookmarks

RINSE Services and Pricing Rinse Repeat Partner Locations Log in Schedule a pickup

California Coin Laundry is a Laundromat in Los Angeles, 90038

© Located at 1204 Olive St, Los Angeles, 90038
☎ 310-517-2095

Have you heard about Rinse?

Rinse is also a dry cleaning and laundry service that delivers to your home 7 days a week.

[Schedule a pickup](#)
Get \$20 off your first Rinse!

California Coin Laundry performs laundry services in Los Angeles, 90038. It is located in the Hollywood neighborhood. As a laundromat, California Coin Laundry lets you wash, dry, and fold your clothes in their facility. California Coin Laundry might also provide a service where they wash and fold your laundry for you.

Monday	8:00AM - 10:00PM
Tuesday	8:00AM - 11:00PM
Wednesday	8:00AM - 11:00PM
Thursday	8:00AM - 11:00PM
Friday	8:00AM - 11:00PM
Saturday	8:00AM - 10:00PM
Sunday	8:00AM - 10:00PM

Rinse is also a laundry company

Try Rinse. We pickup and deliver dry cleaning and laundry to your home 7 days a week.

[Schedule a pickup](#) Get \$20 off your first Rinse!

Is California Coin Laundry your business?

Claim this business to make changes and grow additional laundry revenue.

[Claim business](#)

Coin Laundry C C Land — L... x +

rinse.com/laundry/los-angeles/laundromat/coin-laundry-c-c-land/

Live Admin LWL Live Site LWL Online Mp3 Cutter... WP Rocket Bank of America CHASE Bank - Cre... NFL Sunday Ticket BatchGeo - Make... Authorize.Net All Bookmarks

RINSE Services and Pricing Rinse Repeat Partner Locations Log in Schedule a pickup

Coin Laundry C C Land is a Laundromat in Los Angeles, 90019

© Located at 2348 Venice Blvd, Los Angeles, 90019
☎ 310-993-8705

Have you heard about Rinse?

Rinse is also a dry cleaning and laundry service that delivers to your home 7 days a week.

[Schedule a pickup](#)
Get \$20 off your first Rinse!

Coin Laundry C C Land performs laundry services in Los Angeles, 90019. It is located in the Del Mar Heights neighborhood. As a laundromat, Coin Laundry C C Land lets you wash, dry, and fold your clothes in their facility. Coin Laundry C C Land might also provide a service where they wash and fold your laundry for you.

Monday	8:00AM - 10:00PM
Tuesday	8:00AM - 10:00PM
Wednesday	8:00AM - 10:00PM
Thursday	8:00AM - 10:00PM
Friday	8:00AM - 10:00PM
Saturday	8:00AM - 10:00PM
Sunday	8:00AM - 10:00PM

Rinse is also a laundry company

Try Rinse. We pickup and deliver dry cleaning and laundry to your home 7 days a week.

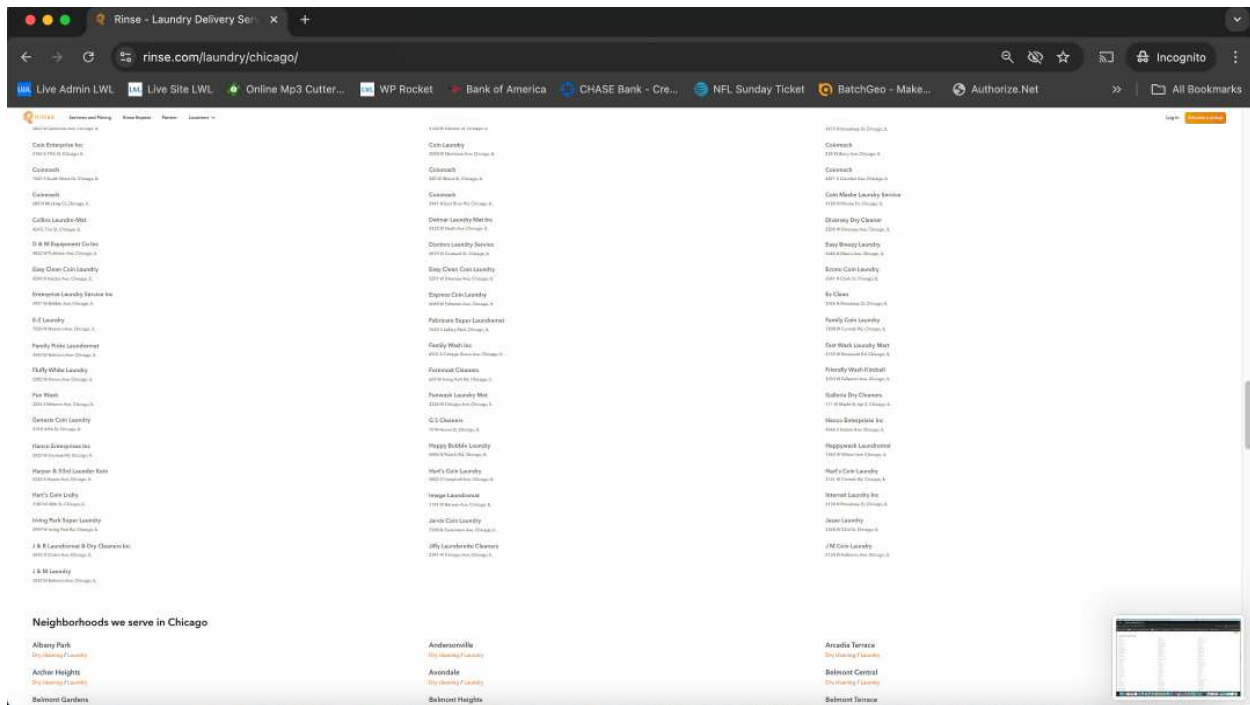
[Schedule a pickup](#) Get \$20 off your first Rinse!

Is Coin Laundry C C Land your business?

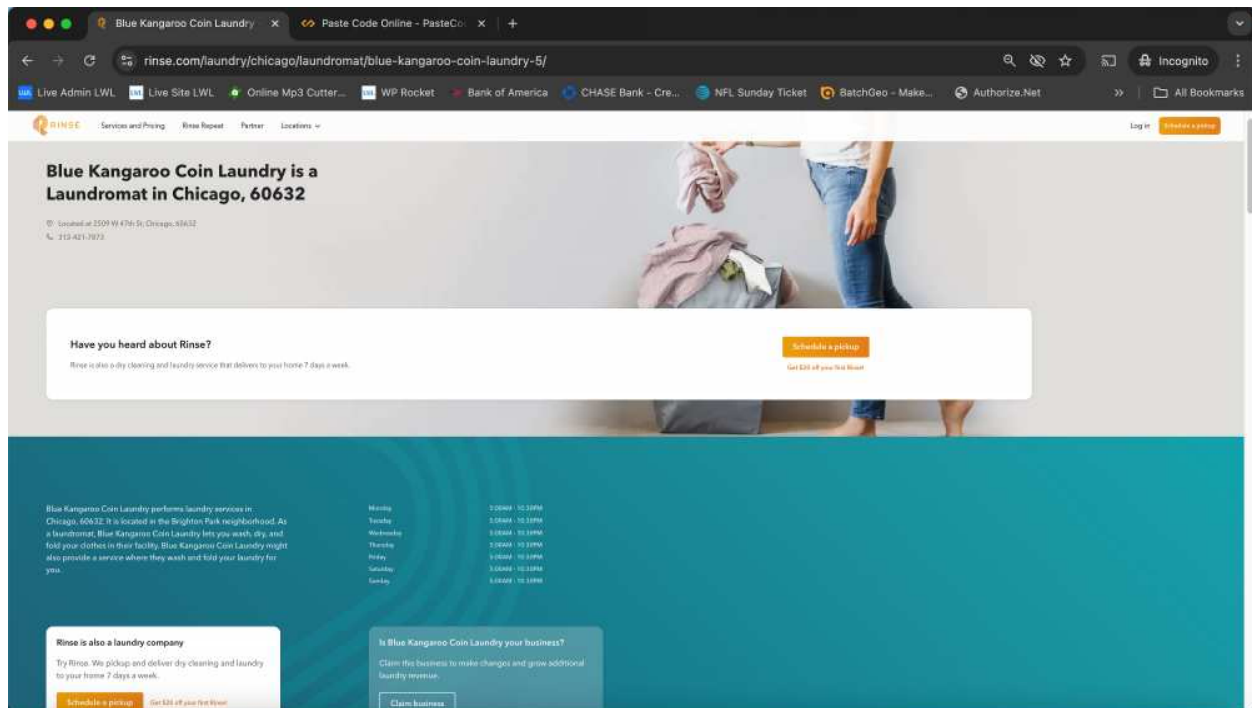
Claim this business to make changes and grow additional laundry revenue.

