

STATE OF MINNESOTA
COUNTY OF RAMSEY

DISTRICT COURT
SECOND JUDICIAL DISTRICT

Case Type: Civil Other
(Consumer Protection)

State of Minnesota, by its Attorney General,
Keith Ellison,

Court File No. _____

Plaintiff,

COMPLAINT

vs.

Venture Concepts Group LLC dba High Light
Vape Co., Amnon Arama, and My PM USA,
Inc.,

Defendants.

The State of Minnesota, by its Attorney General, Keith Ellison, for its Complaint and Prayer for Relief against Venture Concepts Group, LLC dba High Light Vape Co. (“High Light”), Amnon Arama, and My PM USA, Inc, alleges as follows:

INTRODUCTION

1. This is not a picture of a highlighter. It is a vaping device called the Highlight Vape.

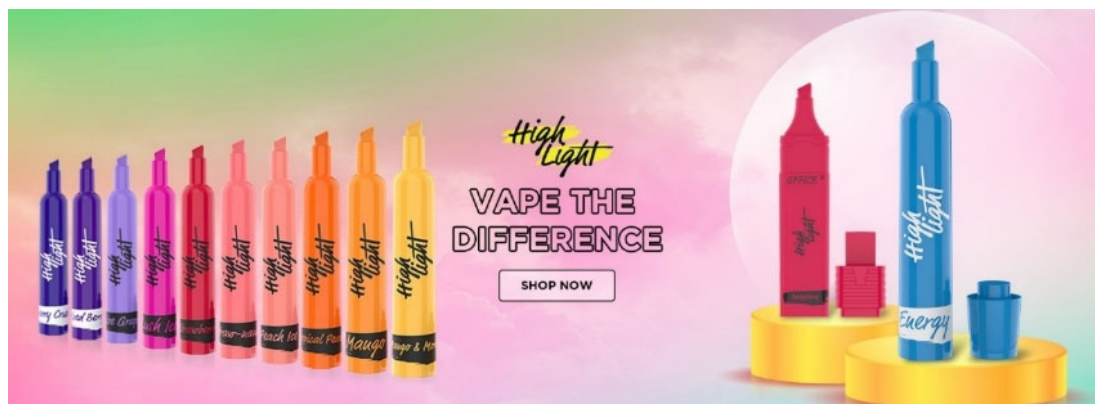


Defendant High Light has manufactured the Highlight Vape and advertises and sells these addictive nicotine vaping devices to Minnesota consumers in Minnesota.

2. High Light intentionally and knowingly disguises its highly addictive vaping devices as highlighters. High Light proudly markets its deceptive products as “stealth vaping” on its website. In particular, High Light makes the following representations on its website:

- “Highlighter Vape, a company that specializes in developing stealthy and cutting-edge vaping options for those on the go.”
- “Our main offering is a disposable vape that cleverly disguises itself as a highlighter, ensuring seamless and covert vaping in any setting.”
- “Our flagship product is a disposable vape that looks like a highlighter, making it the perfect option for those who want to vape discreetly in public.”
- “Our disposable vapes bear a striking resemblance to actual highlighters, making them virtually indistinguishable from the real thing.”
- “Whether you’re discreetly vaping in the office, out with friends, or even in public places where vaping is prohibited, our sleek and inconspicuous design ensures you can enjoy your vaping experience without attracting unwanted attention.”
- “Our highlighter vapes, which were created to resemble regular stationary markers and were inspired by Sharpies’ well-known brand and silhouette, are noted for their covert appearance.”
- “Users can enjoy their favorite e-liquid flavors while simultaneously highlighting notes, books, or documents. This unique combination of features has attracted the attention of many, particularly among students and working professionals.”

3. Not only has the Highlighter Vape promoted addictive nicotine vaping devices as children’s school supplies, but it also offers “a wide variety of flavors . . . to cater to everyone’s needs. Whether you prefer fruity, minty, or dessert flavors, [High Light] has something for you.” High Light markets, promotes, and sells its vaping flavors that are commonly marketed to minors, including dessert- based flavors like Strawberry Cheesecake and fruity flavors like Blueberry Raspberry, Sour Apple, and Magic Fruit:



4. High Light not only markets and sells its flavored vaping devices disguised as highlighters, but High Light also fails to conduct adequate age verification to confirm that underage minors are not purchasing or receiving High Light's vaping devices in violation of Minnesota law.

