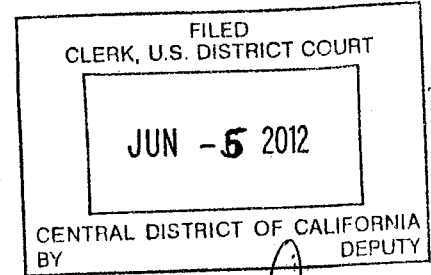


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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

IN RE NAKED JUICE CASES

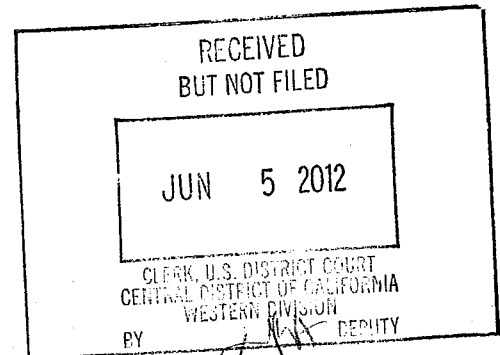
This Document Relates To:

All Actions.

Case No. 2:11-cv-8276-JAK-PLA

**AMENDED CONSOLIDATED CLASS
ACTION COMPLAINT**

JURY TRIAL DEMANDED



AMENDED CONSOLIDATED CLASS ACTION COMPLAINT

1 Plaintiffs Natalie Pappas, Russell Marchewka, Christopher Evans, and Gina Park
 2 (“Plaintiffs”), by and through their counsel, bring this Consolidated Class Action
 3 Complaint against Naked Juice Co. of Glendora, Inc. (“Defendant”), on behalf of
 4 themselves and all others similarly situated, and allege, upon personal knowledge as to
 5 their own actions and their counsels’ investigations, and upon information and belief as
 6 to all other matters, as follows:

7 NATURE OF THE CASE

8 1. In recent years, consumers have become more willing to pay a premium
 9 for food and beverages that they perceive to be healthy, organic, natural and/or non-
 10 genetically modified. As a result, the market for natural or organic foods and beverages
 11 has grown rapidly, yielding billions of dollars in revenue for food and beverage
 12 manufacturers.

13 2. Defendant manufactures, markets and sells beverages nationwide from its
 14 headquarters in Monrovia, California under the brand name “Naked” and offers the
 15 following products: (1) Acai Machine; (2) Berry Veggie; (3) Blue Machine; (4) Gold
 16 Machine; (5) Green Machine; (6) Mango Veggie; (7) Mighty Mango; (8) Pomegranate
 17 Acai; (9) Power C Machine; (10) Protein Zone; (11) Protein Zone Double Berry; (12)
 18 Protein Zone Mango; and (13) Red Machine (collectively, the “Naked Juice Products”
 19 or the “Products”), which are the subject matter of this action. Attached as **Exhibit A**
 20 are ingredient lists and images of the labeling for these Products.

21 3. In an effort to capture a segment of the lucrative natural juice market,
 22 Defendant engages in deceptive advertising that includes, but is not limited to,
 23 prominent labeling of its Products with claims such as “All Natural” and “non-GMO,”
 24 (i.e., free of genetically modified organisms (“GMOs”)).

25 4. In fact, many Naked Juice Products are not “All Natural” because they
 26 contain unnaturally processed and synthetic ingredients, and because they include
 27 ingredients derived from genetically modified crops and other synthetic substances.
 28

1 Further, Naked Juice Products are labeled as containing certain vitamins and nutrients,
2 when in fact they contain chemically distinct vitamin substitutes, often produced via
3 chemical processing.

4 5. The genetic makeup of GMO plants has been altered by scientists in a lab
5 for the express purpose of causing such plants to exhibit traits that are not naturally their
6 own. GMOs therefore are not natural by design, and entirely incompatible with
7 Defendant's "All Natural" representations, as well as Defendant's specific "non-GMO"
8 claims.

9 6. Defendant identifies its non-natural and non-juice ingredients in fine print
10 on the back of the Products' packaging. The size and placement, however, are in stark
11 contrast to the conspicuous "All Natural" and "non-GMO" claims, appearing in larger
12 print in more prominent locations on the packaging.

13 7. Reasonable consumers, including Plaintiffs, do not have the specialized
14 knowledge necessary to identify ingredients in Naked Juice products as being
15 inconsistent with the "All Natural" and "non-GMO" claims.

16 8. Defendant knows that consumers are willing to pay for all natural, and
17 GMO-free products, and advertises its products with the intention that consumers rely
18 on the affirmative misrepresentations on its labeling that the products are "All Natural"
19 and "non-GMO." Further, Defendant's omissions of the material fact that the Products
20 include ingredients that are not "All Natural," but rather are synthetic and/or genetically
21 modified, are likely to deceive reasonable consumers.

22 9. Defendant knows that its labeling claims and omissions are false,
23 deceptive, and likely to mislead reasonable consumers.

24 10. Plaintiffs relied on Defendant's false, deceptive, and misleading labeling
25 claims and omissions and suffered injury in fact and a loss of money with each purchase
26 of Defendant's Products.

11. As a result of Defendant's false, deceptive, and misleading labeling and omissions, consumers such as Plaintiffs do not receive the benefit of their bargain when they purchase Naked Juice Products. They pay money for a product that is not what it claims to be or what they bargained for. They pay a premium for the Naked Juice Products when they could have instead bought other less expensive alternative food products, and lost the opportunity to purchase and consume other, truly all natural and non-GMO foods.

12. Plaintiffs bring claims for violations of California's Unfair Competition Law, Cal. Bus. & Prof. Code §§ 17200, *et seq.* ("UCL"), the False Advertising Law, Cal. Bus. & Prof. Code §§ 17500, *et seq.* ("FAL"), and the Consumers Legal Remedies Act, Cal. Civ. Code §§ 1750 *et seq.* ("CLRA"). Plaintiffs seek an order requiring Defendant to, among other things: (1) cease the unlawful marketing alleged herein; (2) conduct a corrective advertising campaign; and (3) pay damages and restitution to Plaintiffs and Class members in the amounts paid to purchase the products at issue.

JURISDICTION AND VENUE

13. The Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332(d)(2), because the proposed class has more than 100 members, the class contains at least one member of diverse citizenship from Defendant, and the amount in controversy exceeds \$5 million.

14. The Court has personal jurisdiction over Defendant because Defendant's headquarters and principal place of business are in the state of California. Defendant is authorized to, and conducts, substantial business in California.

15. Venue is proper in this District pursuant to 28 U.S.C. § 1391(a)(1), because Defendant resides in this District, a substantial part of the events and omissions giving rise to this action occurred in this District and Defendant is headquartered in this District.

THE PARTIES

1 16. Plaintiff Natalie Pappas is a resident and citizen of Los Angeles,
2 California.

3 17. Plaintiff Russell Marchewka is a resident and citizen of Santa Ana,
4 California.

5 18. Plaintiff Christopher Evans is a resident and citizen of Los Angeles,
6 California.

7 19. Plaintiff Gina Park is a resident and citizen of Los Angeles, California.

8 20. Defendant is a corporation with its principal place of business at 1333 S.
9 Mayflower Avenue, Monrovia, California, 91016. Defendant manufactures, markets,
10 and sells the Naked Juice Products from its headquarters in California to consumers in
11 California and throughout the United States at retail.

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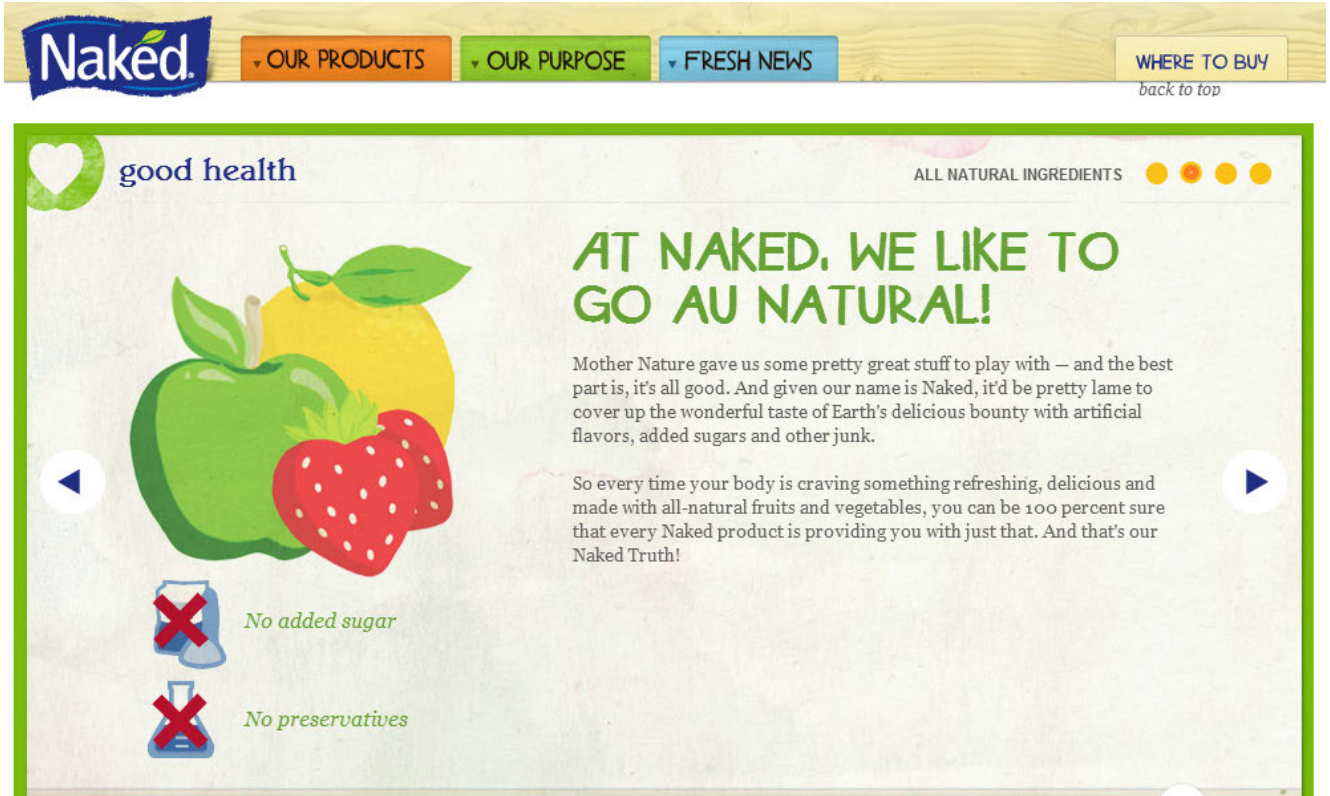
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SUBSTANTIVE ALLEGATIONS

