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10 Attorneys for Defendant CLIF BAR & COMPANY

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA

13 GREG PERIEFF and LINDA CHESLOW, on  
14 behalf of themselves and all others similarly  
15 situated,

16 Plaintiffs,

17 vs.

18 CLIF BAR & COMPANY, a California  
19 corporation,

20 Defendant.

Case No.

**NOTICE OF REMOVAL PURSUANT TO  
28 U.S.C. SECTION 1441(a) – ORIGINAL  
FEDERAL QUESTION JURISDICTION**

21 TO THE CLERK OF THE ABOVE-ENTITLED COURT:

22 PLEASE TAKE NOTICE THAT Defendant Clif Bar & Company (“Defendant” or “Clif Bar”) hereby removes to this Court the state court action described below.

23 1. On March 4, 2016, an action was commenced in the Superior Court of the State of  
24 California in and for the County of San Francisco, entitled *Greg Perieff and Linda Cheslow, on behalf of*  
25 *themselves and all others similarly situated v. Clif Bar & Company, a California corporation*, and  
26 assigned the case number CGC-16-550801. The Complaint is attached hereto as Exhibit A.

27 2. The first date upon which Defendant received a copy of the Summons and Complaint was  
28 March 8, 2016, when Defendant was served by personal delivery with the Complaint, two versions of the

1 Summons (one version dated “3/8/16,” and the other version undated and in a different handwriting), and  
2 “Other Service Documents” consisting of: a Civil Case Cover Sheet; a Notice To Plaintiff; an Alternative  
3 Dispute Resolution Notice Information Package; a blank form Stipulation To Alternative Dispute  
4 Resolution (ADR); and a blank form Case Management Statement. A copy of both versions of the  
5 Summons are attached hereto as Exhibit B; a copy of the Other Service Documents are attached as  
6 Exhibit C. Because Defendant received the Complaint and Summonses on March 8, 2016, removal is  
7 therefore timely pursuant to 28 U.S.C. Section 1446(b).

8 3. This action is a civil action over which this Court has original jurisdiction pursuant to 28  
9 U.S.C. Section 1331, and is one which may be removed to this Court by Defendant pursuant to the  
10 provisions of 28 U.S.C. Section 1441(a) regarding original (federal question) jurisdiction. Plaintiffs’  
11 state-law claims necessarily raise stated federal issues, actually disputed and substantial, which a federal  
12 forum may entertain without disturbing any congressionally approved balance of federal and state  
13 judicial responsibilities. *Grable & Sons Metal Products, Inc. v. Darue Engineering & Mfg.*, 545 U.S.  
14 308, 314 (2005). The gravamen of plaintiffs’ state-law consumer deception claims is whether Clif Bar’s  
15 alleged “essential to health” and “nutritious,” “wholesome,” or “good for your body” label claims  
16 associated with nutrient content statements fail to comply with the federal Food, Drug, and Cosmetic Act  
17 of 1938 (“FDCA”), 21 U.S.C. §§ 301-399f, and applicable U.S. Food and Drug Administration’s  
18 (“FDA”) regulations, including advisory statements by FDA in 1994 regarding its then interpretation of  
19 applicable regulations. *See* Complaint, ¶2, *citing* Food Labeling: Nutrient Content Claims, Definition of  
20 Term: Healthy, 59 Fed. Reg. 24232 (May 10, 1994).

21 4. Regarding Clif Bar’s supposed use of the term “health” in connection with nutrient  
22 content label statements (*e.g.*, “essential for women’s health” used in association with “12g Protein”), for  
23 example, Plaintiffs allege violations of no fewer than 13 separate FDA regulations [(21 C.F.R. §§  
24 101.9(c)(8)(ii), 101.9(c)(8)(iv), 101.12(b), 101.13(b), 101.13(b)(2)(ii), 101.62(b)(2), 101.62(c)(2),  
25 101.65(d), 101.65(d)(1)(i-ii), 101.65(d)(2), 101.65(d)(2)(i), 101.65(d)(2)(i)(A-E), and  
26 101.65(d)(2)(i)(F)]; and five distinct United States Code provisions (21 U.S.C. §§ 331(a), 343(a)(1),  
27 343(q)(1)(D), 343(r), and 343(r)(1)(A)). Plaintiffs claim deception in that had they known that levels of  
28 total fat and saturated fat allegedly exceeded levels permitted by these FDA regulations for use of the

1 challenged “health” nutrient content claims, they allegedly would not have bought the product, would  
2 have bought fewer items, etc. These regulations were promulgated as part of the federal Nutrition  
3 Labeling and Education Act of 1990 (“NLEA”), as amendments to the FDCA.

4 5. Congress enacted NLEA to “provide for *national uniformity* in nutritional labeling on  
5 food products supplied to consumers.” *See* Remarks of Rep. McMillan, 136 Cong. Rec. 5836-01, 1990  
6 WL 107635 at 23 (daily ed. July 30, 1990) (debate on H.R. No. 3562, 101st Cong., 2d Sess.) (emphasis  
7 supplied). Moreover, NLEA expressly preempts any state law that “is not identical to” the  
8 aforementioned FDCA provisions and FDA “healthy” nutrient content regulations. 21 U.S.C. § 343-1(r).  
9 Together, the plain language of NLEA evinces Congress’ intent to create a “national,” “uniform” set of  
10 *federal* law governing nutrient content declarations on food labels, since one obviously cannot know  
11 whether state law is “identical to” federal law without interpreting and applying federal law.

12 6. For purposes of determining original jurisdiction in this Court, therefore, Plaintiffs’ claims  
13 necessarily “arise under” federal law, actually stated and disputed, as evidenced by the many federal law  
14 references in Plaintiffs’ Complaint. Congress’ decision to ensure that federal law effectively governs  
15 nutrient content labeling is the necessary result of its desire for “national uniformity” in the regulation of  
16 nutrition labeling on food products. Indeed, there is no California state law governing nutrient content  
17 labeling other than the one-sentence adoption of federal law in the California Health & Safety Code. Cal.  
18 Health & Safety Code §110670.

19 7. Clif Bar products – including the ones challenged here – enjoy nationwide distribution in  
20 every sales channel. A California state court’s interpretation and application of complex federal nutrient  
21 content regulations could serve as precedent for all food products nationwide, which hardly promotes  
22 “national uniformity.” Such state-law claims indisputably require reference exclusively to federal law to  
23 ensure that state law is “identical to” federal law.

24 8. Put another way, Plaintiffs’ state-law claims cannot be resolved without interpretation and  
25 application of federal law. Therefore, Plaintiffs’ claims “arise under” federal law, and should be heard in  
26 a federal court to ensure “national uniformity.” *See Cnty. Of Santa Clara v. Astra USA, Inc.*, 401 F.  
27 Supp. 2d 1022, 1025 (N.D. Cal. 2005) (denying motion to remand involving Section 17200 state-law  
28 claims based on violation of federal price limitations on prescription medications because “federal law

1 undergirds a claim otherwise based in state law”). The exercise of “arising under” original jurisdiction in  
2 this Court thus hardly would constitute “disturbing any congressionally approved balance of federal and  
3 state judicial responsibilities,” since national uniformity is promoted with the interpretation and  
4 application of federal law *in a federal forum*. See *Grable & Sons, supra*, 545 U.S. at 314.

5 9. A closer examination of Plaintiffs’ state-law claims supports the foregoing conclusions.  
6 For example, as the predicate acts for their claims under Sections 17200 and 17500 of California Unfair  
7 Competition Law, and Section 1770 of California’s Consumer Legal Remedies Act, Plaintiffs aver that  
8 Clif Bar’s use of the term “health” associated with nutrient content claims as to certain products violates  
9 numerous FDCA statutory provisions and FDA regulations. However, more than half of the nutrient  
10 content claims challenged by Plaintiffs do not use the term “health” or “healthy” at all, as alleged by  
11 Plaintiffs, but rather “wholesome,” “nutritious,” and/or “good for the body” that are not addressed in any  
12 federal statute or regulation.

13 10. Instead, Plaintiffs claim that these “wholesome” claims violate FDA “healthy” nutrient  
14 content regulations because in 1994, in an advisory statement to the final rule on “healthy” nutrient  
15 content claims, FDA in the Federal Register equated such “wholesome” terms with “healthy.” Such  
16 advisory statements do not have the force of law, were not incorporated into California law, and will  
17 require a California state court to declare whether this advisory statement applies to the products  
18 challenged here, or even reflects the agency’s current interpretation of the “healthy” nutrient content  
19 regulations. A federal court can and should exercise its “arising under” original jurisdiction over these  
20 claims to divine current agency interpretation, if that is relevant at all, particularly where such a  
21 determination could serve as a national precedent for the national food distribution system.

22 11. Venue is proper in this Court pursuant to 28 U.S.C. Sections 1441 (a) and 1446(a) because  
23 the U.S. District Court for the Northern District of California is the federal judicial district embracing the  
24 Superior Court for the State of California, San Francisco County, where the state court action was  
25 originally filed.

26 12. Defendant Clif Bar & Company is the only Defendant named in the operative complaint;  
27 thus, there is no disagreement among Defendants about the decision to remove this case to the United  
28 States District Court.



1           13. Pursuant to 28 U.S.C. Section 1446(a), a true and correct copy of all the process,  
2 pleadings, and orders served upon Defendant Clif Bar & Company in the state court action are being  
3 filed with this Notice of Removal.

4           14. Attached as Exhibit D are the Proof of Service – Summons, and Proof of Service – By  
5 mail, served on Clif Bar on March 8, 2016.

6           15. Attached as Exhibit E is Plaintiffs’ Application for Complex Case Designation, filed in  
7 the Superior Court in and for the County of San Francisco on April 5, 2016, with exhibits.

8 Dated: April 6, 2016

KELLER AND HECKMAN, LLP

9  
10 By: \_\_\_\_\_/s/  
11 Christopher Van Gundy  
12 Attorneys for Defendant Clif Bar & Company

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27 **AND THE PROPOSED CLASSES**

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN FRANCISCO

GREG PERIEFF and LINDA CHESLOW,  
on behalf of themselves and all others  
similarly situated,

Plaintiffs,

vs.

CLIF BAR & COMPANY, a California  
corporation,

Defendant.

ENDORSED  
FILED  
Superior Court of California  
County of San Francisco

MAR - 4 2016

CLERK OF THE COURT  
BY: BOWMAN LIU  
Deputy Clerk

CASE NO.: CGC-16-550801

CLASS ACTION

**CLASS ACTION COMPLAINT FOR  
DAMAGES, DECLARATORY AND  
INJUNCTIVE RELIEF**

**DEMAND FOR JURY TRIAL**

1 Plaintiffs Greg Perieff and Linda Cheslow (“Plaintiffs”), by their attorneys, bring this class  
2 action against Defendant Clif Bar & Company (“Defendant” or “Clif”) individually and on behalf of  
3 themselves and all others similarly situated and allege as follows based upon the investigation of  
4 their counsel:

### 5 INTRODUCTION

6 1. This is a consumer class action seeking damages, restitution, declaratory, and  
7 injunctive relief on behalf of California consumers against Clif based on Clif’s unlawful labeling,  
8 sales, and distribution of mislabeled and misbranded LUNA brand energy and protein bars  
9 (collectively, “LUNA Bars”)<sup>1</sup> and CLIF brand energy and protein bars (collectively, “CLIF Bars”)<sup>2</sup>

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12 <sup>1</sup> Plaintiffs’ counsel’s pre-suit investigation identified the following LUNA Bars currently being  
13 offered for sale that are subject to this action: LUNA Whole Nutrition Bars in these varieties  
14 (Blueberry Bliss, Caramel Nut Brownie, Chocolate Cupcake, Chocolate Dipped Coconut, Chocolate  
15 Peppermint Stick, Honey Salted Peanut, Iced Oatmeal Raisin, Lemon Zest, Nutz over Chocolate,  
16 Peanut Butter Cookie, S’mores, Vanilla Almond, and White Chocolate Macadamia) identified in  
17 Exhibit A hereto and LUNA Protein Bars in these varieties (Chocolate Chip Cookie Dough,  
18 Chocolate Coconut Almond, Chocolate Peanut Butter, Chocolate Salted Caramel, Lemon Vanilla,  
19 Mint Chocolate Chip, and Berry Greek Yogurt) identified in Exhibit B hereto. The LUNA Bars are  
20 offered for sale individually and in differently sized multicount boxes (e.g., 6-count boxes or 12-  
21 count boxes). The LUNA Bars’ label statements as discussed in this Complaint are uniform on both  
22 the LUNA Bars’ individual labels and the differently sized multicount boxes. Furthermore, the  
23 multicount boxes contain LUNA Bars bearing the individual LUNA Bars’ labels identified in  
24 Exhibits A and B. Plaintiffs reserve the right to amend this Complaint to add additional Clif  
25 products that violate California law in the same ways alleged herein that Plaintiffs identify through  
26 further investigation or discovery.

27 <sup>2</sup> Plaintiffs’ counsel’s pre-suit investigation identified the following CLIF Bars currently being  
28 offered for sale that are subject to this action: CLIF Kid Organic Zbars in these varieties (Chocolate  
Brownie, Chocolate Chip, Iced Lemon Cookie, Iced Oatmeal Cookie, and S’mores) identified in  
Exhibit C hereto, CLIF Kid Protein Zbars in these varieties (Chocolate Chip, Chocolate Mint, and  
Peanut Butter Chocolate) identified in Exhibit D hereto, CLIF MOJO Sweet and Salty Trail Mix  
Bars (Dark Chocolate Almond Coconut, Mountain Mix, and Peanut Butter Pretzel) identified in  
Exhibit E hereto, and CLIF Organic Trail Mix Bars (Dark Chocolate Almond Sea Salt, Dark  
Chocolate Cherry Almond, Dark Chocolate Peanut Butter, Dark Chocolate Pomegranate Raspberry,  
Cranberry Almond, Wild Blueberry Almond, and Coconut Almond Peanut) identified in Exhibit F  
hereto. The CLIF Bars are offered for sale individually and in differently sized multicount boxes  
(e.g., 6-count boxes or 12-count boxes). The CLIF Bars’ label statements as discussed in this  
Complaint are uniform on both the CLIF Bars’ individual labels and the differently sized multicount  
boxes. Furthermore, the multicount boxes contain CLIF Bars bearing the individual CLIF Bars’  
labels identified in Exhibits C, D, E, and F. Plaintiffs reserve the right to amend this Complaint to  
add additional Clif products that violate California law in the same ways alleged herein that  
Plaintiffs identify through further investigation or discovery.

1 in California. Clif holds itself out as the leading purveyor of “health and lifestyle bars,”<sup>3</sup> but the  
2 reality is that Clif misleads consumers by misrepresenting that its LUNA Bars and CLIF Bars are  
3 healthy and contain a nutrient profile consistent with dietary recommendations when, in fact, they do  
4 not meet the requirements for making such claims in violation of the Federal Food, Drug, and  
5 Cosmetic Act of 1938 (“FDCA”), 21 U.S.C. §§ 301–399f, the U.S. Food and Drug Administration’s  
6 (“FDA”) regulations implementing the FDCA, and California’s Sherman Food, Drug and Cosmetic  
7 Law (“Sherman Law”), Cal. Health & Safety Code §§ 109875–111915. Notably, the Sherman Law  
8 adopts all FDA food-labeling regulations promulgated pursuant to the FDCA. Cal. Health & Safety  
9 Code § 110100(a).

10       2.       The FDA, after extensive fact-finding, determined that labeling claims representing  
11 that foods are healthy and contain beneficial nutrients (as defined herein, “Healthy Nutrient Content  
12 Claims”) convey a potent message to consumers that the products are useful in maintaining a healthy  
13 diet. *See* 59 Fed. Reg. 24,232-01, 24,233. In other words, based on its examination of consumer  
14 data, the FDA determined that consumers interpret Healthy Nutrient Content Claims to mean that a  
15 food has a nutrient profile consistent with dietary recommendations. To ensure that consumers are  
16 not deceived or misled by labeling that represents food as being healthy, the FDA promulgated  
17 regulations including, *inter alia*, 21 C.F.R. § 101.65(d), that allow Healthy Nutrient Content Claims  
18 to be made only on food products that satisfy a specific nutrient profile. None of Clif’s LUNA Bars  
19 or CLIF Bars at issue satisfy that required nutrient profile.

20       3.       Specifically, 21 C.F.R. § 101.65(d) requires that foods whose labels make Healthy  
21 Nutrient Content Claims contain no more than minimal levels of total fat and saturated fat. Foods  
22 with Healthy Nutrient Content Claims in violation of this regulation by extension violate the FDCA,  
23 21 U.S.C. §§ 343(a)(1) & (r), and the Sherman Law, Cal. Health & Safety Code §§ 109930,  
24 110100(a) & 110670.

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<sup>3</sup> Clif Bar & Co., The Clif Bar & Company Story, [http://www.clifbar.com/article/  
28 clif\\_bar\\_company\\_story](http://www.clifbar.com/article/clif_bar_company_story) (emphasis added).

1           4.       This case concerns Clif’s ongoing use of Healthy Nutrient Content Claims on the  
2 labels of its LUNA Bars and CLIF Bars containing higher levels of total fat and/or saturated fat than  
3 is consistent with dietary recommendations in violation of 21 C.F.R. § 101.65(d), the FDCA, and the  
4 Sherman Law.

5           5.       The representations that Clif’s LUNA Bars and CLIF Bars are healthy are false,  
6 misleading, and material to consumers’ decisions to purchase Clif’s LUNA Bars and CLIF Bars.

7           6.       Clif’s conduct alleged herein is false, misleading, and unlawful in violation of the  
8 following provisions of California’s Sherman Law: Cal. Health & Safety Code § 110660  
9 (prohibiting false and misleading labeling), § 110670 (prohibiting nutrient content claims not  
10 allowable under FDCA and FDA regulations), § 110760 (prohibiting manufacture, sale, delivery,  
11 etc. of misbranded food), and §§ 109930 and 110100(a) (adopting FDCA regulations violated as  
12 described below), as well as other applicable state consumer laws. Clif’s identical conduct that  
13 violates the Sherman Law and other applicable state laws also violates the FDCA, 21 U.S.C.  
14 § 343(a)(1) (prohibiting false and misleading labeling), § 343(r) (prohibiting nutrient content claims  
15 not defined by FDA regulations), and § 331(a) (prohibiting introduction or delivery for introduction  
16 into interstate commerce of misbranded food). This identical conduct serves as the sole factual basis  
17 for each state-law cause of action brought by this Complaint, and Plaintiffs do not seek to enforce  
18 any of the state-law claims raised herein to impose any standard of conduct that exceeds that which  
19 would violate the FDCA and regulations adopted pursuant thereto. Thus, Plaintiffs’ state-law claims  
20 for state-law violations seek to enforce the same standard of conduct required by federal law, and  
21 Plaintiffs’ state-law claims are based upon Clif’s breach of that standard of conduct. For any of  
22 Plaintiffs’ state-law causes of action, the allegations supporting those causes of action and any forms  
23 of relief sought for those state-law causes of action, Plaintiffs expressly disclaim any attempt to hold  
24 Clif to a higher standard of conduct than what is required under federal law and do not seek any  
25 form of relief based on conduct exceeding that which is required under federal law. All state-law  
26 causes of action asserted in this Complaint, the allegations supporting those state-law causes of  
27 action asserted herein, and any forms of relief sought for those state-law causes of action asserted  
28 herein shall be read consistent with the limitations set forth in this paragraph.

7. Accordingly, Plaintiffs bring this action on behalf of California consumers to declare that Clif’s LUNA Bars and CLIF Bars are misbranded and to enjoin Clif from continuing to sell the LUNA Bars and CLIF Bars in California in a manner that violates 21 C.F.R. § 101.65(d), the FDCA, and the Sherman Law, and mislead consumers, through their improper use of Healthy Nutrient Content Claims (as more fully defined herein, the “LUNA Bars Declaratory/Injunctive Class” and the “CLIF Bars Declaratory/Injunctive Class”), and to recover damages and restitution on behalf of California consumers who purchased Clif’s LUNA Bars and CLIF Bars in California (as more fully defined herein, the “LUNA Bars Damages Class” and the “CLIF Bars Damages Class”).

**THE PARTIES**

8. Plaintiff Greg Perieff is a natural person and a citizen of the State of California, residing in San Francisco County. Between February 2013 and September 2015, Plaintiff Perieff purchased the following CLIF Bars:

- a. CLIF Kid Organic Chocolate Brownie Zbar;
- b. CLIF Kid Organic Chocolate Chip Zbar;
- c. CLIF Kid Organic Iced Lemon Cookie Zbar;
- d. CLIF Kid Organic Iced Oatmeal Cookie Zbar;
- e. CLIF Kid Organic S’mores Zbar;
- f. CLIF Kid Chocolate Chip Protein Zbar;
- g. CLIF Kid Chocolate Mint Protein Zbar;
- h. CLIF Kid Peanut Butter Chocolate Protein Zbar;
- i. CLIF MOJO Sweet and Salty Dark Chocolate Almond Coconut Trail Mix Bar;
- j. CLIF MOJO Sweet and Salty Mountain Mix Trail Mix Bar; and
- k. CLIF MOJO Sweet and Salty Peanut Butter Pretzel Trail Mix Bar.

Plaintiff Perieff purchased these CLIF Bars from retail stores, including Target, near his home in San Francisco, California; Target in Colma, California; and Walmart in Sonora, California. Plaintiff Perieff purchased approximately one to two multicount boxes of Clif’s CLIF MOJO Sweet and Salty Trail Mix Bars for himself every month between February 2013 and September 2013. In addition, Plaintiff Perieff purchased approximately one to two multicount boxes of Clif’s CLIF Kid Organic



1 Zbars and CLIF Kid Protein Zbars every month between February 2013 and September 2013.  
2 Furthermore, Plaintiff Perieff purchased approximately one to two multicount boxes of Clif's CLIF  
3 Kid Organic Zbars and CLIF Kid Protein Zbars every two months between January 2014 and  
4 September 2015. Plaintiff Perieff purchased Clif's CLIF Kid Organic Zbars and CLIF Kid Protein  
5 Zbars for his young cousins, whom he regularly babysat in 2013, and with whom he regularly  
6 attends family events. Clif's CLIF MOJO Sweet and Salty Trail Mix Bars that Plaintiff Perieff  
7 purchased all bore Healthy Nutrient Content Claims because they were labeled as containing  
8 nutrients that are "good for . . . our bodies," together with one or more nutrient statements (e.g., "8g  
9 Protein" or "3g Fiber"). Clif's CLIF Kid Organic Zbars and CLIF Kid Protein Zbars that Plaintiff  
10 Perieff purchased all bore Healthy Nutrient Content Claims because they were labeled as being  
11 "nutritious" and/or "wholesome," and/or containing ingredients "to keep kids . . . growing," together  
12 with one or more nutrient statements (e.g., "3g Fiber," "5g Protein," or "Excellent Source of  
13 Calcium"). Plaintiff Perieff read and relied on the Healthy Nutrient Content Claims displayed on the  
14 labeling of the CLIF Bars that he purchased and understood the Healthy Nutrient Content Claims as  
15 indicating that the CLIF Bars would help him or his young cousins maintain healthy dietary  
16 practices because of their nutrient content. In fact, the labeling of Clif's CLIF Bars reinforces the  
17 impression that the product lines are all healthy and nutritious when, in reality, they all fail to meet  
18 the regulatory requirements to make such claims. Had Plaintiff Perieff known the truth that the  
19 CLIF Bars' Healthy Nutrient Content Claims violated the FDA's requirements because the CLIF  
20 Bars had more total fat and/or saturated fat than permitted for products making Healthy Nutrient  
21 Content Claims, this would have materially affected his purchasing considerations in at least one of  
22 the following ways, namely Plaintiff Perieff: (i) would not have purchased the CLIF Bars; (ii) would  
23 have been willing to pay less for the CLIF Bars that he purchased; (iii) would have purchased a  
24 lesser quantity of the CLIF Bars that he purchased; (iv) would have purchased alternative products  
25 that he felt were truly useful in maintaining healthy dietary practices; and/or (v) would have  
26 purchased a similar product that was less expensive.

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1           9. Plaintiff Linda Cheslow is a natural person and a citizen of the State of California,  
2 residing in Sonoma County. Between February 2013 and December 2015, Plaintiff Cheslow  
3 purchased the following LUNA Bars and CLIF Bars:

- 4           a. LUNA Whole Nutrition Bars Caramel Nut Brownie;
- 5           b. LUNA Whole Nutrition Bars Chocolate Cupcake;
- 6           c. LUNA Whole Nutrition Bars Chocolate Dipped Coconut;
- 7           d. LUNA Whole Nutrition Bars Honey Salted Peanut;
- 8           e. LUNA Whole Nutrition Bars Iced Oatmeal Raisin;
- 9           f. LUNA Whole Nutrition Bars Nutz over Chocolate;
- 10          g. LUNA Whole Nutrition Bars S'mores;
- 11          h. LUNA Whole Nutrition Bars Vanilla Almond;
- 12          i. LUNA Whole Nutrition Bars White Chocolate Macadamia;
- 13          j. LUNA Protein Bars Chocolate Chip Cookie Dough;
- 14          k. LUNA Protein Bars Chocolate Coconut Almond;
- 15          l. LUNA Protein Bars Chocolate Salted Caramel;
- 16          m. LUNA Protein Bars Mint Chocolate Chip;
- 17          n. CLIF MOJO Sweet and Salty Dark Chocolate Almond Coconut Trail Mix  
18 Bar;
- 19          o. CLIF MOJO Sweet and Salty Mountain Mix Trail Mix Bar;
- 20          p. CLIF Dark Chocolate Almond Sea Salt Organic Trail Mix Bar;
- 21          q. CLIF Dark Chocolate Cherry Almond Organic Trail Mix Bar;
- 22          r. CLIF Dark Chocolate Pomegranate Raspberry Organic Trail Mix Bar;
- 23          s. CLIF Cranberry Almond Organic Trail Mix Bar; and
- 24          t. CLIF Coconut Almond Peanut Organic Trail Mix Bar.

25 Plaintiff Cheslow purchased these LUNA Bars and CLIF Bars from retail stores including Target,  
26 Whole Foods, Safeway, Raley's, and Grocery Outlet near her home in Santa Rosa, California, as  
27 well as from retail stores including Safeway in San Francisco, California. When shopping near her  
28 home in Santa Rosa, California, Plaintiff Cheslow purchased approximately two to three of Clif's

1 LUNA Bars every week between February 2013 and September 2015, and approximately one of  
2 Clif's CLIF Bars every one to two weeks between February 2013 and December 2015. When  
3 shopping in San Francisco, California, Plaintiff Cheslow purchased approximately one of Clif's  
4 LUNA Bars every two months between February 2013 and December 2015, and approximately three  
5 of Clif's CLIF Bars every year between February 2013 and December 2015. In addition, when  
6 shopping near her home in Santa Rosa, California, Plaintiff Cheslow purchased one multicount box  
7 of Clif's LUNA Bars approximately every year between February 2013 and September 2015, and  
8 approximately one to two multicount boxes of Clif's CLIF Bars every year between February 2013  
9 and December 2015. Clif's LUNA Bars that Plaintiff Cheslow purchased all bore Healthy Nutrient  
10 Content Claims because they were labeled as being "Whole Nutrition Bar[s] for Women,"  
11 containing nutrients "essential to women's health" and/or "importan[t] to many women seeking to  
12 maintain their health," and/or providing "the nutrition we [women] need to stay strong," together  
13 with one or more nutrient statements (e.g., "9g Protein" or "4g Fiber"). Clif's CLIF Bars that  
14 Plaintiff Cheslow purchased all bore Healthy Nutrient Content Claims because they were labeled as  
15 being "good for . . . our bodies," together with one or more nutrient statements (e.g., "8g Protein" or  
16 "3g Fiber"). Plaintiff Cheslow read and relied on the Healthy Nutrient Content Claims displayed on  
17 the labeling of the LUNA Bars and CLIF Bars that she purchased and understood the Healthy  
18 Nutrient Content Claims as indicating that the LUNA Bars and CLIF Bars would help her maintain  
19 healthy dietary practices because of their nutrient content. In fact, the labeling of Clif's LUNA Bars  
20 and CLIF Bars reinforces the impression that the product lines are all healthy and nutritious when, in  
21 reality, they all fail to meet the regulatory requirements to make such claims. Had Plaintiff Cheslow  
22 known the truth that the LUNA Bars' and CLIF Bars' Healthy Nutrient Content Claims violated the  
23 FDA's requirements because the LUNA Bars and CLIF Bars had more total fat and/or saturated fat  
24 than permitted for products making Healthy Nutrient Content Claims, this would have materially  
25 affected her purchasing considerations in at least one of the following ways, namely Plaintiff  
26 Cheslow: (i) would not have purchased the LUNA Bars and CLIF Bars; (ii) would have been willing  
27 to pay less for the LUNA Bars and CLIF Bars that she purchased; (iii) would have purchased lesser  
28 quantities of the LUNA Bars and CLIF Bars that she purchased; (iv) would have purchased

1 alternative products that she felt were truly useful in maintaining healthy dietary practices; and/or  
2 (v) would have purchased a similar product that was less expensive.

3 10. Defendant Clif Bar & Company is and at all material times has been a California  
4 corporation with its headquarters in Emeryville, California.<sup>4</sup> Clif manufactures a variety of energy  
5 and protein bars and touts itself as “a category leader among health and lifestyle bars,” having  
6 experienced “double-digit, compounded annual growth for the past 10 years.”<sup>5</sup> Apart from the  
7 LUNA Bars’ labeling as described throughout this Complaint, Clif promotes its LUNA Bars as  
8 providing nutrients, including calcium, iron, folic acid, and Vitamin D, that are essential to women’s  
9 health.<sup>6</sup> In addition, apart from the CLIF Bars’ labeling as described throughout this Complaint, Clif  
10 promotes its CLIF Kid Organic Zbars and CLIF Kid Protein Zbars as containing nutrients  
11 particularly beneficial to children to help them grow.<sup>7</sup> Finally, apart from the CLIF Bars’ labeling as  
12 described throughout this Complaint, Clif promotes its MOJO Sweet and Salty Trail Mix Bars and  
13 CLIF Organic Trail Mix Bars as being good for consumers’ bodies.<sup>8</sup> Clif was reported to be valued  
14 at \$340 million in April 2013.<sup>9</sup>

15 \_\_\_\_\_  
16 <sup>4</sup> Cal. Sec’y of State, Business Search, <http://kepler.sos.ca.gov/> (search “Corporation Name” for  
“Clif Bar & Company”; then follow “CLIF BAR & COMPANY” hyperlink).

17 <sup>5</sup> Clif Bar & Co., The Clif Bar & Company Story, [http://www.clifbar.com/article/  
18 clif\\_bar\\_company\\_story](http://www.clifbar.com/article/clif_bar_company_story) (emphasis added).

19 <sup>6</sup> See, e.g., Clif Bar & Co., LUNA Feeds Women’s Need for a Nutritious and Indulgent Snack with  
20 New LUNA Protein Flavors, Jan. 14, 2014, [http://www.clifbar.com/text/lunar-feeds-womens-need-  
21 for-a-nutritious-and-indulgent-snack-with-new-luna-protein-flavors](http://www.clifbar.com/text/lunar-feeds-womens-need-for-a-nutritious-and-indulgent-snack-with-new-luna-protein-flavors) (“LUNA nourishes women with  
delicious snacks made from 70 percent organic ingredients and with the CORE 4 vitamins and  
minerals essential to women’s health—calcium, iron, folic acid and vitamin D.”) (emphasis added).

22 <sup>7</sup> See, e.g., Clif Bar & Co., Clif Kid Zbar, <http://www.clifbar.com/products/clif-kid/zbar> (“An  
23 organic baked whole grain snack made with a nutritious blend of carbohydrates, fiber, protein, and  
fat to maintain kids’ energy . . . so kids can keep zipping and zooming along.”); Clif Bar & Co.,  
24 Zbar Protein, <http://www.clifbar.com/products/clif-kid/zbar-protein> (“A delicious whole grain  
protein snack made with nutritious building blocks for kids’ growing bodies . . . so kids can keep  
zipping and zooming along.”) (All emphasis added).

25 <sup>8</sup> See, e.g., Clif Bar & Co., CLIF Mojo Sweet & Salty Trail Mix Bar, [http://www.clifbar.com/  
26 products/mojo/sweet-salty](http://www.clifbar.com/products/mojo/sweet-salty) (“Ready to go whenever and wherever you are, CLIF MOJO combines  
simple and organic ingredients that are good for both our bodies and the planet.”); Clif Bar & Co.,  
27 CLIF Organic Trail Mix Bar – Dark Chocolate, [http://www.clifbar.com/  
28 products/organic-trail-mix-bar/dark-chocolate](http://www.clifbar.com/products/organic-trail-mix-bar/dark-chocolate) (“CLIF Organic Trail Mix Bar is made for mixing it up and discovering all the  
good stuff the day has to offer. Combining simple and organic ingredients that are good for both  
our bodies and the planet, our trail mix bar comes in flavors for just about every occasion no matter

**JURISDICTION AND VENUE**

1  
2 11. This Court has jurisdiction over the parties, and venue is proper in San Francisco  
3 County Superior Court.

4 12. This Court has jurisdiction and venue pursuant to Cal. Civ. Proc. Code §§ 395.5 &  
5 410.10 and Cal. Civ. Code § 1780(d) over the claims raised in this Complaint for the following  
6 reasons: (i) Clif regularly sells, advertises, markets, and/or distributes the LUNA Bars and CLIF  
7 Bars in San Francisco County and throughout the State of California; (ii) a substantial portion of the  
8 underlying transactions and events complained of herein occurred and affected persons and entities  
9 that reside in San Francisco County; (iii) Plaintiffs are citizens and residents of California;  
10 (iv) Plaintiff Perieff resides in San Francisco County; and (v) Plaintiffs each purchased Clif products  
11 at issue in this Complaint in California, including San Francisco County. Attached hereto as Exhibit  
12 G are Plaintiffs’ declarations establishing that venue is appropriate in San Francisco County pursuant  
13 to Cal. Civ. Code § 1780(d).

14 13. There is no jurisdiction in any U.S. District Court over the claims raised in this  
15 Complaint. There is no “federal question” U.S. District Court jurisdiction because Plaintiffs’ claims  
16 do not arise under the Constitution, laws, or treaties of the United States. 28 U.S.C. § 1331. There  
17 is no U.S. District Court jurisdiction under the general “diversity of citizenship” statute because  
18 Plaintiffs, members of the Classes, and Clif are, and at the times of the transactions at issue were,  
19 California citizens. 28 U.S.C. § 1332(a)(1). There is no U.S. District Court jurisdiction under the  
20 Class Action Fairness Act of 2005 (“CAFA”), Pub. Law No. 109-2, 119 Stat. 4 (2005), because no  
21 member of the Classes is a citizen of a state different from Clif since Clif, Plaintiffs, and members of  
22 the Classes are, and at the times of the transactions at issue were, California citizens. 28 U.S.C.  
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24 where the trail takes you.”); Clif Bar & Co., CLIF Organic Trail Mix Bar – Fruit & Nut,  
25 <http://www.clifbar.com/products/organic-trail-mix-bar/fruit-nut> (“CLIF Organic Trail Mix Bar is  
26 made for mixing it up and discovering all the good stuff the day has to offer. Combining simple and  
organic ingredients that are ***good for both our bodies*** and the planet, our trail mix bar comes in  
flavors for just about every occasion no matter where the trail takes you.”) (All emphasis added).

27 <sup>9</sup> Matt Villano, “Clif Bar Founders Get into Venture Capital,” Entrepreneur Media, Inc., Apr. 15,  
28 2013, <http://www.entrepreneur.com/article/225819>.

1 § 1332(d)(2). If Clif contends that jurisdiction is appropriate under the CAFA as a threshold matter,  
2 U.S. District Court jurisdiction still is lacking because the mandatory exceptions codified at 28  
3 U.S.C. § 1332(d)(4)(A) and (B) apply because (a) greater than two-thirds of the members of the  
4 Classes are California citizens (and were California citizens at the times of the transactions at issue),  
5 Clif is the sole defendant from whom significant relief is sought by members of the Classes, Clif's  
6 alleged conduct forms a significant basis for the claims asserted by the Classes, Clif is a California  
7 citizen (and was a California citizen at the times of the transactions at issue), and no other class  
8 action has been filed concerning Clif's use of Healthy Nutrient Content Claims in the last three  
9 years; and/or (b) at least two-thirds of the members of the Classes and Clif are California citizens  
10 (and were California citizens at the times of the transactions at issue).

11  
12 **CALIFORNIA AND FEDERAL LAW DEFINE NUTRIENT CONTENT CLAIMS**  
13 **AND PROHIBIT THEIR USE ON FOODS' LABELS**  
14 **EXCEPT WHERE EXPRESSLY APPROVED BY THE FDA**

15 14. The FDCA provides that a food is "misbranded," among other things, "if its labeling  
16 is false or misleading in any particular," or if it bears an unauthorized "nutrient content claim." 21  
17 U.S.C. § 343 (a)(1) & (r). The FDCA and California law prohibit selling or distributing misbranded  
18 food. *Id.* § 331(a); Cal. Health & Safety Code § 110760. California's Sherman Law incorporates all  
19 of the FDA's food-labeling regulations promulgated pursuant to the FDCA. Cal. Health & Safety  
20 Code § 110100(a).

21 15. The FDCA and California Law prohibit all nutrient content claims on foods' labels or  
22 labeling, except those that the FDA has expressly authorized by regulation (or which are otherwise  
23 exempted). 21 U.S.C. § 343(r)(1)(A); *see also* 56 Fed. Reg. 60,421-01, 60,422 ("This provision [21  
24 U.S.C. § 343(r)(1)(A)] states that a food is misbranded if it bears a claim in its label or labeling that  
25 either expressly or implicitly characterizes the level of any nutrient of the type required to be  
26 declared as part of nutrition labeling, unless such claim has been specifically defined (or otherwise  
27 exempted) by regulation."); Cal Health & Safety Code § 110670 ("Any food is misbranded if its  
28 labeling does not conform with the requirements for nutrient content or health claims as set forth in  
Section 403(r) (21 U.S.C. Sec. 343(r)) of the [FDCA] and the regulations adopted pursuant thereto.")

1           16.     A “nutrient content claim,” whether express or implied, is any statement on a food’s  
2 label or labeling that characterizes the level of certain nutrients. 21 C.F.R. § 101.13(b). One type of  
3 “implied nutrient content claim” is a statement suggesting that a food, because of its nutrient content,  
4 may be useful in maintaining healthy dietary practices and made in association with an explicit claim  
5 or statement about a nutrient (e.g., “healthy, contains 3 grams of fat”). *Id.* § 101.13(b)(2)(ii).

6           17.     This case is about one specific type of implied nutrient content claim that utilizes the  
7 term “healthy,” its derivative “health,” or synonyms of “healthy” (“Healthy Nutrient Content  
8 Claims”). A Healthy Nutrient Content Claim is an implied nutrient content claim that: (1) is made in  
9 connection with an express or implied statement about a nutrient; (2) utilizes the term “healthy,” a  
10 derivative thereof, or a synonym thereof; and (3) suggests that a food may help consumers maintain  
11 healthy dietary practices because of its nutrient content (e.g., “healthy, contains 3 grams of fat”). *Id.*  
12 § 101.65(d)(1)(i)–(ii).

13           18.     Derivatives of “healthy” that may be used in Healthy Nutrient Content Claims include  
14 “health,” “healthful,” “healthfully,” “healthfulness,” “healthier,” “healthiest,” “healthily,” and  
15 “healthiness.” *Id.* § 101.65(d)(2).

16           19.     Synonyms of “healthy” that signify Healthy Nutrient Content Claims include  
17 “wholesome,” “nutritious,” “good for you,” and “food for today’s diet.” *See* 59 Fed. Reg. 24,232–  
18 01, 24,236.