5. High Light unlawfully markets and sells vaping products that are designed to deceptively appeal to Minnesota's youth in both their designs and flavors. The Attorney General brings this action to enforce the law, to enjoin unlawful practices, deter future violations, and remediate harm to Minnesota consumers, especially Minnesota's youth.

PARTIES

6. Keith Ellison, the Attorney General of the State of Minnesota, is authorized under Minnesota Statutes chapter 8 and has common law authority, including *parens patriae* authority, to bring this action to enforce Minnesota's laws, to vindicate the State's sovereign and quasi-sovereign interests, and to remediate all harm arising out of—and provide full relief for—violations of Minnesota's laws.

7. Defendant High Light is a limited liability company organized under the laws of Florida and with a principal place of business at 4101 Ravenswood Road 405, Fort Lauderdale, Florida 33312. High Light was formed in October 2022. High Light dissolved on August 28, 2024, though it continues to offer its products for sale to Minnesota consumers on other websites. Also,

despite the dissolution, the corporation “continues its corporate existence” for purposes of winding up its business and affairs and may be sued in its corporate name pursuant to Florida law.

8. Defendant Amnon Arama is one of two controlling managers of High Light. His business address is 4101 Ravenswood Road 405, Fort Lauderdale, Florida 33312. He resides in Fort Lauderdale, Florida 33312. He is related to Yuval Arama.

9. Defendant My PM USA, Inc. is a corporation organized under the laws of Florida and with a principal place of business at 3389 Sheridan Street, Unit 170, Hollywood, FL 33021. It was incorporated as of February 25, 2020 and remains active. It was previously incorporated by and is represented as registered agent by Brittany Arama. The sole manager and registered agent for the corporation currently is Yuval Arama, who is related to Defendant Amnon Arama. My PM USA has participated in and facilitated sales by High Light.

JURISDICTION

10. This Court has subject matter jurisdiction over this action pursuant to Minnesota Statutes sections 8.01 and 8.31, and common law, including the State’s *parens patriae* authority.

11. This Court has personal jurisdiction over Defendants because they purposefully and knowingly transacted business in Minnesota and with Minnesota residents and has committed acts inside and outside of Minnesota causing injury to the Minnesota public, including Minnesota youth, in violation of Minnesota law.

12. Venue in Ramsey County is proper under Minnesota Statutes section 542.09 because the cause of action arose, in part, in Ramsey County. Defendants have conducted sales in and done business in Ramsey County and their unlawful acts have affected Ramsey County residents, among others.

FACTUAL BACKGROUND

I. HIGH LIGHT MARKETS, PROMOTES, LABELS, BRANDS, ADVERTISES, DISTRIBUTES, OFFERS FOR SALE, AND SELLS ADDICTIVE VAPES DISGUISED AS HIGHLIGHTERS IN VIOLATION OF MINNESOTA LAW.

13. High Light markets itself as a “revolutionary company that aims to cater to the needs of vapers who value discretion and portability,” “specializing in crafting innovative and discreet vaping solutions for those constantly on the go.” Since at least 2023, High Light has operated websites www.highlightvape.com and www.highlightervape.com, where it has marketed and sold its products. On this website, High Light stated that its “journey started in 2021.”

14. High Light markets on these websites two main vaping devices: the “Office 4 – 4000 Puffs Highlight Vape” and the “Office 6 – 6000 Puffs Highlight Vape.” Both are deceptively designed to look like highlighters, but in fact are electronic vaping devices that are pre-filled with e-liquid that contains concentrated amounts of nicotine. The products are used by inhaling the aerosol produced when the device heats the e-liquid. They are offered in dozens of different fruit and desert flavors.



Figure 1: Office 4 - 4000 Puffs Highlight Vape

15. The “Office 4 – 4000 Puffs Highlight Vape” (“the Office 4”) is High Light’s “flagship product.” High Light’s websites describe the Office 4 as “a disposable vape that

ingeniously resembles a highlighter, providing the perfect option for discreet vaping in public.”

High Light markets the Office 4 as a “Vape That Looks Like a Highlighter.”