Defendant Deceptively Labels The Naked Juice Products As “All Natural”

21. Through its advertising and labeling, Defendant has created a brand that is practically synonymous with its “natural” message. As Defendant explains on its website, for example, the name “Naked” means that Defendant uses only natural ingredients, and no “other junk”:



<<http://nakedjuice.com/our-purpose>> (last visited June 4, 2012).

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22. Defendant has prominently labeled and advertised its products as “All Natural,” including, for example, as pictured below:



23. The dictionary defines the term “natural” as “existing in or produced by nature: not artificial.”¹ This common dictionary definition of the term “natural” is consistent with the expectations of a reasonable consumer.

24. A reasonable consumer would not consider food products containing unnaturally processed, synthetic substances, substances created via chemical processing, or genetically modified organisms (“GMOs”) to be “All Natural.”

25. Naked Juice Products contain substances that are synthetic, substances created via chemical processing, and/or GMOs, rendering Defendant’s claims that the Products are “All Natural” false. Without limitation, the following Naked Juice Products are labeled “All Natural” but contain non-natural ingredients and therefore are not “All Natural”: Acai Machine, Berry Veggie, Blue Machine, Gold Machine, Green Machine, Mango Veggie, Mighty Mango, Pomegranate Acai, Power C Machine, Protein Zone, Protein Zone Double Berry, Protein Zone Mango, and Red Machine. As

¹ WEBSTER’S NINTH NEW COLLEGIATE DICTIONARY 788 (1990).

1 reflected in **Exhibit A**, the following is a non-exhaustive list of non-natural ingredients
2 contained in the Products:

3 26. **ASCORBIC ACID:** Defendant labels ascorbic acid as Vitamin C.
4 Ascorbic acid occurs naturally in certain foods as Vitamin C, or L-ascorbic acid.
5 However, ascorbic acid used as a Vitamin C supplement in foods is not naturally-
6 occurring. Rather, it is synthesized through a combined chemical-organic process
7 known as the Reichstein Process. The Reichstein Process uses the following steps: (a)
8 hydrogenation of D-glucose to D-sorbitol, an organic reaction with nickel as a catalyst
9 under high temperature and high pressure; (b) Microbial oxidation or fermentation of
10 sorbitol to L-sorbose with acetobacter at pH 4-6 and 30° C; (c) protection of the 4
11 hydroxyl groups in sorbose by formation of the acetal with acetone and an acid to
12 Diacetone-L-sorbose (2,3:4,6-Diisopropyliden- α -L-sorbose); (d) Organic oxidation
13 with potassium permanganate followed by heating with water to yield 2-Keto-L-gulonic
14 acid; and (e) a ring-closing step or gamma lactonization with removal of water. In
15 recent years, Chinese chemists have developed a simplification of the Reichstein
16 Process that substitutes biological oxidation using genetically engineered
17 microorganisms for chemical oxidation.

18 27. Manufactured ascorbic acid is chemically identical to naturally-occurring
19 Vitamin C, with both substances having the chemical formula $C_6H_8O_6$. However, its
20 chemical manufacturing process places it outside of a reasonable consumer's definition
21 of "All Natural."

22 28. **BETA CAROTENE:** Defendant labels beta carotene as Vitamin A. Beta
23 carotene occurs naturally in many foods. However, most, though not all, beta carotene
24 added as a supplement to food is produced synthetically. Synthetic beta carotene is
25 produced in two ways: (a) through a Wittig Reaction, a chemical reaction of an
26 aldehyde or ketone with a triphenyl phosphonium yield (often called a Wittig reagent)
27 to give an alkene and triphenylphosphine oxide; or (b) through a Grignard Reaction, an
28

1 organometallic chemical reaction in which alkyl- or aryl-magnesium halides (Grignard
2 reagents) add to a carbonyl group in an aldehyde or ketone.

3 29. Synthetic beta carotene's chemical manufacturing process places it outside
4 of a reasonable consumer's definition of "All Natural."

5 30. Vitamin A is a compound also known as retinal, with the chemical formula
6 $C_{20}H_{30}O$. Beta carotene is a different substance, with the chemical formula $C_{40}H_{56}$.
7 Beta carotene is a precursor to Vitamin A, with one molecule of ingested beta carotene
8 being cleaved into two molecules of Vitamin A within the intestinal tract. However,
9 beta carotene is not itself Vitamin A.

10 31. Thus, regardless of the provenance of the beta carotene in Naked Juice
11 products, labeling it as Vitamin A is misleading.

12 32. **BIOTIN:** Biotin, also known as Vitamin H, occurs naturally in certain
13 foods. Biotin used as a food supplement is created synthetically using a process first
14 developed by Leo Sternbach and Moses Wolf Goldberg in 1949. The process involves
15 (a) three steps to create an imidazolinone ring, using fumaric acid as a starting material;
16 (b) 6 steps to install a side chain, by addition of a Grignard reagent, followed by
17 malonate and decarboxylation; and (c) 6 steps to introduce chirality, by fractional
18 crystallization of diastereomeric salts. Various improvements to the original method
19 have been developed, including (1) reduction of the second process to two steps via (i) a
20 Fukuyama coupling between thiolactone and organozinc reagent; and (ii) reduction of
21 3° alcohol; and (2) substitution of enantioselective desymmetrization in the chirality-
22 introduction process.

23 33. Synthetic biotin is chemically identical to the naturally-occurring variety.
24 However, its chemical manufacturing process places it outside of a reasonable
25 consumer's definition of "All Natural."

26 34. **CHOLINE BITARTRATE:** The side labels of Naked Juice Products
27 containing choline bitartrate on the ingredient list state that the products contain
28

1 choline. Choline bitartrate is a synthetic substitute for choline (a B-complex vitamin)
2 which is manufactured through the reaction of trimethylamine with ethylene oxide,
3 followed by treatment with tartartic acid.

4 35. Choline bitartrate's chemical manufacturing process places it outside of a
5 reasonable consumer's definition of "All Natural."

6 36. Moreover, choline bitartrate, with the chemical formula $C_9H_{19}NO_7$, is a
7 different substance from choline, which has the chemical formula $C_5H_{14}NO$. Thus,
8 Defendant's equation of choline bitartrate with choline on the labels of Naked Juice
9 products is misleading, irrespective of the fact that it is produced via chemical
10 processing.

11 37. **CYANOCOBALAMIN:** Defendant labels cyanocobalamin as Vitamin
12 B12. Cyanocobalamin is a synthetic substitute for Vitamin B12 (cobalamin). It is
13 manufactured via fermentation by a variety of microorganisms, yielding a mixture of
14 methyl-, hydroxo-, and adenosylcobalamin. These compounds are then extracted and
15 converted to cyanocobalamin by addition of potassium cyanide in the presence of
16 sodium nitrite and heat.

17 38. Cyanocobalamin's chemical manufacturing process places it outside of a
18 reasonable consumer's definition of "All Natural."

19 39. Moreover, cyanocobalamin, with the chemical formula $C_{63}H_{88}CoN_{14}O_{14}P$,
20 is a different substance from Vitamin B12 (cobalamin), which has the chemical formula
21 $C_{62}H_{88}CoN_{13}O_{14}P$. Thus, labeling cyanocobalamin as Vitamin B12 is misleading,
22 irrespective of the fact that it is produced via chemical processing.

23 40. **D-CALCIUM PANTOTHENATE:** Defendant labels d-calcium
24 pantothenate as Vitamin B5. D-calcium pantothenate is a chemical salt used as a
25 substitute for Vitamin B5 (pantothenic acid). It is produced synthetically for
26 commercial use from isobutyraldehyde and formaldehyde via 1,1-dimethyl-2-hydroxy-
27 propionaldehyde and pantolactone.

41. D-calcium pantothenate's chemical manufacturing process places it outside of a reasonable consumer's definition of "All Natural."

42. Moreover, d-calcium pantothenate, with the chemical formula $C_{18}H_{32}CaN_2O_{10}$, is a different substance from pantothenic acid (Vitamin B5), which has the chemical formula $C_9H_{17}NO_5$. Thus, labeling d-calcium pantothenate as Vitamin B5 is misleading, irrespective of the fact that it is produced via chemical processing.