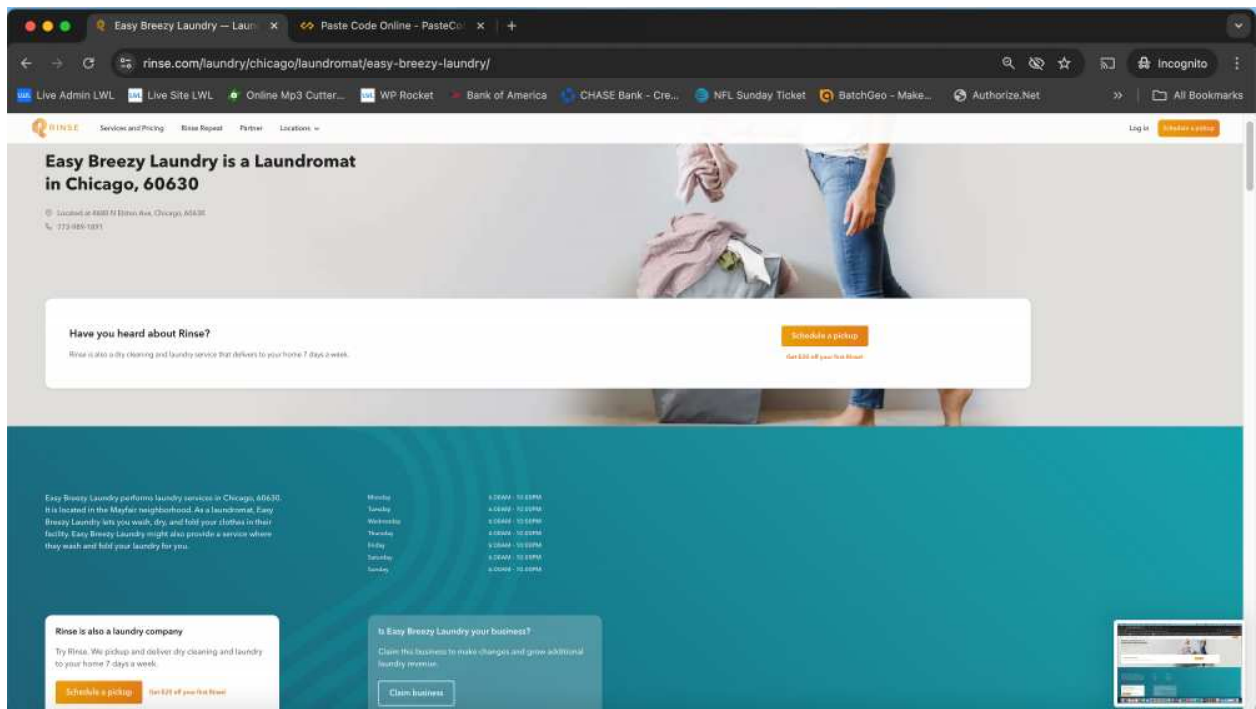
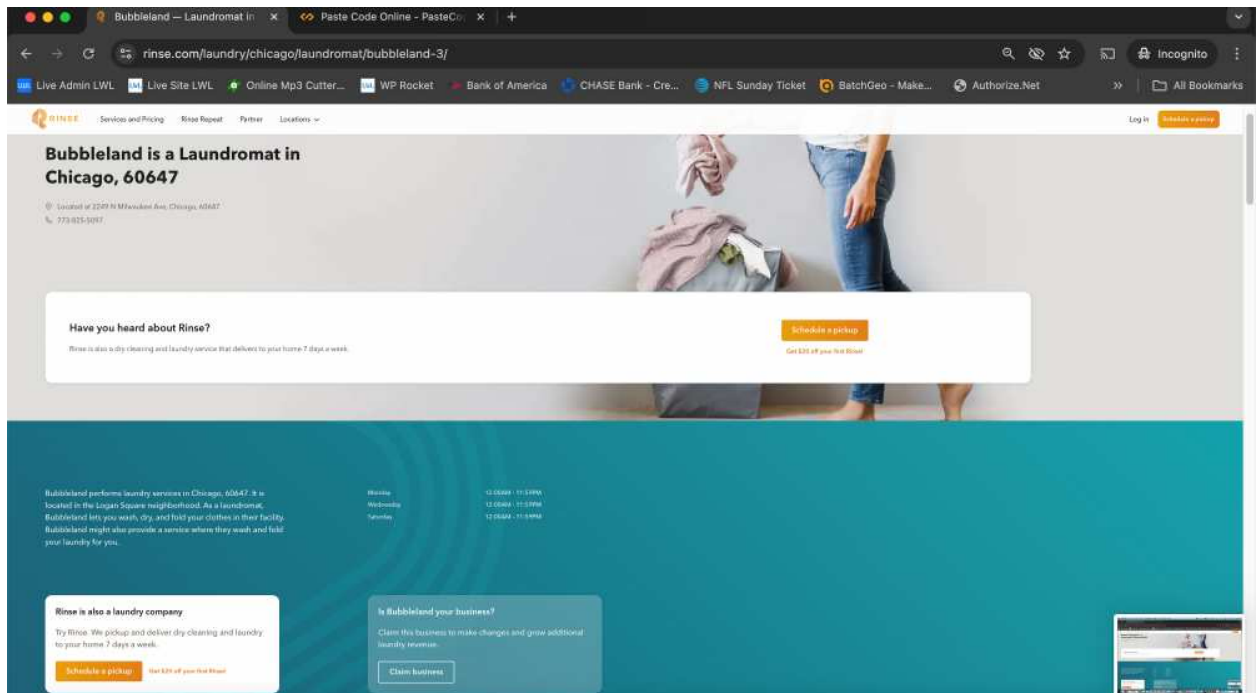
[Claim business](#)

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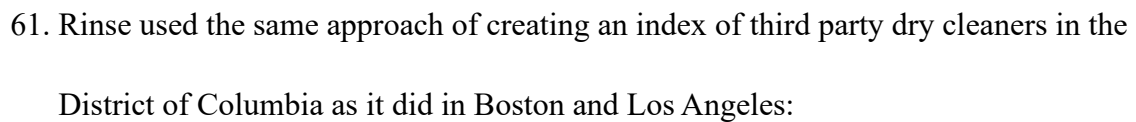