16. High Light further states: “We understand the importance of discreet vaping – that’s why our Office 4 maintains a sleek and compact design. With its uncanny resemblance to a highlighter, it seamlessly blends in with your everyday essentials, allowing you to vape inconspicuously.”

17. As High Light markets on its website, the “Office 4 offers an impressive selection of 20 flavors, ensuring there’s something for everyone. From classic tobacco to refreshing menthol, delightful fruit blends, and indulgent dessert-inspired options, you’ll find your perfect flavor profile with highlight vape.” Such flavors include “Berry Crush,” “Strawberry,” “Blueberry Ice,” “Litchi,” “Sour Apple,” “Tropical Peach,” and “Lush Ice.”

18. The Office 4 offers consumers up to 4,000 puffs, which is estimated to be equivalent to 400 cigarettes,¹ and includes a rechargeable battery.

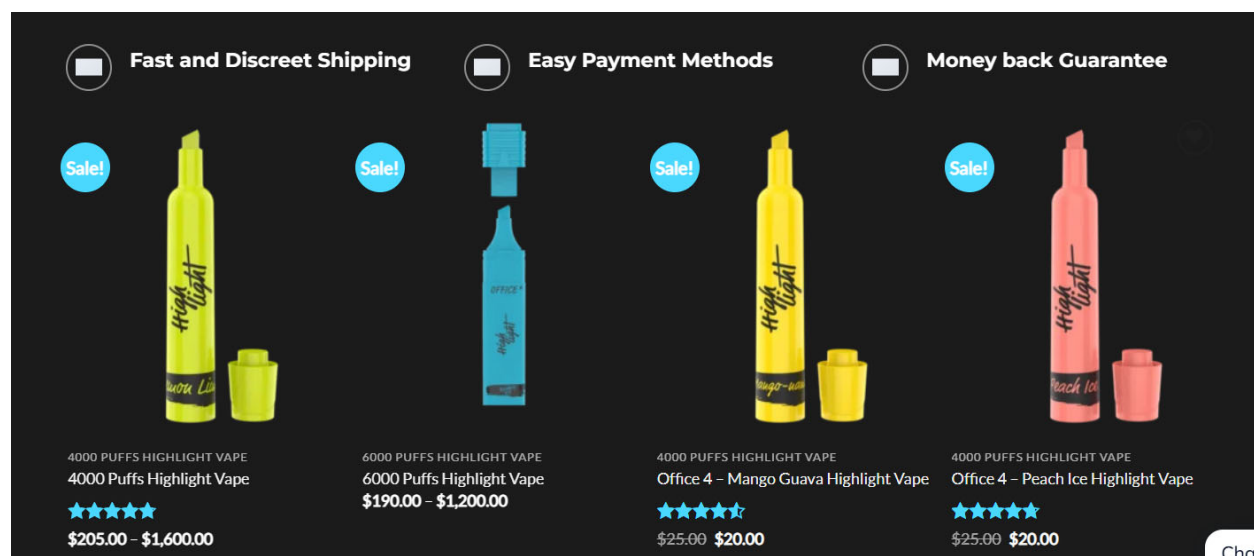


Figure 2: Office 6 - 6000 Puffs Highlight Vape

¹ The number of puffs from a vaping device equivalent to smoking a cigarette depends on many factors, but manufacturers often suggest that 10 puffs from a vaping device are equivalent to one combustible cigarette.

19. Like the Office 4, the Office 6 – 6000 Puffs Highlight Vape, shown above, is designed by High Light to deceptively resemble a highlighter. The Office 6 offers consumers up to 6000 puffs and includes a 650mAh rechargeable battery. It comes in at least 20 different flavor options, including Strawberry Cheesecake.

20. At some point in 2024, High Light stopped using the website highlightvape.com and started exclusively marketing its products on highlightervape.com. Highlervape.com continues to market and sell the same products described above, now called “400 Puffs Highlight Vape” and “6000 Puffs Highlight Vape”:



II. HIGH LIGHT ACCEPTS ORDERS AND SHIPS TOBACCO PRODUCTS WITHOUT CONDUCTING ADEQUATE AGE VERIFICATION MEASURES AS REQUIRED UNDER MINNESOTA LAW.