43. **FIBERSOL®-2:** Fibersol®-2 is a proprietary digestion-resistant maltodextrin dietary fiber developed by Japan's Matsutani Chemical Industry Co., Ltd., and manufactured by Archer Daniels Midland in conjunction with Matsutani America, Inc. Fibersol®-2 is produced by "a proprietary method of enzymatic hydrolysis of cornstarch." The process is designed "*to purposefully rearrange corn starch molecules* to convert a portion of normal alpha -1,4- glucose linkages to random 1,2-, 1,3-, and 1,4- alpha and beta linkages," thus rendering the substance largely indigestible.

44. Fibersol®-2's chemical manufacturing process places it outside of a reasonable consumer's definition of "All Natural."

45. **FRUCTOOLIGOSACCHARIDES:** Fructooligosaccharides are a category of long-chain carbohydrates used as sweeteners and as dietary fiber. Fructooligosaccharides occur naturally in certain fruits and vegetables, but fructooligosaccharides added to food are more commonly commercially synthesized using one of two chemical processes: (a) Enzymatic or chemical degradation of inulin to a mixture of oligosaccharides with the general structure $Glu-(Fru)_n$ (GF_n) and Fru_m (F_m), with n and m ranging from 1 to 7; or (b) transfructosylation action of a β -fructosidase of *Aspergillus niger* (a toxic black mold) on sucrose.

46. The chemical manufacturing process of synthetic fructooligosaccharides places them outside of a reasonable consumer's definition of "All Natural."

47. **INULIN:** Inulin is a fiber occurring in a number of plants. The form of inulin added to food products is produced by (a) extracting natural inulin from the root

1 of the chicory plant via hot water diffusion; (b) enzymatically hydrolyzing the extracted
 2 inulin to yield oligofructose-enriched inulin; and (c) drying the resulting substance to a
 3 powder for use in food.

4 48. Inulin's chemical manufacturing process places it outside of a reasonable
 5 consumer's definition of "All Natural."

6 49. **NIACINAMIDE:** Defendant labels niacinimide as Vitamin B3.
 7 Niacinimide is a synthetic substitute for Vitamin B3 (niacin) which is industrially
 8 produced by a variety of methods, including: (a) esterifying nicotinic acid with
 9 methanol, followed by ammonolysis; (b) passing ammonia gas into molten nicotinic
 10 acid (amidation); and (c) partial hydrolysis of 3-cyanopyridine. Additionally, Lonza
 11 Fine Chemicals and Specialities, a Swiss company claiming to supply over half the
 12 world's niacinimide, employs a four-stage synthesis using nylon 6.6 byproduct 3-
 13 methyl-1,5-diaminopentane as starting material. This is transformed into picoline,
 14 which is ammoxidated and then biocatalytically hydrolysed to niacinamide.

15 50. Niacinamide's chemical manufacturing process places it outside of a
 16 reasonable consumer's definition of "All Natural."

17 51. Moreover, niacinamide, with the chemical formula $C_6H_6N_2O$, is a different
 18 substance from Vitamin B3 (niacin), which has the chemical formula $C_6H_5NO_2$. Thus,
 19 labeling niacinamide as Vitamin B3 is misleading, irrespective of the fact that it is
 20 produced via chemical processing.

21 52. **PYRIDOXINE HYDROCHLORIDE:** Defendant labels pyridoxine
 22 hydrochloride as Vitamin B6. Pyridoxine hydrochloride is a synthetic form of Vitamin
 23 B6 produced by the condensation of ethoxyacetylacetone with cyanoacetamide.

24 53. Pyridoxine hydrochloride's chemical manufacturing process places it
 25 outside of a reasonable consumer's definition of "All Natural."

26 54. **SOY LECITHIN:** Soy Lecithin is used in food as an emulsifier, as a
 27 lubricant, and to extend shelf life.

1 55. In order to extract soy lecithin from soybeans, the soybeans are immersed
2 in hexane, a byproduct of petroleum refining, before further processing.

3 56. Soy Lecithin's chemical manufacturing process places it outside of a
4 reasonable consumer's definition of "All Natural."

5 57. **SOY PROTEIN ISOLATE:** Soy protein isolate is used in food to
6 improve texture, to increase protein content, to enhance moisture retention, and as an
7 emulsifier.

8 58. In order to extract soy protein isolate from soybeans, the soybeans are first
9 immersed in hexane, a byproduct of petroleum refining. The beans are then processed
10 into flour. Aqueous extraction is then carried out at a pH below 9. The extract is
11 clarified to remove the insoluble material and the "supernatant" is acidified to a pH
12 range of 4-5. The precipitated protein-curd is collected and separated from the whey by
13 centrifuge. The curd is usually neutralized with alkali to form a sodium proteinate salt
14 before drying.

15 59. Soy protein isolate's chemical manufacturing process places it outside of a
16 reasonable consumer's definition of "All Natural."

17 60. **ZINC METHIONINE SULFATE:** Zinc methionine sulfate is
18 synthesized via a reaction between equimolar amounts of zinc sulfate and DL-
19 methionine in purified water.

20 61. Zinc methionine sulfate's chemical manufacturing process places it outside
21 of a reasonable consumer's definition of "All Natural."

22 62. **ZINC OXIDE:** Zinc oxide is synthesized using three main chemical
23 processes: (1) Indirect process: Metallic zinc is melted in a graphite crucible and
24 vaporized at temperatures above 907 °C (typically around 1000 °C). Zinc vapor reacts
25 with the oxygen in the air to give ZnO, accompanied by a drop in its temperature and
26 bright luminescence. Zinc oxide particles are then transported into a cooling duct and
27 collected in a bag house; (2) Direct process: The direct process starts with diverse
28

1 contaminated zinc composites, such as zinc ores or smelter by-products. The zinc
 2 precursors are reduced (carbothermal reduction) by heating with a source of carbon
 3 such as anthracite to produce zinc vapor. The Zinc vapor is then oxidized as in the
 4 indirect process; and (3) Wet chemical process: This process starts with aqueous
 5 solutions of purified zinc salts, from which zinc carbonate or zinc hydroxide is
 6 precipitated. The precipitate is then filtered, washed, dried and calcined at temperatures
 7 around 800 °C.

8 63. Zinc oxide's chemical manufacturing process places it outside of a
 9 reasonable consumer's definition of "All Natural."

10 **Defendant Deceptively Labels the Naked Juice Products As "Non-GMO" and**
 11 **States That It Does Not Use GMO Ingredients As A Matter Of Principle**

12 64. In addition to the "natural" claims, all of Defendant's Products claim to be
 13 "non-GMO" on the product packaging. Additionally, Defendant's Product labels state
 14 that "Naked Juice does not use ingredients that were produced using biotechnology as a
 15 matter of principle." See Exhibit A.

16 65. A reasonable consumer would expect a food product labeled as "natural"
 17 or "all natural" to not contain genetically modified ingredients.

18 66. A reasonable consumer would expect a food product labeled as "non-
 19 GMO" to not contain genetically modified ingredients.

20 67. A reasonable consumer would expect a food product label stating that the
 21 product manufacturer does not use ingredients that were produced using biotechnology
 22 as a matter of principle to never use GMO ingredients and to implement quality control
 23 measures to assure the same.

24 68. Genetically modified food has had its genetic makeup altered to exhibit
 25 traits that the food does not naturally contain. This process is known as bio-
 26 engineering. In general, genetically modified plants and organisms are made by
 27 copying desired traits from another organism and implanting them into the subject
 28

1 organism. These bio-engineered organisms express traits that normally would not
2 appear in nature. Thus, organisms produced through bio-engineering, i.e. GMOs, do
3 not occur naturally.

4 69. Third party testing reveals that Defendant utilizes genetically modified soy
5 ingredients in the Products. Based on this testing and discussions with consultants,
6 Plaintiffs allege that Defendant's "non-GMO" representations are false and deceptive
7 on the labels of the following Products, each of which includes Soy Protein Isolate
8 and/or Soy Lecithin: Acai Machine, Protein Zone, Protein Zone Double Berry, Protein
9 Zone Mango, and Pomegranate Acai. *See Exhibit A.*

10 70. It is unsurprising that the processed soy products that Defendant
11 incorporates into its Products include GMO soy, given that the vast majority of soy
12 products — particularly in the United States — now include GMOs. *See, e.g.,* GMO
13 Compass, *USA: Cultivation of GM Plants in 2009, Maize, soybean, cotton: 88 percent*
14 *genetically modified* (2009), available at <[http://www.gmo-](http://www.gmo-compass.org/eng/agri_biotechnology/gmo_planting/506.usa_cultivation_gm_plants_2009.html)
15 [compass.org/eng/agri_biotechnology/gmo_planting/506.usa_cultivation_gm_plants_20](http://www.gmo-compass.org/eng/agri_biotechnology/gmo_planting/506.usa_cultivation_gm_plants_2009.html)
16 [09.html](http://www.gmo-compass.org/eng/agri_biotechnology/gmo_planting/506.usa_cultivation_gm_plants_2009.html)> (last visited May 24, 2012).