19           20.     Pursuant to its statutory authority, the FDA, after notice and comment, promulgated  
20 21 C.F.R. § 101.65(d) governing Healthy Nutrient Content Claims. While its “under the hood”  
21 minutiae vary, the FDA’s rule is straightforward in application: Healthy Nutrient Content Claims  
22 may be made only by foods, among other things, not exceeding established maximum levels of total  
23 fat and saturated fat. 21 C.F.R. § 101.65(d)(2)(i).

24           21.     The minutiae of the Healthy Nutrient Content Claim requirements depend on the type  
25 of food making the claim. All of Clif’s LUNA Bars and CLIF Bars at issue in this case are subject  
26 to the FDA’s “catch-all” category (*id.* § 101.65(d)(2)(i)(F)) because they do not fall within any other  
27 specific category identified in 21 C.F.R. § 101.65(d)(2)(i)(A)–(E), i.e., they are not raw fruits or  
28 vegetables (*id.* at subsection (A)), frozen or canned fruits or vegetables (*id.* at subsection (B)),



1 enriched cereal-grain products (*id.* at subsection (C)), seafood or game meat (*id.* at subsection (D)),  
 2 or “meal products” or “main dish products”<sup>10</sup> (*id.* at subsection (E)).

3 22. As foods subject to the FDA’s “catch-all” category (*id.* § 101.65(d)(2)(i)(F)), the  
 4 Healthy Nutrient Content Claim requirements applicable to Clif’s LUNA Bars and CLIF Bars and  
 5 relevant to Plaintiffs’ claims are as follows:

- 6 a. Each LUNA Bar and CLIF Bar must meet the FDA’s definition for “low fat”  
 7 defined in 21 C.F.R. § 101.62(b)(2). Specifically, Clif’s LUNA Bars and CLIF  
 8 Bars must contain no more than 3 grams of fat per 40 grams of total weight. *See*  
 9 *id.* § 101.65(d)(2)(i)(F) (requiring “catch-all” foods to be “[l]ow fat as defined in  
 10 § 101.62(b)(2)”; *id.* § 101.62(b)(2) (defining “low fat” for foods whose reference  
 11 amounts customarily consumed (“RACCs”) are greater than 30 grams, in part, as  
 12 “contain[ing] 3 g or less of fat per reference amount customarily consumed”); *id.*  
 13 § 101.12(b) (providing RACC of 40 grams for “[g]rain-based bars with or without  
 14 filling or coating, e.g., breakfast bars, granola bars, rice cereal bars”); and
- 15 b. Each LUNA Bar and CLIF Bar must meet the FDA’s definition for “low saturated  
 16 fat” defined in 21 C.F.R. § 101.62(c)(2). Specifically, Clif’s LUNA Bars and  
 17 CLIF Bars must contain no more than 1 gram of saturated fat per 40 grams of  
 18 total weight. *See id.* § 101.65(d)(2)(i)(F) (requiring “catch-all” foods to be “[l]ow  
 19 saturated fat as defined in § 101.62(c)(2)”; *id.* § 101.62(c)(2) (defining “low  
 20 saturated fat,” except for meal products and main dish products, as “contain[ing] 1  
 21

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22 <sup>10</sup> None of Clif’s LUNA Bars or CLIF Bars are “meal products” or “main dish products” because no  
 23 LUNA Bar or CLIF Bar weighs at least six ounces per labeled serving. 21 C.F.R. § 101.13(l)(1)(i)  
 24 & (m)(1)(i); *see* Exhibit A, LUNA Whole Nutrition Bars’ Labels (identifying grams per labeled  
 25 serving in Nutrition Facts on back labels); Exhibit B, LUNA Protein Bars’ Labels (identifying grams  
 26 per labeled serving in Nutrition Facts on back labels); Exhibit C, CLIF Kid Organic Zbars’ Labels  
 27 (identifying grams per labeled serving in Nutrition Facts on back labels); Exhibit D, CLIF Kid  
 28 Protein Zbars’ Labels (identifying grams per labeled serving in Nutrition Facts on back labels);  
 Exhibit E, CLIF MOJO Sweet and Salty Trail Mix Bars’ Labels (identifying grams per labeled  
 serving in Nutrition Facts on back labels); Exhibit F, CLIF Organic Trail Mix Bars’ Labels  
 (identifying grams per labeled serving in Nutrition Facts on back labels); *see also* Wight Hat Ltd.,  
 Metric Conversions: Grams to Ounces, <http://www.metric-conversions.org/weight/grams-to-ounces.htm> (stating that one ounce is equal to 28.349 grams).



1 g or less of saturated fatty acids per reference amount customarily consumed”);  
2 *id.* § 101.12(b) (providing RACC of 40 grams for “[g]rain-based bars with or  
3 without filling or coating, e.g., breakfast bars, granola bars, rice cereal bars”).

4  
5 **THE FDA, AFTER FACT-FINDING, DETERMINED THAT**  
6 **HEALTHY NUTRIENT CONTENT CLAIMS ARE MATERIAL TO CONSUMERS AND**  
7 **CONVEY THE MESSAGE THAT FOOD CONTRIBUTES TO A HEALTHY DIET**

8 23. Prior to promulgating 21 C.F.R. § 101.65(d) governing Healthy Nutrient Content  
9 Claims, the FDA conducted extensive research and fact-finding. The FDA published an initial  
10 proposal for defining the term “healthy” (56 Fed. Reg. 60,421), a proposed rule (58 Fed. Reg. 2944),  
11 and a final rule (59 Fed. Reg. 24,232-01). The FDA solicited, received, and considered comments in  
12 response to its initial proposal for defining the term “healthy” and the proposed rule. In response to  
13 the proposed rule, the FDA received comments from approximately fifty (50) sources including  
14 consumers, consumer organizations, professional organizations, state and local government  
15 agencies, industry, and industry trade associations. 59 Fed. Reg. 24,232-01, 24,232.

16 24. The FDA considered polls and surveys evaluating consumers’ understanding about  
17 Healthy Nutrient Content Claims. *Id.* at 24,232–33. The FDA found that this data showed that  
18 “healthy” conveys a strong message to consumers about the nutrient content of a food and, further,  
19 that consumers associate “healthy” with generally recommended nutrient levels. *Id.* at 24,233.  
20 Thus, the FDA found the comments that it received in response to its proposal to define the term  
21 “healthy” supported the finding that foods labeled as “healthy” “should be those that can be  
22 consumed to assist consumers in maintaining healthy dietary practices, that is, in achieving a total  
23 diet that conforms to current dietary recommendations.” *Id.* Accordingly, the FDA found that  
24 Healthy Nutrient Content Claims are distinguishable from other nutrient content claims because they  
25 uniquely characterize “both the level of the nutrient in a food and, derivatively, the food itself.” *Id.*

26 25. The FDA also concluded, based on the information submitted with comments in  
27 response to its proposed rule, that consumers understand the term “healthy” to carry particular  
28 weight when it is made in conjunction with a specific claim about a nutrient. The FDA found that  
consumers understand “healthy” to mean “that the food that bears the term necessarily has a nutrient

1 profile that would be helpful to consumers in structuring a diet that conforms to dietary guidelines”  
 2 when the term “healthy” is “presented in a context that explicitly or implicitly suggests that the food  
 3 has a particular nutrient profile.” *Id.* at 24,235. Thus, the FDA found that a Healthy Nutrient  
 4 Content Claim is one where the term “healthy” “appears in association with an explicit or implicit  
 5 claim or statement about a nutrient[.]” *Id.*

6 26. Importantly, the FDA also found that “consumers may tend to rely on the ‘healthy’  
 7 claim rather than reading specific information on the label.” *Id.* at 24,236 (emphasis added).  
 8 Thus, the FDA emphasized that it was defining the requirements for Healthy Nutrient Content  
 9 Claims “in such a way that ensures that, even if consumers do not read the full label, foods that  
 10 bear the term will be useful in structuring a healthy diet.” *Id.* (emphasis added).

11 27. The FDA also found that Healthy Nutrient Content Claims can arise even where the  
 12 “healthy” statement and the nutrient claim do not necessarily appear adjacent or in direct relation to  
 13 each other. *See id.* at 24,235 (finding nutrient statement on label of food with “healthy” in brand  
 14 name would give rise to Healthy Nutrient Content Claim).

15 28. Furthermore, the FDA found that “derivatives of ‘healthy’ have the same general  
 16 meaning and connotation as this term and, thus, when used in food labeling may be construed by  
 17 consumers to imply that the products on which they appear will be helpful in maintaining healthy  
 18 dietary practices.” *Id.* The FDA therefore chose to regulate derivatives of “healthy,” including  
 19 “health,” when they are used in a nutritional context in food labeling, in the same manner as  
 20 “healthy.” *Id.*<sup>11</sup>

21 \_\_\_\_\_  
 22 <sup>11</sup> The FDA has sent multiple warning letters to packaged food manufacturers for violations of the  
 23 Healthy Nutrient Content Claim requirements based on statements using the derivative “health”  
 24 alone, and not “healthy.” *See, e.g.*, FDA, Warning Letter to CAW Industries, Inc., Jan. 31, 2012,  
 25 <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2012/ucm290046.htm> (citing  
 26 statements, “ha[ve] 19 trace minerals such as iron, manganese, copper, iodine, zinc, calcium,  
 27 potassium, and selenium and many others that are essential to maintaining optimum health,” and,  
 28 “has the same concentration of the 19 trace minerals found in the [product]. These trace minerals  
 such as iron, manganese, copper, iodine, zinc, calcium, potassium, and selenium and many others  
 found in the [product] are essential to maintaining optimum health”); FDA, Warning Letter to North  
 Dallas Big Honey Company, June 24, 2013,  
<http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2013/ucm358641.htm> (citing  
 statements, “Many people are looking for the health benefits of RAW honey . . . full of antioxidants  
 . . . vitamins, minerals and enzymes,” and, “(L)ove its health benefits . . . honey is loaded with  
 antioxidants . . . vitamins . . . minerals . . .”).

1           29.     The FDA also found that terms such as “wholesome,” “nutritious,” and “good for  
 2 you” can be synonymous with “healthy” and thus constitute Healthy Nutrient Content Claims when  
 3 used in connection with a nutrient statement. *Id.* at 24,236. Despite “recogniz[ing] that terms such  
 4 as ‘nutritious,’ ‘wholesome,’ and ‘good for you’ can be implied nutrient content claims when they  
 5 appear in a nutritional context on a label or in labeling,” the FDA did not find that these terms “are  
 6 necessarily synonymous with ‘healthy.’” *Id.* The FDA therefore declined to expressly define these  
 7 terms as synonymous with “healthy” under all circumstances because “[t]he comments to the  
 8 ‘healthy’ proposal have not provided the agency with the information that it would need to develop  
 9 definitions or to establish these terms as synonyms for the term ‘healthy.’” *Id.* Nevertheless, the  
 10 FDA’s interpretation that such terms can be synonymous with its definition of “healthy” and thus  
 11 subject to the requirements for Healthy Nutrient Content Claims is demonstrated by the FDA’s  
 12 recent regulatory action against a food manufacturer for labeling its product with the “***implied***  
 13 ***nutrient content claim ‘good for you,’ which is an unauthorized synonym for ‘healthy.’***” Exhibit  
 14 H, FDA, Warning Letter to Minerva Dairy, Inc., Oct. 9, 2014 (emphasis added), *available at*  
 15 <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2014/ucm418768.htm>.

16           30.     In sum, the FDA’s factual findings provide in pertinent part as follows:

17           Taken together, . . . establish not only that “healthy” conveys a strong message  
 18 about the nutrient content of a food, but that consumers associate it with the  
 19 nutrient levels that have generally been recommended over the past few years.

20           The agency finds, therefore, that the fundamental purpose of a “healthy” claim is  
 21 to highlight those foods that, based on their nutrient levels, are particularly useful  
 22 in constructing a diet that confirms to current dietary guidelines.

23           59 Fed. Reg. 24,232-01, 24,233.

24           31.     The FDA also made findings with regard to the levels of total fat and saturated fat  
 25 that consumers expect foods bearing Healthy Nutrient Content Claims to contain. The FDA found  
 26 requiring foods bearing Healthy Nutrient Content Claims to be low in fat and low in saturated fat to  
 27 be appropriate “because these restrictions recognize the need to reduce dietary intake of fat and  
 28 saturated fat . . . [and] will assist consumers in constructing a total diet that is consistent with dietary  
 29 recommendations.” *Id.* at 24,238.

1           32.       Furthermore, while the FDA declined to extend its “healthy” definition applicable to  
 2 Healthy Nutrient Content Claims to all uses of “healthy” on a food’s label where not made in  
 3 conjunction with a nutrient content claim, such “healthy” statements still would render a food  
 4 misbranded if they render the food’s labeling false or misleading. 21 U.S.C. § 343(a)(1) (providing  
 5 food is misbranded if its labeling is false or misleading “in any particular”); *see also id.* at 24,235  
 6 (“FDA finds that under section 403(a) of the act, it has ample authority to ensure that ‘healthy’ is not  
 7 used in a misleading manner, even when it is not used in a nutritional context.”).

8  
 9                           **CONGRESS AND THE FDA DETERMINED THAT ALL NUTRIENT**  
 10                           **CONTENT CLAIMS ARE MATERIAL TO CONSUMERS BECAUSE**  
 11                           **CONSUMERS RELY ON THEM IN MAKING FOOD CHOICES**

12           33.       Congress amended the FDCA by enacting the Nutrition Labeling and Education Act  
 13 of 1990 (“NLEA”), Pub. Law No. 101-535, 104 Stat. 2353 (1990), in part, to govern nutrient content  
 14 claims to help consumers make good nutrition choices and to protect them from being misled by the  
 15 many confusing and contradictory nutrient content claims then appearing on foods’ labels. NLEA  
 16 made “the most significant changes in food labeling law since the passage of the [FDCA].” 56 Fed.  
 17 Reg. 60,421-01, 60,422. The FDA described the impetus behind the NLEA:

18                           With the provisions of the 1990 amendments that govern nutrient content claims,  
 19 Congress sought to put an end to the proliferation of confusing and contradictory  
 20 nutrient content claims. . . . In order to assist consumers in improving their eating  
 21 habits, Congress devised a scheme to ensure that nutrient content claims in food  
 22 labeling will help consumers to make good nutrition choices, not mislead them.

23 58 Fed. Reg. 2302-01, 2393 (citations to *Congressional Record* omitted).

24           34.       Congress acted because it considered the confusing, contradictory, ambiguous, and  
 25 unregulated nutrient content claims appearing on foods’ labels prior to the NLEA to be harmful to  
 26 the public. As the FDA described:

27                           Congress considered existing labeling practices to be harmful to the public because of  
 28 the “confusing” and “misleading” nutrient content claims made by many  
 29 manufacturers.

30 . . .

31 By enacting the 1990 amendments, Congress sought to ensure that food labeling,  
 32 including express and implied nutrient content claims, would be accurate, uniform,

1 and “based on science.” . . . With respect to nutrient content claims, the principal  
 2 problem that Congress sought to correct was the use of ambiguous, undefined claims  
 3 like “light” and “low.” . . . Experience had shown that consumers were being misled  
 4 because these terms were being used differently by different manufacturers. . . .  
 5 Congress recognized that consumers were being hampered in their attempts to  
 6 achieve a healthy diet by confusing implied nutrient content claims like “light.”

7 . . .

8 Particular attributes of unregulated nutrition claims on the food label make them  
 9 inherently misleading. Because nutrition claims are of great importance to the public,  
 10 they have a greater potential to be deceptive: Representations relating a product to an  
 11 issue of public concern as a means to induce purchases may take on exaggerated  
 12 importance in the public mind and thus be more likely to mislead.

13 *Id.* at 2393 & 2394 (citations to *Congressional Record* omitted).

14 35. With the NLEA, Congress chose to address the problem of harmful, confusing, and  
 15 misleading nutrient content claims and ensure that nutrient content claims are not confusing,  
 16 contradictory, or misleading by empowering the FDA to regulate nutrient content claims on foods’  
 17 labels. Only nutrient content claims defined by the FDA would be permitted on foods’ labels:

18 Because of the misleading character of unregulated, nonstandardized nutrient content  
 19 claims, Congress legislated that any claim that is not consistent with FDA regulations  
 20 misbrands a food. . . . By taking this approach, Congress chose to permit only those  
 21 nutrient content claims that FDA defines or approves, effectively recognizing that  
 22 unregulated claims mislead the public.

23 *Id.* at 2394; *see also* 21 U.S.C. § 343(r)(1)(A) (providing that a food is misbranded if its label or  
 24 labeling bears a nutrient content claim, except those that the FDA has expressly authorized by  
 25 regulation or which are otherwise exempted); Open Letter to Industry from Dr. Margaret A.  
 26 Hamburg, FDA Commissioner (Mar. 3, 2010) [hereinafter “Hamburg Letter”], *available at*  
 27 <http://www.fda.gov/Food/IngredientsPackagingLabeling/LabelingNutrition/ucm202733.htm> (“[W]e  
 28 urged food manufacturers to examine their product labels in the context of the provisions of the  
 [FDCA] that prohibit false or misleading claims and restrict nutrient content claims to those defined  
 in FDA regulations.”).

36. Charged with this mission, the FDA carefully crafted its regulations to ensure that  
 nutrient content claims are meaningful to consumers. *See* 59 Fed. Reg. 47,072-01, 47,077 (“In  
 defining terms for specific nutrient content claims, the agency carefully considered each claim to  
 ensure that it would be meaningful to consumers.”); 58 Fed. Reg. 2448-01, 2448 (“FDA has

1 carefully considered each nutrient content claim to ensure that these definitions will be meaningful  
2 to consumers.”).

3 37. Even before the NLEA, the FDA “ha[d] a long history of interest in prescribing label  
4 statements concerning the dietary properties of food,” including nutrient content claims. 56 Fed.  
5 Reg. 60,421-01, 60,421.

6 38. The FDA has described nutrient content claims as one of the “the most important  
7 pieces of information on the PDP [principal display panel],” along with the statement of identity.  
8 58 Fed. Reg. 2302-01, 2306 (emphasis added); *see also* 21 C.F.R. § 101.1 (defining “principal  
9 display panel” as “the part of a label that is most likely to be displayed, presented, shown, or  
10 examined under customary conditions of display for retail sale”).

11 39. The FDA recognizes that nutrient content claims affect consumers’ food choices by  
12 inducing them to adopt more restrictive dietary patterns that will help them maintain healthy dietary  
13 practices. *See* 58 Fed. Reg. 2302-01, 2319 (“[T]he agency’s [FDA’s] approach to developing a  
14 system of nutrient content claims emphasizes three objectives: (1) Consistency among definitions,  
15 (2) claims that are in keeping with public health goals, and (3) claims that can be used by consumers  
16 to maintain healthy dietary practices”); 56 Fed. Reg. 60,478-01, 60,478 (stating in pertinent part that  
17 FDA had proposed “requirements for label statements relating to oils, fats, and fatty foods used as a  
18 means of reducing the dietary intake of fatty acids”).

19 40. The FDA also recognizes that food manufacturers make nutrient content claims on  
20 foods’ labels to market their products to consumers and induce consumers to buy them. That is, the  
21 FDA recognizes that for food manufacturers, nutrient content claims are a powerful marketing tool.  
22 *See* 79 Fed. Reg. 23,262-01, 23,271 (“Manufacturers are not likely to voluntarily make nutrient  
23 content claims if the addition would confuse consumers and negatively impact sales.”); 54 Fed. Reg.  
24 32,610-01, 32,614 (observing that prior to NLEA, “[b]ecause of the growing public interest in eating  
25 healthy foods, manufacturers began to place statements on their labels that described their products  
26 in ways such as ‘fresh,’ ‘natural,’ ‘low in salt,’ ‘reduced fat,’ and ‘no cholesterol’”).

27 41. The FDA moreover recognizes the fundamental premise of the provisions of the  
28 NLEA governing nutrient content claims: namely, that consumers read nutrient content claims on



1 foods' labels and, in turn, rely on them in making food choices. *See* 58 Fed. Reg. 2302-01, 2394  
 2 (noting in reference to nutrient content claims, "consumers place great reliance on the portions of the  
 3 food label that they believe to be regulated by the Government"); 56 Fed. Reg. 60,421-01, 60,433  
 4 ("FDA surveys have shown that consumers want nutrient content claims and use them in making  
 5 food selections . . ."). Underscoring this point, the FDA has cited the U.S. Supreme Court for the  
 6 proposition that, "[t]here is an 'immediate connection,' . . . between nutrient content claims on  
 7 food labels and consumers' food choices." 58 Fed. Reg. 2302-01, 2394 (citing *Cent. Hudson Gas*  
 8 *& Elec. Corp. v. Pub. Serv. Comm'n of New York*, 447 U.S. 557, 569 (1980)) (emphasis added).

9 42. Since the enactment of the NLEA and the promulgation of the FDA's implementing  
 10 regulations, Congress has continued to regard nutrient content claims as an important regulatory  
 11 arena. In 2005, the U.S. Senate Committee on Appropriations directed the FDA to continue  
 12 focusing on potentially misleading nutrient content claims:

13 Given the important nature of the information provided on the food label and in light  
 14 of the New Dietary Guidelines for Americans 2005, the Committee is interested in  
 15 ensuring that food labels can be easily understood and reflect information that is  
 16 factual. *The Committee is concerned that consumers may be faced with misleading*  
 17 *information on caloric and nutrient content and health-related claims, and believes*  
 18 *it is vital that consumers are able to trust the accuracy of food labels. Therefore,*  
 19 *the Committee directs the FDA to continue to apply resources to efforts that ensure*  
 20 *the accuracy of the Nutrition Facts panel and address potentially misleading health*  
 21 *and nutrition statements on the food label* and to report to the Committee by  
 22 February 1, 2006 on the types of labeling violations discovered and actions taken in  
 23 response to such violations.

24 S. Rep. No. 109-92 (June 27, 2005) (emphasis added), *available at* 2005 WL 6407430.

25 43. In response to the U.S. Senate Committee on Appropriations' directive, the FDA  
 26 reported in April 2006 that between October 1, 2004 and December 6, 2005 it conducted field  
 27 examinations of approximately 28,000 food labels, collected 543 samples for nutrient analysis and/or  
 28 label review, and issued fifty-six (56) warning letters for misbranding violations, including improper  
 nutrient content claims. Exhibit I at p. 3, Andrew C. von Eschenbach, U.S. Food & Drug Admin.,  
 Report to Congress on Compliance with Food Label Regulations Under the Food and Drug  
 Administration's Purview, S. Rep. No. 109-92 (Apr. 19, 2006).

44. In 2010, in an open letter to the food industry, former FDA Commissioner Margaret  
 A. Hamburg, MD expressed concern "about the number and variety of label claims that may not help



1 consumers distinguish healthy food choices from less healthy ones and, indeed, may be false or  
2 misleading.” Hamburg Letter. To address these concerns, the FDA sent warning letters to many  
3 food manufacturers notifying them that “their labels are in violation of the law and subject to legal  
4 proceedings to remove misbranded products from the marketplace.” *Id.* The FDA’s warning letters  
5 “cover[ed] a range of concerns about how false or misleading labels can undermine the intention of  
6 Congress to provide consumers with labeling information that enables consumers to make informed  
7 and healthy food choices,” including “[m]isleading ‘healthy’ claims continu[ing] to appear on  
8 foods that do not meet the long- and well-established definition for use of that term.” *Id.*  
9 (emphasis added).

10 45. In 2011, the U.S. Government Accountability Office reiterated many of the same  
11 points that Congress and the FDA had made earlier concerning nutrient content claims, including  
12 that consumers increasingly are looking for healthy foods, consumers rely on federally regulated  
13 nutrient content claims in making food choices, and food manufacturers use nutrient content claims  
14 to market their products to consumers:

15 Consumers increasingly seek information on food labels to help them make healthy  
16 food choices, and they rely on federal agencies to ensure that such information is  
17 truthful. Food companies may use health- and/or nutrient-related claims on food  
18 labels to appeal to consumers, distinguish their products from their competitors’, and  
otherwise increase their sales. However, when those claims are false or misleading,  
consumers’ efforts to select healthy food may be undermined.

19 U.S. Gov’t Accountability Office, GAO-11-102, Food Labeling: FDA Needs to Reassess Its  
20 Approach to Protecting Consumers from False or Misleading Claims at 1 (2011), *available at*  
21 <http://www.gao.gov/assets/320/314473.pdf>.

22 46. Additionally, the Federal Trade Commission (“FTC”), whose mission includes  
23 eliminating unfair or deceptive acts or practices in advertising and marketing, has had a long-  
24 standing view that claims involving health in advertising are “presumptively material” to consumers.  
25 *See* FTC Policy Statement on Deception, 103 F.T.C. 110, 1984 WL 565319, at \*49 (1984). After  
26 enactment of the NLEA, the FTC reinforced its position that claims involving health made in  
27 relation to food are “presumptively material,” and are likely to affect a consumer’s choice or use of  
28

1 the food. *See* FTC Enforcement Policy Statement on Food Advertising, 1994 WL 642482, at \*4  
 2 (F.T.C. May 1994).

3 **CLIF’S LABELING OF ITS LUNA BARS AND CLIF BARS**  
 4 **UNIFORMLY VIOLATES THE FDA’S REGULATIONS**

5 47. Clif’s LUNA Bars and CLIF Bars are uniformly mislabeled for at least two reasons.  
 6 First, each LUNA Bar and CLIF Bar bears a Healthy Nutrient Content Claim because each LUNA  
 7 Bar’s and CLIF Bar’s label uses the term “health” or another synonym of “healthy” in connection  
 8 with a nutrient statement. Second, each LUNA Bar and CLIF Bar fails to comply with the FDA’s  
 9 requirements for Healthy Nutrient Content Claims because each LUNA Bar and CLIF Bar has more  
 10 total fat and/or saturated fat than is permitted for a food bearing a Healthy Nutrient Content Claim.  
 11 Each LUNA Bar and CLIF Bar bears a Healthy Nutrient Content Claim that may be ascertained by  
 12 reference to statements on each LUNA Bar’s and CLIF Bar’s labeling. *See* Exhibit A, LUNA Whole  
 13 Nutrition Bars’ Labels; Exhibit B, LUNA Protein Bars’ Labels; Exhibit C, CLIF Kid Organic Zbars’  
 14 Labels; Exhibit D, CLIF Kid Protein Zbars’ Labels; Exhibit E, CLIF MOJO Sweet and Salty Trail  
 15 Mix Bars’ Labels; Exhibit F, CLIF Organic Trail Mix Bars’ Labels. Moreover, each LUNA Bar’s  
 16 and CLIF Bar’s violation(s) of California’s and the FDA’s requirements for Healthy Nutrient  
 17 Content Claims may be ascertained by comparing the specific requirements to the Nutrition Facts  
 18 information on the each LUNA Bar’s and CLIF Bar’s labeling.

19 48. As reflected in ¶¶ 54–55, *infra*, each LUNA Bar’s label states “health,” which is a  
 20 derivative of “healthy.” *See* ¶¶ 18, 28, *supra*. Additionally, as reflected in ¶¶ 54–55, *infra*, each  
 21 LUNA Bar’s label also states “Whole Nutrition” and/or “nutrition,” which are synonyms of  
 22 “healthy” as used on the LUNA Bars’ labels. *See* ¶¶ 19, 29, *supra*.

23 49. As reflected in ¶¶ 54–55, *infra*, each LUNA Bar’s label bears an express or implied  
 24 statement that it contains one or more of the following nutrients:

- 25 a. “protein” (*see* 21 U.S.C. § 343(q)(1)(D));
- 26 b. “fiber” (*see* 21 U.S.C. § 343(q)(1)(D));
- 27 c. “calcium” (*see* 21 C.F.R. § 101.9(c)(8)(ii));
- 28 d. “iron” (*see* 21 C.F.R. § 101.9(c)(8)(ii));

- e. “folic acid” (*see* 21 C.F.R. § 101.9(c)(8)(iv));
- f. “vitamin D” (*see* 21 C.F.R. § 101.9(c)(8)(iv)); and
- g. “total fat” (*see* 21 U.S.C. § 343(q)(1)(D)).

50. As reflected in ¶¶ 54–55, *infra*, each LUNA Bar violates the FDA’s regulation governing Healthy Nutrient Content Claims for both of the following reasons:

- a. High in fat (*see* 21 C.F.R. § 101.62(b)(2)); and
- b. High in saturated fat (*see* 21 C.F.R. § 101.62(c)(2)).

51. As reflected in ¶¶ 56–59, *infra*, each CLIF Bar’s label states “wholesome,” “nutritious,” that it is “good for . . . our bodies,” and/or that it contains ingredients “to keep kids . . . growing,” which are synonyms of “healthy” as used on the CLIF Bars’ labels. *See* ¶¶ 19, 29, *supra*.

52. As reflected in ¶¶ 56–59, *infra*, each CLIF Bar’s label bears an express or implied statement that it contains one or more of the following nutrients:

- a. “fiber” (*see* 21 U.S.C. § 343(q)(1)(D));
- b. “protein” (*see* 21 U.S.C. § 343(q)(1)(D));
- c. “total fat” (*see* 21 U.S.C. § 343(q)(1)(D)); and
- d. “sodium” (*see* 21 U.S.C. § 343(q)(1)(D)).

53. As reflected in ¶¶ 56–59, *infra*, each CLIF Bar violates the FDA’s regulation governing Healthy Nutrient Content Claims for one or more of the following reasons:

- a. High in fat (*see* 21 C.F.R. § 101.62(b)(2)); and
- b. High in saturated fat (*see* 21 C.F.R. § 101.62(c)(2)).

54. Each of Clif’s LUNA Whole Nutrition Bars identified in ¶ 1 n.1 bears a Healthy Nutrient Content Claim and fails to comply with the FDA’s requirements for Healthy Nutrient Content Claims for the reasons stated in ¶¶ 47–50, *supra*. To illustrate this uniform mislabeling for each LUNA Whole Nutrition Bar, included in Exhibit A is a list detailing each LUNA Whole Nutrition Bar’s: (1) label’s healthy statement(s) subject to 21 C.F.R. § 101.65(d) (“Healthy Statements”); (2) label’s express or implied nutrient content statements (“Nutrient Content Statements”); and (3) violations of the FDA’s requirements for Healthy Nutrient Content Claims, i.e., 21 C.F.R. § 101.65(d). As an example of Clif’s unlawful and misleading Healthy Nutrient

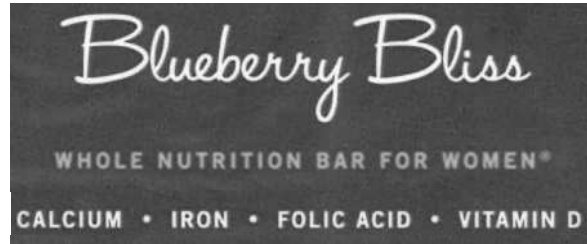
1 Content Claims on its LUNA Whole Nutrition Bars' labels, a scan of the LUNA Whole Nutrition  
2 Blueberry Bliss Bar's label is provided below, in addition to being included with the other LUNA  
3 Whole Nutrition Bars' labels in Exhibit A. By way of example, the Healthy Statements and Nutrient  
4 Content Statements for the LUNA Whole Nutrition Blueberry Bliss Bar giving rise to the Healthy  
5 Nutrient Content Claim are enlarged to make them easier to read in this Complaint. The other  
6 LUNA Whole Nutrition Bars identified in ¶ 1 n.1, *supra*, and included in Exhibit A also bear  
7 Healthy Nutrient Content Claims because their labels included the same Healthy Statements as Clif's  
8 LUNA Whole Nutrition Blueberry Bliss Bar and materially similar Nutrient Content Statements.

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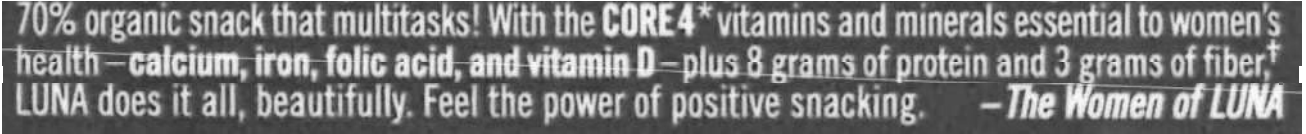


- a. **LUNA Whole Nutrition Blueberry Bliss Bar**
  - i. Healthy Statements (emphasis added)
    - 1. **“Whole Nutrition** Bar for Women”

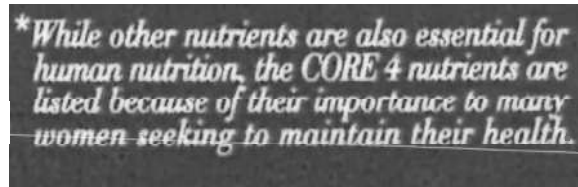


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- 2. “With the CORE 4 vitamins and minerals essential to women’s health – calcium, iron, folic acid, and vitamin D – plus 8 grams of protein and 3 grams of fiber, LUNA does it all, beautifully.”



- 3. “[T]he CORE 4 nutrients are listed because of their importance to many women seeking to maintain their health.”



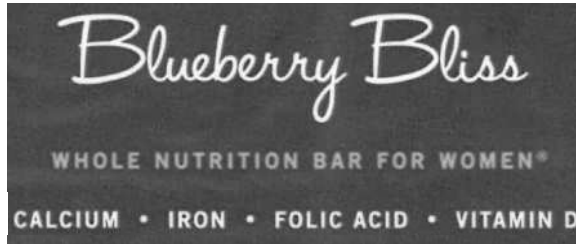
- ii. Nutrient Content Statements

- 1. “8g Protein”
- 2. “3g Fiber”

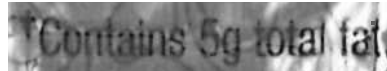


- 3. “Calcium · Iron · Folic Acid · Vitamin D”





4. "5g total fat"



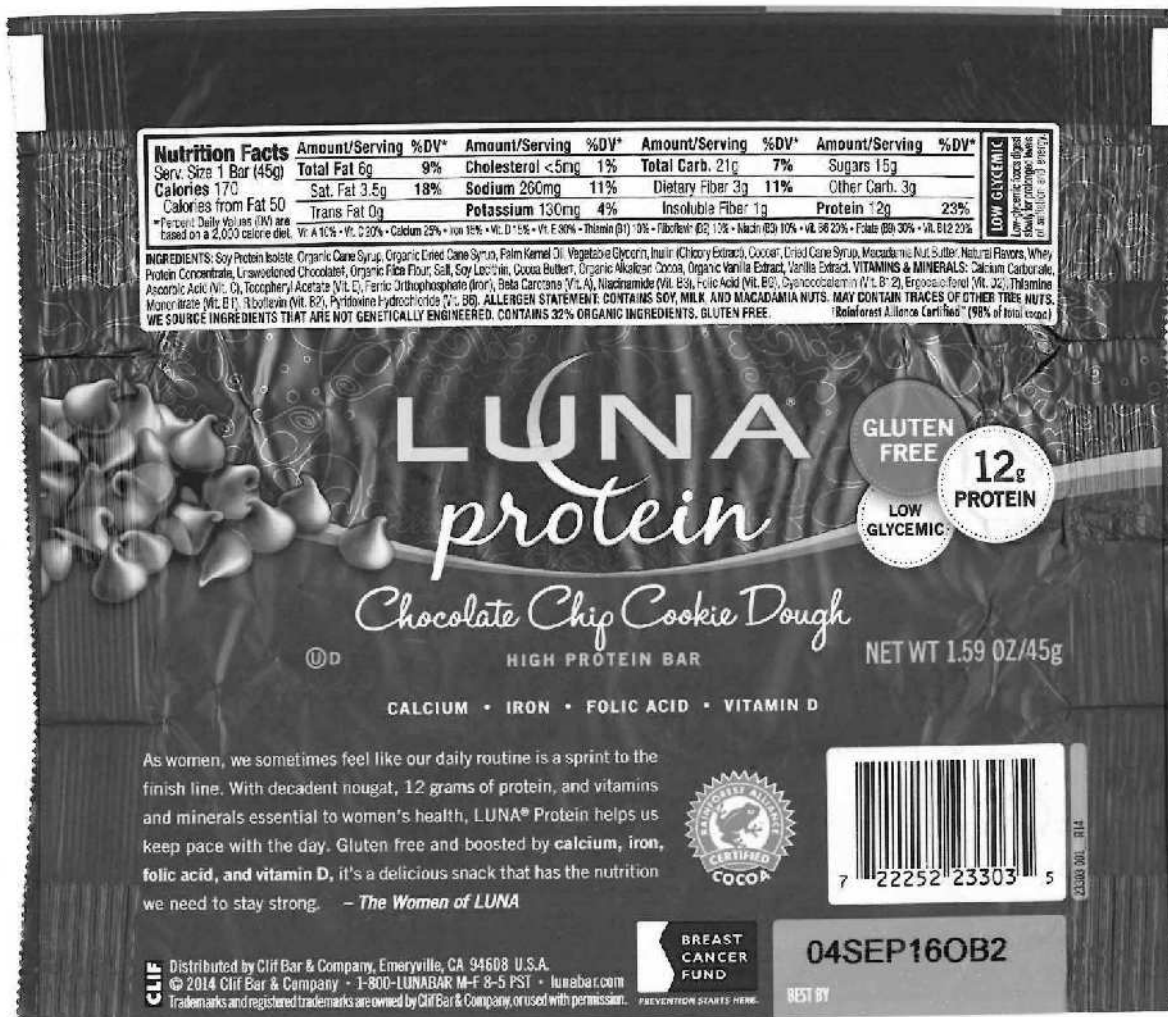
iii. Violations of FDA Regulations

1. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 4.17 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
2. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.67 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

55. Each of Clif's LUNA Protein Bars identified in ¶ 1 n.1 bears a Healthy Nutrient Content Claim and fails to comply with the FDA's requirements for Healthy Nutrient Content Claims for the reasons stated in ¶¶ 47-50, *supra*. To illustrate this uniform mislabeling for each LUNA Protein Bar, included in Exhibit B is a list detailing each LUNA Protein Bar's: (1) label's healthy statement(s) subject to 21 C.F.R. § 101.65(d) ("Healthy Statements"); (2) label's express or implied nutrient content statements ("Nutrient Content Statements"); and (3) violations of the FDA's requirements for Healthy Nutrient Content Claims, i.e., 21 C.F.R. § 101.65(d). As an example of Clif's unlawful and misleading Healthy Nutrient Content Claims on its LUNA Protein Bars' labels, a scan of the LUNA Chocolate Chip Cookie Dough Protein Bar's label is provided below, in addition to being included with the other LUNA Protein Bars' labels in Exhibit B. By way of example, the Healthy Statements and Nutrient Content Statements for the LUNA Chocolate Chip Cookie Dough Protein Bar giving rise to the Healthy Nutrient Content Claim are enlarged to make them easier to



1 read in this Complaint. The other LUNA Protein Bars identified in ¶ 1 n.1, *supra*, and included in  
 2 Exhibit B also bear Healthy Nutrient Content Claims because their labels included the same Healthy  
 3 Statements and the same Nutrient Content Statements as Clif’s LUNA Chocolate Chip Cookie  
 4 Dough Protein Bar.



22 a. LUNA Chocolate Chip Cookie Dough Protein Bar

23 i. Healthy Statements (emphasis added)

- 24 1. “With decadent nougat, 12 grams of protein, and vitamins and  
 25 minerals essential to women’s health, LUNA Protein helps us  
 26 keep pace with the day.”