21. High Light’s website accepts orders for its vaping products. Anyone, including minors, can go to High Light’s website, add as many Highlight Vapes as they would like to their virtual cart, purchase those vapes directly from High Light’s website, and have those vapes shipped to their home. At the checkout page, a consumer must fill out basic personal information: first and last name, country, street address, town/city, state, ZIP Code, phone number, and email address.

22. During the checkout process, the consumer is prompted to provide their birth date, but there is no verifying mechanism (e.g., providing a copy of one's government-issued ID or providing a driver's license number or any other verification) to confirm that the consumer is of a legal age to purchase the product. High Light does not require consumers to provide a copy of a government-issued identification nor does High Light require consumers to provide any sort of written statement attesting to their age.

23. Once the purchase is complete, High Light emails the consumer a confirmation of the purchase and ships the products to the shipping information provided during the checkout process.

24. When orders are placed by Minnesotans through highlightervape.com, High Light continues to send a confirmation email to the consumer and accepts payments via Apple Pay, credit card, and Stripe. To complete a sale via Apple Pay, a High Light representative sends an additional email and/or text message to the consumer to confirm the purchase and provide details for payment via Apple Pay.

25. When High Light's products are delivered, consumers do not need to sign for the package, contrary to Minnesota law. Nor are consumers required to show a government-issued identification at delivery to verify that the consumer is of legal age to purchase tobacco products and that the consumer resides at the delivery address.

26. The packages delivered by High Light are not marked in any way to indicate that the package contains tobacco products or that such products require an adult's signature.

III. DEFENDANTS ARAMA AND MY PM USA, INC PARTICIPATE, AUTHORIZE, AND/OR ACQUIESCE IN HIGH LIGHT'S VIOLATIONS.

27. Defendant Amnon Arama is one of two controlling managers of High Light, as identified in the company's Articles of Incorporation filed on October 18, 2022. He is identified

as the company's registered agent in corporate filings from 2023 and 2024. He is appointed "to wind up the company's activities and affairs" pursuant to High Light's articles of dissolution filed on August 28, 2024.

28. Mr. Arama has been the manager of several LLCs registered in Florida in recent years, including Kosha LLC (now inactive), Relevant Innovations LLC (now inactive), High Roller LLC (now inactive), Turned On LLC (now inactive), Dream Team Innovations LLC (now inactive), Nature Meds LLC (now inactive), BH Novelty LLC (now inactive), Food Fight Co LLC (now inactive), Store in Store LLC (now inactive), Ezer South Carolina Inc. (a nonprofit that is now inactive). Mr. Arama is also currently a controlling manager of Amnuri Ventures LLC, an active business located at the exact same address as High Light—4101 Ravenswood Road, 405, Ford Lauderdale, FL 33312. The co-manager of Amnuri Ventures is Uri Cohen, who has also been a co-manager of High Light.

29. Amnon Arama has controlled the website and sales practices of High Light and participated in the marketing and sales alleged herein.

30. My PM USA, Inc. remains active and is currently managed by Yuval Arama, who is related to Amnon Arama. While "PM USA" refers to and is trademarked by Phillip Morris USA, which manufactures and sells tobacco and vaping products, My PM USA does not have any affiliation with Phillip Morris USA.

31. The stated purpose for which My PM USA was established, according to its articles of incorporation, is "any and all lawful business." My PM USA, however, has no marketed business location and does not operate a business location or official website where it identifies what goods or services it offers for sale.

32. An email address associated with My PM USA, Inc. and managed by Yuval Arama has been used to send and receive information about a consumer's purchase from High Light. Through his identified role for My PM USA, Yuval Arama has also exercised control and access to the High Light sales website.

33. When a customer orders a product from High Light, it has been shipped from Hollywood, Florida 33021—which is the same location and zip code for My PM USA, Inc.