17 71. Defendant's representations that it does not use ingredients "produced
18 using biotechnology" is entirely incompatible with its use of ingredients such as
19 Fibersol-2, which according to its manufacturers, Archer Daniels Midland Company
20 and Matsutani Chemical Industry Co., is made from corn, including genetically
21 modified corn. *See Archer Daniels Midland Company, ADM Corn Sweeteners: Origin*
22 *of ADM Corn Sweetener Products — Fibersol-2* (Dec. 23, 2002), available at
23 <http://www.matsutaniamerica.com/pdf/origin_of_fibersol.pdf> (last visited May 29,
24 2012); <<http://www.fibersol2.com/Solve/faq.asp>> ("When Fibersol®-2 is made in the
25 U.S. it is made from both genetically modified and non-genetically modified corn. The
26 corn processing supply chain simply does not allow for segregation of these types of
27
28

1 corn.”) (last visited May 29, 2012). Thus, Blue Machine, which contains Fibersol-2,
2 contains GMO ingredients contrary to Defendant’s label representations.

3 72. Much information concerning the GMO content in Defendant’s Products is
4 known only to Defendant, and Plaintiffs expect that discovery in this action will reveal
5 further information showing that Defendant’s “non-GMO” representations are false.

6 73. Indeed, the FDA recognizes that “[a] manufacturer who claims that a
7 food or its ingredients, including foods such as raw agricultural commodities, is not
8 bioengineered should be able to substantiate that the claim is truthful and not
9 misleading,” preferably through “validated test methods” or, where testing may not be
10 effective because a given ingredient is highly processed, through careful
11 documentation concerning the source of such ingredients. FDA, *Guidance for*
12 *Industry: Voluntary Labeling Indicating Whether Foods Have or Have Not Been*
13 *Developed Using Bioengineering; Draft Guidance* (2001), available at < [http://](http://www.fda.gov/food/guidancecomplianceregulatoryinformation/guidancedocuments/foodlabelingnutrition/ucm059098.htm)
14 [www.fda.gov/food/guidancecomplianceregulatoryinformation/guidancedocuments/fo](http://www.fda.gov/food/guidancecomplianceregulatoryinformation/guidancedocuments/foodlabelingnutrition/ucm059098.htm)
15 [odelabelingnutrition/ucm059098.htm](http://www.fda.gov/food/guidancecomplianceregulatoryinformation/guidancedocuments/foodlabelingnutrition/ucm059098.htm)> (last visited May 24, 2012). Defendant must have
16 substantiation for its “non-GMO” claims.

17 **PLAINTIFFS PURCHASE NAKED JUICE PRODUCTS IN RELIANCE ON**
18 **DEFENDANT’S MISREPRESENTATIONS**

19 74. Ms. Pappas purchased many Naked Juice Products in California in the past
20 four years in reliance on Defendant’s representations and omissions that the Products
21 contained only: “All Natural” ingredients” and “non-GMO” ingredients. These
22 representations and omissions were material to Ms. Pappas’ decision to purchase the
23 Products. Ms. Pappas was willing to pay for the Products because of these
24 representations and omissions, and would not have purchased, would not have paid as
25 much for the Products, or would have purchased alternative products in absence of
26 these representations and omissions.

1 75. Specifically, Ms. Pappas has purchased all of the Products, in addition to
2 other Naked Juice beverages.

3 76. Mr. Marchewka purchased many Naked Juice Products in California in the
4 the past four years in reliance on Defendant's representations and omissions that the
5 Products contained only: "All Natural" ingredients and "non-GMO" ingredients.
6 These representations and omissions were material to Mr. Marchewka's decision to
7 purchase the Products. Mr. Marchewka was willing to pay for the Products because of
8 these representations and omissions, and would not have purchased, would not have
9 paid as much for the Products, or would have purchased alternative products, in absence
10 of these representations and omissions.

11 77. Specifically, Mr. Marchewka purchased at least the following Naked Juice
12 Products: Acai Machine, Blue Machine, Green Machine, Mighty Mango, Power C
13 Machine, Protein Zone, Protein Zone Double Berry, Protein Zone Mango and Red
14 Machine.

15 78. Mr. Evans purchased many Naked Juice Products in California in the past
16 four years in reliance on Defendant's representations and omissions that the Products
17 contained only: "All Natural" ingredients and "non-GMO" ingredients. These
18 representations and omissions were material to Mr. Evan's decision to purchase the
19 Products. Mr. Evans was willing to pay for the Products because of these
20 representations and omissions, and would not have purchased, would not have paid as
21 much for the Products, or would have purchased alternative products in absence of
22 these representations and omissions.

23 79. Specifically, Mr. Evans purchased at least the following Naked Juice
24 Products: Blue Machine, Pomegranate Acai, Acai Machine, Berry Veggie, Mango
25 Veggie, Power C Machine, Protein Zone, Protein Zone Double Berry, Protein Zone
26 Mango.

80. Ms. Park purchased many Naked Juice Products in California in the past four years in reliance on Defendant's representations and omissions that the Products contained only: "All Natural" ingredients and "non-GMO" ingredients. These representations and omissions were material to Ms. Park's decision to purchase the Products. Ms. Park was willing to pay for the Products because of these representations and omissions, and would not have purchased, would not have paid as much for the Products, or would have purchased alternative products in absence of these representations and omissions.

81. Specifically, Ms. Park purchased at least the following Naked Juice Products: Pomegranate Acai and Protein Zone Mango.

CLASS ACTION ALLEGATIONS

82. Plaintiffs seek relief in their individual capacity and seek to represent a class consisting of all others who are similarly situated. Pursuant to Fed. R. Civ. P. 23(a) and (b)(2) and/or (b)(3), Plaintiffs seek certification of a class initially defined as follows:

All consumers in the United States who from September 27, 2007 until the final disposition of this case (the "Class Period"), purchased the following Naked Juice Products: (1) Acai Machine; (2) Berry Veggie; (3) Blue Machine; (4) Gold Machine; (5) Green Machine; (6) Mango Veggie; (7) Mighty Mango; (8) Pomegranate Acai; (9) Power C Machine; (10) Protein Zone; (11) Protein Zone Double Berry; (12) Protein Zone Mango; and (13) Red Machine.

83. Excluded from the Class are Defendant and its subsidiaries and affiliates, Defendant's executives, board members, legal counsel, all judges and court personnel assigned to this matter, and their immediate families.

84. Plaintiffs reserve the right to amend or modify the Class definition with greater specificity or division into subclasses after they have had an opportunity to conduct discovery.

1 85. Numerosity. Fed. R. Civ. P. 23(a)(1). The potential members of the Class
 2 as defined are so numerous that joinder of all members is unfeasible and not practicable.
 3 While the precise number of Class members has not been determined at this time,
 4 Plaintiffs are informed and believe that many thousands or millions of consumers have
 5 purchased the listed products.

6 86. Commonality. Fed. R. Civ. P. 23(a)(2) and (b)(3). There are questions of
 7 law and fact common to the Class, which predominate over any questions affecting only
 8 individual Class members. These common questions of law and fact include, without
 9 limitation:

- 10 a. Whether Defendant falsely and/or misleadingly misrepresented
 11 Naked Juice Products as being “All Natural”;
- 12 b. Whether Defendant falsely and/or misleadingly misrepresented
 13 Naked Juice Products as being “non-GMO”;
- 14 c. Whether Defendant’s misrepresentations and omissions are likely to
 15 deceive reasonable consumers;
- 16 d. Whether Defendant violated California Civil Code § 1750, *et seq.*;
- 17 e. Whether Defendant violated California Business and Professions
 18 Code § 17500, *et seq.*;
- 19 f. Whether Defendant violated California Business and Professions
 20 Code § 17200, *et seq.*;
- 21 g. The nature of the relief, including equitable relief, to which Plaintiff
 22 and the Class members are entitled.

23 87. Typicality. Fed. R. Civ. P. 23(a)(3). The claims of Plaintiffs are typical of
 24 the claims of the Class. Plaintiffs and all Class members were exposed to uniform
 25 practices and sustained injury arising out of and caused by Defendant’s unlawful
 26 conduct.

1 88. Adequacy of Representation. Fed. R. Civ. P. 23(a)(4). Plaintiffs will
 2 fairly and adequately represent and protect the interests of the members of the Class.
 3 Plaintiffs' Counsel are competent and experienced in litigating class actions.

4 89. Superiority of Class Action. Fed. R. Civ. P. 23(b)(3). A class action is
 5 superior to other available methods for the fair and efficient adjudication of this
 6 controversy since joinder of all the members of the Class is impracticable.
 7 Furthermore, the adjudication of this controversy through a class action will avoid the
 8 possibility of inconsistent and potentially conflicting adjudication of the claims asserted
 9 herein. There will be no difficulty in the management of this action as a class action.

10 90. Injunctive and Declaratory Relief. Fed. R. Civ. P. 23(b)(2). Defendant's
 11 actions regarding the misrepresentations and omission on Naked Juice Products are
 12 uniform as to members of the Class. Defendant has acted or refused to act on grounds
 13 that apply generally to the Class, so that final injunctive relief or declaratory relief as
 14 requested herein is appropriate respecting the Class as a whole.

15 FIRST CAUSE OF ACTION

16 **(California Consumers Legal Remedies Act – Cal. Civ. Code § 1750, *et seq.*)**

17 91. Plaintiffs incorporate by reference and reallege all previous paragraphs.

18 92. Defendant is a "person" within the meaning of California Civil Code §§
 19 1761(c) and 1770, and provides "goods" within the meaning of Civil Code §§ 1761(a)
 20 and 1770. Defendant's customers, including Plaintiffs and Class members, are
 21 "consumers" within the meaning of Civil Code §§ 1761(d) and 1770. Each purchase of
 22 Defendant's Naked Juice Products by Plaintiffs and each Class member constitutes a
 23 "transaction" within the meaning of Civil Code §§ 1761(e) and 1770.