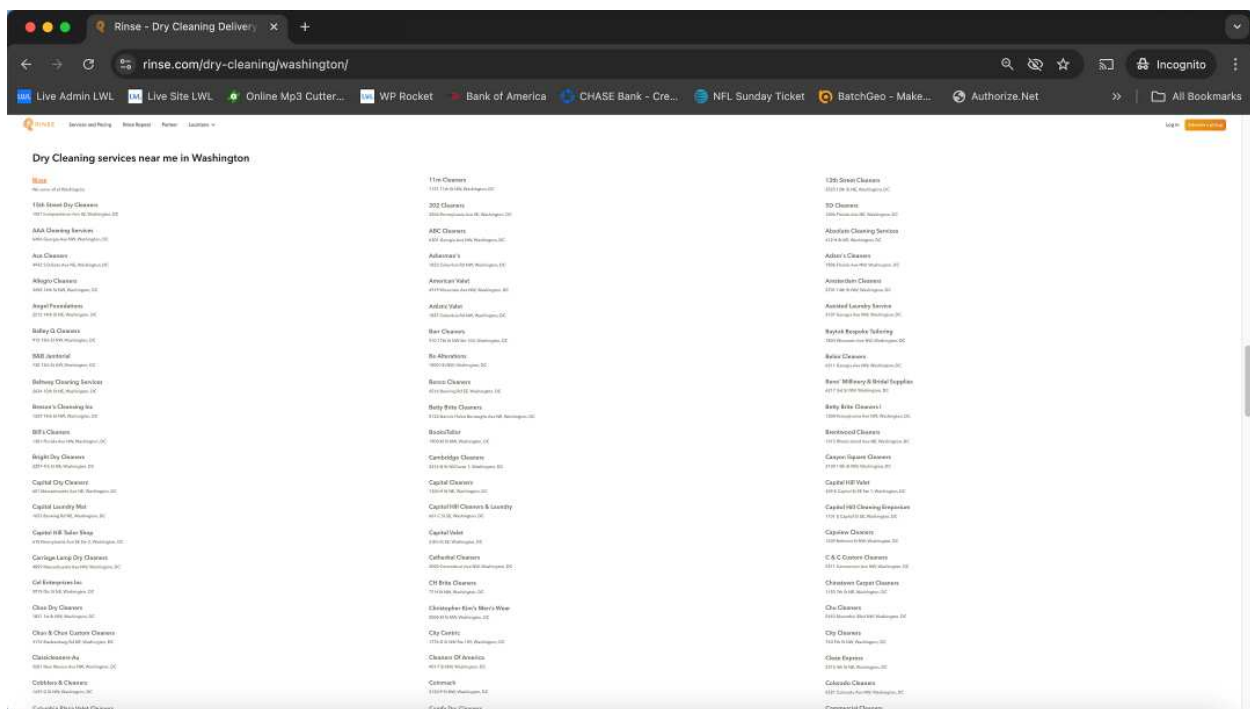
59. Rinse used this fraudulent index to steer users to a same misleading “schedule a pickup” page for “Blue Kangaroo Coin Laundry,” “Bubble Land,” and “Easy Breezy” in Chicago:



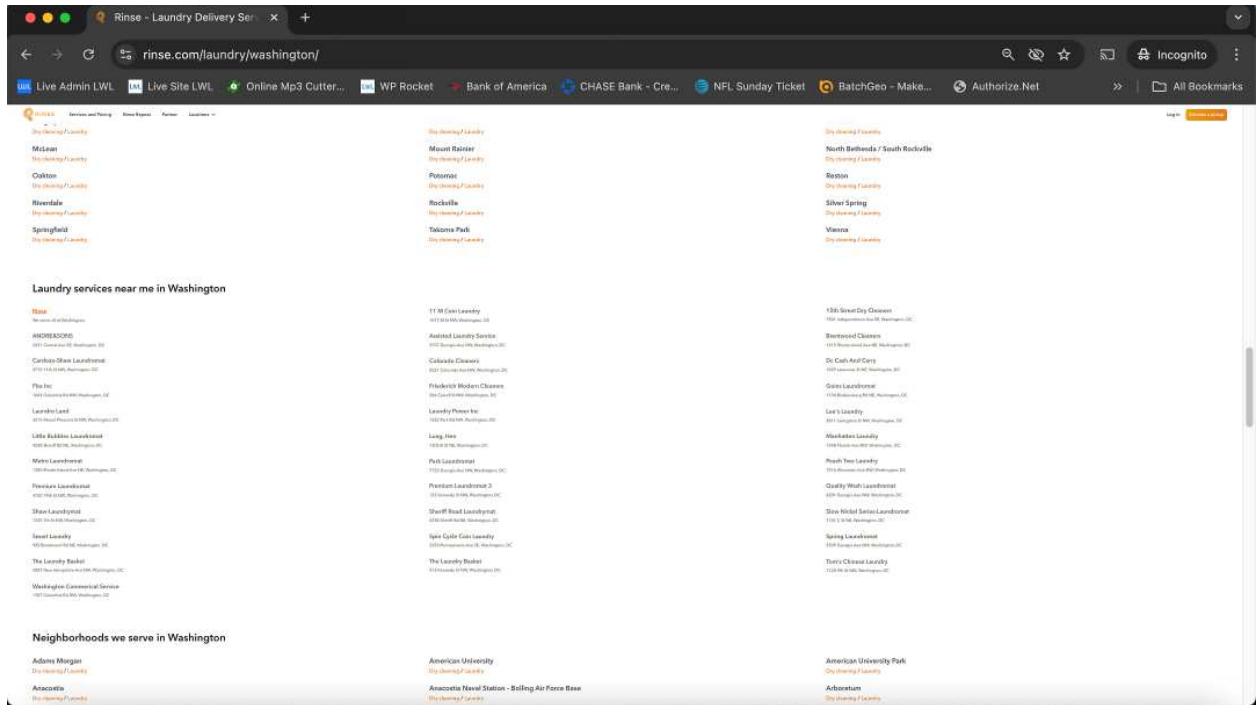


60. Rinse used the same approach of creating an index of third party dry cleaners in Chicago as it did in Boston and Los Angeles:

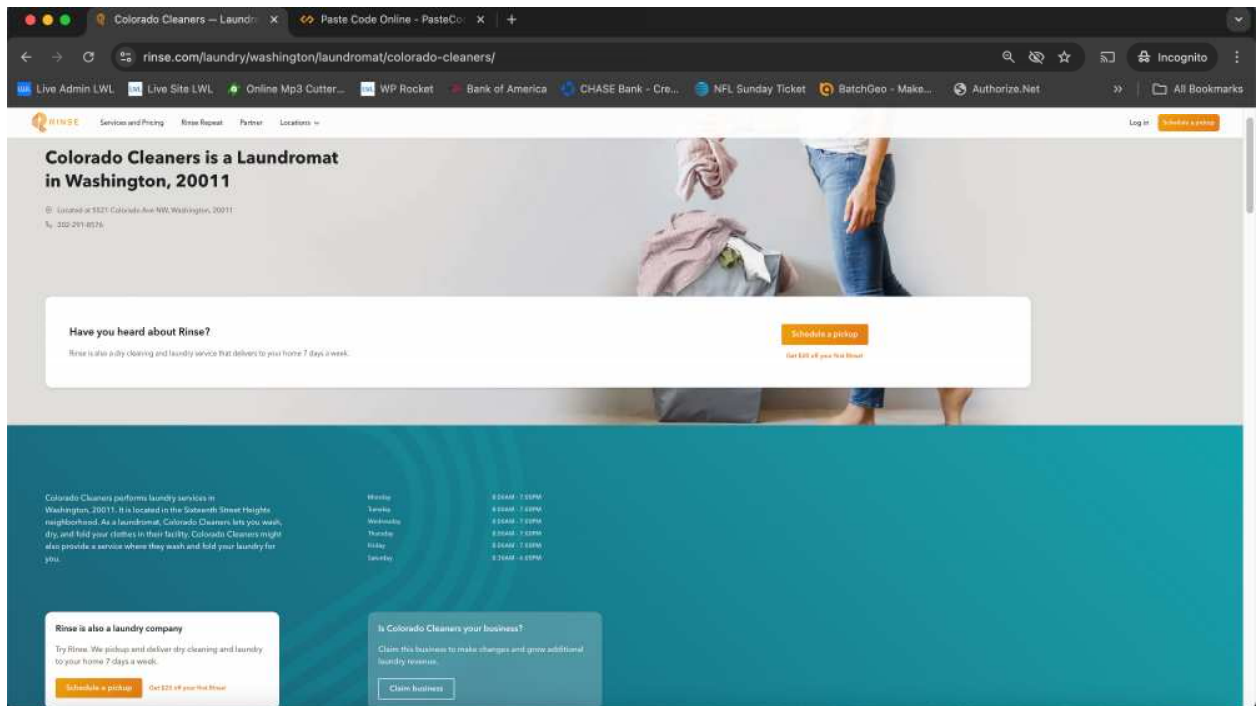


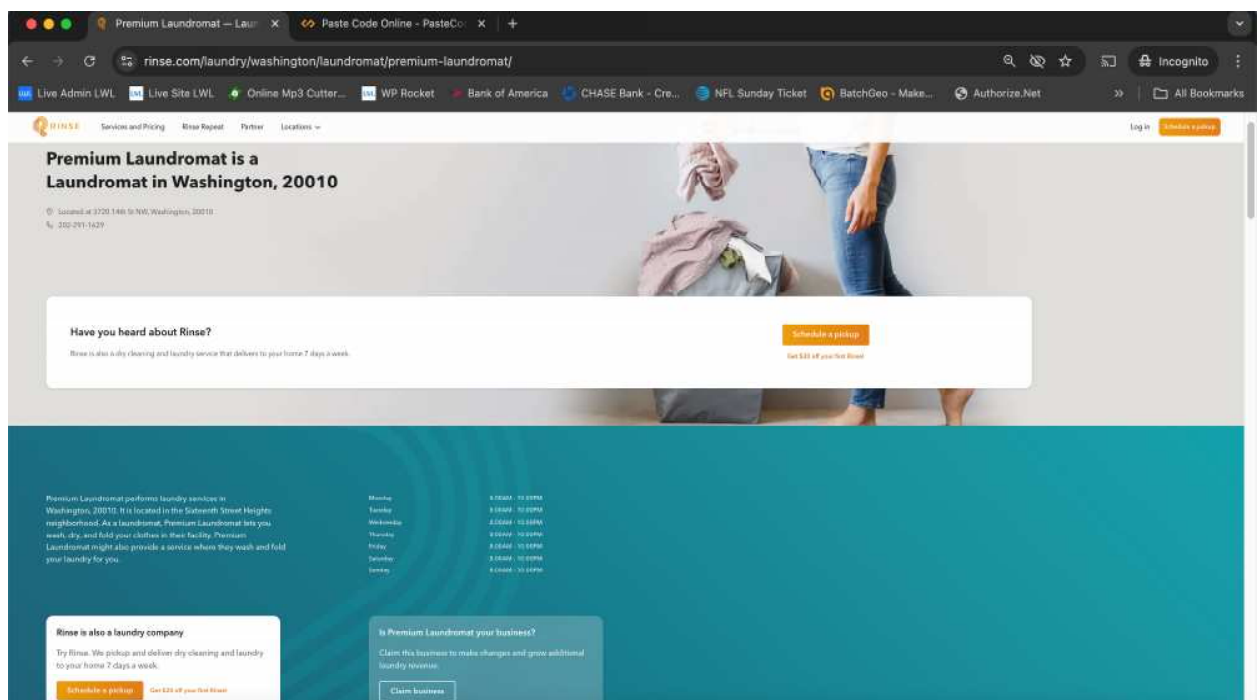
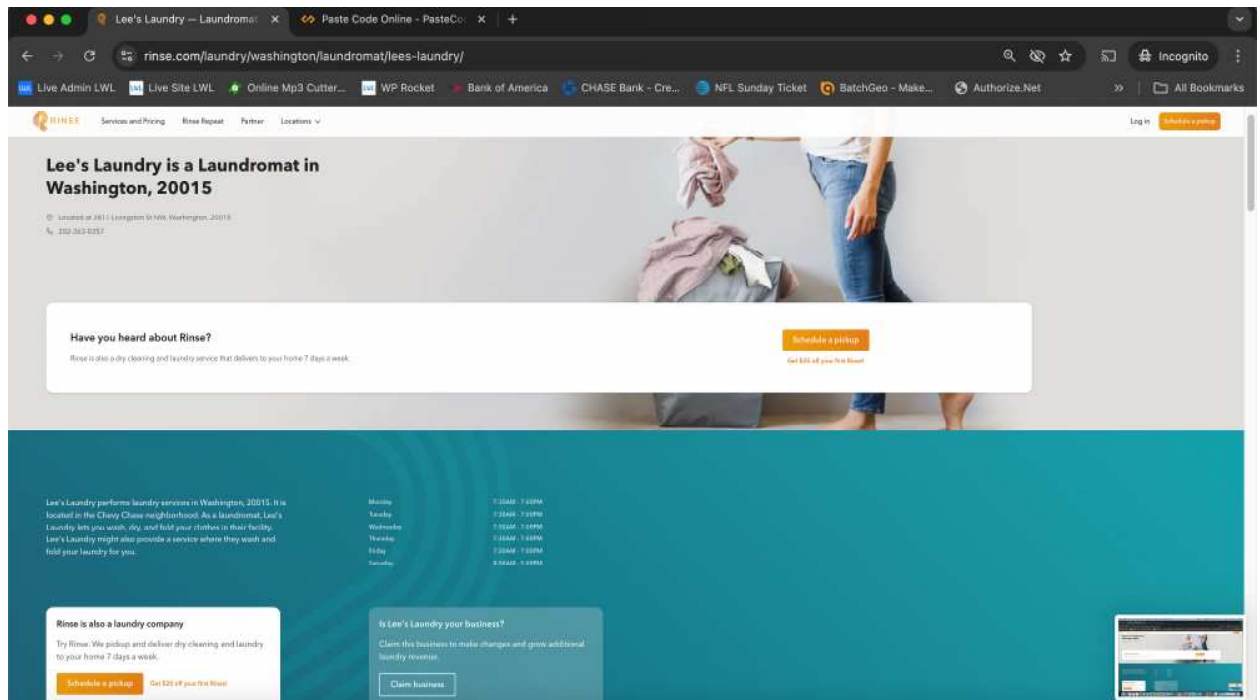


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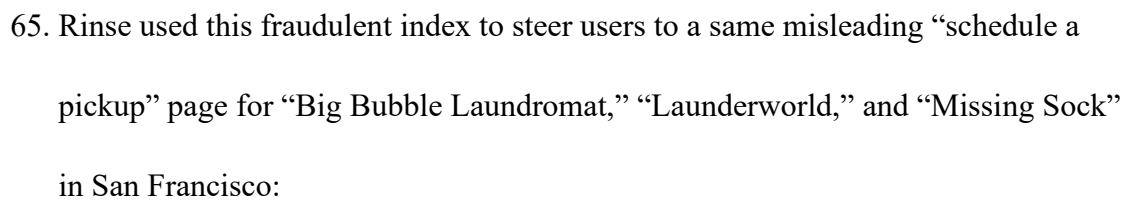


63. Rinse used this fraudulent index to steer users to a same misleading “schedule a pickup” page for “Colorado Cleaners,” “Lee’s Laundry,” and “Premium Laundry” in the District of Columbia:





64. Rinse used the same approach of creating an index of third party laundromats in San Francisco as it did in Boston and Los Angeles:



Big Bubble Laundromat is a Laundromat in San Francisco, 94109

Located at 2545 Van Ness Ave, San Francisco, 94109
 ☎ 415-885-5436

Have you heard about Rinse?