COUNT I
PROHIBITION ON DECEPTIVE VAPOR PRODUCTS
MINN. STAT. § 325F.7821

34. The State re-alleges paragraphs 1 through 33 of this Complaint.

35. Minn. Stat. § 325F.7821 (2024) reads in pertinent part:

A person or entity must not market, promote, label, brand, advertise, distribute, offer for sale, or sell a vapor product by:

(1) Imitating a product that is not a vapor product, including but not limited to:

(i) a food or brand of food commonly marketed to minors, including but not limited to candy, desserts, and beverages;

(ii) school supplies commonly used by minors, including but not limited to erasers, highlighters, pens, and pencils

36. High Light's Office 4 and Office 6 are vapor products as defined under Minn. Stat. § 325F.782.

37. Defendant High Light has violated section 325F.7821 by marketing, promoting, labeling, branding, advertising, distributing, offering for sale, and selling vapor products that imitate products that are not vapor products, including products that imitate school supplies commonly used by minors, including highlighters.

38. Defendant High Light has violated section 325F.7821 by marketing, promoting, labeling, branding, advertising, distributing, offering for sale, and selling vapor products that

imitate products that are not vapor products, including products that imitate foods commonly marketed to minors, including desserts. Examples include Strawberry Cheesecake and fruity flavors like Blueberry Raspberry, Sour Apple, and Magic Fruit.

39. Defendant Amnon Arama is a corporate officer of High Light, controls its sales operations as described herein and in violation of Minnesota law, participated, authorized, and/or acquiesced in the violating conduct.

40. Defendant My PM USA has participated in the violations alleged above by communicating with Minnesota consumers, controlling the High Light website, and facilitating purchases of vapor products through High Light's website.

41. The Attorney General is authorized to bring civil actions to enforce section 325F.7821 pursuant to section 8.31 and his *parens patriae* authority.

42. Defendants' conduct, practices, and actions described in this Complaint constitute multiple separate violations of section 325F.7821.

COUNT II
TOBACCO PRODUCT DELIVERY SALES
MINN. STAT. § 325F.781, SUBD. 2 and SUBD. 3

43. The State re-alleges paragraphs 1 through 33 of this Complaint.

44. Minn. Stat. § 325.781, subdivision 2 reads in pertinent part:

(a) This subdivision applies to acceptance of an order for a delivery sale of tobacco products.

(b) When accepting the first order for a delivery sale from a consumer, the tobacco retailer shall obtain the following information from the person placing the order:

(1) a copy of a valid government-issued document that provides the person's name, current address, photograph, and date of birth;

(2) an original written statement signed by the person documenting that the person:

- (i) is of legal age to purchase tobacco products in the state;
- (ii) has made a choice whether to receive mailings from a tobacco retailer;
- (iii) understands that providing false information may be a violation of law; and
- (iv) understands that it is a violation of law to purchase tobacco products for subsequent resale or for delivery to persons who are under the legal age to purchase tobacco products.

45. Minn. Stat. § 325.781, subdivision 3 reads in pertinent part:

- (a) This subdivision applies to a tobacco retailer shipping tobacco products pursuant to a delivery sale.
- (b) The tobacco retailer shall clearly mark the outside of the package of tobacco products to be shipped “tobacco products – adult signature required” and to show the name of the tobacco retailer.
- (c) The tobacco retailer shall utilize a delivery service that imposes the following requirements:
 - (1) an adult must sign for the delivery; and
 - (2) the person signing for the delivery must show valid government-issued identification that contains a photograph of the person signing for the delivery and indicates that the person signing for the delivery is of legal age to purchase tobacco products and resides at the delivery address.
- (d) The retailer must provide delivery instructions that clearly indicate the requirements of this subdivision and must declare that state law requires compliance with the requirements.

46. High Light is a retailer within the meaning of section 325.781, subdivision 1(f).

47. High Light’s Office 4 and the Office 6 are tobacco products within the meaning of section 325.781, subdivision 1(g).

48. High Light has violated section 325.781, subdivision 2 by accepting orders from consumers for delivery without obtaining the requisite information from the consumer, including a copy of a valid government-issued document that provides the person’s name, current address,

photograph, and date of birth; or an original written statement signed by the consumer documenting that the consumer is of legal age to purchase tobacco products, the consumer had made a choice whether to receive mailings from a tobacco retailer, the consumer understands that providing false information may be a violation of law, and the consumer understands that it is a violation of law to purchase tobacco products for subsequent resale or for delivery to persons who are under the legal age to purchase tobacco products.