24 93. The Consumers Legal Remedies Act makes it unlawful for a company to:

- 25 (a) Represent that goods have characteristics, ingredients uses, benefits, or
- 26 quantities, which they do not have. Cal. Civ. Code § 1770(a)(5);

(b) Represent that goods are of a particular standard, quality, or grade, if they are of another. Cal. Civ. Code § 1770(a)(7); and

(c) Advertise goods with intent not to sell them as advertised. Cal. Civ. Code § 1770(a)(9).

94. Defendant's acts, practices, representations, omissions, and courses of conduct with respect to the production, promotion and marketing of Naked Juice Products violated the Consumers Legal Remedies Act in that, among other things:

(a) Defendant represented that the Naked Juice Products have characteristics, ingredients, uses, benefits, or qualities, which they do not have, in violation of Cal. Civil Code § 1770(a)(5);

(b) Defendant represented that Naked Juice Products were of a particular standard, quality or grade when they were of another standard, quality, or grade in violation of Cal. Civil Code § 1770(a)(7); and

(c) Defendant advertised Naked Juice Products with an intent not to sell them as advertised, in violation of Cal. Civil Code § 1770(a)(9).

95. Plaintiffs reasonably relied on Defendant's misrepresentations and omissions.

96. As a direct and proximate result of Defendant's violations, Plaintiffs suffered injury in fact and lost money.

97. Plaintiffs, on behalf of themselves and Class members, seek damages, restitution and injunctive relief. Plaintiffs seek an order requiring Defendant to refund Plaintiffs and all Class members all monies they paid for Naked Juice Products, and injunctive relief in the form of an order prohibiting Defendant from engaging in the alleged misconduct described herein and performing a corrective advertising campaign.

98. Plaintiffs have complied with California Civil Code § 1782(a) by serving a preliminary notice before seeking damages under the Consumers Legal Remedies Act. Defendant has not provided the relief requested in Plaintiffs' CLRA notice.

1 99. Affidavits in compliance with Cal. Civil Code § 1780(c) will be filed.

2 **SECOND CAUSE OF ACTION**

3 **(California False Advertising Law – Cal. Bus. & Prof. Code § 17500, *et seq.*)**

4 100. Plaintiffs incorporate by reference and reallege all previous paragraphs.

5 101. Defendant publicly disseminated untrue or misleading advertising or
6 intended not to sell its Naked Juice Products as advertised in violation of California
7 Business & Professional Code § 17500, *et seq.*, by, *inter alia*:

8 (a) Representing that Naked Juice Products are “All Natural,” when they
9 are not; and

10 (b) Representing that the Naked Juice Products are “non-GMO,” when
11 they are not.

12 102. Defendant committed such violations of the False Advertising Law with
13 actual knowledge or in the exercise of reasonable care should have known was untrue
14 or misleading.

15 103. Plaintiffs reasonably relied on Defendant’s representations and/or
16 omissions made in violation of California Business & Professional Code § 17500, *et*
17 *seq.*

18 104. As a direct and proximate result of Defendant’s violations, Plaintiffs
19 suffered injury in fact and lost money.

20 105. Plaintiffs, on behalf of themselves and Class members, seek equitable
21 relief in the form of an order requiring Defendant to refund Plaintiffs and all Class
22 members all monies they paid for Naked Juice Products, and injunctive relief in the
23 form of an order prohibiting Defendant from engaging in the alleged misconduct
24 described herein and performing a corrective advertising campaign.

25 **THIRD CAUSE OF ACTION**

26 **(California Unfair Competition Law – Cal. Bus. & Prof. Code § 17200, *et seq.*)**

27 106. Plaintiffs incorporate by reference and reallege all previous paragraphs.
28

1 107. Defendant engaged in unlawful, unfair, and/or fraudulent conduct under
2 California Business & Professional Code § 17200, *et seq.*, by, *inter alia*:

3 (a) Representing that Naked Juice Products are “All Natural,” when they
4 are not; and

5 (b) Representing that Naked Juice Products are “non-GMO,” when they
6 are not.

7 108. Defendant’s conduct is unlawful in that it violates the Consumers Legal
8 Remedies Act, California Civil Code § 1750, *et seq.*, the False Advertising Law,
9 California Business & Professions Code § 17500, *et seq.*

10 109. Defendant’s conduct is unfair in that it offends established public policy
11 and/or is immoral, unethical, oppressive, unscrupulous and/or substantially injurious to
12 Plaintiffs and Class members. The harm to Plaintiffs and Class members arising from
13 Defendant’s conduct outweighs any legitimate benefit Defendant derived from the
14 conduct. Defendant’s conduct undermines and violates the stated spirit and policies
15 underlying the Consumers Legal Remedies Act, False Advertising Law, Sherman Food,
16 Drug & Cosmetic Law, and FDA regulations as alleged herein.

17 110. Defendant’s actions and practices constitute “fraudulent” business
18 practices in violation of the UCL because, among other things, they are likely to
19 deceive reasonable consumers. Plaintiffs relied on Defendant’s representations and
20 omissions.

21 111. As a direct and proximate result of Defendant’s violations, Plaintiffs
22 suffered injury in fact and lost money.

23 112. Plaintiffs, on behalf of themselves and Class members, seek equitable
24 relief in the form of an order requiring Defendant to refund Plaintiffs and all Class
25 members all monies they paid for Naked Juice Products, and injunctive relief in the
26 form of an order prohibiting Defendant from engaging in the alleged misconduct
27 described herein and performing a corrective advertising campaign.
28

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs, on behalf of themselves and Class members, pray for relief as follows:

A. For an order that this action may be maintained as a class action under Rule 23 of the Federal Rules of Civil Procedure, that Plaintiffs be appointed Class representative, and that Plaintiffs' counsel be appointed as counsel for the Class;

B. For damages according to proof;

C. For an order requiring Defendant to refund Plaintiffs and all Class members for the deceptively advertised beverages;

D. For an order prohibiting Defendant from engaging in the misconduct described herein;

E. For an award of attorneys' fees;

F. For an award of the costs of suit incurred herein, including expert witness fees;

G. For an award of interest, including prejudgment interest, at the legal rate; and

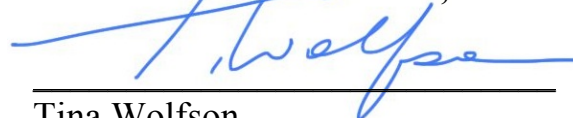
H. For such other and further relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand trial by jury of all claims so triable.

Dated: June 4, 2012

AHDOOT & WOLFSON, APC



Tina Wolfson
Robert Ahdoot
Bradley King
10850 Wilshire Blvd., Suite 370
Los Angeles, California 90024
Telephone: 310-474-9111
Facsimile: 310-474-8585

Interim Co-Lead Counsel for Plaintiffs

1 Dated: June 4, 2012

FINKELSTEIN THOMPSON LLP

2
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Interim Co-Lead Counsel for Plaintiffs

10 Dated: June 4, 2012

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11 /s/ Christopher P. Ridout
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16 Facsimile: 562-216-7385

Interim Co-Lead Counsel for Plaintiffs

17
18 Dated: June 4, 2012

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19 /s/ Marc L. Godino
20 Marc L. Godino
21 1925 Century Park East, Suite 2100
22 Los Angeles, California 90067
23 Telephone: 310-201-9150
24 Facsimile: 310-201-9160

Executive Committee Counsel for Plaintiffs

1 Dated: June 4, 2012

FRANCIS & MAILMAN, P.C.

2 /s/ David A. Searles

3 David A. Searles

4 100 South Broad Street

Philadelphia, Pennsylvania 19110

5 Telephone: 215-735-8600

6 Facsimile: 310-940-8000

7 Dated: June 4, 2012

**CENTER FOR SCIENCE IN THE PUBLIC
INTEREST**

9 /s/ Stephen Gardner

10 Stephen Gardner

Director of Litigation

11 5646 Milton Street, Suite 211

12 Dallas, Texas 75206

Telephone: 214-827-2774 ext. 381

13 Facsimile: 214-827-2787

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EXHIBIT A

AMENDED CONSOLIDATED CLASS ACTION COMPLAINT

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berry veggie
WITH OTHER NATURAL FLAVORS

2 servings of veggies per bottle

Naked®
ALL NATURAL FRUIT + BOOSTS

BERRY FLAVORED BLEND OF 10 VEGETABLE AND FRUIT JUICES WITH OTHER INGREDIENTS PARTIALLY FROM CONCENTRATE

100% FRUIT & VEG JUICE SMOOTHIE

NO SUGAR ADDED

15.2 FL OZ (450mL)

the boost inside*

the fruit & veg inside*

1 1/2 purple carrots
1/3 red beet
1/6 sweet potato
91 kernels sweet corn
18 chick peas
15 sweet cherries
6 1/2 strawberries
1/4 plum
1/5 apple
& a hint of lemon

2500IU vitamin A
240mg vitamin C
14IU vitamin E
1.7mg vitamin B6
19mg vitamin B3
13mg vitamin B5
3mcg vitamin B12

*per bottle

shake well!
separation is natural

100% juice

Nutrition Facts
Serving Size 8 fl oz (240mL)
Servings Per Container About 2

Amount Per Serving	Calories 100	Calories from Fat 5
	% Daily Value*	% Daily Value*
Total Fat 0.5g	0%	0%
Saturated Fat 0g	0%	0%
Trans Fat 0g	0%	0%
Cholesterol 0mg	0%	0%
Sodium 70mg	3%	0%
Potassium 550mg	16%	0%
Total Carbohydrate 37g	12%	0%
Dietary Fiber 5g	20%	0%
Sugars 18g		0%
Protein 5g		0%
Vitamin A 25%	Vitamin C 210%	
Calcium 4%	Iron 0%	
Vitamin E 25%	Vitamin B5 50%	
Vitamin B6 45%	Vitamin B12 25%	
Vitamin B5 70%		

*Percent Daily Values are based on a diet of other people's secrets.