Rinse is also a laundry company. We pickup and deliver dry cleaning and laundry to your home 7 days a week.

[Schedule a pickup](#) [Get \\$25 off your first Rinse!](#)

Big Bubble Laundromat performs laundry services in San Francisco, 94109. It is located in the Cow Hollow neighborhood. As a laundromat, Big Bubble Laundromat lets you wash, dry, and fold your clothes in their facility. Big Bubble Laundromat might also provide a service where they wash and fold your laundry for you.

Monday	6:30AM - 10:00PM
Tuesday	6:30AM - 10:00PM
Wednesday	6:30AM - 10:00PM
Thursday	6:30AM - 10:00PM
Friday	6:30AM - 10:00PM
Saturday	6:30AM - 10:00PM
Sunday	6:30AM - 10:00PM

Rinse is also a laundry company

Try Rinse. We pickup and deliver dry cleaning and laundry to your home 7 days a week.

[Schedule a pickup](#) [Get \\$25 off your first Rinse!](#)

Is Big Bubble Laundromat your business?

Claim this business to make changes and grow additional laundry revenue.

[Claim business](#)

Laundrerworld is a Laundromat in San Francisco, 94110

Located at 2307 Fulton St, San Francisco, 94110
 ☎ 415-254-1424

Have you heard about Rinse?

Rinse is also a laundry company. We pickup and deliver dry cleaning and laundry to your home 7 days a week.

[Schedule a pickup](#) [Get \\$25 off your first Rinse!](#)

Laundrerworld performs laundry services in San Francisco, 94110. It is located in the Mission neighborhood. As a laundromat, Laundrerworld lets you wash, dry, and fold your clothes in their facility. Laundrerworld might also provide a service where they wash and fold your laundry for you.

Monday	6:30AM - 10:00PM
Tuesday	6:30AM - 10:00PM
Wednesday	6:30AM - 10:00PM
Thursday	6:30AM - 10:00PM
Friday	6:30AM - 10:00PM
Saturday	6:30AM - 10:00PM
Sunday	6:30AM - 10:00PM

Rinse is also a laundry company

Try Rinse. We pickup and deliver dry cleaning and laundry to your home 7 days a week.

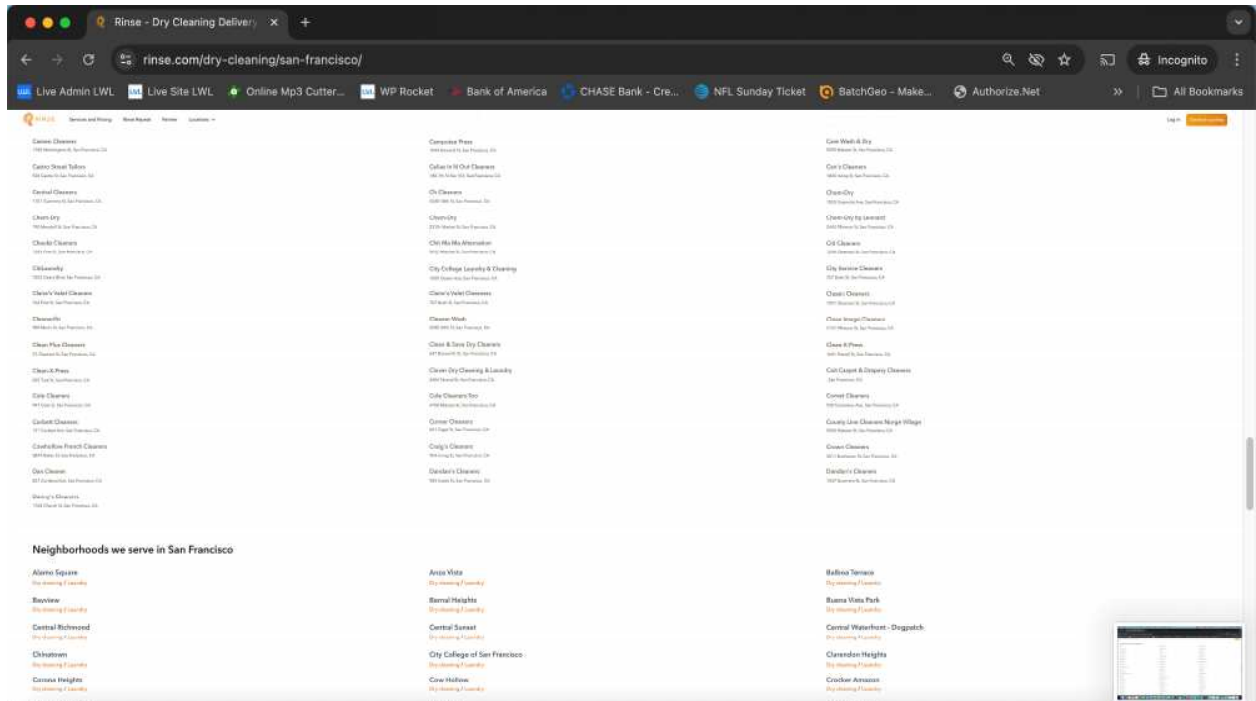
[Schedule a pickup](#) [Get \\$25 off your first Rinse!](#)

Is Laundrerworld your business?

Claim this business to make changes and grow additional laundry revenue.

[Claim business](#)

[illegible]



67. Rinse’s reviews on Yelp! and the Better Business Bureau are woefully bad. To make up for its poor reputation with consumers, Rinse trades on the goodwill of hundreds of mostly “mom and pop” competitors by misusing their registered or common law marks on Rinse’s Website.

68. Rinse engages or engaged in industry-wide deception and misappropriation of the goodwill of hundreds of third parties. On information and belief, Rinse’s HTML code on each competitor page of the Rinse Website described the third party page as a “SEO Competitor Page.”

69. Rinse’s industry-wide misrepresentations are or were intentional. An article promoting Rinse on uschamber.com (a publication of the United States Chamber of Commerce) on January 17, 2024 entitled, “How Laundry Disruptor Rinse Supports Small Brick-and-Mortar Businesses as it Grows at a Fast Clip” states:

- a. “. . . local brick-and-mortar cleaners have struggled amid rising property rates.”
- b. “Often it’s tricky to find a time to drop off dirty clothes when laundromats are open only during traditional business hours. It’s unclear when laundry will be ready, and it’s difficult to find a good time to pick it up.”
- c. “Rinse is helping to streamline and improve how customers get their laundry done by partnering with local brick-and-mortar cleaners across the country, rather than driving them out of business, its founders said.”
- d. “During one chat, [Rinse founder] Joun shared how his parents’ store had become less busy over the last several years. He was mulling over how to help his family. “All the bells went off for me,” said Prakash. “This was an old-school industry with a lot of customer friction.”
- e. “[Founders Prakash and Joun] conducted interviews to learn about peoples’ frustrations with getting laundry done. A common theme was not having a trusted brand—many customers just used the closest service. People also lamented a lack of transparency and accountability.”
- f. “[Founders] envisioned a business model that would help mom-and-pop cleaners struggling with rising rents.”
- g. “There are a lot of really good cleaners out there. We let them do what they do best, clean clothes, while we manage customer acquisition, deploy technology to cleaning partners, and help them to grow their business.” Quote attributed to Ajay Prakash, Co-founder, Rinse.

(See Exhibit “A.”)

