



December 8, 2014

VIA E-MAIL AND REGULAR MAIL

Christy Prunier, CEO
WillaGirl, Inc.



Re: Deceptive Advertising of WillaGirl, Inc. products

Dear Ms. Prunier:

I write to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from false and deceptive advertising. We have found that your company, WillaGirl, Inc. ("willa®"), has been engaged in deceptive advertising for its willa® natural skincare line. Specifically, we have found that:

- willa® claims on its website, in social media, and in its video that its products are "all natural" when, in fact, there is not a single willa® skincare product that is *all* natural. Rather, the products contain artificial colors, petroleum-derived ingredients, and/or synthetic preservatives, among other things.
- willa® claims that its products are "safe for sensitive skin" and has posted on its website that children with eczema can safely use the willa® line. However, several products contain ingredients that are not generally recognized as safe for sensitive skin, including, but certainly not limited to, cocamidopropyl betaine (which won the American Contact Dermatitis Society's Allergen of the Year award in 2004), fragrance (which won the same award in 2007), and phenoxyethanol (which studies have shown can be an extreme irritant to the eyes and skin), among other things.
- willa® claims that its products are "made lovingly in USA" but some of the products, such as the foaming face wash and acne spot treatment click pen, contain extracts from plants that do not grow in North America, which raises doubt that the company can meet the Federal Trade Commission's legal definition

for a “made in the USA” representation, as well as various states’ definitions (e.g., California).

- willa® prominently warns on its homepage that “Dermatologists say that up to 80% of lasting damage happens by age 18.” This is not only scare-tactic marketing that has potentially dangerous consequences as it suggests that sun protection after 18 is not as important, but also a false marketing statement. In reality, the average lifetime sun exposure that occurs by age 18 is less than 23%, according to The Skin Cancer Foundation.

Based on this information, we intend to notify state and/or federal regulators that willa® is deceptively marketing its skincare line unless willa® makes timely changes to its advertising so that it fully complies with all applicable state and federal laws, and notifies us of those changes. It is imperative that such changes be made in advance of willa®’s anticipated March 2015 launch of its multi-level marketing component, whereby children will be rewarded by the company for promoting and selling its products.

If you have any questions, please do not hesitate to contact me directly.

Sincerely,



Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.