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2. “Gluten free and boosted by calcium, iron, folic acid, and vitamin D, it’s a delicious snack that has the nutrition we need to stay strong.”

finish line. With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women’s health, LUNA® Protein helps us keep pace with the day. Gluten free and boosted by **calcium, iron, folic acid, and vitamin D**, it’s a delicious snack that has the nutrition we need to stay strong. – *The Women of LUNA*

ii. Nutrient Content Statements

1. “12g Protein”



2. “Calcium · Iron · Folic Acid · Vitamin D”
3. “High Protein Bar”



4. “vitamins and minerals”
5. “boosted by calcium, iron, folic acid, and vitamin D”

finish line. With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women's health, LUNA® Protein helps us keep pace with the day. Gluten free and boosted by **calcium, iron, folic acid, and vitamin D**, it's a delicious snack that has the nutrition we need to stay strong. – *The Women of LUNA*

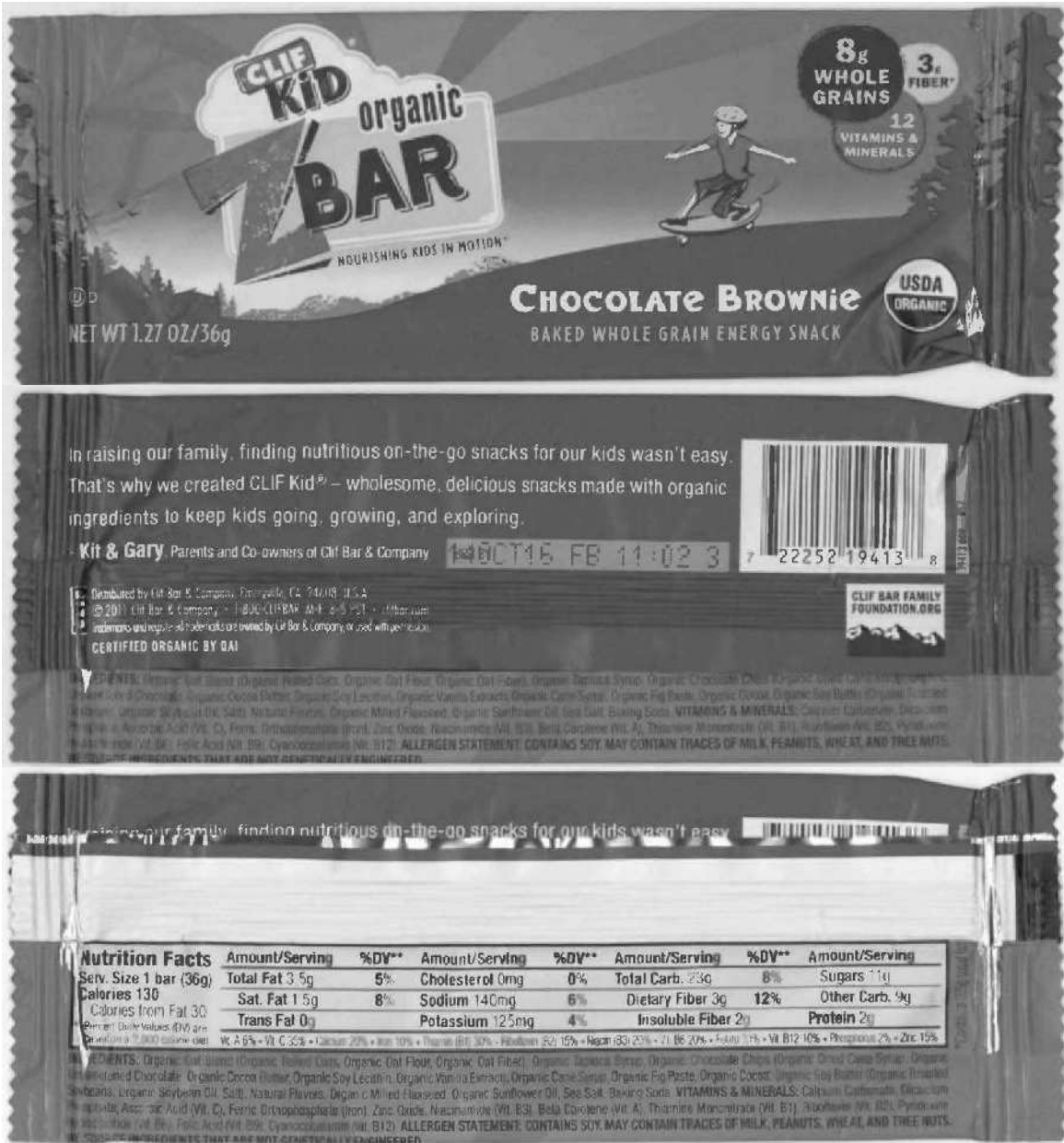
iii. Violations of FDA Regulations

1. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 5.33 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
2. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 3.11 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

56. Each of Clif's CLIF Kid Organic Zbars identified in ¶ 1 n.2 bears a Healthy Nutrient Content Claim and fails to comply with the FDA's requirements for Healthy Nutrient Content Claims for the reasons stated in ¶¶ 47, 51–53, *supra*. To illustrate this uniform mislabeling for each CLIF Kid Organic Zbar, included in Exhibit C is a list detailing each CLIF Kid Organic Zbar's: (1) label's healthy statement(s) subject to 21 C.F.R. § 101.65(d) ("Healthy Statements"); (2) label's express or implied nutrient content statements ("Nutrient Content Statements"); and (3) violations of the FDA's requirements for Healthy Nutrient Content Claims, i.e., 21 C.F.R. § 101.65(d). As an example of Clif's unlawful and misleading Healthy Nutrient Content Claims on its CLIF Kid Organic Zbars' labels, scans of the CLIF Kid Organic Chocolate Brownie ZBar's label are provided below, in addition to being included with the other CLIF Kid Organic ZBars' labels in Exhibit C. By way of example, the Healthy Statement and Nutrient Content Statements for the CLIF Kid Organic Chocolate Brownie ZBar giving rise to the Healthy Nutrient Content Claim are enlarged to make them easier to read in this Complaint. The other CLIF Kid Organic Zbars identified in ¶ 1 n.2, *supra*, and included in Exhibit C also bear Healthy Nutrient Content Claims because their labels included the same Healthy Statement as Clif's CLIF Kid Organic Chocolate Brownie ZBar and materially similar Nutrient Content Statements.



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a. **CLIF Kid Organic Chocolate Brownie Zbar**

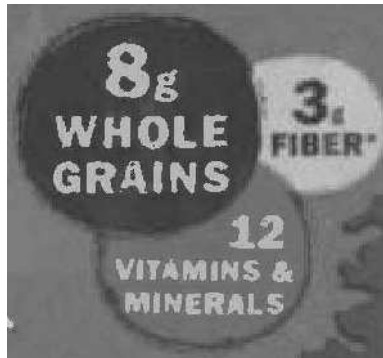
i. **Healthy Statements (emphasis added)**

1. "In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created CLIF Kid—wholesome, delicious snacks made with organic ingredients to keep kids going, growing, and exploring."

In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created CLIF Kid® – wholesome, delicious snacks made with organic ingredients to keep kids going, growing, and exploring.

ii. Nutrient Content Statements

1. “3g Fiber”
2. “12 Vitamins & Minerals”



3. “3.5g total fat”



iii. Violations of FDA Regulations

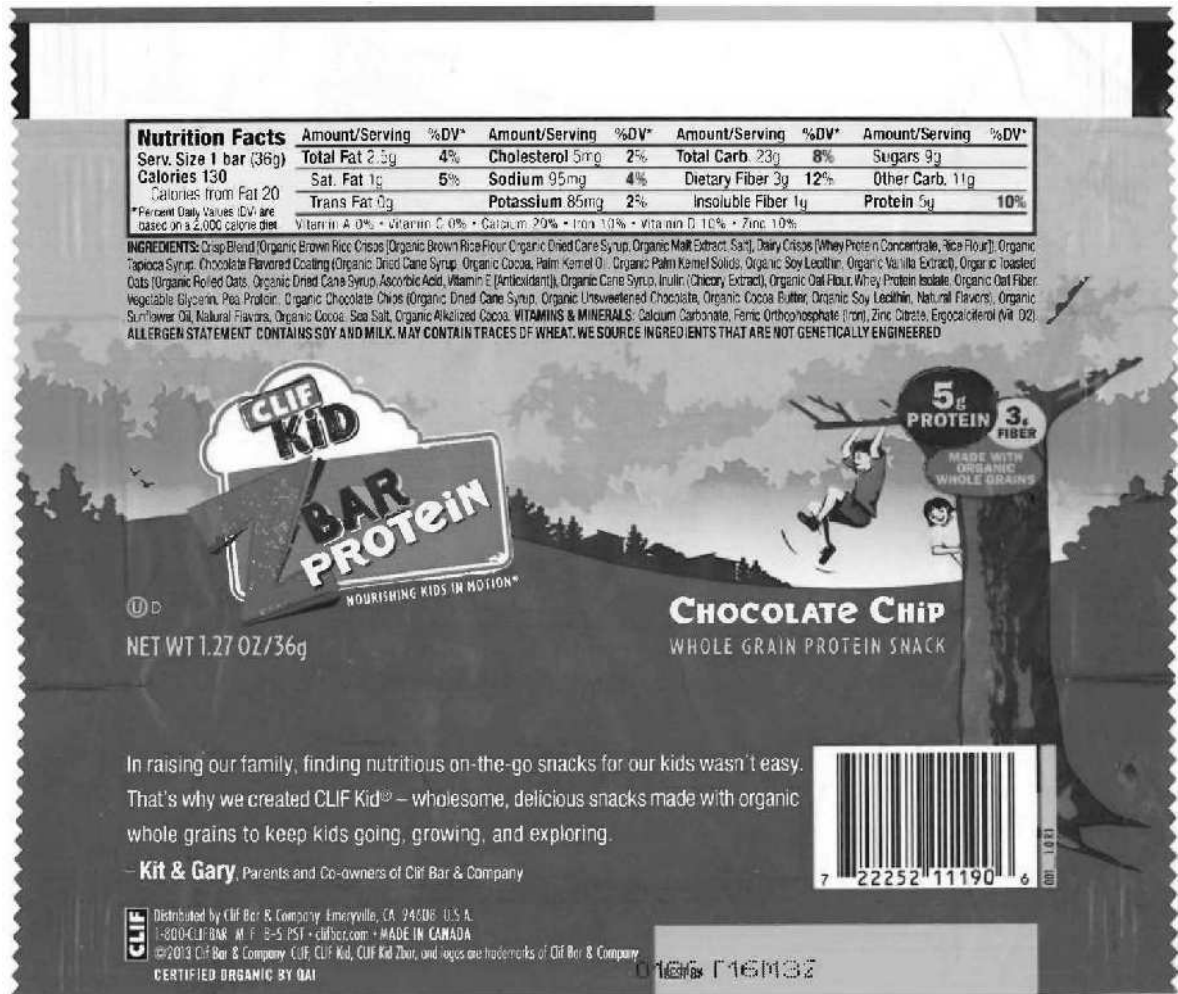
1. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 3.89 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
2. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.67

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grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

57. Each of Clif’s CLIF Kid Protein Zbars identified in ¶ 1 n.2 bears a Healthy Nutrient Content Claim and fails to comply with the FDA’s requirements for Healthy Nutrient Content Claims for the reasons stated in ¶¶ 47, 51–53, *supra*. To illustrate this uniform mislabeling for each CLIF Kid Protein Zbar, included in Exhibit D is a list detailing each CLIF Kid Protein Zbar’s: (1) label’s healthy statement(s) subject to 21 C.F.R. § 101.65(d) (“Healthy Statements”); (2) label’s express or implied nutrient content statements (“Nutrient Content Statements”); and (3) violations of the FDA’s requirements for Healthy Nutrient Content Claims, i.e., 21 C.F.R. § 101.65(d). As an example of Clif’s unlawful and misleading Healthy Nutrient Content Claims on its CLIF Kid Protein Zbars’ labels, a scan of the CLIF Kid Chocolate Chip Protein ZBar’s label is provided below, in addition to being included with the other CLIF Kid Protein ZBars’ labels in Exhibit D. By way of example, the Healthy Statement and Nutrient Content Statements for the CLIF Kid Chocolate Chip Protein ZBar giving rise to the Healthy Nutrient Content Claim are enlarged to make them easier to read in this Complaint. The other CLIF Kid Protein Zbars identified in ¶ 1 n.2, *supra*, and included in Exhibit D also bear Healthy Nutrient Content Claims because their labels included the same Healthy Statement as Clif’s CLIF Kid Chocolate Chip Protein ZBar and materially similar Nutrient Content Statements.





a. **CLIF Kid Chocolate Chip Protein ZBar**

i. Healthy Statements (emphasis added)

1. “In raising our family, finding nutritious on-the-go snacks for our kids wasn’t easy. That’s why we created CLIF Kid—wholesome, delicious snacks made with organic whole grains to keep kids going, growing, and exploring.”

In raising our family, finding nutritious on-the-go snacks for our kids wasn’t easy. That’s why we created CLIF Kid® – wholesome, delicious snacks made with organic whole grains to keep kids going, growing, and exploring.

ii. Nutrient Content Statements

1. “5g Protein”
2. “3g Fiber”

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iii. Violations of FDA Regulations

1. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.11 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

58. Each of Clif’s CLIF MOJO Sweet and Salty Trail Mix Bars identified in ¶ 1 n.2 bears a Healthy Nutrient Content Claim and fails to comply with the FDA’s requirements for Healthy Nutrient Content Claims for the reasons stated in ¶¶ 47, 51–53, *supra*. To illustrate this uniform mislabeling for each CLIF MOJO Sweet and Salty Trail Mix Bar, included in Exhibit E is a list detailing each CLIF MOJO Sweet and Salty Trail Mix Bar’s: (1) label’s healthy statement(s) subject to 21 C.F.R. § 101.65(d) (“Healthy Statements”); (2) label’s express or implied nutrient content statements (“Nutrient Content Statements”); and (3) violations of the FDA’s requirements for Healthy Nutrient Content Claims, i.e., 21 C.F.R. § 101.65(d). As an example of Clif’s unlawful and misleading Healthy Nutrient Content Claims on its CLIF MOJO Sweet and Salty Trail Mix Bars’ labels, a scan of the CLIF MOJO Sweet and Salty Dark Chocolate Almond Coconut Trail Mix Bar’s label is provided below, in addition to being included with the other CLIF MOJO Sweet and Salty Trail Mix Bars’ labels in Exhibit E. By way of example, the Healthy Statement and Nutrient Content Statements for the CLIF MOJO Sweet and Salty Dark Chocolate Almond Coconut Trail Mix Bar giving rise to the Healthy Nutrient Content Claim are enlarged to make them easier to read in this Complaint. The other CLIF MOJO Sweet and Salty Trail Mix Bars identified in ¶ 1 n.2, *supra*, and included in Exhibit E also bear Healthy Nutrient Content Claims because their labels

1 included the same Healthy Statement as Clif’s CLIF MOJO Sweet and Salty Dark Chocolate  
 2 Almond Coconut Trail Mix Bar and materially similar Nutrient Content Statements.



22 a. **CLIF MOJO Sweet and Salty Dark Chocolate Almond Coconut Trail**  
 23 **Mix Bar**

24 i. Healthy Statements (emphasis added)

- 25 1. “Ready to go whenever and wherever you are, CLIF MOJO  
 26 combines simple and organic ingredients that are good for both  
 27 our bodies and the planet.”

ff the day has to offer. Ready to go whenever and wherever you are, CLIF MOJO combines simple and organic ingredients that are good for both our bodies and the planet.

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ii. Nutrient Content Statements

- 1. “8g Protein”
- 2. “3g Fiber”

**8g PROTEIN > 3g FIBER\***  
SEE NUTRITION INFORMATION FOR SATURATED FAT CONTENT

- 3. “12g total fat”

Contains 12g total fat

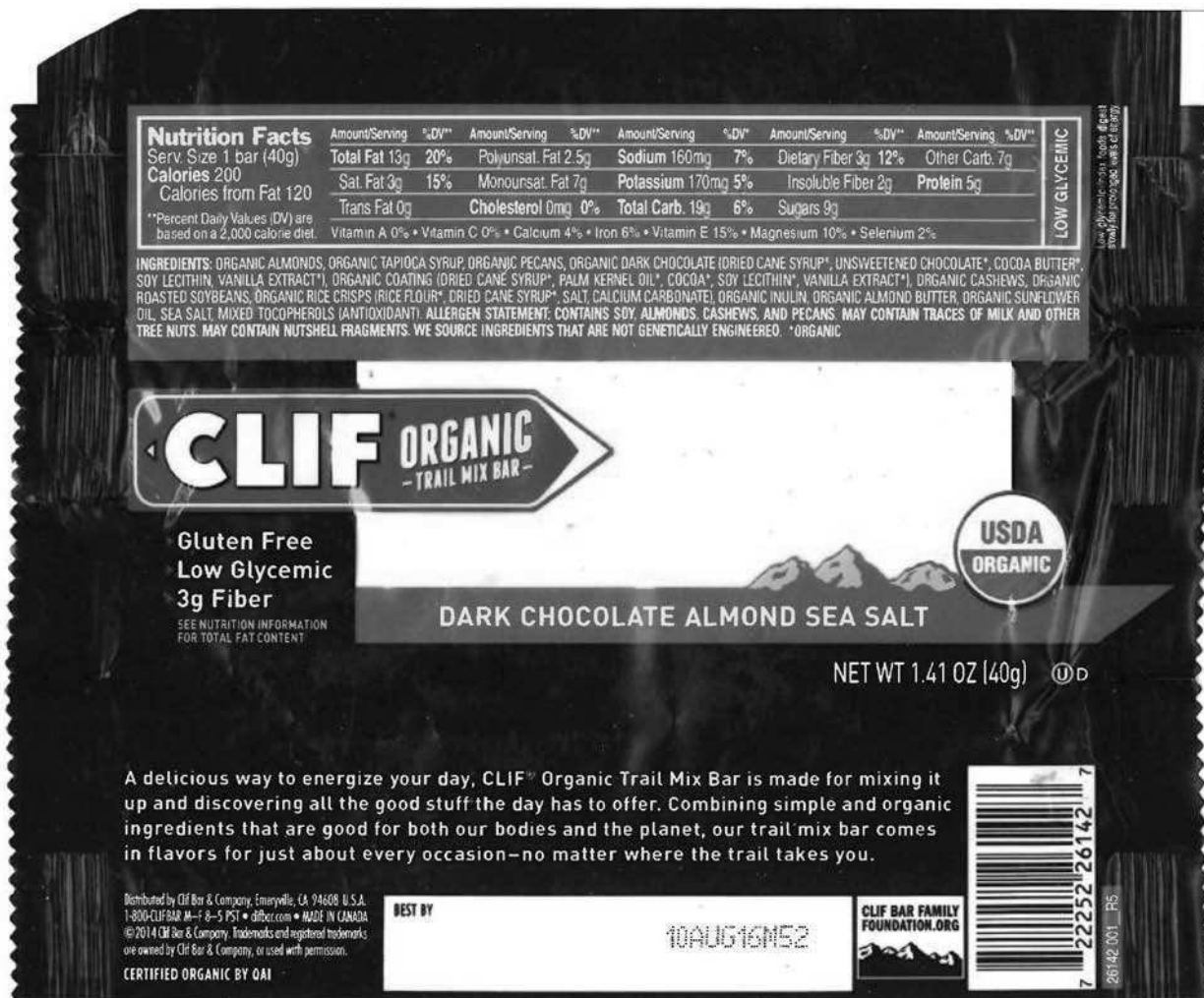
iii. Violations of FDA Regulations

- 1. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 10.67 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- 2. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 5.33 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

59. Each of Clif’s CLIF Organic Trail Mix Bars identified in ¶ 1 n.2 bears a Healthy Nutrient Content Claim and fails to comply with the FDA’s requirements for Healthy Nutrient Content Claims for the reasons stated in ¶¶ 47, 51–53, *supra*. To illustrate this uniform mislabeling for each CLIF Organic Trail Mix Bar, included in Exhibit F is a list detailing each CLIF Organic Trail Mix Bar’s: (1) label’s healthy statement(s) subject to 21 C.F.R. § 101.65(d) (“Healthy Statements”); (2) label’s express or implied nutrient content statements (“Nutrient Content Statements”); and (3) violations of the FDA’s requirements for Healthy Nutrient Content Claims, i.e., 21 C.F.R. § 101.65(d). As an example of Clif’s unlawful and misleading Healthy Nutrient Content Claims on its CLIF Organic Trail Mix Bars’ labels, a scan of the CLIF Dark Chocolate Almond Sea Salt Organic Trail Mix Bar’s label is provided below, in addition to being included with



1 the other CLIF Organic Trail Mix Bars’ labels in Exhibit F. By way of example, the Healthy  
 2 Statement and Nutrient Content Statements for the CLIF Dark Chocolate Almond Sea Salt Organic  
 3 Trail Mix Bar giving rise to the Healthy Nutrient Content Claim are enlarged to make them easier to  
 4 read in this Complaint. The other CLIF Organic Trail Mix Bars identified in ¶ 1 n.2, *supra*, and  
 5 included in Exhibit F also bear Healthy Nutrient Content Claims because their labels included the  
 6 same Healthy Statement Values as Clif’s CLIF Dark Chocolate Almond Sea Salt Organic Trail Mix Bar and  
 7 materially similar Nutrient Content Statements.



24 a. CLIF Dark Chocolate Almond Sea Salt Organic Trail Mix Bar

25 i. Healthy Statements (emphasis added)

- 26 1. “Combining simple and organic ingredients that are good for  
 27 both our bodies and the planet, our trail mix bar comes in  
 28

1 flavors for just about every occasion—no matter where the trail  
2 takes you.”

3 up and discovering all the good stuff the day has to offer. Combining simple and organic  
4 ingredients that are good for both our bodies and the planet, our trail mix bar comes  
in flavors for just about every occasion—no matter where the trail takes you.

5 ii. Nutrient Content Statements

6 1. “3g Fiber”

7 **3g Fiber**

8 iii. Violations of FDA Regulations

9 1. Exceeds the maximum 3 grams of fat per 40 grams of total  
10 weight requirement outlined at ¶ 22(a) herein because it  
11 contains 13 grams of fat per 40 grams of total product. *See* 21  
12 C.F.R. § 101.62(b)(2).

13 2. Exceeds the 1 gram of saturated fat per 40 grams total weight  
14 requirement outlined at ¶ 22(b) herein because it contains 3  
15 grams of saturated fat per 40 grams of total product. *See* 21  
16 C.F.R. § 101.62(c)(2).

17 60. Clif’s labels portray the false and misleading impression that the LUNA Bars and  
18 CLIF Bars have a nutrient profile consistent with dietary recommendations. Further, Clif’s abuse of  
19 Healthy Nutrient Content Claims parallels conduct giving rise to enforcement action by the FDA  
20 against other packaged food manufacturers. Since 2007, the FDA has sent warning letters to at least  
21 twenty (20) packaged food manufacturers including nine in 2015 alone stating that each  
22 manufacturer’s products were misbranded under 21 U.S.C. § 403(r)(1)(A) for bearing Healthy  
23 Nutrient Content Claims but failing to meet the FDA’s requirements for use of such claims.<sup>12</sup> The  
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25 <sup>12</sup> *See* FDA, Warning Letter to Everything Spelt Company, Inc., Mar. 30, 2007, [http://www.fda.gov/](http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2006/ucm076345.htm)  
26 [ICECI/EnforcementActions/WarningLetters/2006/ucm076345.htm](http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2006/ucm076345.htm); FDA, Warning Letter to Ken’s  
27 [Foods, Inc., Feb. 22, 2010, http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/](http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2010/ucm202830.htm)  
28 [ucm202830.htm](http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2010/ucm202830.htm); FDA, Warning Letter to Nestle Nutrition, Feb. 22, 2010, [http://www.fda.gov/](http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2010/ucm202821.htm)  
[ICECI/EnforcementActions/WarningLetters/2010/ucm202821.htm](http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2010/ucm202821.htm); FDA, Warning Letter to  
CytoSport, Inc., June 29, 2011, [http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/](http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/ucm261684.htm)  
[ucm261684.htm](http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/ucm261684.htm); FDA, Warning Letter to CAW Industries, Inc., Jan. 31, 2012, <http://www.fda.gov/>



1 FDA identified as Healthy Nutrient Content Claims statements in parallel with those that Clif makes  
 2 on its products such as, “deliciously sweet and healthy diced plums . . .,”<sup>13</sup> “A Healthy Butter!”,<sup>14</sup>  
 3 “HEALTHY EVERYDAY SNACK!”,<sup>15</sup> and, “healthy and tasty.”<sup>16</sup>

4 61. Moreover, Clif’s LUNA Bars and CLIF Bars are mislabeled with improper Healthy  
 5 Nutrient Content Claims in nearly identical fashion to four similar snack bars manufactured by Kind,  
 6 LLC (“Kind”), which the FDA identified in a warning letter to Kind dated March 17, 2015, attached  
 7 hereto as Exhibit J. The FDA identified as Healthy Nutrient Content Claims on Kind’s products and  
 8 its website the statements, “Healthy and tasty, convenient and wholesome,” “There’s healthy.”

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10 ICECI/EnforcementActions/WarningLetters/2012/ucm290046.htm; FDA, Warning Letter to Hail  
 11 Merry, LLC, Oct. 23, 2012, <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2012/ucm326550.htm>; FDA, Warning Letter to North Dallas Big Honey Company, June 24, 2013,  
 12 <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2013/ucm358641.htm>; FDA,  
 13 Warning Letter to Waterwheel Premium Foods Pty Limited, July 26, 2013, <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2013/ucm364729.htm>; FDA, Warning Letter to Premier  
 14 Organics Inc., Aug. 12, 2014, <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2014/ucm417246.htm>; FDA, Warning Letter to Sunsweet Growers Inc., Oct. 2, 2014, <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/ucm428002.htm>; FDA, Warning Letter to Minerva  
 15 Dairy, Inc., Oct. 9, 2014, <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2014/ucm418768.htm>; FDA, Warning Letter to Carrington Farms, Jan. 13, 2015, <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/ucm433444.htm>; FDA, Warning Letter to Bragg Live  
 16 Food Products, Inc., Mar. 4, 2015, <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/ucm437839.htm>; FDA, Warning Letter to Kind, LLC, Mar. 17, 2015, <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/ucm440942.htm>; FDA, Warning Letter to Yummy Earth Inc.,  
 17 Apr. 2, 2015, <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2015/ucm442130.htm>; FDA, Warning Letter to Laughing Giraffe Organics, May 12, 2015,  
 18 <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2015/ucm453687.htm>; FDA,  
 19 Warning Letter to Wonder Natural Foods Corp., July 13, 2015, <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2015/ucm460910.htm>; FDA, Warning Letter to Quest  
 20 Nutrition, LLC, July 29, 2015, <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2015/ucm460915.htm>; FDA, Warning Letter to Red Mill Farms LLC, Sept. 17, 2015,  
 21 <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2015/ucm463598.htm>; FDA,  
 22 Warning Letter to Ribon Company, Ltd., Oct. 5, 2015, <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2015/ucm465792.htm>.

23 <sup>13</sup> FDA, Warning Letter to Sunsweet Growers Inc., Oct. 2, 2014, <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/ucm428002.htm>.

24 <sup>14</sup> FDA, Warning Letter to Minerva Dairy, Inc., Oct. 9, 2014, <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2014/ucm418768.htm>.

26 <sup>15</sup> FDA, Warning Letter to Laughing Giraffe Organics, May 12, 2015, <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2015/ucm453687.htm>.

27 <sup>16</sup> FDA, Warning Letter to Ribon Company, Ltd., Oct. 5, 2015, <http://www.fda.gov/ICECI/EnforcementActions/WarningLetters/2015/ucm465792.htm>.

1 There's tasty. Then there's healthy and tasty," "all of our snacks are pretty much the nirvana of  
2 healthful tastiness," and, "KIND Peanut Butter Dark Chocolate + Protein is a healthy and satisfying  
3 blend of peanuts and antioxidant-rich dark chocolate." *Id.* at p. 2 The FDA stated that Kind's  
4 products did not meet the requirements for use of Healthy Nutrient Content Claims because they  
5 exceeded the maximum saturated fat requirements for use of such claims, i.e., each Kind snack bar  
6 contained more than 1 gram of saturated fat per 40 grams of total weight. *Id.* at pp. 2–3; *see also*  
7 ¶ 22(b) (describing maximum saturated fat requirement). Just as with Kind, Clif's LUNA Bars and  
8 CLIF Bars similarly do not meet the requirements for use of Healthy Nutrient Content Claims  
9 because they exceed the maximum saturated fat requirements (in addition to the maximum total fat  
10 requirements) to allow Clif to make use of such claims.

11 62. According to FDA policy and practice, it issues warning letters such as those  
12 identified in ¶¶ 60–61 "only for violations of regulatory significance." FDA, Regulatory Procedures  
13 Manual at 4-2 (July 2012), *available at* [http://www.fda.gov/downloads/ICECI/ComplianceManuals/  
14 RegulatoryProceduresManual/UCM074330.pdf](http://www.fda.gov/downloads/ICECI/ComplianceManuals/RegulatoryProceduresManual/UCM074330.pdf). Warning letters "communicate[] the agency's  
15 position on a matter" and are intended "to correct violations of the statutes or regulations." *Id.*; *see*  
16 *also* Hamburg Letter (stating that warning letters "convey our [FDA's] regulatory intentions"). In its  
17 regulatory capacity over food labeling, the FDA issues warning letters to clarify food-labeling  
18 requirements and provide labeling instruction to food manufacturers. *See* Hamburg Letter ("I will  
19 close with the hope that these warning letters will give food manufacturers further clarification about  
20 what is expected of them as they review their current labeling.").

21 63. Independent of the FDA's requirements for Healthy Nutrient Content Claims, each  
22 LUNA Bar's and CLIF Bar's labeling violates the FDCA and California law because its label is false  
23 and misleading under the general standard. As alleged throughout this Complaint, Clif utilizes  
24 "health" and/or synonyms of "healthy" in conjunction with claims that the LUNA Bars and CLIF  
25 Bars contain nutrients that consumers understand as beneficial and healthful such as protein, fiber,  
26 calcium, iron, folic acid, and vitamin D. The FDA's factual findings outlined above confirm that  
27 consumers reasonably expect foods representing themselves as being "healthy" or supporting  
28 "health" because they contain these perceived beneficial nutrients are actually healthy and do not

1 contain unhealthy levels of fat and saturated fat. Thus, each LUNA Bar's and CLIF Bar's label is  
2 false and misleading under the general standard because each LUNA Bar and CLIF Bar  
3 misrepresents to consumers that it is healthy when, in fact, each product contains large quantities of  
4 unhealthy substances. *See* 21 U.S.C. § 343(a)(1).

#### 5 **CLIF REFUSED TO CEASE ITS WRONGDOING**

6 64. On October 20, 2015, Plaintiff Perieff and his counsel notified Clif of the allegations  
7 in this Complaint concerning its CLIF Bars and LUNA Bars via letter pursuant to the CLRA, Cal.  
8 Civ. Code §§ 1750–85. A copy of Plaintiff Perieff's CLRA letter to Clif (labels omitted) is attached  
9 hereto as Exhibit K. Clif's agents signed the U.S. mail return receipt form confirming that Clif  
10 received Plaintiff Perieff's CLRA letter by October 26, 2015. *Id.* at pp. 15–16.

11 65. Plaintiff Perieff's CLRA letter put Clif on notice of the allegations in this Complaint  
12 concerning its CLIF Bars and LUNA Bars and demanded, *inter alia*, that Clif cease selling in  
13 California the CLIF Bars and LUNA Bars bearing the unlawful, false, and misleading labels  
14 described herein. *Id.* at pp. 1–14.

15 66. Clif responded to Plaintiff Perieff's CLRA letter by letter dated November 20, 2015.  
16 A copy of Clif's response to Plaintiff Perieff's CLRA letter is attached here as Exhibit L. In its  
17 response, Clif denied that its CLIF Bars and LUNA Bars were mislabeled, indicated that it would not  
18 change its CLIF Bars' or LUNA Bars' labels, and advised Plaintiff Perieff and his counsel to “not  
19 throw good money after bad.” *Id.* at p. 4.

20 67. On December 21, 2015, Plaintiff Cheslow and her counsel provided Clif with greater  
21 detail about the allegations in this Complaint concerning its LUNA Bars via letter pursuant to the  
22 CLRA, Cal. Civ. Code §§ 1750–85. A copy of Plaintiff Cheslow's CLRA letter to Clif (labels  
23 omitted) is attached hereto as Exhibit M. Clif's agents signed the U.S. mail return receipt forms  
24 confirming that Clif received Plaintiff Cheslow's CLRA letter by December 28, 2015. *Id.* at pp. 24–  
25 25.

26 68. Plaintiff Cheslow's CLRA letter put Clif on notice of the same allegations in this  
27 Complaint concerning its LUNA Bars as were previously made in Plaintiff Perieff's CLRA letter,  
28

1 and demanded, *inter alia*, that Clif cease selling in California the LUNA Bars bearing the unlawful,  
2 false, and misleading labels described herein. *Id.* at pp. 1–23.

3 69. Clif never responded to Plaintiff Cheslow’s CLRA letter, presumably standing by its  
4 prior response to Plaintiff Perieff’s CLRA letter indicating that it would not change its LUNA Bars’  
5 labels.

6 70. Although Clif now has had ample notice of Plaintiffs’ allegations that its LUNA  
7 Bars’ and CLIF Bars’ labeling is unlawful, false, and misleading as described herein and had an  
8 opportunity to address Plaintiffs’ demands, Clif has failed to do so.

9 **CLASS ACTION ALLEGATIONS**

10 **I. Class Action Allegations Relating to Purchases of Clif’s LUNA Bars**

11 71. This action asserts claims relating to purchases of Clif’s LUNA Bars on behalf of two  
12 California Classes pursuant to Cal. Civ. Proc. Code § 382, defined as follows:

13 **The LUNA Bars Damages Class**

14 All California citizens who purchased Clif’s LUNA Bars packaged food products<sup>17</sup> that  
15 were labeled with derivatives of “healthy” such as “health,” and/or synonyms thereof,  
16 i.e., “Whole Nutrition” and/or “nutrition,” and a statement about the level of protein, fiber,  
calcium, iron, folic acid, vitamin D, and/or fat that did not meet the nutrient levels required by  
the FDA when making a Healthy Nutrient Content Claim.

17 **The LUNA Bars Declaratory/Injunctive Class**

18 All California citizens.

19 72. Excluded from the LUNA Bars Damages and Declaratory/Injunctive Classes are:  
20 (i) Clif Bar & Company, including any entity in which Clif Bar & Company has a controlling  
21 interest, is a parent or subsidiary, or which is controlled by Clif Bar & Company, as well as its  
22 officers, directors, affiliates, legal representatives, heirs, predecessors, successors, and assigns;  
23 (ii) any person who is not a California citizen as of the date of the filing of this action; (iii) all  
24 purchases of Clif’s LUNA Bars made outside the State of California by any California citizen; and  
25 (iv) the judges to whom this action is assigned and any members of their immediate families.

26 \_\_\_\_\_  
27 <sup>17</sup> Plaintiffs identified the Clif LUNA Bars identified in ¶ 1 n.1, *supra*, and reserve the right to  
28 amend the class definition to include additional LUNA Bars subsequently identified through  
discovery.

1           73. Certification of Plaintiff Cheslow’s claims for class-wide treatment is appropriate  
2 because Plaintiff Cheslow can prove the elements of her claims on a class-wide basis using the same  
3 evidence as would be used to prove those elements in individual actions alleging the same claims.

4                   **A. The Parties Are Numerous and Ascertainable**

5           74. There are thousands of members of the LUNA Bar Classes who are geographically  
6 dispersed throughout California. Therefore, individual joinder of the LUNA Bar Classes’ members  
7 in order to bring them all before the Court is impracticable.

8                   **B. There Is a Well-Defined Community of Interest**

9           75. In order to determine if there is a well-defined community of interest such that the  
10 question is one of a common or general interest, a court should consider: (1) whether common  
11 questions of law and facts predominate; (2) whether the class representative’s claims or defenses are  
12 typical of the class; and (3) whether the class representatives can adequately represent the class.

13                   **i. Common Questions of Law and Fact Predominate**

14           76. Common questions of law or fact exist as to all members of the LUNA Bar Damages  
15 Class and predominate over any questions affecting only individual members of that Class. These  
16 common legal or factual questions include:

- 17           a. Whether Clif’s LUNA Bars as described herein were sold in California;
- 18           b. Whether Clif’s LUNA Bars’ labels make Healthy Nutrient Content Claims;
- 19           c. Whether Clif’s LUNA Bars’ labels comply with the FDA’s requirements for Healthy  
20 Nutrient Content Claims;
- 21           d. Whether Clif’s mislabeling of the LUNA Bars as described herein is unlawful;
- 22           e. Whether Clif’s mislabeling of the LUNA Bars as described herein is material to  
23 consumers; and
- 24           f. The amount of damages or restitution due to Plaintiff Cheslow and members of the  
25 LUNA Bars Damages Class.

26           77. Common questions of law or fact exist as to all members of the LUNA Bars  
27 Declaratory/Injunctive Class and predominate over any questions affecting only individual members  
28 of that Class. These common legal or factual questions include:

- 1 a. Whether Clif's LUNA Bars as described herein are currently being offered for sale in
- 2 California;
- 3 b. Whether Clif's LUNA Bars' labels make Healthy Nutrient Content Claims;
- 4 c. Whether Clif's LUNA Bars' labels comply with the FDA's requirements for Healthy
- 5 Nutrient Content Claims;
- 6 d. Whether Clif's mislabeling of the LUNA Bars as described herein is unlawful;
- 7 e. Whether Clif's mislabeling of the LUNA Bars as described herein is material to
- 8 consumers; and
- 9 f. Whether Plaintiff Cheslow and members of the LUNA Bars Declaratory/Injunctive
- 10 Class are entitled to declaratory and injunctive relief.

11 **ii. Plaintiff's Claims Are Typical of the Classes**

12 78. Plaintiff Cheslow's claims are typical of the claims of the LUNA Bars Damages

13 Class. Plaintiff Cheslow is a California citizen who purchased Clif LUNA Bars in California as

14 described in ¶ 9, *supra*. Therefore, Plaintiff Cheslow is no different in any material respect from any

15 other member of the LUNA Bars Damages Class, and the relief sought by Plaintiff Cheslow is

16 common to the relief sought by the LUNA Bars Damages Class.

17 79. Plaintiff Cheslow's claims are typical of the claims of the LUNA Bars

18 Declaratory/Injunctive Class. Plaintiff Cheslow is a California citizen who continues to be exposed

19 to Clif's mislabeling as described in ¶ 9, *supra*. Therefore, Plaintiff Cheslow is no different in any

20 material respect from any other member of the LUNA Bars Declaratory/Injunctive Class, and the

21 relief sought by Plaintiff Cheslow is common to the relief sought by the LUNA Bars

22 Declaratory/Injunctive Class.

23 **iii. The Class Representative Can Adequately Represent the Class**

24 80. Plaintiff Cheslow is an adequate representative of the LUNA Bars Classes because

25 her interests are neither antagonistic to nor in conflict with the interests of the members of the

26 LUNA Bars Classes that she seeks to represent, and she has retained counsel competent and

27 experienced in conducting complex class-action litigation. Plaintiff Cheslow and her counsel will

28 adequately protect the interests of the LUNA Bars Classes.



**C. A Class Action Is Superior to All Other Available Methods for the Fair and Efficient Adjudication of Plaintiff's and Class Members' Claims**

81. A class action is superior to other available means for the fair and efficient adjudication of this dispute. It would be virtually impossible for members of the LUNA Bars Classes individually to obtain the relief sought in this Complaint. With respect to the LUNA Bars Damages Class, the damages suffered by each individual member of that Class will likely be relatively small, especially given the relatively small cost of Clif's LUNA Bars at issue and the burden and expense of individual prosecution of the complex litigation necessitated by Clif's misconduct. With respect to the LUNA Bars Declaratory/Injunctive Class, because this action seeks declaratory and injunctive relief to restrain Clif from selling or making available for sale the mislabeled LUNA Bars throughout California, this action is only appropriate as a class action because it affects all California consumers by the nature of the relief sought.

