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6 Attorneys for Plaintiff: DAVID PAZ, an individual and on behalf
7 of all others similarly situated

8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 DAVID PAZ, an individual and on
11 behalf of all others similarly situated,

12 Plaintiff,

13 vs.

14 AG ADRIANO GOLDSCHMIED,
15 INC., a California corporation;
16 NORDSTROM, INC., a Washington
17 Corporation; and DOES 1 through 100,
18 inclusive,

19 Defendants.

CASE NO. '14CV1372 DMS DHB

CLASS ACTION

COMPLAINT FOR:

- (1) VIOLATION OF CONSUMERS LEGAL REMEDIES ACT (CALIFORNIA CIVIL CODE SECTION 1750 ET SEQ.);
- (2) VIOLATION OF BUSINESS & PROFESSIONS CODE SECTIONS 17200 *ET SEQ.* (CALIFORNIA UNFAIR COMPETITION LAW); AND
- (3) VIOLATION OF BUSINESS & PROFESSIONS CODE SECTION 17533.7 (CALIFORNIA FALSE "MADE IN USA" CLAIM).

20 DEMAND FOR JURY TRIAL
21 [FRCP 38]
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1 COMES NOW, plaintiff DAVID PAZ (“Plaintiff”), as an individual and on
2 behalf of the general public and all others similarly situated, by his undersigned
3 attorneys, alleges as follows:

4 **NATURE OF THE CASE**

5 1. This is a putative class action case brought on behalf of all purchasers
6 of AG Adriano Goldschmied, Inc. apparel products manufactured, distributed,
7 marketed, and/or sold by defendants AG Adriano Goldschmied, Inc. (“AGAG”)
8 and Nordstrom, Inc. (“Nordstrom”) in California. AGAG, Nordstrom, and the
9 DOE defendants are collectively hereinafter referred to as the “Defendants.”

10 Through an unlawful, deceptive and unfair course of conduct, Defendants
11 manufactured, marketed, and/or sold to California consumers a variety of AGAG
12 apparel products with the false designation and representation that the AGAG
13 apparel was “Made in U.S.A.”

14 2. The “Made in U.S.A.” claim is prominently printed on the apparel
15 products themselves.¹ However, the offending apparel products are substantially
16 made, manufactured or produced from component parts that are manufactured
17 outside of the United States in violation of California law and/or federal law.

18 3. On information and belief, major components of the apparel products,
19 including but not limited to the fabric, thread, buttons, subcomponents of the
20 zipper assembly, and/or rivets are manufactured *outside the United States*.

21 **PARTIES**

22 4. Plaintiff is an individual residing in San Diego, California.

23 5. Defendant AG Adriano Goldschmied, Inc. (“AGAG”) is a corporation
24 that is organized and exists under the laws of the State of California. AGAG may
25 be served with process in this matter by serving its registered agent for service of
26

27 ¹ Plaintiff intends to seek class wide relief on behalf of all California
28 purchasers of any AGAG apparel product that was labeled as “Made in U.S.A.”
but incorporated foreign-made component parts in violation of California and/or
federal law – not just the specific brand of men’s jeans purchased by Plaintiff.

1 process as follows: John Hur, 2700 Sequoia Drive, South Gate, CA 90280.

2 6. AGAG is a leading designer and manufacturer of men's and women's
3 denim jean products. On information and belief, AGAG sells jeans, shorts, skirts
4 and dresses, maternity wear, knits, woven, sweaters, and jackets for women; and
5 jeans, shorts, knits, woven, sweaters, and jackets, as well as fabrics for men.
6 AGAG sells its products through its own stores, online, and through high-end
7 retailers such as Nordstrom, Inc. It has retail store locations in Atlantic City,
8 Miami, Beverly Hills, Costa Mesa, San Francisco, New York, St. Louis, and
9 Tokyo. One of the products AGAG manufacturers and sells to California retailers
10 is THE PROTÉGÉ brand jean purchased by Plaintiff at a San Diego Nordstrom store
11 on or about May 16, 2014.