All sugars are found naturally in the fruit. Not a low calorie food.

HI, ME & DEP
CA CASH REFUND

31002015402

82592632470

INGREDIENTS: SWEET CORN PUREE, PURPLE CARROT JUICE FROM CONCENTRATE (WATER, PURPLE CARROT JUICE CONCENTRATE), RED BEET JUICE FROM CONCENTRATE (WATER, RED BEET JUICE CONCENTRATE), SWEET POTATO PUREE, STRAWBERRY PUREE, PLUM PUREE, SWEET CHERRY PUREE, APPLE PUREE, CHICK PEAS, LEMON JUICE, INULIN, NATURAL FLAVORS, ASCORBIC ACID (VITAMIN C), D-ALPHA-TOCOPHERYL ACETATE (VITAMIN E), NACHTMID, 7-SCALOPANOLIDE, VITAMIN B6, SWEET CORN PUREE (VITAMIN A), PHOSPHORUS, HYDROCHLORIDE (VITAMIN B3), CHOLECALCIFEROL (VITAMIN D2).

DIST. BY: NAKED JUICE CO., MONROVIA, CA 91016
© 2010 NAKED JUICE CO.
SWEET CORN PUREE, SWEET POTATO PUREE, STRAWBERRY PUREE, PLUM PUREE, SWEET CHERRY PUREE, APPLE PUREE, CHICK PEAS, LEMON JUICE, INULIN, NATURAL FLAVORS, ASCORBIC ACID (VITAMIN C), D-ALPHA-TOCOPHERYL ACETATE (VITAMIN E), NACHTMID, 7-SCALOPANOLIDE, VITAMIN B6, SWEET CORN PUREE (VITAMIN A), PHOSPHORUS, HYDROCHLORIDE (VITAMIN B3), CHOLECALCIFEROL (VITAMIN D2).

PERISHABLE. KEEP REFRIGERATED

While many ingredients do not exist in bioengineered varieties, Naked Juice does not use ingredients that were produced using biotechnology as a matter of principle.

the Naked truth®
We use only the freshest, purest stuff in the world and leave out everything else.
• no added sugar • no preservatives
• non-GMO** • gluten free • vegan

love this reNEWabottle®
It's a bottle made from other bottles. And it can be used to make more bottles in the future. 100% recycled and recyclable. Don't you just love that?

nakedjuice.com

PLEASE RECYCLE

got the blues?
take a swig of this
sweet-happy, fiber-full
blueberry-blackberry
goodness and enjoy your
ride on the happy train.

the Naked truth®
We use only the freshest, purest stuff in
the world and leave out everything else.
• no added sugar • no preservatives
• non-GMO** • gluten free • vegan

love this reNEWabottle®
It's a bottle made from other bottles.
And it can be used to make more bottles in
the future. 100% recycled and recyclable.
Don't you just love that?
nakedjuice.com

PERISHABLE KEEP REFRIGERATED
**While many ingredients do not exist in bioengineered
varieties, Naked Juice does not use ingredients that were
produced using biotechnology as a matter of principle.

PLEASE RECYCLE

blue machine.®

Naked®
ALL NATURAL FRUIT + BOOSTS

BLENDED JUICE SMOOTHIE WITH OTHER INGREDIENTS
BOOSTED
100% JUICE SMOOTHIE
NO SUGAR ADDED
15.2 FL OZ (450mL)

100% juice
shake well!
separation is natural
INGREDIENTS: APPLE JUICE, BANANA PUREE,
BLUEBERRY PUREE, BLACKBERRY PUREE,
NATURAL FLAVORS, FRUIT AND VEGETABLE
JUICE CONCENTRATE, ACESULFAME POTASSIUM,
VITAMIN E (AS ACETATE), NACHTMANN,
D-CALCIUM PANTOTHEATE (VITAMIN B5),
PYRIDOXINE HYDROCHLORIDE (VITAMIN B6),
CANADIAN ALUMINUM (VITAMIN B2).

Nutrition Facts
Serving Size 8 fl oz (240mL)
Servings Per Container About 2

Amount Per Serving	Calories 170	Calories from Fat 0
	% Daily Value*	
Total Fat 0g	0%	
Saturated Fat 0g	0%	
Trans Fat 0g	0%	
Cholesterol 0mg	0%	
Sodium 10mg	0%	
Potassium 370mg	11%	
Total Carbohydrate 40g	13%	
Dietary Fiber 7g	29%	
Sugars 29g		
Protein 1g		
Vitamin A 0%	• Vitamin C 100%	
Calcium 0%	• Iron 2%	
Vitamin E 100%	• Vitamin B3 100%	
Vitamin B6 100%	• Vitamin B12 100%	
Vitamin B5 100%		

*Percent Daily Values are based on a
2,000 calorie diet.

All sugars are found naturally in the fruit.
Not a low calorie food.

the fruit inside
27 blueberries
3 blackberries
3 1/4 apples
1 banana†

the boost inside
38mg vitamin B3
11mcg vitamin B12
114mg vitamin C
19mg vitamin B5
4mg vitamin B6
13g fiber
57IU vitamin E

†per bottle
†sustainably grown & harvested

**RAIN FOREST ALLIANCE
CERTIFIED
BANANAS**

31001972406

82592727150

HI, ME & DEP
CA CASH REFUND

gold machine.

strike nutritional gold with kiwi, pineapple and passion fruit. plus vitamins A, C & E. disclaimer: does not contain actual gold.

the Naked truth®

We use only the freshest, purest stuff in the world and leave out everything else.

- no added sugar • no preservatives
- non-GMO** • gluten free • vegan

love this reNEWabottle®

It's a bottle made from other bottles. And it can be used to make more bottles in the future. 100% recycled and recyclable. Don't you just love that?

nakedjuice.com

PERISHABLE KEEP REFRIGERATED

**While many ingredients do not exist in bioengineered varieties, Naked Juice does not use ingredients that were produced using biotechnology as a matter of principle.

100% juice

shake well!

Ingredients: APPLE JUICE, PINEAPPLE JUICE, GOLDEN KIWIFRUIT JUICE, BANANA JUICE, PASSION FRUIT JUICE, NATURAL FLAVORS, ASCORBIC ACID (VITAMIN C), PHOSPHATIDYLCHOLINE (VITAMIN E), BETA CAROTENE (VITAMIN A), GRAPE SEED EXTRACT, ZINC METHIONINE, PROBIOTIC HYDROLYZED VITAMIN B6, BIOTIN, CANADIAN ALUMINUM (VITAMIN B12).

DIST. BY: NAKED JUICE CO., MONROVIA, CA 91016

© 2010 NAKED JUICE CO.

THIS PRODUCT HAS BEEN CERTIFIED BY THE RAINFEST ALLIANCE. FOR QUESTIONS OR COMMENTS CALL (877) 953-4237

HI, ME 5¢ DEP

CA CASH REFUND

the fruit inside:

1 golden kiwi

1 banana†

2 apples

a hint of passion fruit & pineapple

the boost inside:

142mcg biotin

38mg grape seed extract

9500IU vitamin A

0.95mg vitamin B6

2.85mcg vitamin B12

114mg vitamin C

57IU vitamin E

7.13mg zinc

*per bottle

†sustainably grown & harvested

RAINFEST ALLIANCE CERTIFIED BANANAS

Nutrition Facts

Serving Size 8 fl oz (240mL)

Servings Per Container About 2

Amount Per Serving	Calories 140	Calories from Fat 0
	% Daily Value*	
Total Fat 0g	0%	
Saturated Fat 0g	0%	
Trans Fat 0g	0%	
Cholesterol 0mg	0%	
Sodium 35mg	1%	
Potassium 480mg	14%	
Total Carbohydrate 32g	11%	
Dietary Fiber 0g	0%	
Sugars 26g		
Protein 2g		
Vitamin A 100%	• Vitamin C 100%	
Calcium 2%	• Iron 2%	
Vitamin E 100%	• Vitamin B6 25%	
Vitamin B12 25%	• Biotin 25%	
Zinc 25%		

*Percent Daily Values are based on a diet of other people's secrets.

All sugars are found naturally in the fruit. Not a low calorie food.

Naked®

ALL NATURAL FRUIT + BOOSTS

BOOSTED

100% JUICE SMOOTHIE

NO SUGAR ADDED

15.2 FL OZ (450mL)

31001972608

82592733150

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green machine.

Naked
ALL NATURAL FRUIT + BOOSTS

BLENDING JUICE SMOOTHIE WITH OTHER INGREDIENTS
**BOOSTED
100% JUICE SMOOTHIE**
NO SUGAR ADDED
15.2 FL OZ (450mL)

100% juice

shake well!
separation is natural

Ingredients: APPLE JUICE, MANGO PUREE, PINEAPPLE JUICE, BANANA PUREE, KIWI PUREE, SPIRULINA, NATURAL FLAVORS, CHLORELLA, BROCCOLI, SPINACH, BARLEY GRASS, WHEAT GRASS, PARSLEY, GINGER ROOT, BLUE GREEN ALGAE, ODORLESS GARLIC.