82. Even if members of the LUNA Bars Classes could afford individual actions, a multitude of such individual actions still would not be preferable to class-wide litigation. Individual actions also present the potential for inconsistent or contradictory judgments, which would be dispositive of at least some of the issues and hence interests of the other members not party to the individual actions, would substantially impair or impede their ability to protect their interests, and would establish incompatible standards of conduct for the party opposing the LUNA Bars Classes.

83. A class action presents far fewer litigation management difficulties and provides the benefits of single adjudication, economies of scale, and comprehensive supervision by a single court.

84. With respect to the LUNA Bars Declaratory/Injunctive Class, the Class also may be certified because Clif acted or refused to act on grounds generally applicable to the Class, thereby making preliminary and final injunctive relief and corresponding declaratory relief appropriate.

85. Also, in the alternative, the LUNA Bars Classes may be certified with respect to particular issues.

**II. Class Action Allegations Relating to Purchases of Clif's CLIF Bars**

86. This action asserts claims relating to purchases of Clif's CLIF Bars on behalf of two California Classes pursuant to Cal. Civ. Proc. Code § 382, defined as follows:

1           The CLIF Bars Damages Class

2           All California citizens who purchased Clif’s CLIF Bars packaged food products<sup>18</sup> that  
3 were labeled synonyms of “healthy,” i.e., “wholesome,” “nutritious,” being “good for . . . our  
4 bodies,” and/or containing ingredients “to keep kids . . . growing,” and a statement about the  
level of fiber, protein, fat, and/or sodium that did not meet the nutrient levels required by the  
FDA when making a Healthy Nutrient Content Claim.

5           The CLIF Bars Declaratory/Injunctive Class

6           All California citizens.

7           87. Excluded from the CLIF Bars Damages and Declaratory/Injunctive Classes are:

- 8 (i) Clif Bar & Company, including any entity in which Clif Bar & Company has a controlling  
9 interest, is a parent or subsidiary, or which is controlled by Clif Bar & Company, as well as its  
10 officers, directors, affiliates, legal representatives, heirs, predecessors, successors, and assigns;  
11 (ii) any person who is not a California citizen as of the date of the filing of this action; (iii) all  
12 purchases of Clif’s CLIF Bars made outside the State of California by any California citizen; and  
13 (iv) the judges to whom this action is assigned and any members of their immediate families.

14           88. Certification of Plaintiffs’ claims for class-wide treatment is appropriate because  
15 Plaintiffs can prove the elements of their claims on a class-wide basis using the same evidence as  
16 would be used to prove those elements in individual actions alleging the same claims.

17                   **A. The Parties Are Numerous and Ascertainable**

18           89. There are thousands of members of the CLIF Bar Classes who are geographically  
19 dispersed throughout California. Therefore, individual joinder of the CLIF Bar Classes’ members in  
20 order to bring them all before the Court is impracticable.

21                   **B. There Is a Well-Defined Community of Interest**

22           90. In order to determine if there is a well-defined community of interest such that the  
23 question is one of a common or general interest, a court should consider: (1) whether common  
24 questions of law and facts predominate; (2) whether the class representative’s claims or defenses are  
25 typical of the class; and (3) whether the class representatives can adequately represent the class.

26  
27  
28           <sup>18</sup> Plaintiffs identified the Clif CLIF Bars identified in ¶ 1 n.2, *supra*, and reserve the right to amend  
the class definition to include additional CLIF Bars subsequently identified through discovery.

**i. Common Questions of Law and Fact Predominate**

91. Common questions of law or fact exist as to all members of the CLIF Bar Damages Class and predominate over any questions affecting only individual members of that Class. These common legal or factual questions include:

- g. Whether Clif's CLIF Bars as described herein were sold in California;
- h. Whether Clif's CLIF Bars' labels make Healthy Nutrient Content Claims;
- i. Whether Clif's CLIF Bars' labels comply with the FDA's requirements for Healthy Nutrient Content Claims;
- j. Whether Clif's mislabeling of the CLIF Bars as described herein is unlawful;
- k. Whether Clif's mislabeling of the CLIF Bars as described herein is material to consumers; and
- l. The amount of damages or restitution due to Plaintiffs and members of the CLIF Bars Damages Class.

92. Common questions of law or fact exist as to all members of the CLIF Bars Declaratory/Injunctive Class and predominate over any questions affecting only individual members of that Class. These common legal or factual questions include:

- g. Whether Clif's CLIF Bars as described herein are currently being offered for sale in California;
- h. Whether Clif's CLIF Bars' labels make Healthy Nutrient Content Claims;
- i. Whether Clif's CLIF Bars' labels comply with the FDA's requirements for Healthy Nutrient Content Claims;
- j. Whether Clif's mislabeling of the CLIF Bars as described herein is unlawful;
- k. Whether Clif's mislabeling of the CLIF Bars as described herein is material to consumers; and
- l. Whether Plaintiffs and members of the CLIF Bars Declaratory/Injunctive Class are entitled to declaratory and injunctive relief.

1                                    **ii. Plaintiffs' Claims Are Typical of the Classes**

2            93. Plaintiffs' claims are typical of the claims of the CLIF Bars Damages Class. Plaintiff  
3 Cheslow is a California citizen who purchased Clif CLIF Bars in California as described in ¶ 9,  
4 *supra*. Plaintiff Perieff is a California citizen who purchased Clif CLIF Bars in California as  
5 described in ¶ 8, *supra*. Therefore, Plaintiffs are no different in any material respect from any other  
6 member of the CLIF Bars Damages Class, and the relief sought by Plaintiffs is common to the relief  
7 sought by the CLIF Bars Damages Class.

8            94. Plaintiffs' claims are typical of the claims of the CLIF Bars Declaratory/Injunctive  
9 Class. Plaintiff Cheslow is a California citizen who continues to be exposed to Clif's mislabeling as  
10 described in ¶ 9, *supra*. Plaintiff Perieff is a California citizen who continues to be exposed to Clif's  
11 mislabeling as described in ¶ 8, *supra*. Therefore, Plaintiffs are no different in any material respect  
12 from any other member of the CLIF Bars Declaratory/Injunctive Class, and the relief sought by  
13 Plaintiffs is common to the relief sought by the CLIF Bars Declaratory/Injunctive Class.

14                                    **iii. The Class Representatives Can Adequately Represent the Class**

15            95. Plaintiffs are adequate representatives of the CLIF Bars Classes because their  
16 interests are neither antagonistic to nor in conflict with the interests of the members of the CLIF Bars  
17 Classes that they seek to represent, and they have retained counsel competent and experienced in  
18 conducting complex class-action litigation. Plaintiffs and their counsel will adequately protect the  
19 interests of the CLIF Bars Classes.

20                                    **C. A Class Action Is Superior to All Other Available Methods for the Fair  
21 and Efficient Adjudication of Plaintiffs' and Class Members' Claims**

22            96. A class action is superior to other available means for the fair and efficient  
23 adjudication of this dispute. It would be virtually impossible for members of the CLIF Bars Classes  
24 individually to obtain the relief sought in this Complaint. With respect to the CLIF Bars Damages  
25 Class, the damages suffered by each individual member of that Class will likely be relatively small,  
26 especially given the relatively small cost of Clif's CLIF Bars at issue and the burden and expense of  
27 individual prosecution of the complex litigation necessitated by Clif's misconduct. With respect to  
28 the CLIF Bars Declaratory/Injunctive Class, because this action seeks declaratory and injunctive

1 relief to restrain Clif from selling or making available for sale the mislabeled CLIF Bars throughout  
2 California, this action is only appropriate as a class action because it affects all California consumers  
3 by the nature of the relief sought.

4 97. Even if members of the CLIF Bars Classes could afford individual actions, a  
5 multitude of such individual actions still would not be preferable to class-wide litigation. Individual  
6 actions also present the potential for inconsistent or contradictory judgments, which would be  
7 dispositive of at least some of the issues and hence interests of the other members not party to the  
8 individual actions, would substantially impair or impede their ability to protect their interests, and  
9 would establish incompatible standards of conduct for the party opposing the CLIF Bars Classes.

10 98. A class action presents far fewer litigation management difficulties and provides the  
11 benefits of single adjudication, economies of scale, and comprehensive supervision by a single court.

12 99. With respect to the CLIF Bars Declaratory/Injunctive Class, the Class also may be  
13 certified because Clif acted or refused to act on grounds generally applicable to the Class, thereby  
14 making preliminary and final injunctive relief and corresponding declaratory relief appropriate.

15 100. Also, in the alternative, the CLIF Bars Classes may be certified with respect to  
16 particular issues.

17  
18 **FIRST CAUSE OF ACTION**  
19 **(“Unlawful” Business Practices in Violation of the Unfair Competition Law (“UCL”),**  
20 **Cal. Bus. & Prof. Code §§ 17200, et seq.)**

21 **A. First Cause of Action Relating to Purchases of Clif’s LUNA Bars**

22 101. Plaintiff Cheslow hereby incorporates all other paragraphs of this Complaint and  
23 restates them as if fully set forth herein.

24 102. Plaintiff Cheslow brings this claim on behalf of herself, the LUNA Bars Damages  
25 Class, and the LUNA Bars Declaratory/Injunctive Class.

26 103. The UCL defines unfair business competition to include any “unlawful, unfair or  
27 fraudulent” act or practice, as well as any “unfair, deceptive, untrue or misleading” advertising. Cal.  
28 Bus. Prof. Code § 17200.

1 104. A business act or practice is “unlawful” if it violates any established state or federal  
2 law.

3 105. As described throughout this Complaint, Clif’s LUNA Bars’ labeling violates  
4 California’s Sherman Law, the FDCA, and FDA regulations, including amongst other laws, those  
5 identified in ¶¶ 6, 14-22, *supra*. Moreover, the labeling of Clif’s LUNA Bars is false and  
6 misleading in violation of Sherman Law § 110660, and FDCA § 343(a).

7 106. Clif continues to violate the UCL through its ongoing violation of California and  
8 federal law as described herein.

9 107. As described herein, Clif obtained money from Plaintiff Cheslow through its unlawful  
10 acts and practices because Plaintiff Cheslow purchased the LUNA Bars relying on the accuracy of  
11 Clif’s labeling and Clif’s mislabeling was material to Plaintiff Cheslow’s decision to purchase the  
12 LUNA Bars. As a result of Clif’s alleged conduct, Plaintiff Cheslow has lost money.

13 108. Clif has obtained and continues to obtain money from members of the LUNA Bars  
14 Damages Class through its unlawful acts and practices alleged in this Complaint. As such, Plaintiff  
15 Cheslow requests that this Court cause Clif to restore this money to Plaintiff Cheslow and the LUNA  
16 Bars Damages Class members and to disgorge the profits that Clif made on these transactions.  
17 Otherwise, Plaintiff Cheslow and the LUNA Bars Damages Class may be irreparably harmed and/or  
18 denied an effective and complete remedy if such an order is not granted.

19 109. Plaintiff Cheslow also requests that the Court declare Clif’s LUNA Bars’ labeling  
20 unlawful and enjoin Clif from continuing to violate the UCL by selling, offering for sale, or  
21 distributing the mislabeled LUNA Bars in California, or causing the mislabeled LUNA Bars to be  
22 distributed, sold, or offered for sale in California. Unless Clif is permanently enjoined from  
23 continuing to engage in such violations of the UCL, future consumers of Clif’s LUNA Bars will be  
24 harmed by Clif’s acts and practices in the same way as Plaintiff Cheslow.

25 **B. First Cause of Action Relating to Purchases of Clif’s CLIF Bars**

26 110. Plaintiffs hereby incorporate all other paragraphs of this Complaint and restate them  
27 as if fully set forth herein.

28



1 111. Plaintiffs bring this claim on behalf of themselves, the CLIF Bars Damages Class,  
2 and the CLIF Bars Declaratory/Injunctive Class.

3 112. The UCL defines unfair business competition to include any “unlawful, unfair or  
4 fraudulent” act or practice, as well as any “unfair, deceptive, untrue or misleading” advertising. Cal.  
5 Bus. Prof. Code § 17200.

6 113. A business act or practice is “unlawful” if it violates any established state or federal  
7 law.

8 114. As described throughout this Complaint, Clif’s CLIF Bars’ labeling violates  
9 California’s Sherman Law, the FDCA, and FDA regulations, including amongst other laws, those  
10 identified in ¶¶ 6, 14-22, *supra*. Moreover, the labeling of Clif’s CLIF Bars is false and misleading  
11 in violation of Sherman Law § 110660, and FDCA § 343(a).

12 115. Clif continues to violate the UCL through its ongoing violation of California and  
13 federal law as described herein.

14 116. As described herein, Clif obtained money from Plaintiffs through its unlawful acts  
15 and practices because Plaintiffs purchased the CLIF Bars relying on the accuracy of Clif’s labeling  
16 and Clif’s mislabeling was material to Plaintiffs’ decisions to purchase the CLIF Bars. As a result of  
17 Clif’s alleged conduct, Plaintiffs have lost money.

18 117. Clif has obtained and continues to obtain money from members of the CLIF Bars  
19 Damages Class through its unlawful acts and practices alleged in this Complaint. As such, Plaintiffs  
20 request that this Court cause Clif to restore this money to Plaintiffs and the CLIF Bars Damages  
21 Class members and to disgorge the profits that Clif made on these transactions. Otherwise, Plaintiffs  
22 and the CLIF Bars Damages Class may be irreparably harmed and/or denied an effective and  
23 complete remedy if such an order is not granted.

24 118. Plaintiffs also request that the Court declare Clif’s CLIF Bars’ labeling unlawful and  
25 enjoin Clif from continuing to violate the UCL by selling, offering for sale, or distributing the  
26 mislabeled CLIF Bars in California, or causing the mislabeled CLIF Bars to be distributed, sold, or  
27 offered for sale in California. Unless Clif is permanently enjoined from continuing to engage in  
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1 such violations of the UCL, future consumers of Clif’s CLIF Bars will be harmed by Clif’s acts and  
2 practices in the same way as Plaintiffs.

3  
4 **SECOND CAUSE OF ACTION**  
5 **(“Unfair” Business Practices in Violation of the Unfair Competition Law (“UCL”),**  
6 **Cal. Bus. & Prof. Code §§ 17200, *et seq.*)**

7 **A. Second Cause of Action Relating to Purchases of Clif’s LUNA Bars**

8 119. Plaintiff Cheslow hereby incorporates all other paragraphs of this Complaint and  
9 restates them as if fully set forth herein.

10 120. Plaintiff Cheslow brings this claim on behalf of herself, the LUNA Bars Damages  
11 Class, and the LUNA Bars Declaratory/Injunctive Class.

12 121. The UCL defines unfair business competition to include any “unlawful, unfair or  
13 fraudulent” act or practice, as well as any “unfair, deceptive, untrue or misleading” advertising. Cal.  
14 Bus. Prof. Code § 17200.

15 122. A business act or practice is “unfair” under the UCL if the reasons, justifications, and  
16 motives of the alleged wrongdoer are outweighed by the gravity of the harm to the alleged victims.

17 123. As described throughout this Complaint, Clif’s LUNA Bars’ labeling violates FDA  
18 regulations, the FDCA, the Sherman Law, and is false and misleading. Clif’s practices constitute  
19 unfair business practices in violation of the UCL because, among other things, they are immoral,  
20 unethical, oppressive, unscrupulous, or substantially injurious to consumers and/or any utility of  
21 such practices is outweighed by the harm caused to consumers. Clif’s practices violate the  
22 legislative policies of the underlying statutes alleged herein: namely, protecting consumers and  
23 preventing persons from being injured by false and misleading advertising. Clif’s practices caused  
24 substantial injury to Plaintiff Cheslow and LUNA Bars Class members and are not outweighed by  
25 any benefits, and Plaintiff Cheslow and LUNA Bars Class members could not have reasonably  
26 avoided their injuries.

27 124. Clif continues to violate the UCL through its unfair acts and practices as described  
28 herein.

1 125. As described herein, Clif obtained money from Plaintiff Cheslow through its unfair  
2 acts and practices because Plaintiff Cheslow purchased Clif’s LUNA Bars relying on the accuracy of  
3 Clif’s labeling and Clif’s labeling was material to Plaintiff Cheslow’s decision to purchase the  
4 LUNA Bars. As a result of Clif’s alleged conduct, Plaintiff Cheslow has lost money.

5 126. Clif has obtained and continues to obtain money from members of the LUNA Bars  
6 Damages Class through its unlawful acts and practices alleged in this Complaint. As such, Plaintiff  
7 Cheslow requests that this Court cause Clif to restore this money to Plaintiff Cheslow and the LUNA  
8 Bars Damages Class members and to disgorge the profits Clif made on these transactions.  
9 Otherwise, Plaintiff Cheslow and the LUNA Bars Damages Class may be irreparably harmed and/or  
10 denied an effective and complete remedy if such an order is not granted.

11 127. Plaintiff Cheslow also requests that the Court declare Clif’s LUNA Bars’ labeling  
12 unlawful and enjoin Clif from continuing to violate the UCL by selling, offering for sale, or  
13 distributing the mislabeled LUNA Bars in California, or causing the mislabeled LUNA Bars to be  
14 distributed, sold, or offered for sale in California. Unless Clif is permanently enjoined from  
15 continuing to engage in such violations of the UCL, future consumers of Clif’s LUNA Bars will be  
16 harmed by Clif’s acts and practices in the same way as Plaintiff Cheslow.

17 **B. Second Cause of Action Relating to Purchases of Clif’s CLIF Bars**

18 128. Plaintiffs hereby incorporate all other paragraphs of this Complaint and restate them  
19 as if fully set forth herein.

20 129. Plaintiffs bring this claim on behalf of themselves, the CLIF Bars Damages Class,  
21 and the CLIF Bars Declaratory/Injunctive Class.

22 130. The UCL defines unfair business competition to include any “unlawful, unfair or  
23 fraudulent” act or practice, as well as any “unfair, deceptive, untrue or misleading” advertising. Cal.  
24 Bus. Prof. Code § 17200.

25 131. A business act or practice is “unfair” under the UCL if the reasons, justifications, and  
26 motives of the alleged wrongdoer are outweighed by the gravity of the harm to the alleged victims.

27 132. As described throughout this Complaint, Clif’s CLIF Bars’ labeling violates FDA  
28 regulations, the FDCA, the Sherman Law, and is false and misleading. Clif’s practices constitute

1 unfair business practices in violation of the UCL because, among other things, they are immoral,  
2 unethical, oppressive, unscrupulous, or substantially injurious to consumers and/or any utility of  
3 such practices is outweighed by the harm caused to consumers. Clif's practices violate the  
4 legislative policies of the underlying statutes alleged herein: namely, protecting consumers and  
5 preventing persons from being injured by false and misleading advertising. Clif's practices caused  
6 substantial injury to Plaintiffs and CLIF Bars Class members and are not outweighed by any  
7 benefits, and Plaintiffs and CLIF Bars Class members could not have reasonably avoided their  
8 injuries.

9 133. Clif continues to violate the UCL through its unfair acts and practices as described  
10 herein.

11 134. As described herein, Clif obtained money from Plaintiffs through its unfair acts and  
12 practices because Plaintiffs purchased Clif's CLIF Bars relying on the accuracy of Clif's labeling  
13 and Clif's labeling was material to Plaintiffs' decisions to purchase the CLIF Bars. As a result of  
14 Clif's alleged conduct, Plaintiffs have lost money.

15 135. Clif has obtained and continues to obtain money from members of the CLIF Bars  
16 Damages Class through its unlawful acts and practices alleged in this Complaint. As such, Plaintiffs  
17 request that this Court cause Clif to restore this money to Plaintiffs and the CLIF Bars Damages  
18 Class members and to disgorge the profits Clif made on these transactions. Otherwise, Plaintiffs and  
19 the CLIF Bars Damages Class may be irreparably harmed and/or denied an effective and complete  
20 remedy if such an order is not granted.

21 136. Plaintiffs also request that the Court declare Clif's CLIF Bars' labeling unlawful and  
22 enjoin Clif from continuing to violate the UCL by selling, offering for sale, or distributing the  
23 mislabeled CLIF Bars in California, or causing the mislabeled CLIF Bars to be distributed, sold, or  
24 offered for sale in California. Unless Clif is permanently enjoined from continuing to engage in  
25 such violations of the UCL, future consumers of Clif's CLIF Bars will be harmed by Clif's acts and  
26 practices in the same way as Plaintiffs.

27  
28

1  
2 **THIRD CAUSE OF ACTION**  
3 **(“Fraudulent” Business Practices in Violation of the Unfair Competition Law (“UCL”),**  
4 **Cal. Bus. & Prof. Code §§ 17200, *et seq.*)**

5 **A. Third Cause of Action Relating to Purchases of Clif’s LUNA Bars**

6 137. Plaintiff Cheslow hereby incorporates all other paragraphs of this Complaint and  
7 restates them as if fully set forth herein.

8 138. Plaintiff Cheslow brings this claim on behalf of herself, the LUNA Bars Damages  
9 Class, and the LUNA Bars Declaratory/Injunctive Class.

10 139. The UCL defines unfair business competition to include any “unlawful, unfair or  
11 fraudulent” act or practice, as well as any “unfair, deceptive, untrue or misleading” advertising. Cal.  
12 Bus. Prof. Code § 17200.

13 140. A business act or practice is “fraudulent” under the UCL if it actually deceives or is  
14 likely to deceive members of the consuming public.

15 141. As described throughout this Complaint, Clif’s LUNA Bars’ labeling with Healthy  
16 Nutrient Content Claims when they contain too much fat and saturated fat to qualify for such a claim  
17 actually deceives and is likely to deceive members of the consuming public into believing the  
18 products are something they are not.

19 142. Clif continues to violate the UCL through its ongoing fraudulent acts and practices as  
20 described herein.

21 143. As described herein, Clif obtained money from Plaintiff Cheslow through its unlawful  
22 acts and practices because Plaintiff Cheslow purchased the LUNA Bars relying on the accuracy of  
23 Clif’s labeling and Clif’s mislabeling was material to Plaintiff Cheslow’s decision to purchase the  
24 LUNA Bars. As a result of Clif’s alleged conduct, Plaintiff Cheslow has lost money.

25 144. Clif has obtained and continues to obtain money from members of the LUNA Bars  
26 Damages Class through its unlawful acts and practices alleged in this Complaint. As such, Plaintiff  
27 Cheslow requests that this Court cause Clif to restore this money to Plaintiff Cheslow and the LUNA  
28 Bars Damages Class members and to disgorge the profits Clif made on these transactions.

1 Otherwise, Plaintiff Cheslow and the LUNA Bars Damages Class may be irreparably harmed and/or  
2 denied an effective and complete remedy if such an order is not granted.

3 145. Plaintiff Cheslow also requests that the Court declare Clif's LUNA Bars' labeling  
4 unlawful and enjoin Clif from continuing to violate the UCL by selling, offering for sale, or  
5 distributing the mislabeled LUNA Bars in California, or causing the mislabeled LUNA Bars to be  
6 distributed, sold, or offered for sale in California. Unless Clif is permanently enjoined from  
7 continuing to engage in such violations of the UCL, future consumers of Clif's LUNA Bars will be  
8 harmed by Clif's acts and practices in the same way as Plaintiff Cheslow.

9 **B. Third Cause of Action Relating to Purchases of Clif's CLIF Bars**

10 146. Plaintiffs hereby incorporate all other paragraphs of this Complaint and restate them  
11 as if fully set forth herein.

12 147. Plaintiffs bring this claim on behalf of themselves, the CLIF Bars Damages Class,  
13 and the CLIF Bars Declaratory/Injunctive Class.

14 148. The UCL defines unfair business competition to include any "unlawful, unfair or  
15 fraudulent" act or practice, as well as any "unfair, deceptive, untrue or misleading" advertising. Cal.  
16 Bus. Prof. Code § 17200.

17 149. A business act or practice is "fraudulent" under the UCL if it actually deceives or is  
18 likely to deceive members of the consuming public.

19 150. As described throughout this Complaint, Clif's CLIF Bars' labeling with Healthy  
20 Nutrient Content Claims when they contain too much fat and/or saturated fat to qualify for such a  
21 claim actually deceives and is likely to deceive members of the consuming public into believing the  
22 products are something they are not.

23 151. Clif continues to violate the UCL through its ongoing fraudulent acts and practices as  
24 described herein.

25 152. As described herein, Clif obtained money from Plaintiffs through its unlawful acts  
26 and practices because Plaintiffs purchased the CLIF Bars relying on the accuracy of Clif's labeling  
27 and Clif's mislabeling was material to Plaintiffs' decisions to purchase the CLIF Bars. As a result of  
28 Clif's alleged conduct, Plaintiffs have lost money.



1 153. Clif has obtained and continues to obtain money from members of the CLIF Bars  
2 Damages Class through its unlawful acts and practices alleged in this Complaint. As such, Plaintiffs  
3 request that this Court cause Clif to restore this money to Plaintiffs and the CLIF Bars Damages  
4 Class members and to disgorge the profits Clif made on these transactions. Otherwise, Plaintiffs and  
5 the CLIF Bars Damages Class may be irreparably harmed and/or denied an effective and complete  
6 remedy if such an order is not granted.

7 154. Plaintiffs also request that the Court declare Clif's CLIF Bars' labeling unlawful and  
8 enjoin Clif from continuing to violate the UCL by selling, offering for sale, or distributing the  
9 mislabeled CLIF Bars in California, or causing the mislabeled LUNA Bars to be distributed, sold, or  
10 offered for sale in California. Unless Clif is permanently enjoined from continuing to engage in  
11 such violations of the UCL, future consumers of Clif's CLIF Bars will be harmed by Clif's acts and  
12 practices in the same way as Plaintiffs.

13  
14 **FOURTH CAUSE OF ACTION**  
15 **(False Advertising in Violation of the False Advertising Law ("FAL")**  
16 **Cal. Bus. & Prof. Code §§ 17500, et seq.)**

17 **B. Fourth Cause of Action Relating to Purchases of Clif's LUNA Bars**

18 155. Plaintiff Cheslow hereby incorporates all other paragraphs of this Complaint and  
19 restates them as if fully set forth herein.

20 156. Plaintiff Cheslow brings this claim on behalf of herself, the LUNA Bars Damages  
21 Class, and the LUNA Bars Declaratory/Injunctive Class.

22 157. Clif uses advertising on the LUNA Bars' packaging to sell the LUNA Bars. Clif  
23 disseminates advertising concerning the LUNA Bars which is deceptive, untrue, or misleading  
24 within the meaning of the FAL because Clif's mislabeling is misleading, likely to deceive, and  
25 continues to deceive members of the LUNA Bars Classes and the general public as described  
26 throughout this Complaint.

27 158. In making or disseminating the LUNA Bars' labeling described herein, Clif knew or  
28 should have known that the LUNA Bars' labeling was misleading and acted in violation of the FAL.

1           159. Clif’s material nondisclosures and misrepresentations as described throughout this  
2 Complaint constitute false and misleading advertising and therefore violate the FAL.

3           160. As described herein, Clif obtained money from Plaintiff Cheslow through its unlawful  
4 acts and practices because Plaintiff Cheslow purchased the LUNA Bars relying on the accuracy of  
5 Clif’s labeling, and Clif’s mislabeling was material to Plaintiff Cheslow’s decision to purchase the  
6 LUNA Bars. As a result of Clif’s conduct, Plaintiff Cheslow has lost money.

7           161. Clif has obtained and continues to obtain money from members of the LUNA Bars  
8 Damages Class through its unlawful acts and practices alleged in this Complaint. As such, Plaintiff  
9 Cheslow requests that this Court cause Clif to restore this money to Plaintiff Cheslow and LUNA  
10 Bars Damages Class members and to disgorge the profits Clif made on these transactions.  
11 Otherwise, the LUNA Bars Damages Class may be irreparably harmed and/or denied an effective  
12 and complete remedy if such an order is not granted.

13           162. Plaintiff Cheslow also requests the Court declare Clif’s LUNA Bars’ labeling  
14 unlawful and enjoin Clif from continuing to violate the UCL by selling, offering for sale, or  
15 distributing the mislabeled LUNA Bars in California, or causing the mislabeled LUNA Bars to be  
16 distributed, sold, or offered for sale in California. Unless Clif is permanently enjoined from  
17 continuing to engage in such violations of the UCL, future consumers of Clif’s LUNA Bars will be  
18 harmed by Clif’s acts and practices in the same way as Plaintiff Cheslow.

19           **A. Fourth Cause of Action Relating to Purchases of Clif’s CLIF Bars**

20           163. Plaintiffs hereby incorporate all other paragraphs of this Complaint and restate them  
21 as if fully set forth herein.

22           164. Plaintiffs bring this claim on behalf of themselves, the CLIF Bars Damages Class,  
23 and the CLIF Bars Declaratory/Injunctive Class.

24           165. Clif uses advertising on the CLIF Bars’ packaging to sell the CLIF Bars. Clif  
25 disseminates advertising concerning the CLIF Bars which is deceptive, untrue, or misleading within  
26 the meaning of the FAL because Clif’s mislabeling is misleading, likely to deceive, and continues to  
27 deceive members of the CLIF Bars Classes and the general public as described throughout this  
28 Complaint.

1 166. In making or disseminating the CLIF Bars' labeling described herein, Clif knew or  
2 should have known that the CLIF Bars' labeling was misleading and acted in violation of the FAL.

3 167. Clif's material nondisclosures and misrepresentations as described throughout this  
4 Complaint constitute false and misleading advertising and therefore violate the FAL.

5 168. As described herein, Clif obtained money from Plaintiffs through its unlawful acts  
6 and practices because Plaintiffs purchased the CLIF Bars relying on the accuracy of Clif's labeling,  
7 and Clif's mislabeling was material to Plaintiffs' decisions to purchase the CLIF Bars. As a result of  
8 Clif's conduct, Plaintiffs have lost money.

9 169. Clif has obtained and continues to obtain money from members of the CLIF Bars  
10 Damages Class through its unlawful acts and practices alleged in this Complaint. As such, Plaintiffs  
11 request that this Court cause Clif to restore this money to Plaintiffs and CLIF Bars Damages Class  
12 members and to disgorge the profits Clif made on these transactions. Otherwise, the CLIF Bars  
13 Damages Class may be irreparably harmed and/or denied an effective and complete remedy if such  
14 an order is not granted.

15 170. Plaintiffs also request the Court declare Clif's CLIF Bars' labeling unlawful and  
16 enjoin Clif from continuing to violate the UCL by selling, offering for sale, or distributing the  
17 mislabeled CLIF Bars in California, or causing the mislabeled CLIF Bars to be distributed, sold, or  
18 offered for sale in California. Unless Clif is permanently enjoined from continuing to engage in  
19 such violations of the UCL, future consumers of Clif's CLIF Bars will be harmed by Clif's acts and  
20 practices in the same way as Plaintiffs.

21  
22 **FIFTH CAUSE OF ACTION**  
23 **(Violation of the Consumers Legal Remedies Act ("CLRA"),**  
24 **Cal. Civ. Code §§ 1750, et seq.)**

25 **A. Fifth Cause of Action Relating to Purchases of Clif's LUNA Bars**

26 171. Plaintiff Cheslow hereby incorporates all other paragraphs of this Complaint and  
27 restates them as if fully set forth herein.

28 172. Plaintiff Cheslow brings this claim on behalf of herself, the LUNA Bars Damages  
Class, and the LUNA Bars Declaratory/Injunctive Class.

1 173. Plaintiff Cheslow and each member of the LUNA Bars Classes are “consumers”  
2 within the meaning of Cal. Civ. Code § 1761(d).

3 174. Plaintiff Cheslow’s purchases of Clif’s LUNA Bars are “transactions” within the  
4 meaning of Cal. Civ. Code § 1761(e), and Clif’s LUNA Bars are “goods” within the meaning of Cal.  
5 Civ. Code § 1761(a).

6 175. Clif violated and continues to violate the CLRA in at least the following respects:

7 a. In violation of Cal. Civ. Code § 1770(a)(5), Clif represented that the LUNA Bars had  
8 characteristics which they did not have;

9 b. In violation of Cal. Civ. Code § 1770(a)(7), Clif represented that the LUNA Bars  
10 were of a particular standard, quality, or grade, which they were not; and

11 c. In violation of Cal. Civ. Code § 1770(a)(9), Clif advertised the LUNA Bars with the  
12 intent not to provide what it advertised.

13 176. Clif knew or should have known that its LUNA Bars’ mislabeling as alleged  
14 throughout this Complaint violated consumer-protection laws and that the LUNA Bars’ mislabeling  
15 was presumptively material to Plaintiff Cheslow and the members of the LUNA Bars Classes. Clif’s  
16 mislabeling of the LUNA Bars as described herein is willful, wanton, and done with reckless  
17 disregard for the interests of Plaintiff Cheslow and the LUNA Bars Classes.

18 177. As alleged throughout this Complaint, Plaintiff Cheslow purchased Clif’s LUNA  
19 Bars relying on the accuracy of the LUNA Bars’ labeling, and Clif’s mislabeling of the LUNA Bars  
20 was material to Plaintiff Cheslow’s decision to purchase the LUNA Bars.

21 178. As described herein, Clif obtained money from Plaintiff Cheslow through its unlawful  
22 acts and practices because Plaintiff Cheslow purchased the LUNA Bars relying on the accuracy of  
23 Clif’s labeling and Clif’s mislabeling was material to Plaintiff Cheslow’s decision to purchase the  
24 LUNA Bars. As a result of Clif’s alleged conduct, Plaintiff Cheslow has lost money.

25 179. Because Clif failed to respond to Plaintiff Cheslow’s CLRA letter as detailed in  
26 ¶¶ 67–70, *supra*, and stated in response to a prior letter that it would not change its LUNA Bars  
27 labeling to address the mislabeling at issue in the Complaint as detailed in ¶¶ 64–66, 70, *supra*,

28

1 Plaintiff Cheslow is entitled under the CLRA to actual damages, statutory damages, and/or punitive  
2 damages.

3 180. Plaintiff Cheslow also requests that the Court declare Clif's LUNA Bars' labeling  
4 unlawful and enjoin Clif from continuing to violate the CLRA by selling, offering for sale, or  
5 distributing the mislabeled LUNA Bars in California, or causing the mislabeled LUNA Bars to be  
6 sold or offered for sale in California. Unless Clif is permanently enjoined from continuing to engage  
7 in such violations of the CLRA, future consumers of Clif's LUNA Bars will be harmed by Clif's acts  
8 and practices in the same way as Plaintiff Cheslow.

9 181. Plaintiff Cheslow requests that the Court award Plaintiff Cheslow court costs and  
10 attorneys' fees pursuant to the CLRA, Cal. Civ. Code § 1780(e).

11 **B. Fifth Cause of Action Relating to Purchases of Clif's CLIF Bars**

12 182. Plaintiffs hereby incorporate all other paragraphs of this Complaint and restate them  
13 as if fully set forth herein.

14 183. Plaintiffs bring this claim on behalf of themselves, the CLIF Bars Damages Class,  
15 and the CLIF Bars Declaratory/Injunctive Class.

16 184. Plaintiffs and each member of the CLIF Bars Classes are "consumers" within the  
17 meaning of Cal. Civ. Code § 1761(d).

18 185. Plaintiffs' purchases of Clif's CLIF Bars are "transactions" within the meaning of  
19 Cal. Civ. Code § 1761(e), and Clif's CLIF Bars are "goods" within the meaning of Cal. Civ. Code  
20 § 1761(a).

21 186. Clif violated and continues to violate the CLRA in at least the following respects:

22 d. In violation of Cal. Civ. Code § 1770(a)(5), Clif represented that the CLIF Bars had  
23 characteristics which they did not have;

24 e. In violation of Cal. Civ. Code § 1770(a)(7), Clif represented that the CLIF Bars were  
25 of a particular standard, quality, or grade, which they were not; and

26 f. In violation of Cal. Civ. Code § 1770(a)(9), Clif advertised the CLIF Bars with the  
27 intent not to provide what it advertised.

28

1 187. Clif knew or should have known that its CLIF Bars’ mislabeling as alleged  
2 throughout this Complaint violated consumer-protection laws and that the CLIF Bars’ mislabeling  
3 was presumptively material to Plaintiffs and the members of the CLIF Bars Classes. Clif’s  
4 mislabeling of the CLIF Bars as described herein is willful, wanton, and done with reckless  
5 disregard for the interests of Plaintiffs and the CLIF Bars Classes.

6 188. As alleged throughout this Complaint, Plaintiffs purchased Clif’s CLIF Bars relying  
7 on the accuracy of the CLIF Bars’ labeling, and Clif’s mislabeling of the CLIF Bars was material to  
8 Plaintiffs’ decisions to purchase the CLIF Bars.

9 189. As described herein, Clif obtained money from Plaintiffs through its unlawful acts  
10 and practices because Plaintiffs purchased the CLIF Bars relying on the accuracy of Clif’s labeling  
11 and Clif’s mislabeling was material to Plaintiffs’ decisions to purchase the CLIF Bars. As a result of  
12 Clif’s alleged conduct, Plaintiffs have lost money.

13 190. Because Clif failed to provide, or agree to provide within a reasonable time after  
14 receiving Plaintiff Perieff’s CLRA letter, an appropriate correction, repair, replacement, or other  
15 remedy as detailed in ¶¶ 64–66, 70, *supra*, Plaintiff Perieff is entitled under the CLRA to actual  
16 damages, statutory damages, and/or punitive damages.

17 191. Plaintiffs also request that the Court declare Clif’s CLIF Bars’ labeling unlawful and  
18 enjoin Clif from continuing to violate the CLRA by selling, offering for sale, or distributing the  
19 mislabeled CLIF Bars in California, or causing the mislabeled CLIF Bars to be sold or offered for  
20 sale in California. Unless Clif is permanently enjoined from continuing to engage in such violations  
21 of the CLRA, future consumers of Clif’s CLIF Bars will be harmed by Clif’s acts and practices in  
22 the same way as Plaintiffs.

23 192. Plaintiffs request that the Court award Plaintiffs court costs and attorneys’ fees  
24 pursuant to the CLRA, Cal. Civ. Code § 1780(e).

25 **SIXTH CAUSE OF ACTION**  
26 **(Quasi Contract)**

27 **A. Sixth Cause of Action Relating to Purchases of Clif’s LUNA Bars**



1 193. Plaintiff Cheslow hereby incorporates all other paragraphs of this Complaint and  
2 restates them as if fully set forth herein.

3 194. Plaintiff Cheslow brings this claim on behalf of herself and the LUNA Bars Damages  
4 Class.

5 195. Clif's conduct in enticing Plaintiff Cheslow and the LUNA Bars Damages Class to  
6 purchase its LUNA Bars through the false and misleading labeling as described throughout this  
7 Complaint is unlawful because the statements contained on the LUNA Bars' labels are false,  
8 misleading, and violate the FDCA, the Sherman Law, and FDA regulations. Clif obtained money  
9 from Plaintiff Cheslow and members of the LUNA Bars Damages Class for LUNA Bars labeled  
10 with Healthy Nutrient Content Claims that did not comply with the FDA's and California's parallel  
11 requirements for such claims.

12 196. Clif has been unjustly enriched at the expense of Plaintiff Cheslow and the LUNA  
13 Bars Damages Class as result of its unlawful conduct alleged herein, thereby creating a quasi-  
14 contractual obligation on Clif to restore these ill-gotten gains to Plaintiff Cheslow and the LUNA  
15 Bars Damages Class.

16 197. As a direct and proximate result of Clif's breach of its quasi-contractual obligation by  
17 unjustly enriching itself at Plaintiff Cheslow's and the LUNA Bars Damage Class' expense, Plaintiff  
18 Cheslow and the LUNA Bars Damages Class are entitled to restitution or restitutionary  
19 disgorgement in an amount to be proved at trial.