12 7. Defendant NORDSTROM, INC. (hereinafter "Nordstrom" or
13 "Defendant") is a Washington corporation doing business under and by virtue of
14 the laws of the State of California. Nordstrom's principal place of business is 1700
15 Seventh Avenue, Seattle, WA 98101. Nordstrom may be served with process in
16 this matter by serving its California registered agent for service of process, CT
17 Corporation System, 818 West Seventh Street, 2nd Floor, Los Angeles, CA 90017.

18 8. On information and belief, Nordstrom is a fashion specialty retailer
19 that offers apparel, shoes, cosmetics, and accessories for women, men, and
20 children in the United States. THE PROTÉGÉ brand jean was purchased by Plaintiff
21 at a Nordstrom retail store.

22 9. Plaintiff is ignorant of the true names and capacities of the defendants
23 sued herein as DOES 1-100, inclusive; therefore, Plaintiff sues these defendants by
24 such fictitious names. Plaintiff is informed and believes that each of the fictitious
25 named defendants are legally responsible in some manner for the occurrences
26 herein alleged, assisted in and about the wrongs complained herein by providing
27 financial support, advice, resources or other assistance. Plaintiff will amend the
28 complaint to allege their true names and capacities when ascertained.

1 itself was marked with a “Made in U.S.A.” country of origin designation when the
2 product actually contains component parts made outside of the United States.
3 Accordingly, Defendants are not entitled to lawfully make a “Made in U.S.A.”
4 representation on the product.

5 20. In each case when Plaintiff, and Class Members, purchased a Class
6 Product², they relied upon Defendants’ “Made in U.S.A.” representation in their
7 purchasing decision, which is typical of most U.S. consumers, and they were
8 deceived as a result of Defendants’ actions. These purchasing decisions were
9 supported by the “Made in U.S.A.” representation made by Defendants, which is
10 absent from most of Defendants’ competitors. Plaintiff believed at the time he
11 purchased THE PROTÉGÉ that he was supporting U.S. jobs and the U.S.
12 economy.

13 21. Plaintiff suffered an “injury in fact” because Plaintiff’s money was
14 taken by Defendants as a result of Defendants’ false “MADE IN USA” claims set
15 forth on THE PROTÉGÉ. Furthermore, he suffered an “injury in fact” by paying
16 for something he believed was genuinely manufactured in the USA, when it was
17 not.

18 22. U.S. made component parts are subject to strict regulatory
19 requirements, such as environmental, labor, and safety standards. Foreign made
20 component parts are not subject to the same U.S. manufacturing standards and are
21 often inherently of lower quality than their U.S. made counterparts. Foreign made
22 component parts are also routinely less reliable and durable than their U.S. made
23 counterparts. As such, THE PROTÉGÉ is of inferior quality due to AGAG’s
24 decision to include foreign made component parts within.

25
26
27 ² The term “Class Products” is defined as any AGAG manufactured or labeled
28 product that was sold in California during the past four years with a “Made in
U.S.A” or equivalent country of origin label but that incorporated foreign-made
component parts.

1 23. As such, the offending AGAG apparel products, made with foreign-
2 made component parts, are of inferior quality, less reliable, and fail more often
3 than if the product was truly made from 100% American made component parts.
4 Essentially, THE PROTÉGÉ is not worth the purchase price paid. The precise
5 amount of damages will be proven at time of trial, in large part, by expert
6 testimony.

7 24. Plaintiff and Class Members were undoubtedly injured as a result of
8 Defendants' false "Made in U.S.A." representations that are at issue in this
9 litigation.

10 **CLASS ALLEGATIONS**

11 25. Plaintiff realleges and incorporates herein by reference all of the
12 allegations contained in Paragraphs 1 through 24, inclusive, of this complaint as
13 though fully set forth herein.

14 26. Plaintiff brings this action, as set forth below, against Defendants,
15 pursuant to Rules 23(a), 23(b)(1), 23(b)(2), and 23(b)(3) of the Federal Rules of
16 Civil Procedure ("Fed. R. Civ. P."), individually and on behalf of a class
17 consisting of all persons in the United States who purchased one or more of
18 Defendants' AGAG apparel products during the relevant four-year statutory time
19 period that bore a "Made in U.S.A." country of origin designation but that
20 contained foreign-made component parts (the "Class"). Excluded from the Class
21 are the Court and its employees; Defendants; any parent, subsidiary, or affiliate of
22 Defendants; and all employees and directors who are or have been employed by
23 Defendants during the relevant time period.