DIST BY: NAKED JUICE CO., MONROVIA, CA 91016
© 2010 NAKED JUICE CO.
THIS PRODUCT HAS BEEN TESTED FOR PESTICIDES
GUESTS FOR COMMENTS CALL (877) 858-4237

**HI, ME 5¢ DEP
CA CASH REFUND**

the fruit inside:
2 3/4 apples
1/2 banana
1/3 kiwi
1/3 mango
&
a hint of pineapple

the boost inside:
1300mg spirulina
400mg chlorella
100mg broccoli
100mg spinach
50mg blue green algae
50mg garlic
75mg barley grass
75mg wheat grass
50mg ginger
50mg parsley

Nutrition Facts
Serving Size 8 fl oz (240mL)
Servings Per Container About 2

Amount Per Serving	
Calories 140	Calories from Fat 0
	% Daily Value*
Total Fat 0g	0%
Saturated Fat 0g	0%
Trans Fat 0g	0%
Cholesterol 0mg	0%
Sodium 15mg	1%
Potassium 400mg	11%
Total Carbohydrate 33g	11%
Dietary Fiber 0g	0%
Sugars 28g	
Protein 2g	
Vitamin A 50%	Vitamin C 40%
Calcium 2%	Iron 4%
Thiamin 2%	Riboflavin 10%
Vitamin B6 15%	Vitamin B12 25%
Magnesium 6%	

*Percent Daily Values are based on a diet of other people's secrets.

All sugars are found naturally in the fruit. Not a low calorie food.

looks weird, tastes amazing

the Naked truth®
We use only the freshest, purest stuff in the world and leave out everything else.
• no added sugar • no preservatives
• non-GMO** • vegan

love this reNEWabottle®
It's a bottle made from other bottles. And it can be used to make more bottles in the future. 100% recycled and recyclable. Don't you just love that?

nakedjuice.com

PERISHABLE KEEP REFRIGERATED
**while many ingredients do not exist in bioengineered varieties, Naked Juice does not use ingredients that were produced using biotechnology as a matter of principle.

PLEASE RECYCLE

**RAINFORREST ALLIANCE
CERTIFIED BANANAS**

31001972206
82592720150

32

an amazing
exotic, incredibly
yummy multitude
of mango.

the Naked truth®

We use only the freshest, purest stuff in the world and leave out everything else.

- no added sugar • no preservatives
- non-GMO** • gluten free • vegan

love this reNEwAbottle®

It's a bottle made from other bottles. And it can be used to make more bottles in the future. 100% recycled and recyclable. Don't you just love that?

nakedjuice.com

mighty mango®
WITH OTHER NATURAL FLAVORS



Naked®
ALL NATURAL FRUIT

A BLEND OF 5 JUICES WITH OTHER INGREDIENTS
100% JUICE SMOOTHIE

NO SUGAR ADDED
15.2 FL OZ (450ml)

100% juice
shake well!
separation is natural

the fruit inside®

1 1/4 mangoes
1/2 orange
1 3/4 apples
1/3 banana †
&
a hint of lemon

*per bottle
†sustainably grown & harvested



Nutrition Facts
Serving Size 8 fl oz (240mL)
Servings Per Container About 2

Amount Per Serving	
Calories 150	Calories from Fat 0
% Daily Value*	
Total Fat 0g	0%
Saturated Fat 0g	0%
Trans Fat 0g	0%
Cholesterol 0mg	0%
Sodium 10mg	0%
Potassium 340mg	10%
Total Carbohydrate 36g	12%
Dietary Fiber 0g	0%
Sugars 30g	
Protein 1g	
Vitamin A 100% • Vitamin C 10%	
Calcium 2% • Iron 2%	

*Percent Daily Values are based on a diet of other people's secrets.
All sugars are found naturally in the fruit.
Not a low calorie food.

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MONROVIA, CA 91016
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(877) 858-4237

HI, ME 5¢ DEP
CA CASH REFUND

310019727106

0 82592 66015 2

PERISHABLE KEEP REFRIGERATED
**While many ingredients do not exist in bioengineered varieties, Naked Juice does not use ingredients that were produced using biotechnology as a matter of principle.

 PLEASE RECYCLE

ah, tangy and sweet pomegranate açai. where have you been all our lives? welcome to civilization, you delicious, healthy superfruits.

the Naked truth®

We use only the freshest, purest stuff in the world and leave out everything else.

- no added sugar • no preservatives
- non-GMO** • gluten free • vegan

love this reNEWabottle®

It's a bottle made from other bottles. And it can be used to make more bottles in the future, 100% recycled and recyclable. Don't you just love that?

nakedjuice.com

PERISHABLE KEEP REFRIGERATED

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pomegranate açai

WITH OTHER NATURAL FLAVORS

powerfully delicious

Naked®

ALL NATURAL

POMEGRANATE AÇAÍ FLAVORED 6 JUICE BLEND
PARTIALLY FROM CONCENTRATE

100% JUICE

NO SUGAR ADDED

15.2 FL OZ (450mL)

100% juice

shake well! separation is natural

INGREDIENTS: POMEGRANATE JUICE FROM CONCENTRATE (WATER, POMEGRANATE JUICE CONCENTRATE), APPLE JUICE, RED GRAPE JUICE FROM CONCENTRATE (WATER, RED GRAPE JUICE CONCENTRATE), WHITE GRAPE JUICE FROM CONCENTRATE (WATER, WHITE GRAPE JUICE CONCENTRATE), BANANA PUREE, AÇAÍ PUREE (WATER, AÇAÍ PULP), NATURAL FLAVORS, SOY LECITHIN.

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3 1001971706

6 82592 61715 0

1 2/3 pomegranates

95 açai berries

1 1/3 apples

1/2 banana†

14 red grapes

14 white grapes

***per bottle**

†sustainably grown & harvested

RAIN-FOREST ALLIANCE CERTIFIED BANANAS

Nutrition Facts

Serving Size 8 fl oz (240mL)

Servings Per Container About 2

Amount Per Serving	
Calories 160	Calories from Fat 10
Total Fat 1g	1%
Saturated Fat 0g	0%
Trans Fat 0g	
Cholesterol 0mg	0%
Sodium 30mg	1%
Potassium 410mg	12%
Total Carbohydrate 36g	12%
Dietary Fiber 0g	0%
Sugars 31g	
Protein 1g	
Vitamin A 2%	Vitamin C 0%
Calcium 2%	Iron 2%

*Percent Daily Values are based on a diet of other people's secrets.

All sugars are found naturally in the fruit. Not a low calorie food.

pomegranate blueberry

WITH OTHER NATURAL FLAVORS



Naked®

ALL NATURAL

POMEGRANATE BLUEBERRY FLAVORED
5 JUICE BLEND
PARTIALLY FROM CONCENTRATE
100% JUICE

NO SUGAR ADDED

64 FL OZ (2 QT) 1.89L

31002025100

100% juice

Nutrition Facts

Serving Size 8 fl oz (240mL)
Servings Per Container 8

Amount Per Serving

Calories 150 Calories from Fat 0

% Daily Value*

Total Fat 0g 0%

Saturated Fat 0g 0%

Trans Fat 0g

Cholesterol 0mg 0%

Sodium 20mg 1%

Potassium 300mg 9%

Total Carb. 36g 12%

Dietary Fiber 0g 0%

Sugars 32g

Protein 1g

Vitamin A 0%

Vitamin C 0%

Calcium 2%

Iron 0%

*Percent Daily Values are based on a 2,000 calorie diet.

All sugars are found naturally in the fruit. Not a low calorie food.

INGREDIENTS: POMEGRANATE JUICE FROM CONCENTRATE (WATER, POMEGRANATE JUICE CONCENTRATE), RED GRAPE JUICE FROM CONCENTRATE (WATER, RED GRAPE JUICE CONCENTRATE), WHITE GRAPE JUICE FROM CONCENTRATE (WATER, WHITE GRAPE JUICE CONCENTRATE), APPLE JUICE, BLUEBERRY PUREE, NATURAL FLAVORS.

the **Naked** truth®

We use only the freshest, purest stuff in the world and leave out everything else.
• no added sugar • no preservatives • non-GMO** • vegan

love this reNEWabottle®

It's a bottle made from other bottles. And it can be used to make more bottles in the future. 100% recycled and recyclable. Don't you just love that?

nakedjuice.com

the **fruit** inside

7 pomegranates

99 blueberries

2 1/3 apples

143 red grapes

99 white grapes

*per bottle

**While many ingredients do not exist in bioengineered varieties, Naked Juice does not use ingredients that were produced using biotechnology as a matter of principle.

SHAKE WELL! separation is natural PLEASE RECYCLE

HI, ME 5¢ DEP 31002025800 PERISHABLE KEEP REFRIGERATED



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feeling a little down? lift your taste buds with this uber-yummy blend with strawberry, guava, peach & mango. plus, it's powerfully packed with vitamin C.

the Naked truth®

We use only the freshest, purest stuff in the world and leave out everything else.