70. On information and belief, the US Chamber of Commerce Article was placed in coordination with Rinse as a public relations and marketing effort by Rinse. The article demonstrates that the author interviewed Rinse's founders, Ajay Prakash and James Joun, and quoted them.
71. The article served to intentionally reinforce Rinse's Website misrepresentations regarding Rinse's purported affiliation with almost every laundromat and dry cleaner in the areas it served.
72. Rinse's founders used a story about a founder Ajay Prakash growing up in the laundry business to engage in industry-wide misrepresentation about others in an industry he claimed to care so much about. The vast majority of "mom and pop" laundromats and dry cleaners that the Rinse Website suggest or suggested were 'affiliates' working on Rinse deliveries never worked with Rinse or received customer orders directed to them on the Rinse Website.
73. On information and belief, Rinse falsely identifies or identified the vast majority of other dry cleaners and laundromats as affiliates without their affiliation, knowledge, or consent. Life Without Laundry was never contacted to act as an "affiliate," and never gave its consent to have Rinse use its name.
74. After receiving a cease-and-desist letter in this matter, Rinse appears to have removed all names of third party dry cleaners and laundromats from its Website. However, Rinse has apparently made no effort to redirect the hundreds of laundromats and dry cleaner customers it misdirected back to their rightful service providers.

75. Rinse's infringing use of the Registered Mark on its Website and in its "local business" schema also constitute both false advertisement and unfair competition.
76. By using deceptive schema, "schedule a pickup" subpages on the Rinse Website using countless mom and pop trademarks of its competitors, search engine optimization in contravention of Google and other industry standards, and intentionally misleading public relations efforts, Rinse surpassed Life Without Laundry as the industry leader in laundry and dry cleaning pickup and delivery. Life Without Laundry would be the industry leader were it not for these unlawful, fraudulent and deceptive acts, as it was a prior entrant, a prior trademark registrant, and provided superior service.

COUNT I (False Designation of origin, false description — 15 U.S.C. §1125(a))

77. Life Without Laundry realleges and incorporates by reference each foregoing paragraph as if fully set forth herein.
78. Rinse, without the consent of Life Without Laundry, has used, and/or is using, in commerce Life Without Laundry's Registered Mark in connection with the sale and offering of pickup and delivery laundry and dry-cleaning services, which use has and continues to cause confusion.
79. Rinse's uses of Life Without Laundry's Registered Mark constituted counterfeiting.
80. Upon information and belief, Rinse had actual knowledge of Life Without Laundry's ownership and prior use of the Registered Mark and, without consent of Life Without Laundry, has used, and/or is using, the Registered Mark with the intent to trade upon

Life Without Laundry's reputation and goodwill by causing confusion and mistake among customers and the public, and by deceiving them.

81. Rinse's acts constitute trademark infringement in violation of Section 43(a) of the Lanham Act, 15 U.S.C. §1125(a).

82. Rinse's acts are intentional, willful and in bad faith.

83. The aforesaid acts of Rinse have caused and are causing irreparable harm and damage to Life Without Laundry, and unless preliminary and permanently restrained by this Court, said irreparable injury will continue. Rinse should be ordered, *inter alia*, to provide corrective advertising so that its users know if they have been told that a third party provider was providing their service when in fact those services were completed by Rinse or its different preferred vendor(s).

84. Life Without Laundry has no adequate remedy at law.

COUNT II (Federal Unfair Competition, False Designation of Origin and

False Advertising—15 U.S.C. §1125(a))

85. Life Without Laundry realleges and incorporates by reference each foregoing paragraph as if fully set forth herein.

86. The aforesaid acts of Rinse constitute the intentional use of words, terms, names, symbols and devices and combinations thereof, false designations of origin, and false and misleading representations of fact that were and/or are likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection or association of Rinse with Life Without Laundry, or as to the origin, sponsorship or approval of Rinse's services.

87. The aforesaid acts of Rinse constitute the use of words, terms, names, symbols and devices and combinations thereof, false designations of origin, and false and misleading representations of fact that in commercial advertising or promotion, misrepresent the nature, characteristics or qualities of Rinse's services or other commercial activities.
88. The aforesaid acts of Rinse constitute false designation of origin, false and misleading descriptions and representations, federal unfair competition and false advertising in violation of Section 43(a) of the Lanham Act, 15 U.S.C. §1125(a).
89. The aforesaid acts of Rinse have caused, and are causing, great and irreparable harm and damage to Life Without Laundry, and unless preliminarily and permanently restrained by this Court, said irreparable injury will continue.
90. Life Without Laundry has no adequate remedy at law.

COUNT III (Federal Trademark Infringement—15 U.S.C. §1114)

91. Life Without Laundry realleges and incorporates by reference each foregoing paragraph as if fully set forth herein.
92. Rinse, without the consent of Life Without Laundry, has used in commerce marks confusingly similar and/or identical to Life Without Laundry's Registered Mark, which is federally registered, in connection with the sale and offering of pickup and delivery laundry and dry-cleaning services, which use has and is likely to cause confusion, or to cause mistake or to deceive.
93. Rinse's acts constitute trademark infringement in violation of Section 32(1) of the Lanham Act, 15 U.S.C. § 1114.

94. Rinse's acts are intentional, willful and in bad faith.

95. The aforesaid acts of Rinse have caused, and are causing, great and irreparable harm and damage to Life Without Laundry, and unless preliminarily and permanently restrained by this Court, said irreparable injury will continue.

96. Life Without Laundry has no adequate remedy at law.

COUNT IV (Common Law Unfair Competition)

97. Life Without Laundry realleges and incorporates by reference each foregoing paragraph as if fully set forth herein.

98. Rinse's aforesaid acts are a violation and derogation of Life Without Laundry's common law rights and were and/or are likely to cause confusion, mistake and deception among consumers and the public as to the source, origin, sponsorship, or quality of Rinse's services, and Rinse's aforesaid acts were and/or are likely to cause confusion, mistake and deception among consumers and the public as to Rinse's affiliation with or sponsorship by Life Without Laundry of Rinse's aforesaid acts.

99. Rinse's aforesaid acts have caused and continue to cause loss, damage and injury to Life Without Laundry and to the purchasing public.

100. Rinse knows, or in the exercise of reasonable care should know, that its conduct has likely misled the public.

101. The foregoing conduct by Rinse has been knowing, deliberate, willful, intended to cause mistake or to deceive, and in disregard of Life Without Laundry's rights.

102. Rinse's wrongful acts, as alleged above, have permitted or will permit it to make substantial sales and profits on the strength of Life Without Laundry's good reputation, advertising, sales and consumer recognition.

103. As a direct and proximate result of Rinse's wrongful conduct, as alleged above, Life Without Laundry has been and will be deprived of substantial sales of services in an amount as yet unknown but to be proved at trial, and has been and will be deprived of the value of its registered trademarks and brand in an amount as yet unknown, but to be determined at trial.

104. The aforesaid acts of Rinse constitute unfair competition in violation of common law.

105. The aforesaid acts of Rinse have caused and are causing irreparable harm and damage to Life Without Laundry, and unless preliminarily and permanently restrained by this Court, said irreparable injury will continue.

106. Life Without Laundry has no adequate remedy at law.

107. In the alternative, to the extent that this Unfair Competition Claim is determined to be subsumed within the cause of action under Count V below, each of the underlying factual allegations of misconduct herein are incorporated under Count V as if set forth fully therein insofar as they are construed as providing additional bases for the statutory violation of unfair competition under Chapter 93A below.

COUNT V (Violation of Mass. Gen. Laws c. 93A, §11)

108. Life Without Laundry realleges and incorporates by reference each foregoing paragraph as if fully set forth herein.

109. Rinse is a “person” engaged in trade or commerce within the meaning of M.G.L. c 93A, § 11 in the Commonwealth of Massachusetts.

110. Rinse has committed unfair methods of competition and unfair and/or deceptive acts or practices in trade or commerce by knowingly and willfully making and publishing false, misleading and unfair statements, representations, and impressions about Life Without Laundry and itself.

111. Rinse has committed unfair methods of competition and deceptive acts or practices in trade or commerce by using marks that are confusingly similar and/or identical to the marks used by Life Without Laundry.