49. High Light has violated section 325.781, subdivision 3 by shipping tobacco products and failing to mark the outside of the package of tobacco products to be shipped “tobacco products – adult signature required” and to show the name of the tobacco retailer; and failing to utilize a delivery service that imposes the following requirements: (1) an adult must sign for the delivery, and (2) the person signing for the delivery must show valid government-issued identification that contains a photograph of the person signing for the delivery and indicates that the person signing for the delivery is of legal age to purchase tobacco products and resides at the delivery address.

50. In addition, pursuant to subdivision 10 of section 325F.781, these violations constitute violations of the Unlawful Trade Practices Act, section 325D.09 to 325D.16.

51. Defendant Amnon Arama is a corporate officer of High Light, controls its sales operations as described herein and in violation of Minnesota law, participated, authorized, and/or acquiesced in the violating conduct.

52. Defendant My PM USA also participates in the violations alleged above by communicating with Minnesota consumers, controlling the High Light website, and facilitating purchases of tobacco products through High Light’s website.

53. The Attorney General is authorized to bring civil actions to enforce these violations under subdivision 10 of section 325F.781, in addition to section 8.31 and his *parens patriae* authority.

54. Defendants' conduct, practices, and actions described in this Complaint constitute multiple separate violations of section 325F.781.

COUNT III
PREVENTION OF CONSUMER FRAUD ACT
MINN. STAT. § 325F.68–.70

55. The State re-alleges paragraphs 1 through 33 of this Complaint.

56. The Prevention of Consumer Fraud Act (“MCFA”), Minn. Stat. § 325F.69, provides that the “act, use, or employment” by “any person” of “any fraud, unfair or unconscionable practice, false pretense, false promise, misrepresentation, misleading statement or deceptive practice” that is made “with the intent that others rely thereon in connection with the sale of any merchandise” is “enjoinable as provided in section 325F.70.” The representation or practice is actionable “whether or not any person has in fact been misled, deceived, or damaged thereby.”

57. High Light is a “person” under the MCFA, which includes corporations and any other “business entity” along with “any agent, employee, salesperson, partner, officer, director, member, stockholder, associate, trustee, or cestui que trust thereof.”

58. High Light has repeatedly violated and continues to violate the MCFA by engaging in fraudulent and deceptive practices as described herein. This conduct includes but is not limited to the following summarized practices:

- Marketing vapor products that mimic common school supplies to entice underage minors to purchase such products when in fact the products are inappropriate for underage users;

- Using product designs and website designs to attract underage users to purchase its vapor products when in fact the products are inappropriate for underage users;
- Failing to use proper age verification methods to ensure its vapor products are not being sold to underage minors for improper purposes; and
- Failing to use proper age verification methods to ensure its vapor products are not being delivered to underage minors for improper purposes.

59. High Light has also repeatedly violated and continues to violate the MCFA by engaging in the unfair practices described herein. “Unfair” for purposes of the MCFA is defined to include “any method of competition, act, or practice that: (1) offends public policy as established by the statutes, rules, or common law of Minnesota; (2) is unethical, oppressive, or unscrupulous; or (3) is substantially injurious to consumers.” Specifically, High Light’s above-described unfair acts or practices include, but are not limited to the following summarized practices:

- Creating vapor products that mimic common school supplies to entice and sell such products to underage minors;
- Using product designs and website designs to attract underage users to purchase its vapor products;
- Failing to use proper age verification methods to ensure its vapor products were not being sold to underage minors; and
- Failing to use proper age verification methods to ensure its vapor products were not being delivered to underage minors.

Each of the above practices offend Minnesota public policy, is unethical and unscrupulous, and is substantially injurious to consumers. The above practices, both individually and together, violate the MCFA.

60. The Attorney General is authorized to bring civil actions to enforce the MCFA under section 325F.70, section 8.31, and *parens patriae* authority.

61. Defendant Amnon Arama is a corporate officer of High Light, controls its sales operations as described herein and in violation of Minnesota law, participated, authorized and/or acquiesced in the violating conduct.

62. Defendant My PM USA also participates in the violations alleged above by communicating with Minnesota consumers, controlling the High Light website, and facilitating purchases of vapor products through High Light's website.

63. Defendants' conduct, practices, and actions described in this Complaint constitute multiple separate violations of the MCFA.