24 **Definition of the Subclass**

25 27. Subclass members are all of Defendants' California customers who
26 purchased AGAG apparel products that were labeled as "MADE IN U.S.A. OF
27 IMPORTED FABRIC" that contained foreign-made component parts beyond the
28

1 fabric (e.g., rivets, thread, buttons, and/or subcomponents of the zipper assembly)
2 during the relevant four-year statutory time period (hereinafter the “Sub-Class
3 Products”).

4 **Class Action Requirements**

5 28. The numerosity requirement of Fed. R. Civ. P. 23(a)(1) is satisfied for
6 each of the foregoing Classes because the members of each Class are so numerous
7 and geographically dispersed that joinder of all Class members is impracticable.
8 Plaintiff currently believes that there are at hundreds of thousands of members of
9 each Class located in the State of California.

10 29. Common questions of fact and law exist here, satisfying the
11 requirement of Rule 23(a)(2), including but not limited to:

- 12 a. whether Defendants participated in, or committed the
13 wrongful conduct alleged herein;
- 14 b. whether Defendants’ acts, transactions, or course of
15 conduct constitute the violations of law alleged herein;
- 16 c. whether the members of the Class and the Sub-Class
17 sustained and/or continue to sustain damages by reason of
18 Defendants’ conduct, and, if so, the proper measure and
19 appropriate formula to be applied in determining such damages;
20 and
- 21 f. whether the members of the Class and the Sub-Class are
22 entitled to injunctive or other equitable relief.

23 30. Plaintiff’s claims are typical of the claims of all other members of the
24 Class and the Sub-Class and involve the same violations of law by Defendants as
25 other Class members’ claims. Plaintiff and members of the Class and Sub-Class
26 also sustained damages arising out of Defendants’ common course of conduct
27 complained herein. Accordingly, Plaintiff satisfies the “typicality” requirements
28 of Fed. R. Civ. P. 23(a)(3) with respect to the Class and Sub-Class.

1 31. Plaintiff will fairly and adequately protect the interests of the other
2 members of the Class and Sub-Class, and has no interests that are antagonistic to
3 or which conflict with those of the other members of those Classes. Plaintiff is
4 committed to the vigorous prosecution of this action and has retained competent
5 counsel experienced in litigation of this nature to represent themselves and the
6 other members of the Class and Sub-Class; as such, the requirements of Rule
7 23(a)(4) are satisfied.

8 32. Absent a representative class action, members of the Class and the
9 Sub-Class would continue to suffer the harm described herein, for which they
10 would have no remedy. Even if separate actions could be brought by individual
11 purchasers, the resulting multiplicity of lawsuits would cause undue hardship and
12 expense for both the Court and the litigants, as well as create a risk of inconsistent
13 rulings and adjudications that might be dispositive of the interests of similarly
14 situated purchasers, substantially impeding their ability to protect their interests,
15 while establishing incompatible standards of conduct for Defendants. The
16 proposed Class, and, respectively, the members of the Sub-Class, thus satisfy the
17 requirements of Fed. R. Civ. P. 23(b)(1).

18 33. Defendants has acted or refused to act on grounds generally applicable
19 to Plaintiff and the other members of the Class, and, respectively, the members of
20 the Sub-Class, thereby rendering class certification and injunctive relief with
21 respect to the Class as a whole and the Sub-Class appropriate. Certification under
22 Fed. R. Civ. P. 23(b)(2) is proper in this regard.

23 34. As discussed above, numerous common questions of fact and law
24 exist. These questions predominate over the individual questions presented in this
25 action. The predominance requirement of Rule 23(b)(3) is thus satisfied.