112. Rinse has committed unfair methods of competition and deceptive acts or practices in trade or commerce by wrongfully interfering with Life Without Laundry’s contractual and/or prospective advantageous business relations. Such relations include the prospective customers Life Without Laundry lost to Rinse due to misdirection of laundry and dry cleaning delivery services.

113. Such actions constitute unfair and deceptive acts in trade or commerce in violation of Mass. Gen. Law 93A.

114. Rinse’s unfair methods of competition and unfair and/or deceptive acts and practices in trade or commerce have caused, and continue to cause, Life Without Laundry to suffer financial, reputational, and competitive damage in an amount to be determined at trial, including but not limited to, loss of money, loss of future and past sales, and harm to reputation.

115. Rinse's methods, acts and practices as alleged herein resulting in violations of Mass Gen. Law c. 93A occurred primarily and substantially in the Commonwealth of Massachusetts. Plaintiff is headquartered here, the alleged representations and relevant conduct by Rinse was primarily directed here, and Rinse's relevant business conduct was primarily and substantially felt and occurred here.

116. Rinse's unfair methods of competition and deceptive acts and practices in trade or commerce will continue to injure Life Without Laundry unless enjoined.

117. Rinse's unfair and deceptive acts and practices in trade or commerce have been willful or knowing, and/or performed with reckless disregard of applicable law, all within the meaning and violation of M.G.L. c 93A, §§ 2, 11.

RELIEF REQUESTED

WHEREFORE, Plaintiff, Life Without Laundry, Inc. prays for judgment in its favor and against Defendant Rinse, Inc. d/b/a Rinse, and requests that:

- A. Judgment enter in its favor and against Rinse on each Count of the Complaint;
- B. Rinse be adjudged to have infringed the Registered Mark and that such infringement be adjudged to have been willful;
- C. Life Without Laundry be awarded its actual damages in an amount to be proven at trial;
- D. Life Without Laundry be awarded its lost profits in an amount to be proven at trial;

E. Rinse's past and future profits during the relevant period be disgorged to Life Without Laundry;

F. Life Without Laundry be awarded treble damages pursuant to 15 U.S.C. § 1117 (b) and Life Without Laundry recovers treble damages as a result of Rinse's violation of Mass. Gen. Laws c. 93A because of, *inter alia*, the willful and knowing nature of Rinse's acts;

G. Life Without Laundry be awarded \$2,000,000 in statutory damages for counterfeiting pursuant to 15 U.S.C. § 1117 (c) because of the willful nature of Rinse's acts;

H. That an injunction be entered requiring Rinse to make corrective advertising on its website and in appropriate traditional media and social media channels;

I. Life Without Laundry be awarded prejudgment interest;

J. Life Without Laundry be awarded its costs, attorneys' fees, and expenses in this suit pursuant to 15 U.S.C. § 1117 (a), Mass. Gen. Law c. 93A;

K. Rinse, and each of its officers, directors, agents, servants, employees and representatives, and those persons in active concert or participation with them or any of them, be preliminarily and permanently enjoined and restrained from:

- (1) using in connection with advertising, promotion or otherwise the Registered Mark in conjunction with pickup and delivery laundry and dry-cleaning services or any variations thereof that are confusingly similar to Plaintiff's Registered Mark;
- (2) representing by any means whatsoever, directly or indirectly, or doing any other act or things calculated or likely to cause confusion, mistake or to deceive consumers into believing that Rinse's services are those of

Life Without Laundry, or that there is any affiliation or connection between Life Without Laundry or its services and Rinse or its services, and from otherwise unfairly competing with Plaintiff;

(3) causing to be advertised, published or disseminated by any means any false or misleading representations as to the existence of any relationship between Rinse and Life Without Laundry or between any services of Rinse and any services of Life Without Laundry.

L. Life Without Laundry recovers its damages sustained as a result of Rinse's infringement, unfair competition and false designation of origin under federal, state and common law, together with an accounting of Rinse's profits arising from such activities, and that the Court exercise its discretion and enter a judgment for such additional sums as the Court shall find to be just, according to the egregious, willful and intentional nature of the acts of Rinse;

M. Rinse be required to recall from any and all channels of trade, any and all advertising or promotional materials using the Registered Mark in connection with pickup and delivery laundry and dry-cleaning services or any variations thereof that are confusingly similar to Plaintiff's Registered Mark, and to take affirmative steps to dispel any false suggestion of a connection to Life Without Laundry by virtue of its activities, including, but not limited to, all necessary and appropriate corrective advertising measures;

N. Life Without Laundry recovers its costs and disbursements herein; and

O. Life Without Laundry be awarded such other and further relief as this Court may deem just and proper.

DEMAND FOR JURY TRIAL

Life Without Laundry requests a trial by jury on all issues so triable.

Date: October 3, 2025

Respectfully submitted,
The Plaintiff,
LIFE WITHOUT LAUNDRY, LLC.
By its attorneys,

/s/ Benjamin Lajoie

Benjamin Lajoie, BBO# 693715
Julianne Landry, BBO# 714356
NELSON MULLINS, RILEY & SCARBOROUGH LLP
One Financial Center, Suite 3500
Boston, MA 02111
617.217.4609
617.217.4622
benjamin.lajoie@nelsonmullins.com
julianne.landry@nelsonmullins.com

/s/ Justin Sobodash

Justin Sobodash (*Admitted Pro Hac Vice*)
LAW OFFICE OF JUSTIN SOBODASH, P.C.
8335 West Sunset Blvd., Suite 366
West Hollywood, California 90069
Telephone: 310.729.2184
Email: justin@sobodashlaw.com

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

Date: October 3, 2025

/s/ Justin Sobodash

Justin Sobodash

EXHIBIT A

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How Laundry Disruptor **Rinse** Supports Small Brick-and-Mortar Businesses as It Grows at a Fast Clip

Rinse founders and college friends Ajay Prakash and James Joun are tapping into technology to help make getting laundry done less of a hassle.

By: *Deborah Lynn Blumberg*, Contributor

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Rinse, a San Francisco-based on-demand laundry and dry cleaning pickup and delivery app, is helping to streamline and improve how customers get their laundry. — Rinse

Why it matters:

Customers face multiple pain points when doing laundry, like inflexible laundromat hours and lack of transparency around delivery times.

At the same time, local brick-and-mortar cleaners have struggled amid rising property rents.

Laundry and dry cleaning pickup and delivery app Rinse offers consumers on-demand service by partnering with small business cleaners across the country, seeking to bring newfound convenience to the chore, while offering local laundromats a new revenue stream.

Few people like the regular chore of laundry. But if you live in a big metropolis, getting your clothes clean can be a major inconvenience that's full of obstacles and fi

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College friends and business school graduates Ajay Prakash and James Joun understood these barriers well. Joun, in particular, had an inside view into the laundry industry, having grown up at his family's dry cleaning facility in San Francisco.

Prakash, for his part, lived for a period in Manhattan, where getting laundry done can be a hassle. In 2013, Prakash left a role at a travel-related startup and was ready for a new challenge. He wanted to start a business that would bring new technologies to a traditional, established industry and remove friction for customers.

Now, Prakash and Joun are the co-founders of **Rinse**, a San Francisco-based on-demand laundry and dry cleaning pickup and delivery app. Rinse is helping to streamline and improve how customers get their laundry done by partnering with local brick-and-mortar laundries across the country, rather than driving them out of business, its founder

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“There are a lot of really good cleaners out there,” Prakash said. “We let them do what they do best, clean clothes, while we manage customer acquisition, deploy technology to cleaning partners, and help them to grow their business.”

Rinse is part of the [global dry cleaning and laundry services market](#), valued at \$104.2 billion in 2021 and projected to reach \$145.8 billion by 2031.