20 **B. Sixth Cause of Action Relating to Purchases of Clif's CLIF Bars**

21 198. Plaintiffs hereby incorporate all other paragraphs of this Complaint and restate them  
22 as if fully set forth herein.

23 199. Plaintiffs bring this claim on behalf of themselves and the CLIF Bars Damages Class.

24 200. Clif's conduct in enticing Plaintiffs and the CLIF Bars Damages Class to purchase its  
25 CLIF Bars through the false and misleading labeling as described throughout this Complaint is  
26 unlawful because the statements contained on the CLIF Bars' labels are false, misleading, and  
27 violate the FDCA, the Sherman Law, and FDA regulations. Clif obtained money from Plaintiffs and  
28

1 members of the CLIF Bars Damages Class for CLIF Bars labeled with Healthy Nutrient Content  
2 Claims that did not comply with the FDA's and California's parallel requirements for such claims.

3 201. Clif has been unjustly enriched at the expense of Plaintiffs and the CLIF Bars  
4 Damages Class as result of its unlawful conduct alleged herein, thereby creating a quasi-contractual  
5 obligation on Clif to restore these ill-gotten gains to Plaintiffs and the CLIF Bars Damages Class.

6 202. As a direct and proximate result of Clif's breach of its quasi-contractual obligation by  
7 unjustly enriching itself at Plaintiffs' and the CLIF Bars Damage Class' expense, Plaintiffs and the  
8 CLIF Bars Damages Class are entitled to restitution or restitutionary disgorgement in an amount to  
9 be proved at trial.

10 **PRAYER**

11 Plaintiffs, on behalf of themselves and all members of the CLIF Bars Classes, and Plaintiff  
12 Cheslow, on behalf of herself and all members of the LUNA Bars Classes, request that the Court  
13 order the following relief and enter judgment against Clif as follows:

14 A. An order certifying that this action is properly brought and may be maintained as a  
15 class action, that Plaintiff Cheslow be appointed Class Representative for the LUNA Bars Classes  
16 and CLIF Bar Classes, that Plaintiff Perieff be appointed Class Representative for the CLIF Bars  
17 Classes, and that Plaintiffs' counsel be appointed Class Counsel for the LUNA Bars and CLIF Bars  
18 Classes.

19 B. An order on behalf of Plaintiffs and the CLIF Bars Declaratory/Injunctive Class, and  
20 Plaintiff Cheslow and the LUNA Bars Declaratory/Injunctive Class, declaring that Clif's mislabeling  
21 of the LUNA Bars and CLIF Bars as described herein is unlawful.

22 C. An order on behalf of Plaintiffs and the CLIF Bars Declaratory/Injunctive Class, and  
23 Plaintiff Cheslow and the LUNA Bars Declaratory/Injunctive Class, enjoining Clif from selling,  
24 distributing, or offering for sale the mislabeled LUNA Bars and CLIF Bars in California, or causing  
25 the mislabeled LUNA Bars and CLIF Bars to be distributed, sold, or offered for sale in California.

26 D. An order awarding Plaintiffs their costs of suit, including reasonable attorneys' fees  
27 and expenses under the CLRA (Cal. Civ. Code § 1780(e)), Cal. Civ. Proc. Code § 1021.5, or as  
28 otherwise provided by law.

1 E. Restitution in such amount that Plaintiffs and the CLIF Bars Damages Class  
2 members, and Plaintiff Cheslow and the LUNA Bars Damages Class members, paid to purchase  
3 Clif's LUNA Bars and CLIF Bars, paid as a premium over similar products that did not bear Healthy  
4 Nutrient Content Claims, or restitutionary disgorgement of the profits Clif obtained from these  
5 transactions, for Causes of Action for which they are available.

6 F. Compensatory damages on behalf of Plaintiffs and the CLIF Bars Damages Class,  
7 and Plaintiff Cheslow and the LUNA Bars Damages Class, for Causes of Action for which they are  
8 available.

9 G. Statutory damages on behalf of Plaintiffs and the CLIF Bars Damages Class, and  
10 Plaintiff Cheslow and the LUNA Bars Damages Class, allowable under Cal. Civ. Code § 1780.

11 H. Other statutory penalties on behalf of Plaintiffs and the CLIF Bars Damages Class,  
12 and Plaintiff Cheslow and the LUNA Bars Damages Class, for Causes of Action for which they are  
13 available.

14 I. Punitive damages on behalf of Plaintiffs and the CLIF Bars Damages Class, and  
15 Plaintiff Cheslow and the LUNA Bars Damages Class, for Causes of Action for which they are  
16 available.

17 J. Such other and further relief as may be available as part of the statutory claims  
18 asserted herein or otherwise as may be deemed necessary or appropriate for any of the claims  
19 asserted.

20 DATED: March 4, 2016

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***ATTORNEYS FOR PLAINTIFFS  
AND THE PROPOSED CLASSES***

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# EXHIBIT A

1. **LUNA Whole Nutrition Blueberry Bliss Bar**

- a. Healthy Statements (emphasis added)
  - i. “**Whole Nutrition** Bar for Women”
  - ii. “With the CORE 4 vitamins and minerals essential to women’s **health** – calcium, iron, folic acid, and vitamin D – plus 8 grams of protein and 3 grams of fiber, LUNA does it all, beautifully.”
  - iii. “[T]he CORE 4 nutrients are listed because of their importance to many women seeking to maintain their **health**.”
- b. Nutrient Content Statements
  - i. “8g Protein”
  - ii. “3g Fiber”
  - iii. “Calcium · Iron · Folic Acid · Vitamin D”
  - iv. “5g total fat”
- c. Violations of FDA Regulations
  - i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 4.17 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
  - ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.67 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

2. **LUNA Whole Nutrition Caramel Nut Brownie Bar**

- a. Healthy Statements (emphasis added)
  - i. “**Whole Nutrition** Bar for Women”
  - ii. “With the CORE 4 vitamins and minerals essential to women’s **health** – calcium, iron, folic acid, and vitamin D – plus 8 grams of protein and 3 grams of fiber, LUNA does it all, beautifully.”



- iii. “[T]he CORE 4 nutrients are listed because of their importance to many women seeking to maintain their health.”
- b. Nutrient Content Statements
  - i. “8g Protein”
  - ii. “3g Fiber”
  - iii. “Calcium · Iron · Folic Acid · Vitamin D”
  - iv. “6g total fat”
- c. Violations of FDA Regulations
  - i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 5 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
  - ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 2.5 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

3. **LUNA Whole Nutrition Chocolate Cupcake Bar**

- a. Healthy Statements (emphasis added)
  - i. “Whole Nutrition Bar for Women”
  - ii. “With the CORE 4 vitamins and minerals essential to women’s health – calcium, iron, folic acid, and vitamin D – plus 9 grams of protein and 4 grams of fiber, LUNA does it all, beautifully.”
  - iii. “[T]he CORE 4 nutrients are listed because of their importance to many women seeking to maintain their health.”
- b. Nutrient Content Statements
  - i. “9g Protein”
  - ii. “4g Fiber”
  - iii. “Calcium · Iron · Folic Acid · Vitamin D”
  - iv. “5g total fat”

c. Violations of FDA Regulations

- i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 4.17 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 2.08 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

4. **LUNA Whole Nutrition Chocolate Dipped Coconut Bar**

a. Healthy Statements (emphasis added)

- i. “**Whole Nutrition** Bar for Women”
- ii. “With the CORE 4 vitamins and minerals essential to women’s **health** – calcium, iron, folic acid, and vitamin D – plus 9 grams of protein and 3 grams of fiber, LUNA does it all, beautifully.”
- iii. “[T]he CORE 4 nutrients are listed because of their importance to many women seeking to maintain their **health**.”

b. Nutrient Content Statements

- i. “9g Protein”
- ii. “3g Fiber”
- iii. “Calcium · Iron · Folic Acid · Vitamin D”
- iv. “7g total fat”

c. Violations of FDA Regulations

- i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 5.83 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 3.75 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

5. **LUNA Whole Nutrition Chocolate Peppermint Stick Bar**

- a. Healthy Statements (emphasis added)
  - i. “**Whole Nutrition** Bar for Women”
  - ii. “With the CORE 4 vitamins and minerals essential to women’s **health** – calcium, iron, folic acid, and vitamin D – plus 8 grams of protein and 4 grams of fiber, LUNA does it all, beautifully.”
  - iii. “[T]he CORE 4 nutrients are listed because of their importance to many women seeking to maintain their **health**.”
- b. Nutrient Content Statements
  - i. “8g Protein”
  - ii. “4g Fiber”
  - iii. “Calcium · Iron · Folic Acid · Vitamin D”
  - iv. “5g total fat”
- c. Violations of FDA Regulations
  - i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 4.17 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
  - ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 2.08 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

6. **LUNA Whole Nutrition Honey Salted Peanut Bar**

- a. Healthy Statements (emphasis added)
  - i. “**Whole Nutrition** Bar for Women”
  - ii. “With the CORE 4 vitamins and minerals essential to women’s **health** – calcium, iron, folic acid, and vitamin D – plus 10 grams of protein and 3 grams of fiber, LUNA does it all, beautifully.”

- iii. “[T]he CORE 4 nutrients are listed because of their importance to many women seeking to maintain their health.”
- b. Nutrient Content Statements
  - i. “10g Protein”
  - ii. “3g Fiber”
  - iii. “Calcium · Iron · Folic Acid · Vitamin D”
  - iv. “7g total fat”
- c. Violations of FDA Regulations
  - i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 5.83 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
  - ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 2.08 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

7. **LUNA Whole Nutrition Iced Oatmeal Raisin Bar**

- a. Healthy Statements (emphasis added)
  - i. “Whole Nutrition Bar for Women”
  - ii. “With the CORE 4 vitamins and minerals essential to women’s health – calcium, iron, folic acid, and vitamin D – plus 9 grams of protein and 3 grams of fiber, LUNA does it all, beautifully.”
  - iii. “[T]he CORE 4 nutrients are listed because of their importance to many women seeking to maintain their health.”
- b. Nutrient Content Statements
  - i. “9g Protein”
  - ii. “3g Fiber”
  - iii. “Calcium · Iron · Folic Acid · Vitamin D”
  - iv. “4.5g total fat”

c. Violations of FDA Regulations

- i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 3.75 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.67 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

8. **LUNA Whole Nutrition Lemon Zest Bar**

a. Healthy Statements (emphasis added)

- i. “**Whole Nutrition** Bar for Women”
- ii. “With the CORE 4 vitamins and minerals essential to women’s **health** – calcium, iron, folic acid, and vitamin D – plus 9 grams of protein and 3 grams of fiber, LUNA does it all, beautifully.”
- iii. “[T]he CORE 4 nutrients are listed because of their importance to many women seeking to maintain their **health**.”

b. Nutrient Content Statements

- i. “9g Protein”
- ii. “3g Fiber”
- iii. “Calcium · Iron · Folic Acid · Vitamin D”
- iv. “5g total fat”

c. Violations of FDA Regulations

- i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 4.17 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 2.08 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

9. **LUNA Whole Nutrition Nutz over Chocolate Bar**

- a. Healthy Statements (emphasis added)
  - i. “**Whole Nutrition** Bar for Women”
  - ii. “With the CORE 4 vitamins and minerals essential to women’s **health** – calcium, iron, folic acid, and vitamin D – plus 9 grams of protein and 4 grams of fiber, LUNA does it all, beautifully.”
  - iii. “[T]he CORE 4 nutrients are listed because of their importance to many women seeking to maintain their **health**.”
- b. Nutrient Content Statements
  - i. “9g Protein”
  - ii. “4g Fiber”
  - iii. “Calcium · Iron · Folic Acid · Vitamin D”
  - iv. “6g total fat”
- c. Violations of FDA Regulations
  - i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 5 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
  - ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 2.08 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

10. **LUNA Whole Nutrition Peanut Butter Cookie Bar**

- a. Healthy Statements (emphasis added)
  - i. “**Whole Nutrition** Bar for Women”
  - ii. “With the CORE 4 vitamins and minerals essential to women’s **health** – calcium, iron, folic acid, and vitamin D – plus 9 grams of protein and 3 grams of fiber, LUNA does it all, beautifully.”



- iii. “[T]he CORE 4 nutrients are listed because of their importance to many women seeking to maintain their health.”
- b. Nutrient Content Statements
  - i. “9g Protein”
  - ii. “3g Fiber”
  - iii. “Calcium · Iron · Folic Acid · Vitamin D”
  - iv. “6g total fat”
- c. Violations of FDA Regulations
  - i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 5 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
  - ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.67 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

11. **LUNA Whole Nutrition S’mores Bar**

- a. Healthy Statements (emphasis added)
  - i. “Whole Nutrition Bar for Women”
  - ii. “With the CORE 4 vitamins and minerals essential to women’s health – calcium, iron, folic acid, and vitamin D – plus 9 grams of protein and 3 grams of fiber, LUNA does it all, beautifully.”
  - iii. “[T]he CORE 4 nutrients are listed because of their importance to many women seeking to maintain their health.”
- b. Nutrient Content Statements
  - i. “9g Protein”
  - ii. “3g Fiber”
  - iii. “Calcium · Iron · Folic Acid · Vitamin D”
  - iv. “5g total fat”

c. Violations of FDA Regulations

- i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 4.17 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 2.08 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

12. **LUNA Whole Nutrition Vanilla Almond Bar**

a. Healthy Statements (emphasis added)

- i. “**Whole Nutrition** Bar for Women”
- ii. “With the CORE 4 vitamins and minerals essential to women’s **health** – calcium, iron, folic acid, and vitamin D – plus 10 grams of protein and 3 grams of fiber, LUNA does it all, beautifully.”
- iii. “[T]he CORE 4 nutrients are listed because of their importance to many women seeking to maintain their **health**.”

b. Nutrient Content Statements

- i. “10g Protein”
- ii. “3g Fiber”
- iii. “Calcium · Iron · Folic Acid · Vitamin D”
- iv. “6g total fat”

c. Violations of FDA Regulations

- i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 5 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.67 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

13. **LUNA Whole Nutrition White Chocolate Macadamia Bar**

- a. Healthy Statements (emphasis added)
  - i. “**Whole Nutrition** Bar for Women”
  - ii. “With the CORE 4 vitamins and minerals essential to women’s **health** – calcium, iron, folic acid, and vitamin D – plus 9 grams of protein and 3 grams of fiber, LUNA does it all, beautifully.”
  - iii. “[T]he CORE 4 nutrients are listed because of their importance to many women seeking to maintain their **health**.”
- b. Nutrient Content Statements
  - i. “9g Protein”
  - ii. “3g Fiber”
  - iii. “Calcium · Iron · Folic Acid · Vitamin D”
  - iv. “7g total fat”
- c. Violations of FDA Regulations
  - i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 5.83 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
  - ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.67 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

<b>Nutrition Facts</b>	<b>Amount/Serving</b>	<b>%DV**</b>	<b>Amount/Serving</b>	<b>%DV**</b>	<b>Amount/Serving</b>	<b>%DV**</b>
Serv. Size 1 bar (48g)						
<b>Calories 180</b>						
Calories from Fat 45						
<b>Total Fat 5g</b>	<b>5g</b>	<b>8%</b>	<b>Sodium 110mg</b>	<b>5%</b>	<b>Insoluble Fiber 0g</b>	
Sat. Fat 2g	2g	10%	Potassium 90mg	3%	Sugars 13g	
Trans Fat 0g	0g		<b>Total Carb. 28g</b>	<b>9%</b>	Other Carb. 12g	
<b>Cholesterol 0mg</b>	<b>0mg</b>	<b>0%</b>	<b>Dietary Fiber 3g</b>	<b>12%</b>	<b>Protein 8g</b>	<b>16%</b>

\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Vit. A 20% • Vit. C 20% • Calcium 35% • Iron 30% • Vit. D 15% • Vit. E 30% • Vit. K 10% • Thiamin (B1) 10% • Riboflavin (B2) 40% • Niacin (B3) 40% • Vit. B6 80% • Folate 100% • Vit. B12 80% • Biotin 25% • Pantothenic Acid 40% • Phosphorus 20% • Iodine 35% • Magnesium 10% • Zinc 35% • Selenium 35% • Copper 10% • Manganese 25% • Chromium 25% • Molybdenum 25%

**LOW GLYCEMIC**  
Low-glycemic foods digest slowly for prolonged levels of satisfaction and energy.  
Contains 5g total fat

**INGREDIENTS:** LunaPro™ (Soy Rice Cries, Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate), Organic Toasted Oats (Organic Rolled Oats, Organic Dried Cane Syrup, Natural Vitamin E (tocopherol)), Organic Soy Flour, Organic Tapioca, Organic Tapioca Syrup, Organic Tapioca Starch, Organic Tapioca Maltodextrin, Citric Acid, Natural Flavor, Pectin, Organic Soy Lecithin, Red Cabbage Extract (for Color), Quinoa (Organic Dried), Organic Tapioca Syrup, Organic Tapioca Syrup Solids, Dried Blueberries (Blueberry), Apple Juice Concentrate, Vegetable Glycerin, Organic Sunflower Oil, Natural Flavors, Sea Salt, Citric Acid, Natural Vitamin E (tocopherol), Organic Tapioca Syrup Solids, Dried Blueberries (Blueberry), Apple Juice Concentrate, Vegetable Glycerin, Organic Sunflower Oil, Natural Flavors, Sea Salt, Citric Acid, Natural Vitamin E (tocopherol).  
**VITAMINS & MINERALS:** Calcium Carbonate, Magnesium Oxide, Ferrous Fumarate (Iron), Nicotinamide (Ni, B3), Ascorbic Acid (Vit. C), D, L-Alpha Tocopherol Acetate (Vit. E), Zinc Oxide, 1,25-Dihydroxy Vitamin D3, D-Calcium Phosphate, Beta-Carotene (Vit. A), Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Biotin (Vit. B7), Molybdenum Amino Acid Chelate, Pantothenic Acid (Vit. B5), Folic Acid, Copper, Zinc, Selenium, Iodine, Biotin, Manganese, Chromium, Molybdenum. **ALLERGEN STATEMENT:** CONTAINS SOY AND ALMONDS. MAY CONTAIN TRACES OF MILK, PEANUTS AND OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.



**LUNA**

**GLUTEN FREE**

**8g PROTEIN**

**3g FIBER\***

**70% ORGANIC**

*Blueberry Bliss*

Ⓢ **WHOLE NUTRITION BAR FOR WOMEN®** **NET WT 1.69 OZ/48g**

**CALCIUM • IRON • FOLIC ACID • VITAMIN D**

*To Aunt Doris: Never without lipstick—glamorous, classy, and "fierce" despite fighting breast cancer—you are an inspiration still.*  
—Jennifer (LUNAFEST Host)

WHO INSPIRES YOU? TELL US AT LUNABAR.COM

**BREAST CANCER FUND**

PREVENTION STARTS HERE.

LUNA® is an active sponsor of the Breast Cancer Fund and its efforts to eliminate the environmental and preventable causes of the disease.

[breastcancerfund.org](http://breastcancerfund.org)



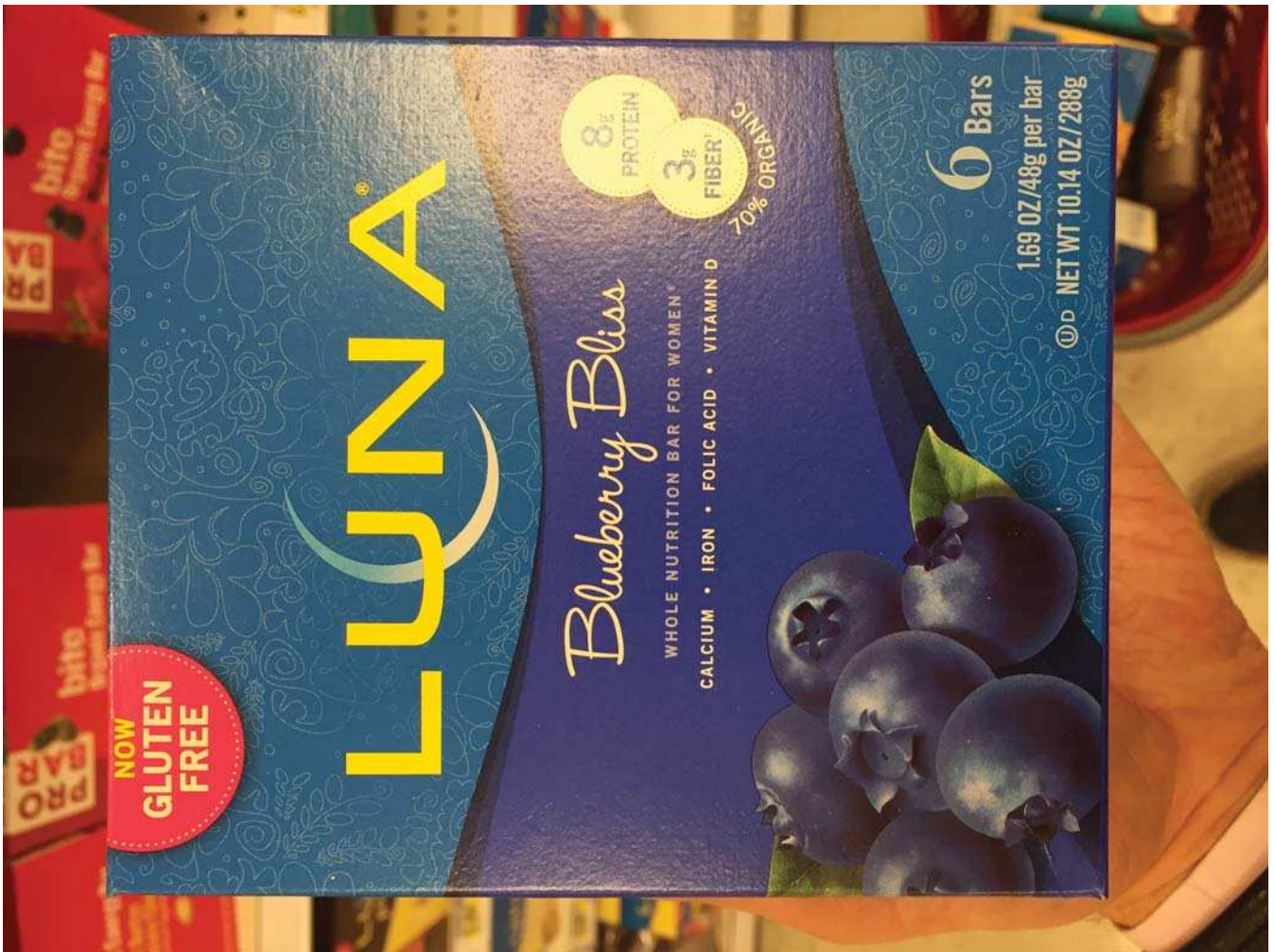
As women, we crave a snack that does more than merely get us through the day. It needs to nourish, curb hunger, AND taste great—to satisfy entirely. Say hello to LUNA, the delightfully delicious, 70% organic snack that multitasks! With the **CORE 4**™ vitamins and minerals essential to women's health—**calcium, iron, folic acid, and vitamin D**—plus 8 grams of protein and 3 grams of fiber, LUNA does it all, beautifully. Feel the power of positive snacking. —The Women of LUNA

\*While other nutrients are also essential for human nutrition, the **CORE 4** nutrients are listed because of their importance to many women seeking to maintain their health.

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**25SEP16OM1**







Blueberry Bliss

**Nutrition Facts**

Serv. Size 1 bar (48g)  
 Serv. Per Container 6  
 Calories 180  
 Calories from Fat 45  
 \*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Amount/Serving	%DV**	Amount/Serving	%DV**
<b>Total Fat</b> 5g	8%	<b>Total Carb.</b> 28g	9%
Sat. Fat 2g	10%	Dietary Fiber 3g	12%
Trans Fat 0g		Insoluble Fiber 0g	
<b>Cholesterol</b> 0mg	0%	Sugars 13g	
<b>Sodium</b> 110mg	5%	Other Carb. 12g	
<b>Potassium</b> 90mg	3%	<b>Protein</b> 8g	16%

Vit. A 20% • Vit. C 20% • Calcium 35% • Iron 30% • Vit. D 15% • Vit. E 30%  
 Vit. K 10% • Thiamin (B1) 10% • Riboflavin (B2) 40% • Niacin (B3) 40%  
 Vit. B6 80% • Folate 100% • Vit. B12 80% • Biotin 25% • Pantothenic Acid 40%  
 Phosphorus 20% • Iodine 35% • Magnesium 10% • Zinc 35% • Selenium 20%  
 Copper 10% • Manganese 25% • Chromium 25% • Molybdenum 20%

**INGREDIENTS:** Lund-Peel® Soy Rice Cassis, Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate, Organic Flavored Oats, Organic Rolled Oats, Organic Dried Cane Syrup, Natural Vitamin E (Antioxidant), Organic Soy Flour, Organic Flaxseed, Organic Brown Rice Syrup, Blueberry Fruit Topping, Organic Dried Cane Syrup, Inulin (Chicory Extract), Organic Brown Rice Syrup, Organic Apple Powder, Vegetable Glycerin, Organic Blueberry Juice Concentrate, Organic Corn Starch, Water, Organic Palm Kernel Solids, Organic Tapioca Maltodextrin, Citric Acid, Natural Flavor, Protein, Organic Soy Lecithin, Peel Cabbage Extract (for Choc), Creaming Agent, Dried Cane Syrup, Palm Kernel Oil, Organic Palm Kernel Solids, Organic Soy Flour, Organic Soy Lecithin, Organic Vanilla Extract, Inulin (Chicory Extract), Organic Soy Butter (Organic Flavored Soybeans, Organic Soybean Oil, Salt, Organic Almonds, Organic Cocoa Syrup Solids, Dried Blueberries, Blueberries, Apple Juice Concentrate), Vegetable Glycerin, Organic Sunflower Oil, Natural Flavors, Sea Salt, Citric Acid, Natural Vitamin E (Antioxidant).

**VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Carbonate, Magnesium Oxide, Ferrus Fumarate (Iron), Maltodextrin (Vit. B3), Ascorbic Acid (Vit. C), Di-Alpha Tocopheryl Acetate (Vit. E), Zinc Oxide, Molybdenum Glycinate, Pyridoxine Hydrochloride (Vit. B6), D-Calcium Pantothenate, Beta Carotene (Vit. A), Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Cyanocobalamin (Vit. B12), Folic Acid, Cupric Oxide, Phytantriene (Vit. K), Boron, Potassium Iodide.

**ALLERGEN STATEMENT: CONTAINS SOY AND ALMONDS. MAY CONTAIN TRACES OF MILK, PEANUTS, AND OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.**

†Contains 5g total fat.

**LOW GLYCEMIC**

Low-glycemic foods digest slowly for prolonged levels of satiation and energy.

*Gabe: We all need a friend that makes us feel funnier, smarter, and more beautiful just by being around them. Thank you for being that friend to me for going on 35 years! - Kathy*

WHO INSPIRES YOU? TELL US AT [LUNABAR.COM](http://LUNABAR.COM)

As women, we crave a snack that does more than merely get us through the day. It needs to nourish, curb hunger, AND taste great - to satisfy entirely. Say hello to LUNA, the delightfully delicious 70% organic snack that multitasks! With the **CORE 4\***, vitamins and minerals essential to women's health - calcium, iron, folic acid, and vitamin D - plus 8 grams of protein and 3 grams of fiber! LUNA does it all, beautifully. Feel the power of positive snacking.

- The Women of LUNA

\*While other nutrients are also essential for human nutrition, the CORE 4 nutrients are loved because of their importance to many women seeking to maintain their health.



LUNA® is an active sponsor of the Breast Cancer Fund and its efforts to eliminate the environmental and preventable causes of the disease. [breastcancerfund.org](http://breastcancerfund.org)

**LUNA**







Nutrition Facts	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**
Serv. Size 1 bar (48g)	<b>Total Fat</b> 6g	<b>9%</b>	<b>Sodium</b> 135mg	<b>6%</b>	<b>Insoluble Fiber</b> 1g	
<b>Calories 190</b>	Sat. Fat 3g	<b>15%</b>	<b>Potassium</b> 170mg	<b>5%</b>	<b>Sugars</b> 13g	
Calories from Fat 50	Trans Fat 0g		<b>Total Carb.</b> 27g	<b>9%</b>	<b>Other Carb.</b> 11g	
	<b>Cholesterol</b> 0mg	<b>0%</b>	<b>Dietary Fiber</b> 3g	<b>12%</b>	<b>Protein</b> 8g	<b>16%</b>
**Percent Daily Values (DV) are based on a 2,000 calorie diet.	Vit. A 20% • Vit. C 20% • Calcium 35% • Iron 30% • Vit. D 15% • Vit. E 30% • Vit. K 10% • Thiamin (B1) 10% • Riboflavin (B2) 40% Niacin (B3) 40% • Vit. B6 80% • Folate 100% • Vit. B12 80% • Biotin 25% • Pantothenic Acid 40% • Phosphorus 20% • Iodine 35% Magnesium 10% • Zinc 35% • Selenium 35% • Copper 10% • Manganese 25% • Chromium 25% • Molybdenum 25%					

**LOW GLYCEMIC**  
 Low-glycemic foods digest slowly for prolonged levels of satiation and energy.  
 †Contains 6g total fat.

**INGREDIENTS:** LunaPro® (Cocoa Soy Rice Crisps (Soy Protein Isolate, Organic Rice Flour, Organic Alkylated Cocoa, Calcium Carbonate), Organic Soy Protein, Organic Flaxseed), Organic Brown Rice Syrup, Caramel (Organic Dried Cane Syrup, Organic Brown Rice Syrup, Organic Cane Syrup, Cocoa Butter, Water, Soy Protein Concentrate, Natural Flavors, Salt, Organic Soy Lecithin), Coating (Organic Dried Cane Syrup, Organic Cocoa, Palm Kernel Oil, Organic Soy Lecithin, Organic Vanilla Extract), Organic Chocolate Chips (Organic Dried Cane Syrup, Organic Unsweetened Chocolate, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract), Walnuts, Inulin (Chicory Extract), Vegetable Glycerin, Organic Unsweetened Chocolate, Organic Cocoa, Organic Alkylated Cocoa, Organic Natural Flavor, Organic Sunflower Oil, Sea Salt, Natural Flavor, Natural Vitamin E (Antioxidant), **VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Carbonate, Magnesium Oxide, Ferrous Fumarate (Iron), Nicotinamide (Vit. B3), Ascorbic Acid (Vit. C), DL-Alpha Tocopheryl Acetate (Vit. E), Zinc Oxide, Molybdenum Glycinate, Pyridoxine Hydrochloride (Vit. B6), D-Calcium Pantothenate, Beta Carotene (Vit. A), Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Cyanocobalamin (Vit. B12), Folic Acid, Cupric Oxide, Phytanadione (Vit. K), Biotin, Potassium Iodide. **ALLERGEN STATEMENT:** CONTAINS SOY AND WALNUTS. MAY CONTAIN TRACES OF MILK. MAY CONTAIN NUTSHELL FRAGMENTS, NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.



**LUNA**

**GLUTEN FREE**

**8g PROTEIN**

**3g FIBER†**

**70% ORGANIC**

*Caramel Nut Brownie*

**WHOLE NUTRITION BAR FOR WOMEN®** NET WT 1.69 OZ/48g

**CALCIUM • IRON • FOLIC ACID • VITAMIN D**

*To my sister Carrie, who inspires me every day to work a little harder, search a little deeper, and strive for just a little more in life and in love. — Kelly*  
 WHO INSPIRES YOU? TELL US AT LUNABAR.COM

**BREAST CANCER FUND**  
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[breastcancerfund.org](http://breastcancerfund.org)



As women, we crave a snack that does more than merely get us through the day. It needs to nourish, curb hunger, AND taste great—to satisfy entirely. Say hello to LUNA, the delightfully delicious, 70% organic snack that multitasks! With the **CORE 4\*** vitamins and minerals essential to women's health—**calcium, iron, folic acid, and vitamin D**—plus 8 grams of protein and 3 grams of fiber, LUNA does it all, beautifully. Feel the power of positive snacking. —*The Women of LUNA*

*\*While other nutrients are also essential for human nutrition, the CORE 4 nutrients are listed because of their importance to many women seeking to maintain their health.*

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*Made in Canada*  
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**BEST BY**



Nutrition Facts		Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**
Serv. Size 1 bar (48g)		<b>Total Fat</b> 5g	8%	<b>Sodium</b> 150mg	6%	<b>Insoluble Fiber</b> 1g	
<b>Calories</b> 180		Sat. Fat 2.5g	13%	<b>Potassium</b> 140mg	4%	<b>Sugars</b> 12g	
Calories from Fat 45		Trans Fat 0g		<b>Total Carb.</b> 27g	9%	<b>Other Carb.</b> 11g	
		<b>Cholesterol</b> 0mg	0%	<b>Dietary Fiber</b> 4g	16%	<b>Protein</b> 9g	18%
**Percent Daily Values (DV) are based on a 2,000 calorie diet.		Vit. A 20% • Vit. C 20% • Calcium 35% • Iron 30% • Vit. D 15% • Vit. E 30% • Vit. K 10% • Thiamin (B1) 10% • Riboflavin (B2) 40% • Niacin (B3) 40% • Vit. B6 80% • Folate 100% • Vit. B12 80% • Biotin 25% • Pantothenic Acid 40% • Phosphorus 20% • Iodine 35% • Magnesium 10% • Zinc 35% • Selenium 35% • Copper 10% • Manganese 25% • Chromium 25% • Molybdenum 25%					

**LOW GLYCEMIC**  
Low-glycemic foods digest slowly for prolonged levels of satiation and energy.

Contains 5g total fat.

**INGREDIENTS:** LunaPro® (Cocoa Soy Rice Crisps, Soy Protein Isolate, Organic Rice Flour, Organic Alkalinized Cocoa, Calcium Carbonate), Organic Milled Flaxseed, Organic Brown Rice Syrup, Coating (Organic Dried Cane Syrup, Organic Cocoa, Palm Kernel Oil, Organic Palm Kernel Solids, Organic Soy Lecithin, Organic Vanilla Extract), Inulin (Calcium Extract), Organic Cane Syrup, Organic Chocolate Chips (Organic Dried Cane Syrup, Organic Unsweetened Chocolate, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract), Organic Alkalinized Cocoa, Vegetable Glycerin, Organic Cocoa, Organic Cashew Butter, Natural Flavors, Organic Sunflower Oil, Organic Unsweetened Chocolate (Iron), Nicotinamide (Vit. B3), Ascorbic Acid (Vit. C), DL-Alpha Tocopheryl Acetate (Vit. E), Zinc Oxide, Molybdenum Glycinate, Pyridoxine Hydrochloride (Vit. B6), D-Calcium Pantothenate (Beta Carotene (Vit. A), Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Cyanocobalamin (Vit. B12), Folic Acid, Cupric Oxide, Phytonadione (Vit. K), Biotin, Potassium Iodide. **ALLERGEN STATEMENT: CONTAINS SOY AND CASHEWS. MAY CONTAIN TRACES OF MILK AND OTHER TREE NUTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS**

**NEW FLAVOR**

**LUNA**

**GLUTEN FREE**

**9g PROTEIN**

**4g FIBER\***

**70% ORGANIC**



*Chocolate Cupcake*

ⓈD **WHOLE NUTRITION BAR FOR WOMEN\*** **NET WT 1.69 OZ/48g**

**CALCIUM • IRON • FOLIC ACID • VITAMIN D**

*Audrey: You taught me how to walk to the edge, listen to my heart, and choose with no regret. Thank you for believing in me. —Erica*

WHO INSPIRES YOU? TELL US AT LUNABAR.COM

**BREAST CANCER FUND**

PREVENTION STARTS HERE.  
LUNA® is an active sponsor of the Breast Cancer Fund and its efforts to eliminate the environmental and preventable causes of the disease.  
[breastcancerfund.org](http://breastcancerfund.org)



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\*While other nutrients are also essential for human nutrition, the CORE 4 nutrients are listed because of their importance to many women seeking to maintain their health.

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BEST BY **26MAY16OL2**



# LUNA

Chocolate Cupcake

**NOW  
GLUTEN  
FREE**

**NEW  
FLAVOR**

# LUNA

Chocolate Cupcake

WHOLE NUTRITION BAR FOR WOMEN

CALCIUM • IRON • FOLIC ACID • VITAMIN D

**9g PROTEIN**  
**4g FIBER**  
**70% ORGANIC**

**6 Bars**  
1.69 OZ/48g per bar  
NET WT 10.14 OZ/288g

25077\_002\_R4



This carton is made from 100% recycled content with a maximum 65% pre-consumer content and a minimum 35% post-consumer fiber content. Please recycle.

**100% Recycled Paperboard**

CERTIFIED ORGANIC BY QAI

**CLIF**  
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Chocolate Cupcake

### Nutrition Facts

Serv. Size 1 bar (48g)  
Serv. Per Container 6  
Calories 180  
Calories from Fat 45

\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Amount/Serving	%DV**	Amount/Serving	%DV**
<b>Total Fat</b> 5g	<b>8%</b>	<b>Total Carb.</b> 27g	<b>9%</b>
Sat. Fat 2.5g	5%	Dietary Fiber 4g	8%
Trans Fat 0g	0%	Insoluble Fiber 1g	2%
<b>Cholesterol</b> 0mg	<b>0%</b>	<b>Sugars</b> 12g	<b>24%</b>
<b>Sodium</b> 150mg	<b>6%</b>	<b>Other Carb.</b> 11g	<b>23%</b>
<b>Potassium</b> 140mg	<b>4%</b>	<b>Protein</b> 9g	<b>18%</b>

**INGREDIENTS:** LunaPro® Cocoa Soy Rice Crisps (Soy Protein Isolate, Organic Rice Flour, Organic Alkalized Cocoa, Calcium Carbonate), Organic Soy Protein Concentrate, Organic Millet Flakes, Organic Brown Rice Syrup, Coating (Organic Dried Cane Syrup, Organic Cocoa, Palm Kernel Oil, Organic Palm Kernel Solids, Organic Soy Lecithin, Organic Vanilla Flavors, Inulin (Chicory Extract), Organic Cane Syrup, Organic Chocolate Flavors, Organic Dried Cane Syrup, Organic Unsweetened Chocolate, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract), Organic Alkalized Cocoa, Vegetable Glycerin, Organic Cocoa, Organic Caramelized Natural Flavors, Organic Sunflower Oil, Organic Unsweetened Chocolate, Organic Gum Arabic, Sea Salt, Soy Lecithin, Natural Vitamin E (Ashtagalun).

**VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Citrate, Magnesium Oxide, Ferrus Fumarate (Iron), Nicotinamide (Vit. B3), Ascorbic Acid (Vit. C), Alpha Tocopherol Acetate (Vit. E), Zinc Oxide, Molybdenum (Vit. 9), Pyridoxine Hydrochloride (Vit. B6), D-Calcium Pantothinate, Beta Carotene (Vit. A), Manganese Sulfate, Selenium Amino Acid Complex, Hoodlain (Vit. B2), Chromium Amino Acid Chelate, Ergothioneine (Vit. 12), Thiamine Mononitrate (Vit. B1), Cyanocobalamin (Vit. B12), Folic Acid, Cupric Oxide, Phytanalone (Vit. K), Biotin, Potassium Iodide.

**ALLERGEN STATEMENT: CONTAINS SOY AND CASHEWS. MAY CONTAIN TRACES OF MILK AND OTHER TREE NUTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED.**

**70% ORGANIC INGREDIENTS.**

**LOW GLYCEMIC**  
Low glycemic foods digest more slowly, helping to keep blood sugar levels steady.

\*Contains 5g total fat.