26 35. A class action is the superior method for the fair and efficient
27 adjudication of this controversy, because joinder of all members of the Class, and,
28 respectively, the Sub-Class, is impracticable. Because the damages suffered by

1 individual members of the Class, and, respectively, the Sub-Class, may be
2 relatively small, the expense and burden of litigation would prevent class
3 members from individually redressing the wrongs done to them. Where, as here,
4 the size and nature of individual Class members' claims would allow few, if any,
5 members of those Classes to seek legal redress against Defendants for the wrongs
6 complained of herein, a representative class action is both the appropriate vehicle
7 by which to adjudicate these claims and is essential to the interests of justice.
8 Furthermore, a class action regarding the issues in this action creates no
9 significant problems of manageability. The superiority and manageability
10 requirements of Rule 23(b)(3) are thus satisfied.

11 **FIRST CLAIM FOR RELIEF**

12 **(Violation of California Consumers Legal Remedies Act Against All**
13 **Defendants)**

14 36. Plaintiff realleges and incorporates herein by reference all of the
15 allegations contained in Paragraphs 1 through 35, inclusive, of this complaint as
16 though fully set forth herein.

17 37. California Civil Code Section 1750 *et seq.* (entitled the Consumers
18 Legal Remedies Act) provides a list of "unfair or deceptive" practices in a
19 "transaction" relating to the sale of "goods" or "services" to a "consumer." The
20 Legislature's intent in promulgating the Consumers Legal Remedies Act is
21 expressed in Civil Code Section 1760, which provides, *inter alia*, that its terms are
22 to be:

23 [C]onstrued liberally and applied to promote its underlying
24 purposes, which are to protect consumers against unfair and
25 deceptive business practices and to provide efficient and
economical procedures to secure such protection.

26 38. Defendant's AGAG apparel products constituted "goods" as defined
27 in Civil Code Section 1761(a).

1 39. Plaintiff, and Class members, are each a “Consumer” as defined in
2 Civil Code Section 1761(d).

3 40. Each of Plaintiff’s purchases of Defendant’s AGAG apparel products
4 constituted a “transaction” as defined in Civil Code Section 1761(e).

5 41. Civil Code Section 1770(a)(4) and (9) provides that “[t]he following
6 unfair methods of competition and unfair or deceptive acts or practices undertaken
7 by any person in a transaction intended to result or which results in the sale or
8 lease of goods or services to any consumer are unlawful: Using deceptive
9 representations or designations of geographic origin in connection with goods or
10 services [and] [a]dvertising goods or services with intent not to sell them as
11 advertised.”

12 42. Defendant violated Civil Code Section 1770(a)(4) and (9) by
13 marketing and representing that their AGAG apparel products are “Made in
14 U.S.A.” when they actually contain component parts that are manufactured
15 outside of the United States.

16 43. It is alleged on information and belief that Defendant’s violations of
17 the Consumer’s Legal Remedies Act set forth herein were done with awareness of
18 the fact that the conduct alleged was wrongful and were motivated solely for
19 increased profit. It is also alleged on information and belief that Defendants did
20 these acts knowing the harm that would result to Plaintiff and that Defendants did
21 these acts notwithstanding that knowledge.

22 44. As a direct and proximate result of Defendants’ violations of the
23 Consumers Legal Remedies Act, Plaintiff and Class members are entitled to the
24 following remedies as against Defendants: (a) a declaration that Defendants
25 violated the Consumers Legal Remedies Act, and (b) an injunction preventing
26 Defendants’ unlawful actions.

1 45. Plaintiff suffered an “injury in fact” because Plaintiff’s money was
2 taken by Defendants as a result of Defendants’ false “Made in U.S.A.” claims set
3 forth on the AGAG apparel products.

4 46. Plaintiff and Class Members were undoubtedly injured as a result of
5 Defendants’ false “MADE IN USA” representations that are at issue in this
6 litigation.

7 **SECOND CLAIM FOR RELIEF**

8 **(Violation of Business & Prof. Code Section 17200 *Et Seq.* Against All**
9 **Defendants)**

10 47. Plaintiff realleges and incorporates herein by reference all of the
11 allegations contained in Paragraphs 1 through 46, inclusive, of this complaint as
12 though fully set forth herein.

13 48. Business & Professions Code section 17200 *et seq.* provides that
14 unfair competition means and includes “any unlawful, unfair or fraudulent
15 business act or practice and unfair, deceptive, untrue or misleading marketing.”