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Rinse aims to offer a seamless process for customers, and also provides an opportunity for increased income for its cleaning partners. — Rinse

Bringing a technology-driven, customer-centric approach to the laundry business

In early 2013, Prakash and Joun started to have regular brainstorming sessions during which they exchanged business ideas and gave each other feedback.

During one chat, Joun shared how his parents' store had become less busy over the last several years. He was mulling over how to help his family. "All the bells went off for me," said Prakash. "This was an old-school industry with a lot of customer friction."

The idea for a business involving laundry started to take shape. Prakash dozen friends if they could pick up their laundry, take it to Joun's parent return the clothes to them. The exercise was seamless, and the friends v

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service. People also lamented a lack of transparency and accountability.

“Our thought was, we can create this seamless experience from start to finish, leveraging technology and a customer-centric approach,” said Prakash. They also envisioned a business model that would help mom-and-pop cleaners struggling with rising rents.

In 2013, the two launched Rinse. Customers sign up with Rinse, then use the app to choose a pickup time for their dirty laundry. Rinse valets, who work as W-2 employees (so employee taxes are covered), pick up the laundry during an 8 p.m. to 10 p.m. time slot, then take it to a trusted Rinse cleaning partner. Rinse delivers the clean laundry to customers’ doorstep the next day.

“The goal is that it’s really easy for consumers,” Prakash said. “They should never see anybody except our valet.”

[Read: [Meta, Google, and Shopify Execs on How New AI Tools Will Drive Sales in 2024](#)]



“There are a lot of really good cleaners out there. We let them do what they do best, clean clothes, while we manage customer acquisition, deploy technology to cleaning partners, and help them to grow their business.”

Ajay Prakash, Co-founder, Rinse

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Prakash. Rinse sends local cleaners a predictable steady stream of business seven days a week, helping them to raise revenue.

Cleaners don't interact with customers, freeing them up to do what they do best: clean clothes.

Rinse developed a five-step process for working with its cleaner partners that includes ensuring cleaners hire the best possible employees. "It's also really important that the cleaner wants to grow," Prakash said.

Both customers and cleaning partners benefit from Rinse's simple scheduling technology — clients easily book a pickup slot and can keep track of their laundry while cleaners monitor their business more efficiently. Using technology, Rinse also analyzes cleaners' data, helping them to adjust and grow their business.

"We help them think about staffing, how to cut costs, and to think about their P&Ls—strengths that aren't necessarily standard in that world," Prakash said.

On average, a cleaning partner during their first year with Rinse sees a 20% increase in revenue, while dry cleaning partners experience a 10% increase.

[Read: 4 Trend-Driven Ways Brands Are Tapping Personalization for Growth]

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Ajay Prakash and James Joun, Co-founders of Rinse. — Rinse

Scaling slowly: Angling to be the first national brand in the laundry space 'and a household name'

Rinse started out with three zip codes in San Francisco. Now, it's cleaned around 100 million items of clothing and it's operating across a dozen metro areas in the U.S. It launched in Manhattan, its fastest growing market, in 2022. "Our goal is to be the first national brand in the space and a household name," Prakash said.

Rinse cleaning partners say they've benefitted from the extra income and employee retention. One cleaner was able to fund plant improvements and pay for a Thanksgiving dinner and bonus for its employees because of Rinse.

Over the years, Rinse has grown by slowly and methodically making acquisitions. In the last ten years, it's acquired seven companies, mostly startups in the laun

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complexity in cleaning, Prakash said. It's taken patience. Rinse takes a tortoise approach, he said, focusing on metrics and delivering true value to customers rather than on "the flash," like a fancy, expensive-to-make app.

At first, laundry pick-up was only available on Sundays. It took several years of honing the Rinse process and procedures to confidently build up to seven days, he said.

"It was about being methodical and creating an amazing customer experience as we scaled," Prakash said. "We leveraged existing infrastructure in markets and always treat our partners with respect as we fulfill our product promise: clean clothes delivered."

Small business partners log 70% year-over-year growth

Now, new Rinse customers are growing more than 70% year-over-year. The coming year brings expansion plans. Prakash and Joun have their sights set on opening in five to ten other major metropolitan areas, possibly including Miami, Atlanta, Denver, and Philadelphia. Expanding internationally is on Rinse's radar for the long term.

At the same time, Rinse is focused on giving back and supporting the communities it operates in. It accepts clothing donations, and around the holidays collects gently used coats, cleaning them before they're passed on to a new owner. This past holiday season Rinse partnered with [New York Cares](#).

It's grounded in sustainability, too. Rinse is committed to reusing hange and not using harmful chemicals to clean.

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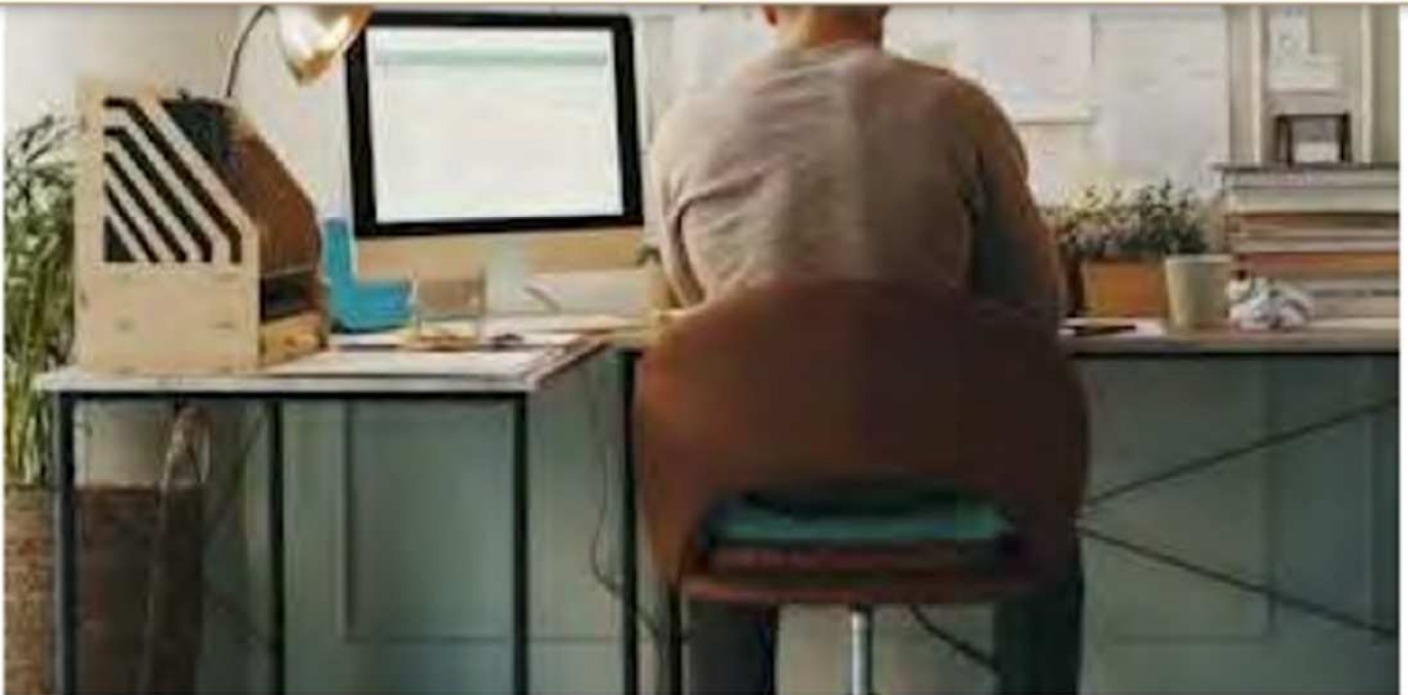
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