FO 553786  
6/15 12



L13\_1304

70% ORGANIC  
4g FIBER  
9g PROTEIN

# LUNA

Chocolate Cupcake  
WHOLE NUTRITION BAR FOR WOMEN  
CALCIUM • IRON • FOLIC ACID • VITAMIN D



NOW  
GLUTEN  
FREE

23-0773-01  
1 2 3  
1 2 3

6 Bars

*To my precious "sole" sisters: Thank you for sharing all the miles, laughs, triumphs, and challenges with me. I am inspired, motivated, and deeply grateful for you. - Sara (Portland Team LUNA Chin)*

WHO INSPIRES YOU? TELL US AT LUNABAR.COM

As women, we crave a snack that does more than merely get us through the day. It needs to nourish, curb hunger, AND taste great - to satisfy entirely. Say hello to LUNA, the delightfully delicious, 70% organic snack that multitasks! With the **CORE 4\*** vitamins and minerals essential to women's health - **calcium, iron, folic acid, and vitamin D** - plus 9 grams of protein and 4 grams of fiber, LUNA does it all, beautifully. Feel the power of positive snacking.

- The Women of LUNA

\*While other nutrients are also essential for human nutrition, the CORE 4 nutrients are listed because of their importance to many women seeking to maintain their health.



LUNA is an active sponsor of the Breast Cancer Fund and its efforts to eliminate the environmental and preventable causes of the disease. [breastcancerfund.org](http://breastcancerfund.org)

# LUNA

BEST BY 25/11/15



**Nutrition Facts**  
 Serv. Size 1 bar (48g)  
**Calories 190**  
 Calories from Fat 70

Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**
<b>Total Fat</b> 7g	<b>11%</b>	<b>Sodium</b> 200mg	<b>8%</b>	<b>Insoluble Fiber</b> 1g	
Sat. Fat 4.5g	<b>23%</b>	<b>Potassium</b> 110mg	<b>3%</b>	<b>Sugars</b> 11g	
<b>Trans Fat</b> 0g		<b>Total Carb.</b> 25g	<b>8%</b>	<b>Other Carb.</b> 11g	
<b>Cholesterol</b> 0mg	<b>0%</b>	<b>Dietary Fiber</b> 3g	<b>12%</b>	<b>Protein</b> 9g	<b>18%</b>

\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Vit. A 20% • Vit. C 20% • Calcium 35% • Iron 30% • Vit. D 15% • Vit. E 30% • Vit. K 10% • Thiamin (B1) 10% • Riboflavin (B2) 40%  
 Niacin (B3) 40% • Vit. B6 80% • Folate 100% • Vit. B12 80% • Biotin 25% • Pantothenic Acid 40% • Phosphorus 20% • Iodine 35%  
 Magnesium 10% • Zinc 35% • Selenium 35% • Copper 10% • Manganese 25% • Chromium 25% • Molybdenum 25%

**LOW GLYCEMIC**  
 Low-glycemic foods digest slowly for prolonged levels of satiation and energy.

†Contains 7g total fat.

**INGREDIENTS:** LunaPro® (Soy Rice Chips (Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate), Organic Toasted Oats (Organic Rolled Oats, Organic Dried Cane Syrup, Natural Vitamin E (Antioxidant)), Organic Roasted Soybeans, Organic Soy Flour, Organic Milled Flaxseed), Organic Brown Rice Syrup, Coating (Organic Dried Cane Syrup, Organic Cocoa, Palm Kernel Oil, Organic Palm Kernel Solids, Organic Soy Lecithin, Organic Vanilla Extract), Organic Soy Protein Concentrate, Inulin (Chicory Extract), Organic Dried Cane Syrup, Almond Butter, Organic Coconut Oil, Organic Almonds, Vegetable Glycerin, Organic Tapioca Syrup Solids, Organic Coconut, Organic Sunflower Oil, Sea Salt, Organic Natural Flavors, Natural Flavors, Soy Lecithin, Natural Vitamin E (Antioxidant). **VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Carbonate, Magnesium Oxide, Ferrous Fumarate (Iron), Niacinamide (Vit. B3), Ascorbic Acid (Vit. C), DL-Alpha Tocopheryl Acetate (Vit. E), Zinc Oxide, Molybdenum Glycinate, Pyridoxine Hydrochloride (Vit. B6), D-Calcium Pantothenate, Beta Carotene (Vit. A), Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Cyanocobalamin (Vit. B12), Folic Acid, Organic Oxide, Phytanediol (Vit. K), Biotin, Potassium Iodide. **ALLERGEN STATEMENT:** CONTAINS SOY, ALMONDS, AND COCONUT. MAY CONTAIN TRACES OF MILK, PEANUTS, AND OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.



**LUNA**

**GLUTEN FREE**

**3g FIBER**

**9g PROTEIN**

**70% ORGANIC**

*Chocolate Dipped Coconut*

Ⓢ **WHOLE NUTRITION BAR FOR WOMEN®**

**NET WT 1.69 OZ/48g**

**CALCIUM • IRON • FOLIC ACID • VITAMIN D**

*To my first dance partner, my mom, Susan: Thank you for showing me that moving is fun from very early on in life.*  
 - Lindsey (LUNA Moms Club)

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**BREAST CANCER FUND**

**PREVENTION STARTS HERE.**  
 LUNA® is an active sponsor of the Breast Cancer Fund and its efforts to eliminate the environmental and preventable causes of the disease.  
[breastcancerfund.org](http://breastcancerfund.org)



\*While other nutrients are also essential for human nutrition, the **CORE 4** nutrients are listed because of their importance to many women seeking to maintain their health.

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**CERTIFIED ORGANIC BY QAI**

*Made in Canada*  
 05 JUL 16/163

**BEST BY**





LUNA 6 Bars

Chocolate Dipped Coconut

NOW GLUTEN FREE

LUNA

Chocolate Dipped Coconut

WHOLE NUTRITION BAR FOR WOMEN®  
CALCIUM • IRON • FOLIC ACID • VITAMIN D

9g PROTEIN  
3g FIBER  
70% ORGANIC

LUNA

Chocolate Dipped Coconut

WHOLE NUTRITION BAR FOR WOMEN®  
CALCIUM • IRON • FOLIC ACID • VITAMIN D

NOW GLUTEN FREE



6 Bars  
1.69 OZ/48g per bar  
NET WT 10.14 OZ/288g

Chocolate Dipped Coconut

Nutrition Facts			
Serving Size 1 bar (48g)		Calories 190	
Serv Per Container 6		Calories from Fat 70	
*Percent Daily Values (DV) are based on a 2,000 calorie diet.			
Amount/Serving	%DV**	Amount/Serving	%DV**
Total Fat 7g	11%	Total Carb. 25g	8%
Sat. Fat 4.5g	23%	Dietary Fiber 5g	12%
Trans Fat 0g		Insoluble Fiber 5g	
Cholesterol 0mg	0%	Sugars 11g	
Sodium 200mg	8%	Other Carb. 11g	
Potassium 110mg	3%	Protein 9g	18%

**INGREDIENTS:** Lundberg® Rice, Rice Cakes, Soy Protein Isolate, Organic Rice Flour, Coconut Carbohydrate, Organic Toasted Oats, Organic Rolled Oats, Organic Dried Case Syrup, Natural Vitamin E (Antioxidant), Organic, Refined Soybeans, Organic Soy Flour, Organic Almond Flour, Organic Brown Rice Syrup, Coconut Oil, Organic Dried Case Syrup, Organic Cocoa, Palm Kernel Oil, Organic Palm Kernel Salts, Organic Soy Lecithin, Organic Vanilla Extract, Organic Soy Protein Concentrate, Inulin (Chicory Extract), Organic Dried Case Syrup, Almond Butter, Organic Coconut Oil, Organic Almonds, Vegetable Glycerin, Organic Tapioca Starch, Organic Coconut, Organic Sunflower Oil, Sea Salt, Organic Natural Flavors, Natural Flavors, Soy Lecithin, Natural Vitamin E (Antioxidant).

**VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Carbonate, Magnesium Oxide, Ferrous Fumarate (Iron), Riboflavin (B2), Ascorbic Acid (Vit. C), DL-Alpha Tocopherol Acetate (Vit. E), Zinc Oxide, Methylcobalamin (Vitamin B12), Selenium (As a Selenate), Zinc Oxide, Chromium (As a Chromium Chloride), Inulin (Chicory Extract), Magnesium Oxide, Zinc Oxide, Vitamin B12 (Cyanocobalamin), Vit. B12, Folic Acid, Zinc Oxide, Phosphorus (As a Phosphate).

**ALLERGEN STATEMENT:** CONTAINS SOY, ALMONDS, AND COCONUT. MAY CONTAIN TRACES OF MILK, PEANUTS, AND OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. **LOW GLYCEMIC**

\*Contains 7g total fat.



**CLIF**  
100% Recycled Paperboard  
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LUNA LUNAR M-F-8-5-P1  
Made in USA





Nutrition Facts		Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**
Serv. Size 1 bar (48g)		<b>Total Fat</b> 5g	<b>8%</b>	<b>Sodium</b> 110mg	<b>5%</b>	<b>Insoluble Fiber</b> 1g	
<b>Calories 180</b>		Sat. Fat 2.5g	<b>13%</b>	<b>Potassium</b> 115mg	<b>3%</b>	Sugars 12g	
Calories from Fat 45		Trans Fat 0g		<b>Total Carb.</b> 29g	<b>10%</b>	Other Carb. 13g	
		<b>Cholesterol</b> 0mg	<b>0%</b>	Dietary Fiber 4g	<b>16%</b>	<b>Protein</b> 8g	<b>16%</b>

\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

**INGREDIENTS:** LunaPro® (Cocoa Soy Rice Crisps [Soy Protein Isolate, Organic Rice Flour, Organic Alkalinized Cocoa, Calcium Carbonate], Organic Toasted Oats [Organic Rolled Oats, Organic Dried Cane Syrup, Natural Vitamin E (Antioxidant)], Organic Roasted Soybeans, Organic Soy Flour, Organic Milled Flaxseed), Organic Brown Rice Syrup, Coating (Organic Dried Cane Syrup, Palm Kernel Oil, Organic Palm Kernel Solids, Organic Soy Flour, Organic Soy Lecithin, Organic Vanilla Extract), Inulin (Chicory Extract), Chocolate Cookies (Organic Rice Flour, Organic Dried Cane Syrup, Sunflower Oil, Tapioca Starch, Alkalinized Cocoa, Unsweetened Chocolate, Salt, Sodium Bicarbonate, Soy Lecithin), Vegetable Glycerin, Organic Cocoa, Organic Unsweetened Chocolate, Organic Sunflower Oil, Peppermint Candy (Dried Cane Syrup, Natural Flavors, Beet Powder [for Color], Natural Flavors, Sea Salt, **VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Carbonate, Magnesium Oxide, Ferrus Fumarate (Iron), Nicotinamide (Vit. B3), Ascorbic Acid (Vit. C), DL-Alpha Tocopheryl Acetate (Vit. E), Zinc Oxide, Molybdenum Glycinate, Pyridoxine Hydrochloride (Vit. B6), D-Calcium Pantothenate, Beta Carotene (Vit. A), Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Erythrocytic Acid (Vit. D2), Thiamine Mononitrate (Vit. B1), Cyanocobalamin (Vit. B12), Folic Acid, Cupric Oxide, Phytylmalonate (Vit. K), Biotin, Potassium Iodide, **ALLERGEN STATEMENT: CONTAINS SOY. MAY CONTAIN TRACES OF MILK, PEANUTS, AND TREE NUTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.**

**LOW GLYCEMIC**  
Low-glycemic foods digest slowly for prolonged levels of satisfaction and energy.

Contains 5g total fat.

# LUNA

**GLUTEN FREE**

**8g PROTEIN**

**4g FIBER**

70% ORGANIC

## Chocolate Peppermint Stick

WHOLE NUTRITION BAR FOR WOMEN®  
 NET WT 1.69 OZ/48g  
 CALCIUM • IRON • FOLIC ACID • VITAMIN D

*Audrey: You taught me how to walk to the edge, listen to my heart, and choose with no regret. Thank you for believing in me. - Erica*

WHO INSPIRES YOU? TELL US AT LUNABAR.COM

**BREAST CANCER FUND**



As women, we crave a snack that does more than merely get us through the day. It needs to nourish, curb hunger, AND taste great - to satisfy entirely. Say hello to LUNA, the delightfully delicious, 70% organic snack that multitasks! With the **CORE4**® vitamins and minerals essential to women's health - **calcium, iron, folic acid, and vitamin D** - plus 8 grams of protein and 4 grams of fiber, LUNA does it all, beautifully. Feel the power of positive snacking. - *The Women of LUNA*

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[breastcancerfund.org](http://breastcancerfund.org)

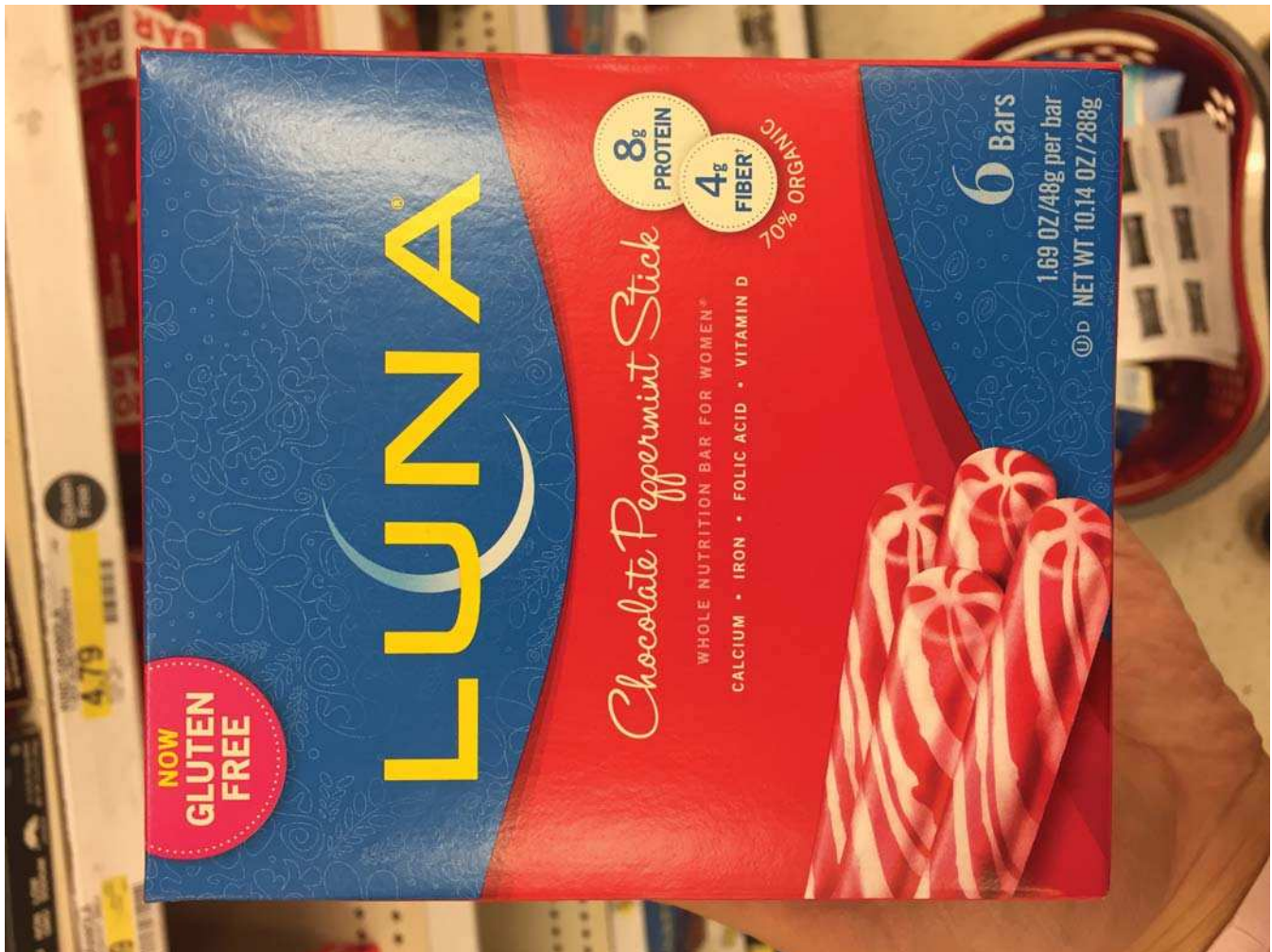
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**CERTIFIED ORGANIC BY QAI**

Made in Canada  
 09 JUL 16M61

BEST BY







*Chocolate Peppermint Stick*

**Nutrition Facts**  
 Serv. Size 1 bar (48g) Calories 180  
 Serv. Per Container 6 Calories from Fat 45  
 \*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Amount/Serving	%DV**	Amount/Serving	%DV**
<b>Total Fat</b> 5g	8%	<b>Total Carb.</b> 29g	10%
Sat. Fat 2.5g	13%	Dietary Fiber 4g	16%
Trans Fat 0g		Insoluble Fiber 1g	
<b>Cholesterol</b> 0mg	0%	Sugars 12g	
<b>Sodium</b> 110mg	5%	Other Carb. 13g	
<b>Potassium</b> 115mg	3%	<b>Protein</b> 8g	16%

**INGREDIENTS:** LunaPro® (Cocoa Soy Rice Crisps (Soy Protein Isolate, Organic Rice Flour, Organic Alkalinized Cocoa, Calcium Carbonate), Organic Toasted Oats (Organic Rolled Oats, Organic Dried Cane Syrup, Natural Vitamin E (Antioxidant)), Organic-Resealed Soybeans, Organic Soy Flour, Organic Milled Flaxseed), Organic Brown Rice Syrup, Creaming Organic Dried Cane Syrup, Palm Kernel Oil, Organic Palm Kernel Solids, Organic Soy Flour, Organic Soy Lecithin, Organic Vanilla Extract), Inulin (Chocoy Extract), Chocolate Cookies (Organic Rice Flour, Organic Dried Cane Syrup, Sunflower Oil, Tapioca Starch, Alkalinized Cocoa, Unsweetened Chocolate, Salt, Sodium Bicarbonate, Soy Lecithin), Vegetable Glycerin, Organic Cocoa, Organic Unsweetened Chocolate, Organic Sunflower Oil, Peppermint Candy (Dried Cane Syrup, Natural Flavors, Beet Powder [for Color]), Natural Flavors, Sea Salt.

**VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Carbonate, Magnesium Oxide, Ferrous Fumarate (Iron), Nicotinamide (Vit. B3), Ascorbic Acid (Vit. C), DL-Alpha Tocopheryl Acetate (Vit. E), Zinc Oxide, Molybdenum Glycinate, Pyridoxine Hydrochloride (Vit. B6), D-Calcium Pantothenate, Beta Carotene (Vit. A), Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Cyanocobalamin (Vit. B12), Folic Acid, Cupric Oxide, Phosphatidone (Vit. K), Boron, Potassium Iodide.

**ALLERGEN STATEMENT: CONTAINS SOY. MAY CONTAIN TRACES OF MILK, PEANUTS, AND TREE NUTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.**

**LOW GLYCEMIC**  
 Low-glycemic foods digest slowly for prolonged levels of satiation and energy.

\*Contains 5g total fat.

*Kim: You take life by the horns and inspire all of us on a daily basis. You are a strong, beautiful woman, and we are glad you are healthy again.*

*Love, Kristin and the Boulder Team LUNA Chix*

WHO INSPIRES YOU? TELL US AT [LUNABAR.COM](http://LUNABAR.COM)

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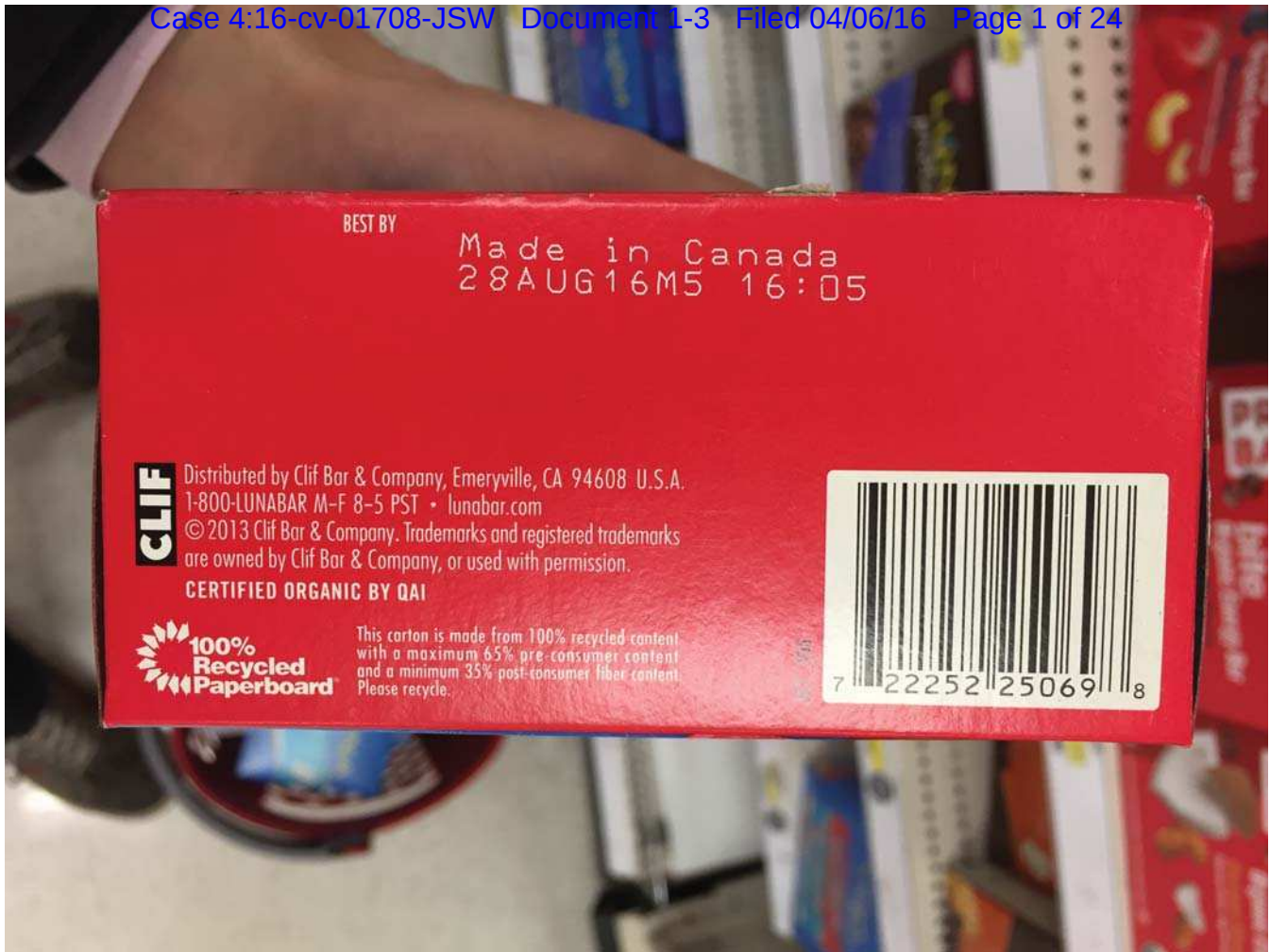
—The Women of LUNA

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**BREAST CANCER FUND**  
 PREVENTION STARTS HERE.  
[breastcancerfund.org](http://breastcancerfund.org)

**LUNA**











Chocolate Peppermint Stick

**Nutrition Facts**

Serv. Size 1 bar (48g)  
 Calories 180  
 Serv. Per Container 7  
 Calories from Fat 45

\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Amount/Serving	%DV**	Amount/Serving	%DV**
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<b>Sodium</b> 115mg	5%	Other Carb. 13g	16%
<b>Potassium</b> 120mg	3%	<b>Protein</b> 8g	16%

Vit. A 20% • Vit. C 20% • Calcium 35% • Iron 30% • Vit. D 15% • Vit. E 30%  
 Vit. K 10% • Thiamin (B1) 10% • Riboflavin (B2) 40% • Nicotin (B3) 40%  
 Vit. B6 80% • Folate 100% • Vit. B12 90% • Biotin 25% • Panthothenic Acid 40%  
 Phosphorus 20% • Iodine 35% • Magnesium 10% • Zinc 35% • Selenium 35%  
 Copper 10% • Manganese 25% • Chromium 25% • Molybdenum 25%

**INGREDIENTS:** LunaPro® (Cocoa Soy Rice Crisps (Soy Protein Isolate, Organic Rice Flour, Organic Alkalized Cocoa, Calcium Carbonate), Organic Roasted Oats, Organic Roasted Soybeans, Organic Soy Flour, Organic Millet Flaxseed), Organic Brown Rice Syrup, Coating (Organic Dried Cane Syrup, Palm Kernel Oil, Organic Palm Kernel Solids, Organic Soy Flour, Organic Soy Lecithin, Organic Vanilla Extract), Inulin (Chicory Extract), Chocolate Cookies (Organic Rice Flour, Organic Dried Cane Syrup, Sunflower Oil, Tapioca Starch, Alkalized Cocoa, Unsweetened Chocolate, Salt, Baking Soda, Soy Lecithin), Vegetable Glycerin, Organic Cocoa, Organic Unsweetened Chocolate, Organic Sunflower Oil, Peppermint Candy (Dried Cane Syrup, Natural Flavors, Beet Powder (for Color)), Natural Flavors, Sea Salt.

**VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Carbonate, Magnesium Oxide, Ferrous Fumarate (Iron), Nicotinamide (Vit. B3), Ascorbic Acid (Vit. C), DL-Alpha Tocopheryl Acetate (Vit. E), Zinc Oxide, Molybdenum Glycinate, Pyridoxine Hydrochloride (Vit. B6), D-Calcium Pantothenate, Beta Carotene (Vit. A), Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Cyanocobalamin (Vit. B12), Folic Acid, Cupric Oxide, Phytanadione (Vit. K), Biotin, Potassium Iodide.

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 Love, Kristin and the Boulder Team LUNA Chix*

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—The Women of LUNA

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**LUNA**







**Nutrition Facts**

Serv. Size 1 bar (48g)  
**Calories 190**  
 Calories from Fat 70

Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**
<b>Total Fat</b> 7g	<b>11%</b>	<b>Sodium</b> 260mg	<b>11%</b>	<b>Insoluble Fiber</b> 1g	
Sat. Fat 2.5g	13%	<b>Potassium</b> 135mg	4%	<b>Sugars</b> 11g	
Trans Fat 0g		<b>Total Carb.</b> 24g	8%	<b>Other Carb.</b> 10g	
<b>Cholesterol</b> 0mg	<b>0%</b>	<b>Dietary Fiber</b> 3g	<b>12%</b>	<b>Protein</b> 10g	<b>20%</b>

\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Vit. A 20% • Vit. C 20% • Calcium 35% • Iron 30% • Vit. D 15% • Vit. E 30% • Vit. K 10% • Thiamin (B1) 10% • Riboflavin (B2) 40%  
 Niacin (B3) 40% • Vit. B6 80% • Folate 100% • Vit. B12 80% • Biotin 25% • Pantothenic Acid 40% • Phosphorus 20% • Iodine 35%  
 Magnesium 10% • Zinc 35% • Selenium 35% • Copper 10% • Manganese 25% • Chromium 25% • Molybdenum 25%

**LOW GLYCEMIC**

Low-glycemic foods digest slowly for prolonged levels of satiation and energy.

† Contains 7g total fat.

**INGREDIENTS:** LunaPro® (Soy Rice Crisps [Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate], Organic Toasted Oats [Organic Rolled Oats, Organic Dried Cane Syrup, Natural Vitamin E (Antioxidant)], Organic Soy Flour, Organic Roasted Soybeans, Organic Flaxseed), Organic Brown Rice Syrup, Coating (Organic Dried Cane Syrup, Palm Kernel Oil, Organic Palm Kernel Solids, Organic Soy Flour, Organic Soy Lecithin, Organic Vanilla Extract), Organic Peanuts, Organic Peanut Butter (Organic Peanuts, Salt), Inulin (Chicory Extract), Organic Chips (Organic Dried Cane Syrup, Organic Palm Kernel Solids, Organic Peanut Flour, Organic Soy Lecithin), Organic Honey, Natural Flavors, Vegetable Glycerin, Organic Tapioca Syrup Solids, Sea Salt, Organic Peanut Flour, Natural Vitamin E (Antioxidant). **VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Carbonate, Magnesium Oxide, Ferrous Fumarate (Iron), Nicotinamide (Vit. B3), Ascorbic Acid (Vit. C), DL-Alpha Tocopheryl Acetate (Vit. E), Zinc Oxide, Molybdenum Glycinate, Pyridoxine Hydrochloride (Vit. B6), D-Calcium Pantothenate, Beta Carotene (Vit. A), Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Cyanocobalamin (Vit. B12), Folic Acid, Cupric Oxide, Phytonadione (Vit. K), Biotin, Potassium Iodide. **ALLERGEN STATEMENT: CONTAINS SOY AND PEANUTS. MAY CONTAIN TRACES OF MILK AND TREE NUTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.**

NEW RECIPE

**LUNA**

GLUTEN FREE  
 10g PROTEIN  
 3g FIBER  
 70% ORGANIC

Honey Salted Peanut

ⓈD WHOLE NUTRITION BAR FOR WOMEN® NET WT 1.69 OZ/48g  
 CALCIUM • IRON • FOLIC ACID • VITAMIN D

*To my beautiful daughter: You have taught me to take life one day at a time. Your laughter and joyful personality have been just what my soul needed. I love you. —Mom*  
 WHO INSPIRES YOU? TELL US AT LUNABAR.COM

**BREAST CANCER FUND**  
 PREVENTION STARTS HERE.  
 LUNA® is an active sponsor of the Breast Cancer Fund and its efforts to eliminate the environmental and preventable causes of the disease.  
[breastcancerfund.org](http://breastcancerfund.org)



As women, we crave a snack that does more than merely get us through the day. It needs to nourish, curb hunger, AND taste great—to satisfy entirely. Say hello to LUNA, the delightfully delicious, 70% organic snack that multitasks! With the CORE4® vitamins and minerals essential to women's health—calcium, iron, folic acid, and vitamin D—plus 10 grams of protein and 3 grams of fiber, LUNA does it all, beautifully. Feel the power of positive snacking. —The Women of LUNA

\*While other nutrients are also essential for human nutrition, the CORE 4 nutrients are listed because of their importance to many women seeking to maintain their health.

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 CERTIFIED ORGANIC BY QAI

Made in Canada  
 29AUG16M52

BEST BY





LUNA® 6 Bars

Honey Salted Peanut

NOW GLUTEN FREE

NEW RECIPE

LUNA®

Honey Salted Peanut

WHOLE NUTRITION BAR FOR WOMEN®  
CALCIUM • IRON • FOLIC ACID • VITAMIN D

10g PROTEIN

3g FIBER

70% ORGANIC

6 Bars

1.69 OZ/48g per bar

NET WT 10.14 OZ/288g

10g PROTEIN

3g FIBER

70% ORGANIC

LUNA®

Honey Salted Peanut

WHOLE NUTRITION BAR FOR WOMEN®  
CALCIUM • IRON • FOLIC ACID • VITAMIN D

NOW GLUTEN FREE

Honey Salted Peanut

**Nutrition Facts**

Serv. Size: 1 bar (48g)	Calories 160		
Serv. Per Container: 6	Calories from Fat 70		
*Percent Daily Values (DV) are based on a diet of other people's misdeeds.			
Amount/Serving	%DV**	Amount/Serving	%DV**
Total Fat 7g	11%	Total Carb. 24g	8%
Sat. Fat 2.5g	13%	Dietary Fiber 3g	12%
Trans Fat 0g		Insoluble Fiber 1g	
Cholesterol 0mg	0%	Sugars 11g	
Sodium 250mg	11%	Other Carb. 10g	
Potassium 135mg	4%	Protein 10g	20%

\*\*% Daily Values are based on a diet of other people's misdeeds.

INGREDIENTS: LUNA® Soy Rice (Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate), Organic Inulin (Fats (Organic Refined Canola, Organic Coconut Oil, Organic Sunflower Oil, Organic Sesame Oil, Organic Soy Flour, Organic Refined Soybeans, Organic Flaxseed), Organic Brown Rice Syrup, Organic (Organic Coconut Oil, Organic Palm Kernel Oil, Organic Palm Kernel Solids, Organic Soy Flour, Organic Soy Lecithin, Organic Vanilla Extract, Organic Peanuts, Organic Peanut Butter (Organic Peanuts, Salted Peanut Butter), Organic Cocoa (Organic Cocoa Beans, Organic Cocoa Powder), Organic Peanut Flour, Organic Soy Lecithin, Organic Honey, Natural Flavors, Vegetable Glycerine, Organic Lipoma Syrup Solids, Sea Salt), Organic Peanut Flour, Natural Vitamin E (All-rac-alpha-tocopherol), Magnesium Oxide, Ferrous Fumarate (Iron), Microencapsulated Vitamin C, D, E, Alpha Tocopheryl Acetate (Vit. E), Zinc Oxide, Methylcobalamin (Vitamin B12), Pyridoxine Hydrochloride (Vit. B6), D-Calcium Phosphate, Zinc Oxide, Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Ergothioneine (Vit. C2), Thiamine Mononitrate (Vit. B1), Lipoic Acid (Vit. B3), Folic Acid, Calcium Diolate, Phytantriol (Vit. K), Biotin, Potassium Iodide.

VITAMINS & MINERALS: Dicalcium Phosphate, Calcium Carbonate, Magnesium Oxide, Ferrous Fumarate (Iron), Microencapsulated Vitamin C, D, E, Alpha Tocopheryl Acetate (Vit. E), Zinc Oxide, Methylcobalamin (Vitamin B12), Pyridoxine Hydrochloride (Vit. B6), D-Calcium Phosphate, Zinc Oxide, Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Ergothioneine (Vit. C2), Thiamine Mononitrate (Vit. B1), Lipoic Acid (Vit. B3), Folic Acid, Calcium Diolate, Phytantriol (Vit. K), Biotin, Potassium Iodide.

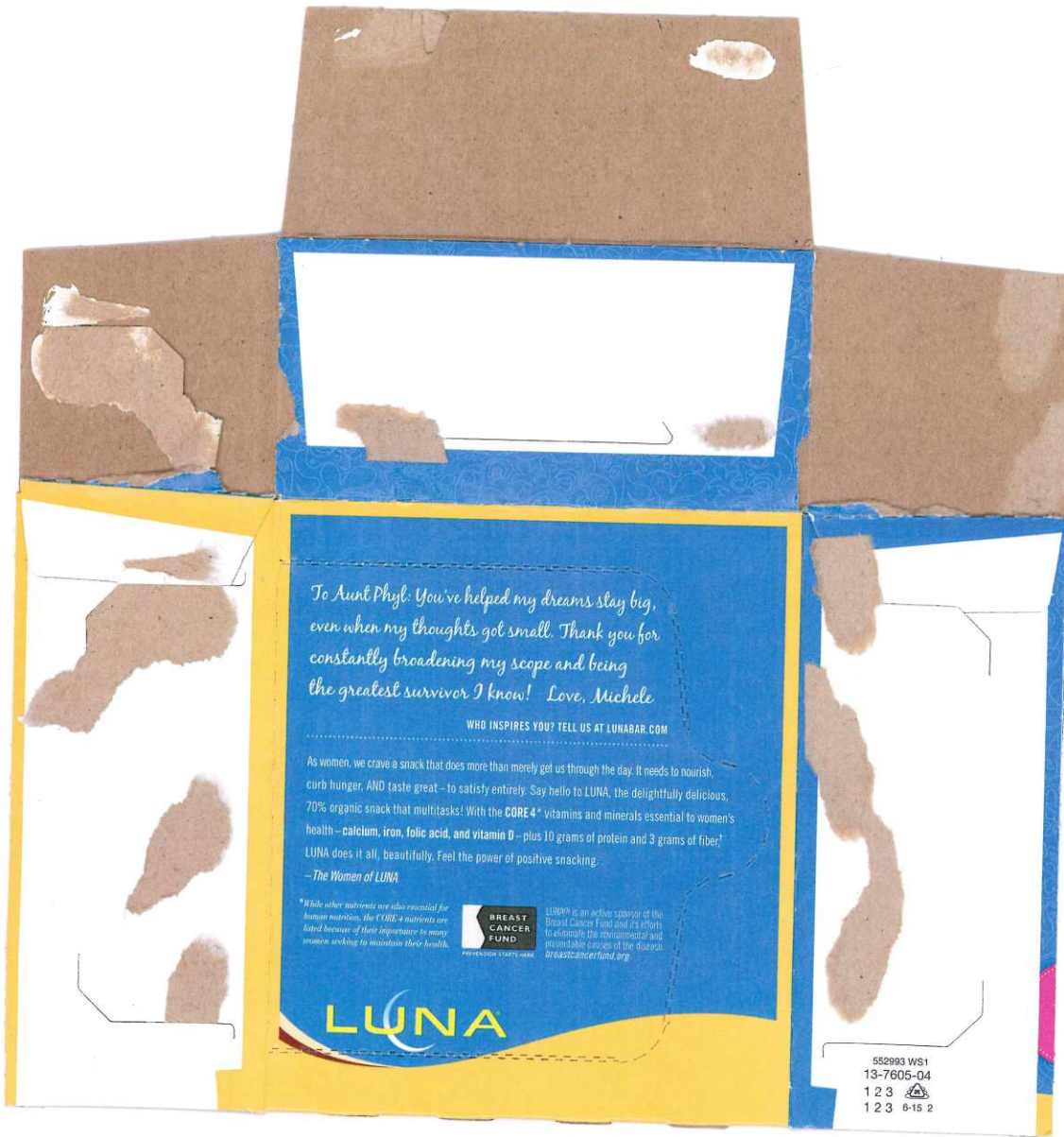
ALLERGEN STATEMENT: CONTAINS SOY AND PEANUTS. MAY CONTAIN TRACES OF MILK AND TREE NUTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS. **LOW GLYCEMIC**

\*Contains 1g total fat.



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CERTIFIED ORGANIC (DAI)  
This cereal is made from 100% recycled content with a minimum 55% post-consumer fiber content. Please recycle.

Made in China





Nutrition Facts		Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**
Serv. Size 1 bar (48g)		<b>Total Fat</b> 4.5g	7%	<b>Sodium</b> 150mg	6%	<b>Insoluble Fiber</b> 1g	
<b>Calories</b> 180		<b>Sat. Fat</b> 2g	10%	<b>Potassium</b> 130mg	4%	<b>Sugars</b> 13g	
<b>Calories from Fat</b> 45		<b>Trans Fat</b> 0g		<b>Total Carb.</b> 27g	9%	<b>Other Carb.</b> 11g	
		<b>Cholesterol</b> 0mg	0%	<b>Dietary Fiber</b> 3g	12%	<b>Protein</b> 9g	18%
		Vit. A 20% • Vit. C 20% • Calcium 35% • Iron 30% • Vit. D 15% • Vit. E 30% • Vit. K 10% • Thiamin (B1) 10% • Riboflavin (B2) 40% Niacin (B3) 40% • Vit. B6 80% • Folate 100% • Vit. B12 80% • Biotin 25% • Pantothenic Acid 40% • Phosphorus 20% • Iodine 35% Magnesium 10% • Zinc 35% • Selenium 35% • Copper 10% • Manganese 25% • Chromium 25% • Molybdenum 25%					

**LOW GLYCEMIC**  
Low glycemic foods digest slowly for prolonged levels of satiation and energy.

**INGREDIENTS:** LunaPro® Soy Rice Crisps (Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate), Organic Toasted Oats (Organic Rolled Oats, Organic Dried Cane Syrup, Natural Vanilla (Annattoin), Organic Toasted Soybeans, Organic Soy Flour, Organic Milled Flaxseed), Organic Brown Rice Syrup, Coating (Organic Dried Cane Syrup, Palm Kernel Oil, Organic Palm Kernel Oil), Organic Soy Flour, Organic Soy Lecithin, Organic Vanilla Extract, Organic Raisins, Inulin (Culinary Extract), Organic Soy Butter (Organic Toasted Soybeans, Organic Soybean Oil, Salt, Vegetable Glycerin, Organic Rapeseed Syrup Solids, Natural Flavors, Organic Sunflower Oil, Sea Salt, Organic Cinnamon), **VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Perchlorate, Magnesium Oxide, Ferrous Fumarate, Iron, Nicotinamide (Vit. B3), Ascorbic Acid (Vit. C), DL-Alpha Tocopheryl Acetate (Vit. E), Zinc Oxide, Molybdenum Glycinate, Pyridoxine Hydrochloride (Vit. B6), Beta-D-Calcium Pantothenate, Beta Carotene (Vit. A), Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Ergocalciferol (Vit. D), Potassium Mononitrate (Vit. B1), Cyanocobalamin (Vit. B12), Folic Acid, Cupric Oxide, Phytosterolone (Vit. K), Biotin, Potassium Iodide. **ALLERGEN STATEMENT:** CONTAINS SOY, RICE, CORN, WHEAT, TRACES OF MILK, PEANUTS, AND TREE NUTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.