16 49. By and through their conduct, including the conduct detailed above,
17 Defendants engaged in activities which constitute unlawful, unfair, and fraudulent
18 business practices prohibited by Business & Professions Code Section 17200 *et*
19 *seq.* Beginning at an exact date unknown as yet and continuing up through the
20 present, Defendants committed acts of unfair competition, including those
21 described above, by engaging in a pattern of “unlawful” business practices, within
22 the meaning of Business & Professions Code Section 17200 *et seq.*, by
23 manufacturing, distributing, marketing AGAG apparel products with a false
24 country of origin designation and violating Section 17533.7 by falsely claiming
25 that the products referenced herein are “Made in U.S.A.” when they actually
26 contain component parts manufactured *outside of the United States.*

27 50. Beginning at an exact date unknown as yet and continuing up through
28 the present, Defendants committed acts of unfair competition that are prohibited

1 by Business and Professions Code section 17200 *et seq.* Defendants engaged in a
2 pattern of “unfair” business practices that violate the wording and intent of the
3 statutes, by engaging in practices that threaten an incipient violation of law or
4 violate the policy or spirit of laws because their effects are comparable to or the
5 same as a violation of the law by manufacturing, distributing, and marketing their
6 AGAG apparel products with a false country of origin designation, and by
7 violating Section 17533.7 by falsely claiming that their AGAG apparel products
8 referenced herein are “Made in U.S.A.” when they actually contain component
9 parts manufactured outside of the United States.

10 51. Alternatively, Defendants engaged in a pattern of “unfair” business
11 practices that violate the wording and intent of the statutes, by engaging in
12 practices that are immoral, unethical, oppressive or unscrupulous, the utility (if
13 any) of which conduct is far outweighed by the harm done to consumers and
14 public policy by manufacturing, distributing, marketing, and advertising AGAG
15 apparel products with the false claim that the products referenced herein are
16 “Made in U.S.A.”

17 52. Alternatively, Defendants engaged in a pattern of “unfair” business
18 practices that violate the wording and intent of the statutes, by engaging in
19 practices, including manufacturing, distributing, marketing, and advertising
20 AGAG apparel products with the false claim that the products referenced herein
21 are “Made in U.S.A.,” wherein: (1) the injury to the consumer was substantial; (2)
22 the injury was not outweighed by any countervailing benefits to consumers or
23 competition; and (3) the injury was of the kind that the consumers themselves
24 could not reasonably have avoided.

25 53. Beginning at an exact date unknown as yet and continuing up through
26 the present, Defendants committed acts of unfair competition, including those
27 described above, prohibited by Business and Professions Code section 17200 *et*
28 *seq.* by engaging in a pattern of “fraudulent” business practices within the

1 meaning of Business & Professions Code section 17200 *et seq.*, by manufacturing,
2 distributing, marketing AGAG apparel products with a false country of origin
3 designation and violating Section 17533.7 by falsely claiming that the products
4 referenced herein are “Made in U.S.A.”

5 54. Defendant engaged in these unlawful, unfair and fraudulent business
6 practices for the primary purpose of collecting unlawful and unauthorized monies
7 from Plaintiff and all others similarly situated; thereby unjustly enriching
8 Defendants.

9 55. As a result of the repeated violations described herein, Defendants
10 received and continue to receive unearned commercial benefits at the expense of
11 their competitors and the public.

12 56. Defendants’ unlawful, unfair and fraudulent business practices
13 presents a continuing threat to the public in that Defendants continues to engage in
14 unlawful conduct.

15 57. Such acts and omissions are unlawful and/or unfair and/or fraudulent
16 and constitute a violation of Business & Professions Code section 17200 *et seq.*
17 Plaintiff reserves the right to identify additional violations by Defendants as may
18 be established through discovery.

19 58. As a direct and legal result of their unlawful, unfair and fraudulent
20 conduct described herein, Defendants have been and will be unjustly enriched by
21 the receipt of ill-gotten gains from customers, including Plaintiff, who unwittingly
22 provided their money to Defendants based on Defendants’ fraudulent country of
23 origin designation.