COUNT IV
UNIFORM DECEPTIVE TRADE PRACTICES ACT
MINN. STAT. § 325D.43–.48

64. The State re-alleges paragraphs 1 through 33 of this Complaint.

65. The Uniform Deceptive Trade Practices Act ("UDTPA"), Minnesota statutes, section 325D.44 provides that a "person engages in a deceptive trade practice" in violation of the statute when "in the course of business, vocation, or occupation, the person: . . .

....

(13) engages in . . . (ii) unfair or unconscionable acts or practices."

(14) engages in any other conduct which similarly creates a likelihood of confusion or of misunderstanding.

Minn. Stat. § 325D.44, subd. 1(13), (14). Deceptive practices under section 325D.44 may be enjoined without "proof of monetary damage, loss of profits, or intent to deceive." *Id.*, subd. 2.

66. High Light is a "person" within the meaning of section 325D.44, which includes corporate entities. *See* Minn. Stat. § 645.44, subd. 7 (defining "person" generally). High Light is subject to the UDTPA because it engages in a "course of business" in Minnesota pursuant to Minnesota Statute, section 325D.44, subdivision 1.

67. High Light has repeatedly violated and continues to violate the UDTPA by engaging in the deceptive and unfair practices described in this Complaint. This conduct includes, but is not limited to:

- Creating vapor products that mimic common school supplies to entice and sell such products to underage minors;
- Using vapor product designs and website designs to attract underage users to purchase its products;
- Failing to use proper age verification methods to ensure its vapor products were not being sold to underage minors; and
- Failing to use proper age verification methods to ensure its vapor products were not being delivered to underage minors.

Each of the above practices is deceptive, offends Minnesota public policy, is unethical and unscrupulous, and is substantially injurious to consumers. The above practices, both individually and together, violate the UDTPA.

68. Defendant Amnon Arama is a corporate officer of High Light, controls its sales operations as described herein and in violation of Minnesota law, participated, controlled, and/or acquiesced in the violating conduct.

69. Defendant My PM USA also participates in the violations alleged above by communicating with Minnesota consumers, controlling the High Light website, and facilitating purchases of vapor products through High Light's website.

70. The Attorney General is authorized to bring civil actions to enforce the UDTPA under section 325D.45, section 8.31, and *parens patriae* authority.

71. Defendants' conduct, practices, and actions described in this Complaint constitute multiple, separate violations of the UDTPA.

RELIEF

WHEREFORE, the State of Minnesota, by its Attorney General, Keith Ellison, respectfully asks this Court to award judgment, jointly and severally, against Defendants as follows:

1. Declaring that Defendants' acts described in this Complaint constitute multiple, separate violations of the Minnesota statutes identified in counts I through IV.

2. Enjoining Defendants, as well as Defendants' employees, officers, directors, agents, successors, assignees, affiliates, merged or acquired predecessors, parents or controlling entities, subsidiaries, and all other persons acting in concert or participation with Defendants, from engaging in the practices described herein.

3. Awarding judgment against Defendants for restitution and/or disgorgement under the *parens patriae* doctrine, the general equitable powers of this Court, section 8.31, and any other applicable authority, for the harm or injuries to persons resulting from Defendants' acts as described herein;

4. Awarding judgment for civil penalties pursuant to section 8.31, subdivision 3, for each separate violation of the Minnesota statutes identified in counts I through IV;

5. Awarding judgment for civil penalties pursuant to section 325F.781, subdivision 9, for each separate violation of section 325F.781;

6. Awarding the State its costs, including litigation costs, costs of investigation, and attorneys' fees, as authorized by section 8.31, subdivision 3a; and

7. Granting such further relief as provided by law or equity or as the Court deems appropriate and just.

Dated: December 16, 2024

KEITH ELLISON
Attorney General
State of Minnesota

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MINN. STAT. § 549.211 ACKNOWLEDGMENT

The party on whose behalf the attached document is served acknowledges through its undersigned counsel that sanctions, including reasonable attorney fees and other expenses, may be awarded to the opposite party or parties pursuant to Minn. Stat. § 549.211.

Dated: December 16, 2024

/s/ Adam Welle

Adam Welle
Assistant Attorney General