# LUNA



*Oatmeal Raisin*

**GLUTEN FREE**  
**9g PROTEIN**  
**3g FIBER**  
**70% ORGANIC**

WHOLE NUTRITION BAR FOR WOMEN®  
CALCIUM • IRON • FOLIC ACID • VITAMIN D

NET WT 1.69 OZ/48g

*Ginger: Thank you for teaching me to always push harder on the uphill. I couldn't ask for a better running buddy, sister, and friend. -Wendy*  
WHO INSPIRES YOU? TELL US AT LUNABAR.COM

**BREAST CANCER FUND**  
PREVENTION STARTS HERE  
LUNA® is an active sponsor of the Breast Cancer Fund and its efforts to eliminate the environmental and preventable causes of the disease.  
breastcancerfund.org



As women, we crave a snack that does more than merely get us through the day. It needs to nourish, curb hunger, AND taste great—to satisfy entirely. Say hello to LUNA, the delightfully delicious, 70% organic snack that multitasks! With the **CORE4™** vitamins and minerals essential to women's health—**calcium, iron, folic acid, and vitamin D**—plus 9 grams of protein and 3 grams of fiber, LUNA does it all, beautifully. *-The Women of LUNA*

\*While other nutrients are also essential for human nutrition, the **CORE4** nutrients are listed because of their importance to many women seeking to maintain their health.

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**CERTIFIED ORGANIC BY QAI**

**BEST BY** 03.JUN16OD1



Nutrition Facts		Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**
Serv. Size 1 bar (48g)		<b>Total Fat</b> 5g	<b>8%</b>	<b>Sodium</b> 110mg	<b>5%</b>	<b>Insoluble Fiber</b> 1g	
<b>Calories 180</b>		Sat. Fat 2.5g	13%	<b>Potassium</b> 110mg	<b>3%</b>	<b>Sugars</b> 12g	
<b>Calories from Fat 45</b>		Trans Fat 0g		<b>Total Carb.</b> 27g	<b>9%</b>	<b>Other Carb.</b> 12g	
		<b>Cholesterol</b> 0mg	<b>0%</b>	<b>Dietary Fiber</b> 3g	<b>12%</b>	<b>Protein</b> 9g	<b>18%</b>

\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Vit. A 20% • Vit. C 20% • Calcium 35% • Iron 30% • Vit. D 15% • Vit. E 30% • Vit. K 10% • Thiamin (B1) 10% • Riboflavin (B2) 40% • Niacin (B3) 40% • Vit. B6 80% • Folate 100% • Vit. B12 80% • Biotin 25% • Pantothenic Acid 40% • Phosphorus 20% • Iodine 35% • Magnesium 10% • Zinc 35% • Selenium 35% • Copper 10% • Manganese 25% • Chromium 25% • Molybdenum 25%

**INGREDIENTS:** LunaPro® (Glycine, Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate), Organic Toasted Oats, Organic Dried Cane Syrup, Natural Vanilla (Almondmilk), Organic Roasted Soybeans, Organic Soy Flour, Organic Milled Flaxseed, Organic Brown Rice Syrup, Caramel (Organic Dried Cane Syrup, Palm Kernel Oil, Organic Palm Kernel Oil, Organic Soy Flour, Organic Soy Lecithin, Organic Vanilla Extract), Inulin (Chlorella Extract), Organic Soy Butter (Organic Roasted Soybeans, Organic Soybean Oil, Salt), Organic Tapioca Syrup, Organic Lemon Juice Concentrate, Organic Glucose Syrup, Pectin, Citric Acid, Sodium Bicarbonate, Natural Flavor, Vegetable Glycerin, Lemon Fruit Pieces (Organic Dried Cane Syrup, Organic Lemon Juice Concentrate, Organic Glucose Syrup), Organic Natural Flavor, Citric Acid, Sea Salt. **VITAMINS & MINERALS:** Tocopherol Phosphate, Calcium Carbonate, Magnesium Oxide, Ferrous Fumarate, Iron, Nicotinamide (Vit. B3), Ascorbic Acid (Vit. C), DL-Alpha Tocopheryl Acetate (Vit. E), Zinc Oxide, Manganese Glycinate, Pyridoxine Hydrochloride (Vit. B6), D-Calcium Phosphate, Beta Carotene (Vit. A), Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Cholesterol, Vitamin A Palmitate, Vitamin B12, Folic Acid, Calcium Oxide, Phosphorus (Vit. K), Biotin, Pantothenic Acid. **ALLERGEN STATEMENT: CONTAINS SOY. MAY CONTAIN TRACES OF YOUR PEANUTS, AND TREE NUTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.**

**LOW GLYCEMIC**  
Low-glycemic foods digest slowly for prolonged levels of satiation and energy.



# LUNA

**GLUTEN FREE**

**9g PROTEIN**

**3g FIBER**

70% ORGANIC

## LemonZest®

Ⓢ **WHOLE NUTRITION BAR FOR WOMEN®**

**CALCIUM • IRON • FOLIC ACID • VITAMIN D**

**NET WT 1.69 OZ/48g**

*Mom: Now that I'm about to become a mother myself, I'm more grateful than ever for the strong, inspiring example you set for me and my child-to-be. Love always, Ellen*

WHO INSPIRES YOU? TELL US AT LUNABAR.COM

**BREAST CANCER FUND**

PREVENTION STARTS HERE.  
LUNA® is an active sponsor of the Breast Cancer Fund and its efforts to eliminate the environmental and preventable causes of the disease.  
[breastcancerfund.org](http://breastcancerfund.org)



As women, we crave a snack that does more than merely get us through the day. It needs to nourish, curb hunger, AND taste great—to satisfy entirely. Say hello to LUNA, the delightfully delicious, 70% organic snack that multitasks! With the **CORE 4** vitamins and minerals essential to women's health—calcium, iron, folic acid, and vitamin D—plus 9 grams of protein and 3 grams of fiber,<sup>†</sup> LUNA does it all, beautifully. Feel the power of positive snacking. —*The Women of LUNA*

*\*While other nutrients are also essential for human nutrition, the CORE 4 nutrients are listed because of their importance to many women seeking to maintain their health.*

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Made in Canada  
0440616462

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BEST BY







LemonZest

**Nutrition Facts**  
 Serv. Size 1 bar (48g)  
 Serv. Per Container 6  
 Calories 180  
 Calories from Fat 45  
 \*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Amount/Serving	%DV**	Amount/Serving	%DV**
<b>Total Fat</b> 5g	8%	<b>Total Carb.</b> 27g	9%
Sat. Fat 2.5g	13%	Dietary Fiber 3g	12%
Trans Fat 0g		Insoluble Fiber 1g	
<b>Cholesterol</b> 0mg	0%	Sugars 12g	
<b>Sodium</b> 110mg	5%	Other Carb. 12g	
<b>Potassium</b> 110mg	3%	<b>Protein</b> 9g	18%

**INGREDIENTS:** LunapPro® (Soy Rice Crisps [Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate], Organic Toasted Oats [Organic Rolled Oats, Organic Dried Cane Syrup, Natural Vitamin E (Antioxidant)], Organic Roasted Soybeans, Organic Soy Flour, Organic Milled Flaxseed), Organic Brown Rice Syrup, Coating (Organic Dried Cane Syrup, Palm Kernel Oil, Organic Palm Kernel Solids, Organic Soy Flour, Organic Soy Lecithin, Organic Vanilla Extract), Inulin (Chicory Extract), Organic Soy Butter (Organic Roasted Soybeans, Organic Soybean Oil, Salt), Organic Tapioca Syrup Solids, Lemon Fruit Pieces (Organic Dried Cane Syrup, Organic Lemon Juice Concentrate, Organic Glucose Syrup, Pectin, Citric Acid, Sodium Bicarbonate, Natural Flavor), Vegetable Glycerin, Organic Sunflower Oil, Natural Flavor, Organic Natural Flavor, Citric Acid, Sea Salt.

**VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Carbonate, Magnesium Oxide, Ferrous Fumarate (Iron), Nicotinamide (Vit. B3), Ascorbic Acid (Vit. C), DL-Alpha Tocopheryl Acetate (Vit. E), Zinc Oxide, Molybdenum Glycinate, Pyridoxine Hydrochloride (Vit. B6), D-Calcium Pantothenate, Beta Carotene (Vit. A), Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Cyanocobalamin (Vit. B12), Folic Acid, Cupric Oxide, Phosphorus (Vit. K), Boron, Potassium Iodide.

**ALLERGEN STATEMENT: CONTAINS SOY. MAY CONTAIN TRACES OF MILK, PEANUTS, AND TREE NUTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.**

**LOW GLYCEMIC**  
 Low-glycemic foods digest slowly for prolonged levels of satiation and energy.

†Contains 5g total fat.

*My dear Katie: You inspire me and comfort me.  
 Thank you for accepting me and challenging me.  
 May every woman find a friend like the one  
 I have in you! — Courtney*

WHO INSPIRES YOU? TELL US AT [LUNABAR.COM](http://LUNABAR.COM)

As women, we crave a snack that does more than merely get us through the day. It needs to nourish, curb hunger, AND taste great – to satisfy entirely. Say hello to LUNA, the delightfully delicious, 70% organic snack that multitasks! With the **CORE 4\*** vitamins and minerals essential to women's health – **calcium, iron, folic acid, and vitamin D** – plus 9 grams of protein and 3 grams of fiber, LUNA does it all, beautifully. Feel the power of positive snacking.

— *The Women of LUNA*

**BREAST CANCER FUND**  
 PREVENTION STARTS HERE.  
[breastcancerfund.org](http://breastcancerfund.org)

\*While other nutrients are also essential for human nutrition, the CORE 4 nutrients are listed because of their importance to many women seeking to maintain their health.

**LUNA**









**Nutrition Facts**

Serv. Size 1 bar (48g)  
 Calories 190  
 Calories from Fat 60

\*\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**
Total Fat 6g	9%	Sodium 180mg	8%	Insoluble Fiber 1g	
Sat. Fat 2.5g	13%	Potassium 130mg	4%	Sugars 10g	
Trans Fat 0g		Total Carb. 26g	9%	Other Carb. 12g	
Cholesterol 0mg	0%	Dietary Fiber 4g	16%	Protein 9g	18%

**INGREDIENTS:** LunaPro® (Soy Rice Crisps (Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate), Organic Toasted Oats (Organic Rolled Oats, Organic Dried Cane Syrup, Natural Vitamin E (mixed tocopherols), Organic Soy Flour, Organic Milled Flaxseed), Organic Brown Rice Syrup, Coating (Organic Dried Cane Syrup, Organic Cocoa Palm Kernel Oil, Organic Palm Kernel Seeds, Organic Soy Lecithin, Organic Vanilla Extract), Inulin (Chicory Extract), Organic Peanut Butter (Organic Peanuts, Salt), Organic Peanuts, Organic Peanut Flour, Organic Palm Flavors, Organic Tapioca Syrup Solids, Vegetable Glycerin, Sea Salt, Natural Vitamin E (mixed tocopherols)), **VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Citrate Malate, Magnesium Oxide, Potassium Fumarate (Iron, Nicotinamide (Vit. B3), Ascorbic Acid (Vit. C), DL-Alpha Tocopheryl Acetate (Vit. E), Zinc Oxide, Molybdenum Glycinate, Pyridoxine Hydrochloride (Vit. B6), Manganese Citrate Malate, Beta-Carotene (Vit. A), Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Ergosterol (Vit. D2), Thiamine Mononitrate (Vit. B1), Cyanocobalamin (Vit. B12), Folic Acid, Cupric Oxide, Phytolactone (Vit. K), Biotin, Potassium Iodate. **ALLERGEN STATEMENT: CONTAINS SOY AND PEANUTS. MAY CONTAIN TRACES OF MILK AND TREE NUTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.**

**LOW GLYCEMIC**  
 Low glycemic foods digest slowly for prolonged levels of sustained energy.

Contains 0g Total Fat.

**LUNA**

GLUTEN FREE

9g PROTEIN

4g FIBER

70% ORGANIC

Nutz Over Chocolate®

WHOLE NUTRITION BAR FOR WOMEN®  
 CALCIUM • IRON • FOLIC ACID • VITAMIN D

NET WT 1.69 OZ/48g

*To my sister Carrie, who inspires me every day to work a little harder, search a little deeper, and strive for just a little more in life and in love. — Kelly*  
 WHO INSPIRES YOU? TELL US AT LUNABAR.COM

BREAST CANCER FUND



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PREVENTION STARTS HERE.  
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 \*While other nutrients are also essential for human nutrition, the CORE 4 nutrients are listed because of their importance to many women seeking to maintain their health.

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REST BY 02JU 16 01



Nitz Over Chocolate

**Nutrition Facts**  
 Serv. Size 1 bar (49g)  
 Calories 190  
 Calories from Fat 60  
 Percent Daily Values (DV) are based on a 2,000 calorie diet.

<b>Total Fat</b> 15g	30%	<b>Total Carb.</b> 25g	50%
<b>Sodium</b> 180mg	4%	<b>Other Carb.</b> 12g	18%
<b>Total Fiber</b> 4g	8%	<b>Protein</b> 9g	18%
<b>Total Sugar</b> 12g	24%		

**INGREDIENTS:** Lundberg® Soy Rice Crisps, Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate, Organic Toasted Oats (Organic Rolled Oats, Organic Dried Cane Syrup, Natural Vitamin E Antioxidant), Organic Soy Flour, Organic Coconut Flour, Organic Cocoa Powder, Organic (Organic Dried Cassia, Organic Cocoa, Palm Kernel Oil, Organic Palm Kernel Slices, Organic Soy Lecithin, Organic Vanilla Extract), Inulin (Chicory Extract), Organic Peanut Butter, Organic Dark Chocolate, Organic Cocoa Beans, Peanut Flour, Natural Flavors, Organic Banana Syrup, Stevia Vegetable Glycerin, Sea Salt, Natural Vitamin E (Antioxidant), **VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Carbonate, Magnesium Oxide, Ferrous Fumarate Iron, Magnesium (Mg), Boronic Acid, Zinc Oxide, Vitamin B6, Vitamin B12, Vitamin E, Vitamin K, Vitamin C, Vitamin D, Vitamin B1, Vitamin B2, Vitamin B3, Vitamin B5, Vitamin B9, Vitamin B10, Vitamin B11, Vitamin B12, Vitamin B13, Vitamin B14, Vitamin B15, Vitamin B16, Vitamin B17, Vitamin B18, Vitamin B19, Vitamin B20, Vitamin B21, Vitamin B22, Vitamin B23, Vitamin B24, Vitamin B25, Vitamin B26, Vitamin B27, Vitamin B28, Vitamin B29, Vitamin B30, Vitamin B31, Vitamin B32, Vitamin B33, Vitamin B34, Vitamin B35, Vitamin B36, Vitamin B37, Vitamin B38, Vitamin B39, Vitamin B40, Vitamin B41, Vitamin B42, Vitamin B43, Vitamin B44, Vitamin B45, Vitamin B46, Vitamin B47, Vitamin B48, Vitamin B49, Vitamin B50, Vitamin B51, Vitamin B52, Vitamin B53, Vitamin B54, Vitamin B55, Vitamin B56, Vitamin B57, Vitamin B58, Vitamin B59, Vitamin B60, Vitamin B61, Vitamin B62, Vitamin B63, Vitamin B64, Vitamin B65, Vitamin B66, Vitamin B67, Vitamin B68, Vitamin B69, Vitamin B70, Vitamin B71, Vitamin B72, Vitamin B73, Vitamin B74, Vitamin B75, Vitamin B76, Vitamin B77, Vitamin B78, Vitamin B79, Vitamin B80, Vitamin B81, Vitamin B82, Vitamin B83, Vitamin B84, Vitamin B85, Vitamin B86, Vitamin B87, Vitamin B88, Vitamin B89, Vitamin B90, Vitamin B91, Vitamin B92, Vitamin B93, Vitamin B94, Vitamin B95, Vitamin B96, Vitamin B97, Vitamin B98, Vitamin B99, Vitamin B100.

**LOW GLYCEMIC**  
 Low glycemic foods digest slowly to provide a steady stream of energy.

**CLIF**  
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 Certified Organic by OGI.







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13-7599-04  
1 8 3  
1 2 3 7-15 5

*For you, Mom, who at 85 still does aerobics and naps, cooks, cleans, gardens, drives, and volunteers. You are a constant gift of wonder and love to your 3 daughters! —Julie*

WHO INSPIRES YOU? TELL US AT [LUNBAR.COM](http://LUNBAR.COM)

As women, we crave a snack that does more than merely get us through the day. It needs to nourish, curb hunger, AND taste great. To satisfy entirely. Say hello to LUNA, the delightfully delicious, 70% organic snack that multitasks! With the CORE 4 - vitamins and minerals essential to women's health - calcium, iron, folic acid, and vitamin D - plus 9 grams of protein and 4 grams of fiber!

LUNA does it all, beautifully. Feel the power of positive snacking.

— The Women of LUNA

\*Your other nutrients are also essential for human nutrition, the CDC's 4 nutrients are listed because of their importance to women's health. For more information, visit [breastcancerfund.org](http://breastcancerfund.org)



LUNA is an active sponsor of the Breast Cancer Fund and its efforts to raise awareness of the most preventable causes of the disease.

# LUNA

**KILKIN®**  
KILKIN® is a registered trademark of KILKIN®.  
KILKIN® is a registered trademark of KILKIN®.

Nutrition Facts		Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**
Serv. Size 1 bar (48g)		<b>Total Fat</b> 6g	<b>9%</b>	<b>Sodium</b> 140mg	<b>6%</b>	<b>Insoluble Fiber</b> 1g	
<b>Calories 190</b>		Sat. Fat 2g	<b>10%</b>	<b>Potassium</b> 110mg	<b>3%</b>	<b>Sugars</b> 11g	
Calories from Fat 50		Trans Fat 0g		<b>Total Carb.</b> 26g	<b>9%</b>	<b>Other Carb.</b> 12g	
		<b>Cholesterol</b> 0mg	<b>0%</b>	<b>Dietary Fiber</b> 3g	<b>12%</b>	<b>Protein</b> 9g	<b>18%</b>
**Percent Daily Values (DV) are based on a 2,000 calorie diet.		Vit. A 20% • Vit. C 20% • Calcium 35% • Iron 30% • Vit. D 15% • Vit. E 30% • Vit. K 10% • Thiamin (B1) 10% • Riboflavin (B2) 40% Niacin (B3) 40% • Vit. B6 80% • Folate 100% • Vit. B12 80% • Biotin 25% • Pantothenic Acid 40% • Phosphorus 20% • Iodine 35% Magnesium 10% • Zinc 35% • Selenium 35% • Copper 10% • Manganese 25% • Chromium 25% • Molybdenum 25%					

**LOW GLYCEMIC**  
Low glycemic foods digest slowly for prolonged levels of sustained energy.

Contains 6g protein

**INGREDIENTS:** LunaPro® (Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate), Organic Toasted Oats (Organic Rolled Oats, Organic Oiled Cane Syrup, Natural Vanilla B (Aroma Only), Organic Roasted Soybeans, Organic Soy Flour, Organic Millet (Roasted), Organic Brown Rice Syrup, Coating (Organic Dried Cane Syrup, Palm Kernel Oil, Organic Palm Kernel Sides, Organic Soy Flour, Organic Soy Lecithin, Organic Vanilla Extract), Inulin (Cicory Extract), Organic Peanut Butter (Organic Peanuts, Salt), Natural Flavors, Organic Peanut Vegetable Glycerol, Organic Tapioca Syrup Solids, Sea Salt, Organic Peanut Flour, Natural Vitamin E (Antioxidant), **VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Carbonate, Magnesium Citrate, Ferrus Fumarate (Iron), Nicotinamide (Vit. B3), Ascorbic Acid (Vit. C), DL-Alpha Tocopheryl Acetate (Vit. E), Zinc Oxide, Molybdenum Glycinate, Pyridoxin Hydrochloride (Vit. B6), D-Calcium Pantothenate, Beta Carotene (Vit. A), Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Cyanocobalamin (Vit. B12), Folic Acid, Cupric Oxide, Phytantriol (Vit. K), Biotin, Potassium Iodide. **ALLERGEN STATEMENT: CONTAINS SOY AND PEANUTS. MAY CONTAIN TRACES OF MILK AND TREE NUTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.**

# LUNA

**GLUTEN FREE**  
**9g PROTEIN**  
**3g FIBER**  
70% ORGANIC



Peanut Butter Cookie

WHOLE NUTRITION BAR FOR WOMEN®  
CALCIUM • IRON • FOLIC ACID • VITAMIN D  
NET WT 1.69 OZ/48g

*My dear Katie: You inspire me and comfort me. Thank you for accepting me and challenging me. May every woman find a friend like the one I have in you! - Courtney*  
WHO INSPIRES YOU? TELL US AT LUNABAR.COM

BREAST CANCER FUND



As women, we crave a snack that does more than merely get us through the day. It needs to nourish, curb hunger, AND taste great - to satisfy entirely. Say hello to LUNA, the delightfully delicious, 70% organic snack that multitasks! With the **CORE 4**\* vitamins and minerals essential to women's health - calcium, iron, folic acid, and vitamin D - plus 9 grams of protein and 3 grams of fiber! LUNA does it all, beautifully. Feel the power of positive snacking. -The Women of LUNA

PROBATION STARTS HERE  
LUNA® is an active sponsor of the Breast Cancer Fund and its efforts to eliminate the environmental and preventable causes of the disease.  
breastcancerfund.org

\*While other nutrients are also essential for human nutrition, the CORE 4 nutrients are listed because of their importance to many women seeking to maintain their health.

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CERTIFIED ORGANIC BY QAI

BEST BY 10JUN16OD2



<b>Nutrition Facts</b>	<b>Amount/Serving</b>	<b>%DV**</b>	<b>Amount/Serving</b>	<b>%DV**</b>	<b>Amount/Serving</b>	<b>%DV**</b>
Serv. Size 1 bar (48g)	<b>Total Fat</b> 5g	<b>8%</b>	<b>Sodium</b> 130mg	<b>5%</b>	<b>Insoluble Fiber</b> 1g	
<b>Calories</b> 180	<b>Sat. Fat</b> 2.5g	<b>13%</b>	<b>Potassium</b> 120mg	<b>3%</b>	<b>Sugars</b> 13g	
Calories from Fat 45	<b>Trans Fat</b> 0g		<b>Total Carb.</b> 28g	<b>9%</b>	<b>Other Carb.</b> 12g	
	<b>Cholesterol</b> 0mg	<b>0%</b>	<b>Dietary Fiber</b> 3g	<b>12%</b>	<b>Protein</b> 9g	<b>18%</b>

**\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.**

Vit. A 20% • Vit. C 20% • Calcium 35% • Iron 30% • Vit. D 15% • Vit. E 30% • Vit. K 10% • Thiamin (B1) 10% • Riboflavin (B2) 40%  
 Niacin (B3) 40% • Vit. B6 80% • Folate 100% • Vit. B12 80% • Biotin 25% • Pantothenic Acid 40% • Phosphorus 20% • Iodine 35%  
 Magnesium 10% • Zinc 35% • Selenium 35% • Copper 10% • Manganese 25% • Chromium 25% • Molybdenum 25%

**LOW GLYCEMIC**  
 Low glycemic foods digest slowly for prolonged levels of satiation and energy.

**INGREDIENTS:** Luna® Pure Soy Rice Crisps (Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate), Organic Toasted Oats (Organic Rolled Oats, Organic Dried Cane Syrup, Natural Vitamin E, Ancho Pico), Organic Roasted Soybeans, Organic Soy Flour, Organic Milled Raisins, Organic Brown Rice Syrup, Coconut (Organic Dried Cane Syrup, Organic Cocoa, Palm Kernel Oil, Organic Palm Kernel Sols), Organic Soy Lecithin, Organic Vanilla Extract, Marshmallow Flavored Nuggets (Organic Dried Cane Syrup, Rice Flour, Cocoa Butter, Fructose, Inulin (Chicory Extract), Natural Flavors, Gum Arabic, Soy Lecithin), and Chicory Extract, Organic Soy Butter (Organic Roasted Soybeans, Organic Soybean Oil, Salt), Organic Tapioca Syrup Solids, Vegetable Glycerin, Organic Sunflower Oil, Natural Flavors, Sea Salt.

**VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Carbonate, Magnesium Oxide, Potassium Formate (from), Nicotinamide (Vit. B3), Ascorbic Acid (Vit. C), DL-Alpha Tocopherol (Acetate) (Vit. E), Zinc Oxide, Molybdenum Sulfate, Pyridoxine Hydrochloride (Vit. B6), D-Calcium Pantothenate, Beta-Carotene (Vit. A), Magnesium Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Ethoxycarbonyl (Vit. D2), Thiamine Mononitrate (Vit. B1), Cyanocobalamin (Vit. B12), Folic Acid, Quercetin Phosphate (Vit. Q), Biotin, Potassium Iodate. **ALLERGEN STATEMENT: CONTAINS SOY AND TRACES OF MILK, PEANUTS, AND TREE NUTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.**



**LUNA**

**GLUTEN FREE**

**9g PROTEIN**

**3g FIBER!**

**70% ORGANIC**

*Smores*

ⓉD **WHOLE NUTRITION BAR FOR WOMEN®** **NET WT 1.69 OZ/48g**

**CALCIUM • IRON • FOLIC ACID • VITAMIN D**

*To my new baby, Giana, that you grow to be strong in body and mind. May your entire generation be an asset and a blessing to this planet. Love, Mom*

WHO INSPIRES YOU? TELL US AT LUNABAR.COM

**BREAST CANCER FUND**



As women, we crave a snack that does more than merely get us through the day. It needs to nourish, curb hunger, AND taste great – to satisfy entirely. Say hello to LUNA, the delightfully delicious, 70% organic snack that multitasks! With the **CORE 4\*** vitamins and minerals essential to women's health – calcium, iron, folic acid, and vitamin D – plus 9 grams of protein and 3 grams of fiber! LUNA does it all, beautifully. Feel the power of positive snacking. —The Women of LUNA

PREVENTION STARTS HERE. LUNA® is an active sponsor of the Breast Cancer Fund and its efforts to eliminate the environmental and preventable causes of the disease. breastcancerfund.org

\*While other nutrients are also essential for human nutrition, the CORE 4 nutrients are listed because of their importance to many women seeking to maintain their health.

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Made in Canada  
 07 JUL 16M61

**CERTIFIED ORGANIC BY QAI** **BEST BY**







S'mores

**Nutrition Facts**

Serv. Size 1 bar (48g) **Calories 180**  
 Serv. Per Container 6 **Calories from Fat 45**  
 \*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Amount/Serving	%DV**	Amount/Serving	%DV**
<b>Total Fat</b> 5g	<b>8%</b>	<b>Total Carb.</b> 28g	<b>9%</b>
Sat. Fat 2.5g	5%	Dietary Fiber 3g	12%
Trans Fat 0g	0%	Insoluble Fiber 1g	2%
<b>Cholesterol</b> 0mg	<b>0%</b>	Sugars 13g	26%
<b>Sodium</b> 130mg	<b>5%</b>	Other Carb. 12g	24%
<b>Potassium</b> 120mg	<b>3%</b>	<b>Protein</b> 9g	<b>18%</b>

**INGREDIENTS:** LunaPro® (Soy Rice Crisps [Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate], Organic Toasted Oats [Organic Rolled Oats, Organic Dried Cane Syrup, Natural Vitamin E (Antioxidant)], Organic Roasted Soybeans, Organic Soy Flour, Organic Milled Flaxseed), Organic Brown Rice Syrup, Coating (Organic Dried Cane Syrup, Organic Cocoa, Palm Kernel Oil, Organic Palm Kernel Solids, Organic Soy Lecithin, Organic Vanilla Extract), Marshmallow Flavored Nuggets (Organic Dried Cane Syrup, Rice Flour, Cocoa Butter, Fructose, Inulin [Chicory Extract], Natural Flavors, Gum Arabic, Soy Lecithin), Inulin (Chicory Extract), Organic Soy Butter (Organic Roasted Soybeans, Organic Soybean Oil, Salt), Organic Tapioca Syrup Solids, Vegetable Glycerin, Organic Sunflower Oil, Natural Flavor, Sea Salt.

**VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Carbonate, Magnesium Oxide, Ferrus Fumarate (Iron), Nicotinamide (Vit. B3), Ascorbic Acid (Vit. C), D-Alpha Tocopheryl Acetate (Vit. E), Zinc Oxide, Molybdenum Glycinate, Pyridoxine Hydrochloride (Vit. B6), D-Calcium Pantothenate, Beta Carotene (Vit. A), Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Cyanocobalamin (Vit. B12), Folic Acid, Cupric Oxide, Phosphatidylcholine (Vit. K), Boron, Potassium Iodide.

**ALLERGEN STATEMENT: CONTAINS SOY. MAY CONTAIN TRACES OF MILK, PEANUTS, AND TREE NUTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.**

**LOW GLYCEMIC**  
 Low-glycemic foods digest slowly for prolonged levels of satiation and energy.

\*Contains 5g total fat.

*To my sister Carrie, who inspires me every day to work a little harder, search a little deeper, and strive for just a little more in life and in love.*  
 — Kelly

WHO INSPIRES YOU? TELL US AT [LUNABAR.COM](http://LUNABAR.COM)

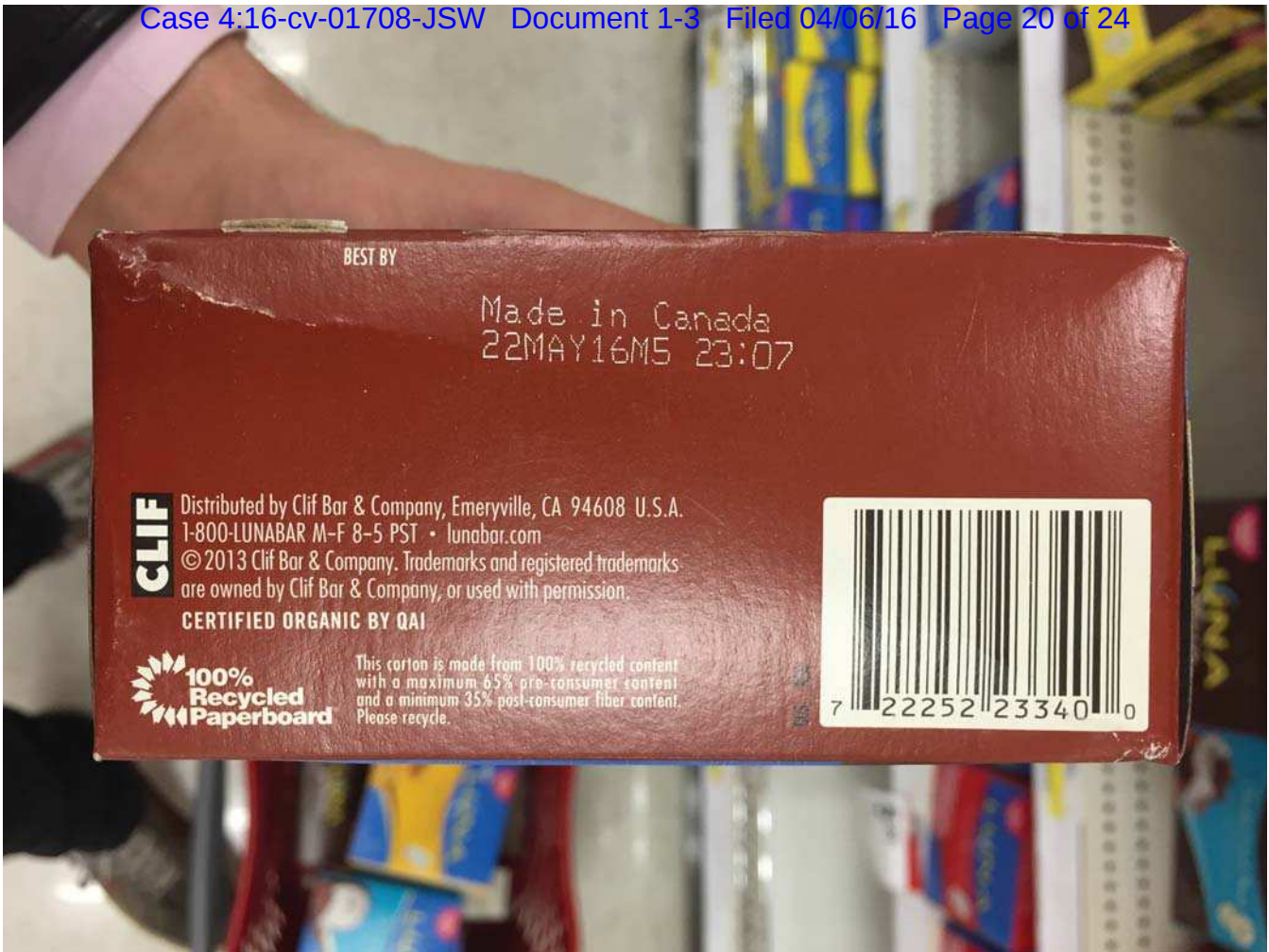
As women, we crave a snack that does more than merely get us through the day. It needs to nourish, curb hunger, AND taste great – to satisfy entirely. Say hello to LUNA, the delightfully delicious, 70% organic snack that multitasks! With the **CORE 4\*** vitamins and minerals essential to women's health – calcium, iron, folic acid, and vitamin D – plus 9 grams of protein and 3 grams of fiber, LUNA does it all, beautifully. Feel the power of positive snacking.

—The Women of LUNA

**BREAST CANCER FUND**  
 PREVENTION STARTS HERE  
 LUNA® is an active sponsor of the Breast Cancer Fund and its efforts to eliminate the environmental and preventable causes of the disease. [breastcancerfund.org](http://breastcancerfund.org)

**LUNA**







Nutrition Facts		Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**
Serv. Size 1 bar (48g)		<b>Total Fat</b> 6g	9%	<b>Sodium</b> 200mg	8%	<b>Insoluble Fiber</b> 1g	
<b>Calories 190</b>		<b>Sat. Fat</b> 2g	10%	<b>Potassium</b> 130mg	4%	<b>Sugars</b> 11g	
<b>Calories from Fat 60</b>		<b>Trans Fat</b> 0g		<b>Total Carb.</b> 25g	8%	<b>Other Carb.</b> 11g	
		<b>Cholesterol</b> 0mg	0%	<b>Dietary Fiber</b> 3g	12%	<b>Protein</b> 10g	20%

\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

**INGREDIENTS:** LUNA® (Soy Rice Cakes (Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate), Organic Toasted Oats (Organic Rolled Oats, Organic Dried Cane Syrup, Natural Wheat Flour, Organic Roasted Soybeans, Organic Soy Flour, Organic Milled Flaxseed), Organic Brown Rice Syrup, Coating (Organic Dried Cane Syrup, Palm Kernel Oil, Organic Palm Kernel Solid, Organic Soy Flour, Organic Soy Lecithin, Organic Vanilla Extract), Organic Almonds, Inulin (Chicory Extract), Almond Butter, Vegetable Glycerine, Organic Tapioca Syrup Solids, Organic Sunflower Oil, Sea Salt), Organic Natural Flavors, Natural Vitamin E (Antioxidant). **VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Carbonate, Magnesium Oxide, Ferrous Fumarate (Iron), Nicotinamide, Vit. B3, Ascorbic Acid (Vit. C), DL-Alpha Tocopheryl Acetate (Vit. E), Zinc Oxide, Molybdenum Glycinate, Pyridoxine Hydrochloride (Vit. B6), D-Calcium Panthothenate, Caffeine (Vit. A), Guaiacum Resin, Pyridoxine (Vit. B6), Chromium Amino Acid Chelate, Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Cholecalciferol (Vit. D3), Folic Acid, Guaiacum Resin, Pyridoxine (Vit. B6), Riboflavin (Vit. B2), Phosphorus (Vitamin). **ALLERGEN STATEMENT:** CONTAINS SOY AND ALMONDS. MAY CONTAIN TRACES OF MILK, PEANUTS, AND OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.

**LOW GLYCEMIC**  
Low-glycemic foods digest slowly for prolonged levels of satiation and energy.



**LUNA**

**GLUTEN FREE**

**10g PROTEIN**

**3g FIBER**

**70% ORGANIC**

Vanilla Almond

UD WHOLE NUTRITION BAR FOR WOMEN® NET WT 1.69 OZ/48g

CALCIUM • IRON • FOLIC ACID • VITAMIN D

*Mrs. B: You were a poet, mentor, and passionate teacher. In memory of your life, we will speak, we will write, we will dance. -Elyse*

WHO INSPIRES YOU? TELL US AT LUNABAR.COM

**BREAST CANCER FUND**

PREVENTION STARTS HERE.

LUNA® is an active sponsor of the Breast Cancer Fund and its efforts to eliminate the environmental and preventable causes of the disease.

[breastcancerfund.org](http://breastcancerfund.org)

Barcode: 7 22252 27003 0

As women, we crave a snack that does more than merely get us through the day. It needs to nourish, curb hunger, AND taste great—to satisfy entirely. Say hello to LUNA, the delightfully delicious, 70% organic snack that multitasks! With the CORE 4\* vitamins and minerals essential to women's health—calcium, iron, folic acid, and vitamin D—plus 10 grams of protein and 3 grams of fiber, LUNA does it all, beautifully. Feel the power of positive snacking. —The Women of LUNA

\*While other nutrients are also essential for human nutrition, the CORE 4 nutrients are listed because of their importance to women seeking to maintain their health.

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BEST BY 17AUG160D3



Nutrition Facts		Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**
Serv. Size 1 bar (48g)		<b>Total Fat</b> 7g	<b>11%</b>	<b>Sodium</b> 200mg	<b>8%</b>	<b>Insoluble Fiber</b> 1g	
<b>Calories</b> 190		Sat. Fat 2g	<b>10%</b>	<b>Potassium</b> 115mg	<b>3%</b>	Sugars 11g	
Calories from Fat 60		Trans Fat 0g		<b>Total Carb.</b> 25g	<b>8%</b>	<b>Other Carb.</b> 11g	
***Percent Daily Values (DV) are based on a 2,000 calorie diet.		<b>Cholesterol</b> 0mg	<b>0%</b>	<b>Dietary Fiber</b> 3g	<b>12%</b>	<b>Protein</b> 9g	<b>18%</b>
		Vit. A 20% • Vit. C 20% • Calcium 35% • Iron 30% • Vit. D 15% • Vit. E 30% • Vit. K 10% • Thiamin (B1) 10% • Riboflavin (B2) 40% Niacin (B3) 40% • Vit. B6 80% • Folate 100% • Vit. B12 80% • Biotin 25% • Pantothenic Acid 40% • Phosphorus 20% • Iodine 35% Magnesium 10% • Zinc 35% • Selenium 35% • Copper 10% • Manganese 25% • Chromium 25% • Molybdenum 25%					

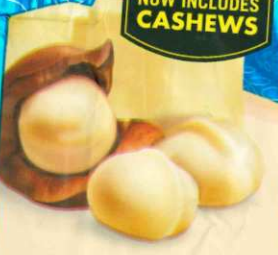
**LOW GLYCEMIC**  
Low glycemic foods digest slowly for prolonged levels of sustained energy.