24 59. Plaintiff suffered an “injury in fact” because Plaintiff’s money was
25 taken by Defendants as a result of Defendant’s false “Made in U.S.A.” claims set
26 forth on the AGAG apparel products.

1 these acts knowing the harm that would result to Plaintiff and that Defendants did
2 these acts notwithstanding that knowledge.

3 65. As a direct and proximate result of Defendants' violations of Business
4 & Professions Code Section 17533.7, Plaintiff and Class members are entitled to
5 restitution of excess monies paid to Defendants by Plaintiff and Class members
6 relating to the false "Made in U.S.A." claims on Defendants' AGAG apparel
7 products.

8 66. Plaintiff suffered an "injury in fact" because Plaintiff's money was
9 taken by Defendants as a result of Defendants' false "Made in U.S.A." claims set
10 forth on the AGAG apparel products.

11 67. In prosecuting this action for the enforcement of important rights
12 affecting the public interest, Plaintiff seeks the recovery of attorneys' fees, which
13 is available to a prevailing plaintiff in class action cases such as this.

14 **PRAYER**

15 WHEREFORE, Plaintiffs, on behalf of themselves, collectively on behalf of
16 the Class, and respectively on behalf of the Sub-Class, respectfully request the
17 following relief:

18 1. That the Court determine that this action may be maintained as a class
19 action by certifying this case as a California class action as to both the Class and
20 Sub-Class;

21 2. That the Court certify Plaintiff to serve as a class representative in this
22 case;

23 3. That Defendants' wrongful conduct alleged herein be adjudged and
24 decreed to violate the consumer protection statutory claims asserted herein;

25 4. That Plaintiff and each of the other members of the Class and each of
26 the Sub-Class recover the amounts by which Defendants have been unjustly
27 enriched;

28 5. That Defendants be enjoined from continuing the wrongful conduct

1 alleged herein and required to comply with all applicable law;

2 6. That Plaintiff and each of the other members of the Class and each of
3 the Sub-Class recover their costs of suit, including reasonable attorneys' fees and
4 expenses as provided by law; and

5 7. That Plaintiff and each of the other members of Class and each of the
6 Sub-Class be granted such other and further relief as the nature of the case may
7 require or as this Court deems just and proper.

8 **DEMAND FOR JURY TRIAL**

9 Pursuant to Rule 38, Federal Rules of Civil Procedure, Plaintiff hereby
10 demands a trial by jury with respect to all issues triable to a jury.

11
12 Dated: June 4, 2014

Respectfully submitted,

13 DEL MAR LAW GROUP, LLP

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15
16 By: /s/John H. Donboli _____

John H. Donboli

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17
18 Attorneys for: DAVID PAZ, an
19 individual and on behalf of all others
20 similarly situated

JS 44 (Rev. 12/07)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

David Paz

(b) County of Residence of First Listed Plaintiff San Diego
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)
Del Mar Law Group, LLP, 12250 El Camino Real, Ste. 120, San Diego, CA 92130; (858) 793-6244

DEFENDANTS

AG Adriano Goldschmied, Inc., Nordstrom, Inc., and DOES 1 through 100

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known) **'14CV1372 DMS DHB**

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|-------------------------------------|--------------------------|---|--------------------------|-------------------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> | <input type="checkbox"/> |
| Citizen of Another State | <input type="checkbox"/> | <input type="checkbox"/> | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> | <input type="checkbox"/> | Foreign Nation | <input type="checkbox"/> | <input type="checkbox"/> |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395f) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from another district (specify)
- 6 Multidistrict Litigation
- 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing. (Do not cite jurisdictional statutes unless diversity):
28 USC Section 1332 ; 28:1331- Federal Question

Brief description of cause:
Violation of Consumer Statutes (False Country of Origin Designation)

VII. REQUESTED IN COMPLAINT:

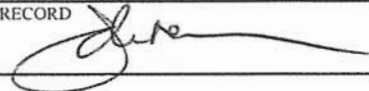
CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$** _____
CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE _____ DOCKET NUMBER _____

DATE
06/04/2014

SIGNATURE OF ATTORNEY OF RECORD



FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____