- no added sugar • no preservatives
- non-GMO** • gluten free • vegan

love this reNEWabottle®

It's a bottle made from other bottles. And it can be used to make more bottles in the future, 100% recycled and recyclable. Don't you just love that?

nakedjuice.com

PERISHABLE KEEP REFRIGERATED

**While many ingredients do not exist in bioengineered varieties, Naked Juice does not use ingredients that were produced using biotechnology as a matter of principle.

power-c machine.®



1000% PDA of vitamin C

Naked®

ALL NATURAL FRUIT + BOOSTS

BLENDED JUICE SMOOTHIE WITH OTHER INGREDIENTS

BOOSTED

100% JUICE SMOOTHIE

NO SUGAR ADDED

15.2 FL OZ (450mL)

100% juice

shake well!

separation is natural

INGREDIENTS: APPLE JUICE, MANGO PUREE, ORANGE JUICE, GUAVA PUREE, PEACH PUREE, STRAWBERRY PUREE, ASORBIC ACID, CITRUS FLAVOR, CITRUS BIOFLAVONOIDS, VITAMIN C POWDER, ZINC OXIDE.

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the fruit inside:

- 5 strawberries
- 1 1/3 guavas
- 1 1/2 apples
- 1/2 orange
- 1/2 peach
- 1/2 mango

the boost inside:

- 1140mg vitamin C
- 209mg acerola cherry
- 209mg citrus bioflavonoids
- 209mg rose hips
- 2.8mg zinc

Nutrition Facts

Serving Size 8 fl oz (240mL)

Servings Per Container About 2

Amount Per Serving	% Daily Value*
Calories 120	Calories from Fat 0
Total Fat 0g	0%
Saturated Fat 0g	0%
Trans Fat 0g	0%
Cholesterol 0mg	0%
Sodium 0mg	0%
Potassium 360mg	10%
Total Carbohydrate 29g	10%
Dietary Fiber 0g	0%
Sugars 23g	0%
Protein 1g	
Vitamin A 6%	Vitamin C 1000%
Calcium 2%	Iron 2%
Zinc 10%	

*Percent Daily Values are based on a diet of other people's secrets.

All sugars are found naturally in the fruit. Not a low calorie food.

810019727206

7 1 5 1 7 1 5 9 2 9 2 8 0

protein zone®
WITH OTHER NATURAL FLAVORS

pineapple, coconut and banana teamed with 30 grams of whey & soy proteins* – strong and sweet, that's how we like 'em.

the **Naked** truth®
We use only the freshest, purest stuff in the world and leave out everything else.
• no added sugar • no preservatives
• non-GMO** • gluten free

love this reNEWabottle®
It's a bottle made from other bottles. And it can be used to make more bottles in the future. 100% recycled and recyclable. Don't you just love that?

nakedjuice.com

PERISHABLE KEEP REFRIGERATED
***While many ingredients do not exist in bioengineered varieties, Naked Juice does not use ingredients that were produced using biotechnology as a matter of principle.

30g of protein per bottle

Naked®
ALL NATURAL FRUIT + BOOSTS

PROTEIN JUICE SMOOTHIE

NO SUGAR ADDED

15.2 FL OZ (450mL)

all natural fruit + boosts
90% JUICE

shake well!
separation is natural
INGREDIENTS: APPLE JUICE, BANANA PUREE, ORANGE JUICE, PINEAPPLE JUICE, WHEY PROTEIN CONCENTRATE, SOY PROTEIN ISOLATE, COCONUT MILK EXTRACT, SOY LECITHIN, NATURAL FLAVORS, ASCORBIC ACID (VITAMIN C), CONTAINS MILK AND SOY INGREDIENTS.

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HI, ME & DEP
CA CASH REFUND

Nutrition Facts
Serving Size 8 fl oz (240mL)
Servings Per Container About 2

Amount Per Serving	% Daily Value*
Calories 220	Calories from Fat 20
Total Fat 2g	3%
Saturated Fat 1g	5%
Trans Fat 0g	
Cholesterol 30mg	10%
Sodium 140mg	6%
Potassium 480mg	14%
Total Carbohydrate 34g	11%
Dietary Fiber 0g	0%
Sugars 28g	
Protein 16g	32%
Vitamin A 0%	Vitamin C 150%
Calcium 6%	Iron 6%

*Percent Daily Values are based on a diet of other people's secretaries.
All sugars are found naturally in the fruit. Not a low calorie food.

the fruit inside
the boost inside

2 1/3 apples
1 banana†
1/3 orange
& a hint of pineapple & coconut

30g whey & soy protein
171mg vitamin C
920mg potassium

†per bottle
‡sustainably grown & harvested

RAIN FOREST ALLIANCE
CERTIFIED
BANANAS

Barcode: 825592 722215 7
31001973306

protein zone.[®]
double berry
WITH OTHER NATURAL FLAVORS



30g of protein per bottle

Naked[®]
ALL NATURAL FRUIT + BOOSTS

BERRY FLAVORED BLEND OF PROTEIN & 4 JUICES
PROTEIN JUICE SMOOTHIE

NO SUGAR ADDED
15.2 FL OZ (450mL)

deliciously ripe strawberries and blueberries plus 30 grams of the finest whey & soy proteins. now, that's fine dining for muscles!

the Naked truth[®]
We use only the freshest, purest stuff in the world and leave out everything else.
• no added sugar • no preservatives
• non-GMO** • gluten free

love this reNEWabottle[®]
It's a bottle made from other bottles. And it can be used to make more bottles in the future. 100% recycled and recyclable. Don't you just love that?
nakedjuice.com

PERISHABLE KEEP REFRIGERATED
***While many ingredients do not exist in bioengineered varieties, Naked Juice does not use ingredients that were produced using biotechnology as a matter of principle.

K D
PLEASE RECYCLE

all natural fruit + boosts
93% JUICE

shake well!
separation is natural
INGREDIENTS: APPLE JUICE, BANANA PUREE, STRAWBERRY PUREE, SOY PROTEIN ISOLATE, WHEY PROTEIN CONCENTRATE, BLUEBERRY PUREE, SOY LECITHIN, FRUIT AND VEGETABLE JUICE FOR COLOR, NATURAL FLAVORS, ASCORBIC ACID (VITAMIN C).

Nutrition Facts
Serving Size 8 fl oz (240mL)
Servings Per Container About 2

Amount Per Serving	
Calories 220	Calories from Fat 20
	% Daily Value*
Total Fat 2g	3%
Saturated Fat 0.5g	3%
Trans Fat 0g	
Cholesterol 10mg	4%
Sodium 130mg	5%
Potassium 450mg	13%
Total Carbohydrate 35g	12%
Dietary Fiber 0g	0%
Sugars 29g	
Protein 16g	32%
Vitamin A 0%	Vitamin C 100%
Calcium 4%	Iron 0%

*Percent Daily Values are based on a diet of other people's secrets.
All sugars are found naturally in the fruit. Not a low calorie food.

the fruit inside.[®]
6 strawberries
5 blueberries
1 banana[†]
3 apples

the boost inside.[®]
30g whey & soy protein
114mg vitamin C
855mg potassium

*per bottle
†sustainably grown & harvested

RAIN FOREST ALLIANCE CERTIFIED BANANAS

**HI, ME 5¢ DEP
CA CASH REFUND**

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31001995306

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protein zone.[®]
mango
WITH OTHER NATURAL FLAVORS

30g of protein per bottle

Naked[®]
ALL NATURAL FRUIT + BOOSTS

MANGO FLAVORED BLEND OF PROTEIN & 4 JUICES
PROTEIN JUICE SMOOTHIE
NO SUGAR ADDED
15.2 FL OZ (450mL)

ripe, sweet mango with 30 grams of powerful whey & soy proteins. a mangolicious dream.

the Naked truth[®]
We use only the freshest, purest stuff in the world and leave out everything else.
• no added sugar • no preservatives
• non-GMO** • gluten free

love this reNEWabottle[®]
It's a bottle made from other bottles. And it can be used to make more bottles in the future. 100% recycled and recyclable. Don't you just love that?
nakedjuice.com

PERISHABLE KEEP REFRIGERATED
***While many ingredients do not exist in bioengineered varieties, Naked Juice does not use ingredients that were produced using biotechnology as a matter of principle.

all natural fruit + boosts
93% JUICE

shake well!
separation is natural
INGREDIENTS: APPLE JUICE, MANGO PULP, ORANGE JUICE, BANANA PULP, SOY PROTEIN ISOLATE, WHEY PROTEIN CONCENTRATE, SOY LECITHIN, NATURAL FLAVORS, ASCORBIC ACID (VITAMIN C), VITAMIN E (AS ACETATE), BETA CAROTENE FOR COLOR (VITAMIN A). CONTAINS MILK AND SOY INGREDIENTS.

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HI, ME 5¢ DEP
CA CASH REFUND

Nutrition Facts
Serving Size 8 fl oz (240mL)
Servings Per Container About 2

Amount Per Serving	% Daily Value*
Calories 220	Calories from Fat 10
	% Daily Value*
Total Fat 1g	2%
Saturated Fat 0g	0%
Trans Fat 0g	
Cholesterol 10mg	4%
Sodium 130mg	5%
Potassium 400mg	11%
Total Carbohydrate 35g	12%
Dietary Fiber 0g	0%
Sugars 28g	
Protein 16g	32%
Vitamin A 120%	Vitamin C 250%
Calcium 6%	Iron 6%
Vitamin E 140%	

*Percent Daily Values are based on a diet of other people's secrets.
All sugars are found naturally in the fruit.
Net a low calorie food.

the fruit inside[®]
3/4 mango
1 orange
1/2 banana[†]
1 3/4 apples

the boost inside[®]
30g whey & soy protein
11742 IU vitamin A
287mg vitamin C
82 IU vitamin E
763mg potassium

*per bottle
†sustainably grown & harvested

RAIN FOREST ALLIANCE CERTIFIED BANANAS

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