**INGREDIENTS:** LunaPro® (Soy Rice Crisps (Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate), Organic Toasted Oats (Organic Rolled Oats, Organic Dried Cereal Syrup, Natural Vitamin E (Antioxidant)), Organic Roasted Soybeans, Organic Soy Flour, Organic Flaxseed), Organic Brown Rice Syrup, Organic Casting (Organic Dried Cane Syrup, Organic Palm Kernel Solids, Organic Soy Flour, Organic Soy Lecithin, Organic Vanilla Extract, Inulin (Chicory Extract), Macadamia Nuts, Macadamia Nut Butter, Organic Cashews, Organic Tapioca Syrup Solids, Organic Softener Oil, Vegetable Glycerine, Sea Salt, Natural Flavors, Organic Natural Flavor, Natural Vitamin E (Antioxidant)), **VITAMINS & MINERALS:** Dicalcium Phosphate, Calcium Carbonate, Magnesium Oxide, Ferrous Fumarate (Iron), Nicotinamide (Vit. B3), Ascorbic Acid (Vit. C), Di-Alpha-Tocopheryl Acetate (Vit. E), Zinc Oxide, Molybdenum Glycinate, Pyridoxine Hydrochloride (Vit. B6), D-Calcium Pantothenate, Beta Carotene (Vit. A), Manganese Sulfate, Selenium Amino Acid Chelate, Riboflavin (Vit. B2), Chromium Amino Acid Chelate, Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Cyanocobalamin (Vit. B12), Folic Acid, Calcium Oxide, Phytanone (Vit. K), Biotin, Potassium Iodide. **ALLERGEN STATEMENT:** CONTAINS SOY, CASHEWS, AND MACADAMIA NUTS. MAY CONTAIN TRACES OF MILK AND OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.

**NEW RECIPE**  
**NOW INCLUDES CASHEWS**

**LUNA**

**GLUTEN FREE**  
**9g PROTEIN**  
**3g FIBER**  
**70% ORGANIC**



**White Chocolate Macadamia**  
natural flavor  
**WITH CASHEWS**

**WHOLE NUTRITION BAR FOR WOMEN\*** NET WT 1.69 OZ/48g  
**CALCIUM • IRON • FOLIC ACID • VITAMIN D**

*To Aunt Phyl: You've helped my dreams stay big, even when my thoughts got small. Thank you for constantly broadening my scope and being the greatest survivor I know! Love, Michele*  
WHO INSPIRES YOU? TELL US AT LUNABAR.COM

**BREAST CANCER FUND**



As women, we crave a snack that does more than merely get us through the day. It needs to nourish, curb hunger, AND taste great - to satisfy entirely. Say hello to LUNA, the delightfully delicious, 70% organic snack that multitasks! With the **CORE 4** vitamins and minerals essential to women's health - **calcium, iron, folic acid, and vitamin D** - plus 9 grams of protein and 3 grams of fiber, LUNA does it all, beautifully. Feel the power of positive snacking. *-The Women of LUNA*

**PREVENTION STARTS HERE.** LUNA® is an active sponsor of the Breast Cancer Fund and its efforts to eliminate the environmental and preventable causes of the disease. [breastcancerfund.org](http://breastcancerfund.org)

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Made in Canada  
02.JUL.16M52



**LUNA**<sup>®</sup> 6 Bars

White Chocolate Macadamia  
natural flavor WITH CASHEWS

NEW RECIPE  
NOW INCLUDES  
CASHEWS

**LUNA**<sup>®</sup>

White Chocolate Macadamia  
natural flavor WITH CASHEWS

WHOLE NUTRITION BAR FOR WOMEN<sup>™</sup>  
CALCIUM • IRON • FOLIC ACID • VITAMIN D

9g PROTEIN  
3g FIBER  
70% ORGANIC

6 Bars  
1.69 OZ./48g per bar  
NET WT 10.14 OZ./288g

**LUNA**<sup>®</sup>

White Chocolate Macadamia  
natural flavor WITH CASHEWS

WHOLE NUTRITION BAR FOR WOMEN<sup>™</sup>  
CALCIUM • IRON • FOLIC ACID • VITAMIN D

NEW RECIPE  
NOW INCLUDES  
CASHEWS

White Chocolate Macadamia  
natural flavor WITH CASHEWS

**Nutrition Facts**  
Serving Size 1 bar (48g)      Calories 150  
Serv. Per Container 6      Calories from Fat 60

\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Amount/Serving	%DV**	Amount/Serving	%DV**
Total Fat 7g	11%	Total Carb. 25g	8%
Sat. Fat 2g	10%	Dietary Fiber 3g	12%
Trans Fat 0g		Insoluble Fiber 1g	
Cholesterol 0mg	0%	Sugars 11g	
Sodium 200mg	8%	Other Carb. 11g	
Potassium 115mg	3%	Protein 9g	18%

**INGREDIENTS:** Lunapro® Soy Rice Cakes (Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate), Organic Toasted Oats (Organic Rolled Oats, Organic Direct Cane Syrup, Natural Vitamin E (Anthroxanthol)), Organic Roasted Soybeans, Organic Soy Flour, Organic Flaxseed, Organic Brown Rice Syrup, Organic Cinnamon (Organic Direct Cane Syrup, Organic Palm Kernel Solids, Organic Soy Flour, Organic Soy Lecithin, Organic Vanilla Extract, Inulin (Chicory Extract), Macadamia Nuts, Macadamia Nut Butter, Organic Cashews, Organic Tapioca Syrup Solids, Organic Sunflower Oil, Vegetable Glycerine, Sea Salt, Natural Flavors, Organic Natural Flavor, Natural Vitamin E (Anthroxanthol)).

**VITAMINS & MINERALS:** Iron, Phosphate, Calcium, Magnesium, Zinc, Folate, Vitamin B12, Vitamin D, Vitamin E, Vitamin K, Vitamin A, Vitamin C, Vitamin B6, Vitamin B1, Vitamin B2, Vitamin B3, Vitamin B5, Vitamin B7, Vitamin B9, Vitamin B10, Vitamin B11, Vitamin B12, Vitamin B13, Vitamin B14, Vitamin B15, Vitamin B16, Vitamin B17, Vitamin B18, Vitamin B19, Vitamin B20, Vitamin B21, Vitamin B22, Vitamin B23, Vitamin B24, Vitamin B25, Vitamin B26, Vitamin B27, Vitamin B28, Vitamin B29, Vitamin B30, Vitamin B31, Vitamin B32, Vitamin B33, Vitamin B34, Vitamin B35, Vitamin B36, Vitamin B37, Vitamin B38, Vitamin B39, Vitamin B40, Vitamin B41, Vitamin B42, Vitamin B43, Vitamin B44, Vitamin B45, Vitamin B46, Vitamin B47, Vitamin B48, Vitamin B49, Vitamin B50, Vitamin B51, Vitamin B52, Vitamin B53, Vitamin B54, Vitamin B55, Vitamin B56, Vitamin B57, Vitamin B58, Vitamin B59, Vitamin B60, Vitamin B61, Vitamin B62, Vitamin B63, Vitamin B64, Vitamin B65, Vitamin B66, Vitamin B67, Vitamin B68, Vitamin B69, Vitamin B70, Vitamin B71, Vitamin B72, Vitamin B73, Vitamin B74, Vitamin B75, Vitamin B76, Vitamin B77, Vitamin B78, Vitamin B79, Vitamin B80, Vitamin B81, Vitamin B82, Vitamin B83, Vitamin B84, Vitamin B85, Vitamin B86, Vitamin B87, Vitamin B88, Vitamin B89, Vitamin B90, Vitamin B91, Vitamin B92, Vitamin B93, Vitamin B94, Vitamin B95, Vitamin B96, Vitamin B97, Vitamin B98, Vitamin B99, Vitamin B100.

**ALLERGEN STATEMENT: CONTAINS SOY, CASHEWS, AND MACADAMIA NUTS. MAY CONTAIN TRACES OF MILK AND OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. NO HYDROGENATED OILS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED.** **LOW GLYCEMIC**

\*Contains 7g total fat.



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# EXHIBIT B

1. **LUNA Chocolate Chip Cookie Dough Protein Bar**

- a. Healthy Statements (emphasis added)
  - i. “With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women’s **health**, LUNA Protein helps us keep pace with the day.”
  - ii. “Gluten free and boosted by calcium, iron, folic acid, and vitamin D, it’s a delicious snack that has the **nutrition** we need to stay strong.”
- b. Nutrient Content Statements
  - i. “12g Protein”
  - ii. “Calcium · Iron · Folic Acid · Vitamin D”
  - iii. “High Protein Bar”
  - iv. “vitamins and minerals”
  - v. “boosted by calcium, iron, folic acid, and vitamin D”
- c. Violations of FDA Regulations
  - i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 5.33 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
  - ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 3.11 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

2. **LUNA Chocolate Coconut Almond Protein Bar**

- a. Healthy Statements (emphasis added)
  - i. “With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women’s **health**, LUNA Protein helps us keep pace with the day.”
  - ii. “Gluten free and boosted by calcium, iron, folic acid, and vitamin D, it’s a delicious snack that has the **nutrition** we need to stay strong.”



b. Nutrient Content Statements

- i. “12g Protein”
- ii. “Calcium · Iron · Folic Acid · Vitamin D”
- iii. “High Protein Bar”
- iv. “vitamins and minerals”
- v. “boosted by calcium, iron, folic acid, and vitamin D”

c. Violations of FDA Regulations

- i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 6.22 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 3.56 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

3. **LUNA Chocolate Peanut Butter Protein Bar**

a. Healthy Statements (emphasis added)

- i. “With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women’s ***health***, LUNA Protein helps us keep pace with the day.”
- ii. “Gluten free and boosted by calcium, iron, folic acid, and vitamin D, it’s a delicious snack that has the ***nutrition*** we need to stay strong.”

b. Nutrient Content Statements

- i. “12g Protein”
- ii. “Calcium · Iron · Folic Acid · Vitamin D”
- iii. “High Protein Bar”
- iv. “vitamins and minerals”
- v. “boosted by calcium, iron, folic acid, and vitamin D”

c. Violations of FDA Regulations

- i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 7.11 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 3.11 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

4. **LUNA Chocolate Salted Caramel Protein Bar**

a. Healthy Statements (emphasis added)

- i. “With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women’s ***health***, LUNA Protein helps us keep pace with the day.”
- ii. “Gluten free and boosted by calcium, iron, folic acid, and vitamin D, it’s a delicious snack that has the ***nutrition*** we need to stay strong.”

b. Nutrient Content Statements

- i. “12g Protein”
- ii. “Calcium · Iron · Folic Acid · Vitamin D”
- iii. “High Protein Bar”
- iv. “vitamins and minerals”
- v. “boosted by calcium, iron, folic acid, and vitamin D”

c. Violations of FDA Regulations

- i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 4.44 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 2.67 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

5. **LUNA Lemon Vanilla Protein Bar**

- a. Healthy Statements (emphasis added)
  - i. “With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women’s **health**, LUNA Protein helps us keep pace with the day.”
  - ii. “Gluten free and boosted by calcium, iron, folic acid, and vitamin D, it’s a delicious snack that has the **nutrition** we need to stay strong.”
- b. Nutrient Content Statements
  - i. “12g Protein”
  - ii. “Calcium · Iron · Folic Acid · Vitamin D”
  - iii. “High Protein Bar”
  - iv. “vitamins and minerals”
  - v. “boosted by calcium, iron, folic acid, and vitamin D”
- c. Violations of FDA Regulations
  - i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 4 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
  - ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 2.67 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

6. **LUNA Mint Chocolate Chip Protein Bar**

- a. Healthy Statements (emphasis added)
  - i. “With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women’s **health**, LUNA Protein helps us keep pace with the day.”
  - ii. “Gluten free and boosted by calcium, iron, folic acid, and vitamin D, it’s a delicious snack that has the **nutrition** we need to stay strong.”



b. Nutrient Content Statements

- i. “12g Protein”
- ii. “Calcium · Iron · Folic Acid · Vitamin D”
- iii. “High Protein Bar”
- iv. “vitamins and minerals”
- v. “boosted by calcium, iron, folic acid, and vitamin D”

c. Violations of FDA Regulations

- i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 4.44 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 3.11 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

7. **LUNA Berry Greek Yogurt Protein Bar**

a. Healthy Statements (emphasis added)

- i. “With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women’s ***health***, LUNA Protein helps us keep pace with the day.”
- ii. “Gluten free and boosted by calcium, iron, folic acid, and vitamin D, it’s a delicious snack that has the ***nutrition*** we need to stay strong.”

b. Nutrient Content Statements

- i. “12g Protein”
- ii. “Calcium · Iron · Folic Acid · Vitamin D”
- iii. “High Protein Bar”
- iv. “vitamins and minerals”
- v. “boosted by calcium, iron, folic acid, and vitamin D”

c. Violations of FDA Regulations

- i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 4.44 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 2.22 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

Nutrition Facts	Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*
Serv. Size 1 Bar (45g)	<b>Total Fat</b> 6g	9%	<b>Cholesterol</b> <5mg	1%	<b>Total Carb.</b> 21g	7%	<b>Sugars</b> 15g	
<b>Calories</b> 170	<b>Sat. Fat</b> 3.5g	18%	<b>Sodium</b> 260mg	11%	<b>Dietary Fiber</b> 3g	11%	<b>Other Carb.</b> 3g	
<b>Calories from Fat</b> 50	<b>Trans Fat</b> 0g		<b>Potassium</b> 130mg	4%	<b>Insoluble Fiber</b> 1g		<b>Protein</b> 12g	23%

\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Vit. A 10% • Vit. C 20% • Calcium 25% • Iron 15% • Vit. D 15% • Vit. E 30% • Thiamin (B1) 10% • Riboflavin (B2) 10% • Niacin (B3) 10% • Vit. B6 20% • Folate (B9) 30% • Vit. B12 20%

**INGREDIENTS:** Soy Protein Isolate, Organic Cane Syrup, Organic Dried Cane Syrup, Palm Kernel Oil, Vegetable Glycerin, Inulin (Chicory Extract), Cacao<sup>†</sup>, Dried Cane Syrup, Macadamia Nut Butter, Natural Flavors, Whey Protein Concentrate, Unsweetened Chocolate<sup>†</sup>, Organic Rice Flour, Salt, Soy Lecithin, Cocoa Butter<sup>†</sup>, Organic Alkalinized Cocoa, Organic Vanilla Extract, Vanilla Extract, **VITAMINS & MINERALS:** Calcium Carbonate, Ascorbic Acid (Vit. C), Tocopheryl Acetate (Vit. E), Ferric Orthophosphate (Iron), Beta Carotene (Vit. A), Nicotinamide (Vit. B3), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12), Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6). **ALLERGEN STATEMENT: CONTAINS SOY, MILK, AND MACADAMIA NUTS. MAY CONTAIN TRACES OF OTHER TREE NUTS.** WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. CONTAINS 32% ORGANIC INGREDIENTS. GLUTEN FREE. <sup>†</sup>Rainforest Alliance Certified<sup>®</sup> (98% of total cacao)

# LUNA

## protein

### Chocolate Chip Cookie Dough

UD HIGH PROTEIN BAR NET WT 1.59 OZ/45g

CALCIUM • IRON • FOLIC ACID • VITAMIN D

As women, we sometimes feel like our daily routine is a sprint to the finish line. With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women's health, LUNA<sup>®</sup> Protein helps us keep pace with the day. Gluten free and boosted by calcium, iron, folic acid, and vitamin D, it's a delicious snack that has the nutrition we need to stay strong. — *The Women of LUNA*




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CANCER  
FUND**

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Nutrition Facts		Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*
Serv. Size 1 Bar (45g)		<b>Total Fat</b> 7g	<b>10%</b>	<b>Cholesterol</b> <5mg	<b>1%</b>	<b>Total Carb.</b> 21g	<b>7%</b>	<b>Sugars</b> 13g	
<b>Calories</b> 180		<b>Sat. Fat</b> 4g	<b>21%</b>	<b>Sodium</b> 140mg	<b>6%</b>	<b>Dietary Fiber</b> 3g	<b>12%</b>	<b>Other Carb.</b> 5g	
Calories from Fat 60		<b>Trans Fat</b> 0g		<b>Potassium</b> 130mg	<b>4%</b>	<b>Insoluble Fiber</b> 1g		<b>Protein</b> 12g	<b>24%</b>

\*Percent Daily Values (DV) are based on a 2,000 calorie diet. Vit. A 10% • Vit. C 20% • Calcium 25% • Iron 15% • Vit. D 15% • Vit. E 30% • Thiamin (B1) 10% • Riboflavin (B2) 10% • Niacin (B3) 10% • Vit. B6 20% • Folate (B9) 30% • Vit. B12 20%

**INGREDIENTS:** Soy Protein Isolate, Organic Cane Syrup, Organic Dried Cane Syrup, Vegetable Glycerin, Palm Kernel Oil, Inulin (Chicory Extract), Organic Toasted Coconut, Almonds, Cocoa, Almond Butter, Whey Protein Concentrate, Natural Flavors, Water, Tapioca Starch, Soy Lecithin, Salt, Organic Vanilla Extract. **VITAMINS & MINERALS:** Calcium Carbonate, Ascorbic Acid (Vit. C), Tocopherol Acetate (Vit. E), Ferric Orthophosphate (Iron), Beta Carotene (Vit. A), Niacinamide (Vit. B3), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12), Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6). **ALLERGEN STATEMENT:** CONTAINS SOY, MILK, ALMONDS, AND COCONUT. MAY CONTAIN TRACES OF OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. CONTAINS 32% ORGANIC INGREDIENTS. GLUTEN FREE. \*Rainforest Alliance Certified\*

# LUNA

## protein

### Chocolate Coconut Almond

HIGH PROTEIN BAR

NET WT 1.59 OZ/45g

CALCIUM • IRON • FOLIC ACID • VITAMIN D

As women, we sometimes feel like our daily routine is a sprint to the finish line. With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women's health, LUNA® Protein helps us keep pace with the day. Gluten free and boosted by calcium, iron, folic acid, and vitamin D, it's a delicious snack that has the nutrition we need to stay strong. — *The Women of LUNA*





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FUND**

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**LOW GLYCEMIC**  
Low-glycemic foods digest slowly for prolonged levels of satisfaction and energy.



**GLUTEN FREE**

# LUNJA<sup>®</sup> protein

**12g PROTEIN**

**LOW GLYCEMIC**

*Chocolate Coconut Almond*

HIGH PROTEIN BAR

CALCIUM • IRON • FOLIC ACID • VITAMIN D



1.59 OZ / 45g per bar

ⓁD

NET WT 9.54 OZ / 270g

### Nutrition Facts

Serv. Size 1 Bar (45g)  
Serv. per Container 6  
Calories 180  
Calories from Fat 60

Amount/Serving	%DV*	Amount/Serving	%DV*
<b>Total Fat</b> 7g	10%	<b>Total Carb.</b> 21g	7%
Sat. Fat 4g	21%	Dietary Fiber 3g	12%
Trans Fat 0g		Insoluble Fiber 1g	
<b>Cholesterol</b> <5mg	1%	Sugars 13g	
<b>Sodium</b> 140mg	6%	Other Carb. 5g	
<b>Potassium</b> 130mg	4%	<b>Protein</b> 12g	24%

Vit. A 10% • Vit. C 20% • Calcium 25% • Iron 15%  
Vit. D 15% • Vit. E 30% • Thiamin (B1) 10%  
Riboflavin (B2) 10% • Niacin (B3) 10%  
Vit. B6 20% • Folate (B9) 30% • Vit. B12 20%

**INGREDIENTS:** Soy Protein Isolate, Organic Cane Syrup, Organic Dried Cane Syrup, Vegetable Glycerin, Palm Kernel Oil, Inulin (Chicory Extract), Organic Toasted Coconut, Almonds, Cocoa, Almond Butter, Whey Protein Concentrate, Natural Flavors, Water, Tapioca Starch, Soy Lecithin, Salt, Organic Vanilla Extract.

**VITAMINS & MINERALS:** Calcium Carbonate, Ascorbic Acid (Vit. C), Tocopheryl Acetate (Vit. E), Ferric Orthophosphate (Iron), Beta Carotene (Vit. A), Nicotinamide (Vit. B3), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12), Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6).

**ALLERGEN STATEMENT:** CONTAINS SOY, MILK, ALMONDS, AND COCONUT. MAY CONTAIN TRACES OF OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. CONTAINS 32% ORGANIC INGREDIENTS. GLUTEN FREE.

#RainforestAlliance Certified™



**LOW GLYCEMIC**

Low-glycemic foods digest slowly for prolonged levels of satiation and energy.



**LUNA**  
protein

Bars

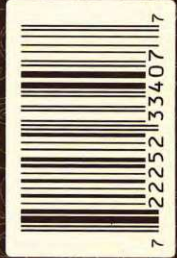
**LUNA**  
protein

*Keeps you going strong ...*

12 GRAMS OF PROTEIN • GLUTEN FREE • LOW GLYCEMIC



As women, we sometimes feel like our daily routine is a sprint to the finish line. With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women's health, LUNA® Protein helps us keep pace with the day. Gluten free and boosted by **calcium, iron, folic acid, and vitamin D**, it's a delicious snack that has the nutrition we need to stay strong. — *The Women of LUNA*



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GLUTEN FREE



**LUNA**  
protein

Chocolate Coconut Almond

HIGH PROTEIN BAR

12g  
PROTEIN  
LOW  
GLYCEMIC

554523 WS#2

21-0910-03

1 2 3

1 2 3

6/15 7

10





Nutrition Facts		Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*
Serv. Size 1 Bar (45g)		<b>Total Fat</b> 8g	13%	<b>Cholesterol</b> 0mg	0%	<b>Total Carb.</b> 19g	6%	<b>Sugars</b> 13g	
<b>Calories</b> 190		<b>Sat. Fat</b> 3.5g	18%	<b>Sodium</b> 250mg	10%	<b>Dietary Fiber</b> 3g	10%	<b>Other Carb.</b> 3g	
<b>Calories from Fat</b> 80		<b>Trans Fat</b> 0g		<b>Potassium</b> 140mg	4%	<b>Insoluble Fiber</b> 1g		<b>Protein</b> 12g	23%
*Percent Daily Values (DV) are based on a 2,000 calorie diet. Vit. A 10% • Vit. C 20% • Calcium 25% • Iron 15% • Vit. D 15% • Vit. E 30% • Thiamin (B1) 10% • Riboflavin (B2) 10% • Niacin (B3) 10% • Vit. B6 20% • Folate (B9) 30% • Vit. B12 20%									

**INGREDIENTS:** Soy Protein Isolate, Organic Cane Syrup, Peanuts, Organic Dried Cane Syrup, Palm Kernel Oil, Vegetable Glycerin, Organic Peanut Butter, Inulin (Chicory Extract), Cocoa, Natural Flavors, Whey Protein Concentrate, Salt, Soy Lecithin, Tapioca Starch, Almonds, Organic Vanilla Extract. **VITAMINS & MINERALS:** Calcium Carbonate, Ascorbic Acid (Vit. C), Tocopherol Acetate (Vit. E), Ferric Orthophosphate (Iron), Beta Carotene (Vit. A), Nicotinamide (Vit. B3), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12), Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6). **ALLERGEN STATEMENT: CONTAINS SOY, MILK, PEANUTS, AND ALMONDS. MAY CONTAIN TRACES OF OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. CONTAINS 36% ORGANIC INGREDIENTS. GLUTEN FREE. Rainforest Alliance Certified™**

**LOW GLYCEMIC**  
Low glycemic foods digest slowly for more energy or satisfaction and energy.

As women, we sometimes feel like our daily routine is a sprint to the finish line. With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women's health, LUNA® Protein helps us keep pace with the day. Gluten free and boosted by calcium, iron, folic acid, and vitamin D, it's a delicious snack that has the nutrition we need to stay strong. — *The Women of LUNA*

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**GLUTEN FREE**

**Nutrition Facts**

Serv. Size 1 Bar (45g)  
 Serv. per Container 6  
 Calories 190  
 Calories from Fat 80

\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Amount/Serving	%DV*	Amount/Serving	%DV*
<b>Total Fat</b> 8g	13%	<b>Total Carb.</b> 19g	6%
Sat. Fat 3.5g	18%	Dietary Fiber 3g	10%
Trans Fat 0g		Insoluble Fiber 1g	
<b>Cholesterol</b> 0mg	0%	Sugars 13g	
<b>Sodium</b> 250mg	10%	Other Carb. 3g	
<b>Potassium</b> 140mg	4%	<b>Protein</b> 12g	23%

Vit. A 10% • Vit. C 20% • Calcium 25% • Iron 15%  
 Vit. D 15% • Vit. E 30% • Thiamin (B1) 10%  
 Riboflavin (B2) 10% • Niacin (B3) 10%  
 Vit. B6 20% • Folate (B9) 30% • Vit. B12 20%

**INGREDIENTS:** Soy Protein Isolate, Organic Cane Syrup, Peanuts, Organic Dried Cane Syrup, Palm Kernel Oil, Vegetable Glycerin, Organic Peanut Butter, Inulin (Chicory Extract), Cocoa†, Natural Flavors, Whey Protein Concentrate, Salt, Soy Lecithin, Tapioca Starch, Almonds, Organic Vanilla Extract.

**VITAMINS & MINERALS:** Calcium Carbonate, Ascorbic Acid (Vit. C), Tocopheryl Acetate (Vit. E), Ferric Orthophosphate (Iron), Beta Carotene (Vit. A), Nicotinamide (Vit. B3), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12), Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6).

**ALLERGEN STATEMENT: CONTAINS SOY, MILK, PEANUTS, AND ALMONDS. MAY CONTAIN TRACES OF OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. CONTAINS 36% ORGANIC INGREDIENTS. GLUTEN FREE.**



**LOW GLYCEMIC**  
 Low-glycemic foods digest slowly for prolonged levels of satisfaction and energy.

# LUNA<sup>®</sup> protein

*Chocolate Peanut Butter*

HIGH PROTEIN BAR  
 CALCIUM • IRON • FOLIC ACID • VITAMIN D

**12g PROTEIN**  
**LOW GLYCEMIC**



1.59 OZ/45g per bar  
 NET WT 9.54 OZ/270g



554741 WS#1

7/15 7

12



LP13\_1184



**GLUTEN FREE**

# LUNA

protein

*Chocolate Peanut Butter*

HIGH PROTEIN BAR

**12g PROTEIN**

**LOW GLYCEMIC**

# LUNA

protein

6 Bars

# LUNA

protein

*Keeps you going strong ...*

**12 GRAMS OF PROTEIN • GLUTEN FREE • LOW GLYCEMIC**



As women, we sometimes feel like our daily routine is a sprint to the finish line. With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women's health, LUNA® Protein helps us keep pace with the day. Gluten free and boosted by **calcium, iron, folic acid, and vitamin D**, it's a delicious snack that has the nutrition we need to stay strong. — *The Women of LUNA*



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1 2 3



Nutrition Facts	Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*
Serv. Size 1 Bar (45g)	Total Fat 5g	8%	Cholesterol <5mg	1%	Total Carb. 22g	7%	Sugars 15g	
Calories 170	Sat. Fat 3g	15%	Sodium 270mg	11%	Dietary Fiber 3g	11%	Other Carb. 4g	
Calories from Fat 45	Trans Fat 0g		Potassium 115mg	3%	Insoluble Fiber 0g		Protein 12g	24%
*Percent Daily Values (DV) are based on a 2,000 calorie diet. Vit. A 10% • Vit. C 20% • Calcium 25% • Iron 15% • Vit. D 15% • Vit. E 30% • Thiamin (B1) 10% • Riboflavin (B2) 10% • Niacin (B3) 10% • Vit. B6 20% • Folate (B9) 30% • Vit. B12 20%								

**INGREDIENTS:** Soy Protein Isolate, Organic Cane Syrup, Organic Dried Cane Syrup, Inulin (Chicory Extract), Palm Kernel Oil, Vegetable Glycerin, Macadamia Nut Butter, Cocoa†, Natural Flavors, Whey Protein Concentrate, Organic Brown Rice Syrup, Organic Cocoa Butter†, Salt, Tapioca Starch, Soy Lecithin, Organic Soy Lecithin, Organic Vanilla Extract. **VITAMINS & MINERALS:** Calcium Carbonate, Ascorbic Acid (Vit. C), Tocopherol Acetate (Vit. E), Ferric Orthophosphate (Iron), Beta Carotene (Vit. A), Niacinamide (Vit. B3), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12), Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6). **ALLERGEN STATEMENT: CONTAINS SOY, MILK, AND MACADAMIA NUTS. MAY CONTAIN TRACES OF OTHER TREE NUTS.** WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. CONTAINS 33% ORGANIC INGREDIENTS. GLUTEN FREE. #Rainforest Alliance Certified

**LOW GLYCEMIC**  
Low glycemic index means slower for prolonged levels of satiation and energy.

**NEW FLAVOR**

# LUNA<sup>®</sup>

## protein

*Chocolate Salted Caramel*  
naturally flavored  
HIGH PROTEIN BAR

**GLUTEN FREE**  
**LOW GLYCEMIC**  
**12g PROTEIN**

NET WT 1.59 OZ/45g

UD

CALCIUM • IRON • FOLIC ACID • VITAMIN D

As women, we sometimes feel like our daily routine is a sprint to the finish line. With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women's health, LUNA<sup>®</sup> Protein helps us keep pace with the day. Gluten free and boosted by calcium, iron, folic acid, and vitamin D, it's a delicious snack that has the nutrition we need to stay strong. — *The Women of LUNA*



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**GLUTEN FREE**

**Nutrition Facts**

Serv. Size 1 Bar (45g)  
 Serv. per Container 6  
 Calories 170  
 \*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Amount/Serving	%DV*	Amount/Serving	%DV*
<b>Total Fat</b> 5g	8%	<b>Total Carb.</b> 22g	7%
Sat. Fat 3g	15%	Dietary Fiber 3g	11%
Trans Fat 0g		Insoluble Fiber 0g	
<b>Cholesterol</b> <5mg	1%	Sugars 15g	
<b>Sodium</b> 270mg	11%	Other Carb. 4g	
<b>Potassium</b> 115mg	3%	<b>Protein</b> 12g	24%

Vit. A 10% • Vit. C 20% • Calcium 25% • Iron 15%  
 Vit. D 15% • Vit. E 30% • Thiamin (B1) 10%  
 Riboflavin (B2) 10% • Niacin (B3) 10%  
 Vit. B6 20% • Folate (B9) 30% • Vit. B12 20%

**INGREDIENTS:** Soy Protein Isolate, Organic Cane Syrup, Organic Dried Cane Syrup, Inulin (Chicory Extract), Palm Kernel Oil, Vegetable Glycerin, Macadamia Nut Butter, Cocoa\*, Natural Flavors, Whey Protein Concentrate, Organic Brown Rice Syrup, Organic Cocoa Butter†, Salt, Tapioca Starch, Soy Lecithin, Organic Soy Lecithin, Organic Vanilla Extract.

**VITAMINS & MINERALS:** Calcium Carbonate, Ascorbic Acid (Vit. C), Tocopheryl Acetate (Vit. E), Ferric Orthophosphate (Iron), Beta Carotene (Vit. A), Nicotinamide (Vit. B3), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12), Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6).

**ALLERGEN STATEMENT: CONTAINS SOY, MILK, AND MACADAMIA NUTS. MAY CONTAIN TRACES OF OTHER TREE NUTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. CONTAINS 33% ORGANIC INGREDIENTS. GLUTEN FREE.**

\*Rainforest Alliance Certified™



**LOW GLYCEMIC**  
 Low-glycemic foods digest slowly for prolonged levels of satisfaction and energy.

# LUNA<sup>®</sup> protein

**NEW FLAVOR**

*Chocolate Salted Caramel*

naturally flavored

HIGH PROTEIN BAR

CALCIUM • IRON • FOLIC ACID • VITAMIN D

**12g PROTEIN**  
**LOW GLYCEMIC**



**6 Bars**

1.59 OZ/45g per bar  
 NET WT 9.54 OZ/270g

U.D.



protein LUNA

6 Bars

LUNA protein

Keeps you going strong...

12 GRAMS OF PROTEIN • GLUTEN FREE • LOW GLYCEMIC



As women, we sometimes feel like our daily routine is a sprint to the finish line. With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women's health, LUNA® Protein helps us keep pace with the day. Gluten free and boosted by calcium, iron, folic acid, and vitamin D, it's a delicious snack that has the nutrition we need to stay strong. — *The Women of LUNA*



33408 002 R3

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LP14.1297

GLUTEN FREE



LUNA protein

Chocolate Salted Caramel  
naturally flavored  
HIGH PROTEIN BAR

12g PROTEIN  
LOW GLYCEMIC

554523 WS#3  
23-0853-02  
1 2 3  
1 2 3  
6/15 9

16



Nutrition Facts		Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*
Serv. Size 1 Bar (45g)		<b>Total Fat</b> 4.5g	7%	<b>Cholesterol</b> <5mg	1%	<b>Total Carb.</b> 21g	7%	<b>Sugars</b> 15g	
<b>Calories</b> 170		<b>Sat. Fat</b> 3g	15%	<b>Sodium</b> 160mg	7%	<b>Dietary Fiber</b> 3g	12%	<b>Other Carb.</b> 3g	
<b>Calories from Fat</b> 40		<b>Trans Fat</b> 0g		<b>Potassium</b> 85mg	2%	<b>Insoluble Fiber</b> 0g		<b>Protein</b> 12g	24%

\*Percent Daily Values (DV) are based on a 2,000 calorie diet. Vit. A 10% • Vit. C 20% • Calcium 25% • Iron 15% • Vit. D 15% • Vit. E 30% • Thiamin (B1) 10% • Riboflavin (B2) 10% • Niacin (B3) 10% • Vit. B6 20% • Folate (B9) 30% • Vit. B12 20%

**INGREDIENTS:** Soy Protein Isolate, Organic Cane Syrup, Organic Dried Cane Syrup, Inulin (Chicory Extract), Vegetable Glycerin, Palm Kernel Oil, Macadamia Nut Butter, Natural Flavors, Whey Protein Concentrate, Organic Lemon Juice Concentrate, Nonfat Dry Milk, Organic Glucose Syrup, Water, Soy Lecithin, Tapioca Starch, Salt, Organic Vanilla Extract, Pectin, Citric Acid, Sodium Bicarbonate, **VITAMINS & MINERALS:** Calcium Carbonate, Ascorbic Acid (Vit. C), Tocopheryl Acetate (Vit. E), Ferric Orthophosphate (Iron), Beta Carotene (Vit. A), Niacinamide (Vit. B3), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12), Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6). **ALLERGEN STATEMENT: CONTAINS SOY, MILK AND MACADAMIA NUTS. MAY CONTAIN TRACES OF OTHER TREE NUTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. CONTAINS 32% ORGANIC INGREDIENTS. GLUTEN FREE.**

**LOW GLYCEMIC**  
Low glycemic foods digest slowly for prolonged levels of satiation and energy.

# LUNA

protein

Lemon Vanilla

HIGH PROTEIN BAR

NET WT 1.59 OZ/45g

GLUTEN FREE

LOW GLYCEMIC

12g PROTEIN

CALCIUM • IRON • FOLIC ACID • VITAMIN D

As women, we sometimes feel like our daily routine is a sprint to the finish line. With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women's health, LUNA® Protein helps us keep pace with the day. Gluten free and boosted by calcium, iron, folic acid, and vitamin D, it's a delicious snack that has the nutrition we need to stay strong. — *The Women of LUNA*



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BREAST CANCER FUND  
PREVENTION STARTS HERE.

14JUL16OB1  
BEST BY



**GLUTEN FREE**

**Nutrition Facts**

Serv. Size 1 Bar (45g)  
 Serv. per Container 6  
 Calories 170  
 Calories from Fat 40

Amount/Serving	%DV*	Amount/Serving	%DV*
<b>Total Fat</b> 4.5g	7%	<b>Total Carb.</b> 21g	7%
Sat. Fat 3g	15%	Dietary Fiber 3g	12%
Trans Fat 0g		Insoluble Fiber 0g	
<b>Cholesterol</b> <5mg	1%	Sugars 15g	
<b>Sodium</b> 160mg	7%	Other Carb. 3g	
<b>Potassium</b> 85mg	2%	<b>Protein</b> 12g	24%
Vit. A 10% • Vit. C 20% • Calcium 25% • Iron 15%			
Vit. D 15% • Vit. E 30% • Thiamin (B1) 10%			
Riboflavin (B2) 10% • Niacin (B3) 10%			
Vit. B6 20% • Folate (B9) 30% • Vit. B12 20%			

**INGREDIENTS:** Soy Protein Isolate, Organic Cane Syrup, Organic Dried Cane Syrup, Inulin (Chicory Extract), Vegetable Glycerin, Palm Kernel Oil, Macadamia Nut Butter, Natural Flavors, Whey Protein Concentrate, Organic Lemon Juice Concentrate, Nontat Dry Milk, Organic Glucose Syrup, Water, Soy Lecithin, Tapioca Starch, Salt, Organic Vanilla Extract, Pectin, Citric Acid, Sodium Bicarbonate.

**VITAMINS & MINERALS:** Calcium Carbonate, Ascorbic Acid (Vit. C), Tocopheryl Acetate (Vit. E), Ferric Orthophosphate (Iron), Beta Carotene (Vit. A), Miacinamide (Vit. B3), Folic Acid (Vit. B9), Ojancobalamin (Vit. B12), Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6).

**ALLERGEN STATEMENT: CONTAINS SOY, MILK, AND MACADAMIA NUTS. MAY CONTAIN TRACES OF OTHER TREE NUTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. CONTAINS 32% ORGANIC INGREDIENTS. GLUTEN FREE.**

**LOW GLYCEMIC**

Low-glycemic foods digest slowly for prolonged levels of satiation and energy.

# LUNA<sup>®</sup> protein

*Lemon Vanilla*

HIGH PROTEIN BAR

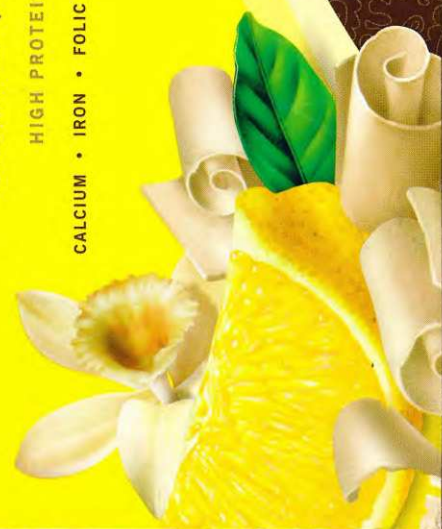
CALCIUM • IRON • FOLIC ACID • VITAMIN D

**12g PROTEIN**  
**LOW GLYCEMIC**

**6 Bars**

1.59 OZ/45g per bar

NET WT 9.54 OZ/270g





LP13\_1184

6  
Bars

LUNA<sup>®</sup>  
protein



GLUTEN  
FREE

LUNA<sup>®</sup>  
protein  
Lemon Vanilla  
HIGH PROTEIN BAR

LOW  
GLYCEMIC  
12g  
PROTEIN

LUNA<sup>®</sup>  
protein

Keeps you going strong ...

12 GRAMS OF PROTEIN • GLUTEN FREE • LOW GLYCEMIC



As women, we sometimes feel like our daily routine is a sprint to the finish line. With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women's health, LUNA<sup>®</sup> Protein helps us keep pace with the day. Gluten free and boosted by **calcium, iron, folic acid, and vitamin D**, it's a delicious snack that has the nutrition we need to stay strong. – *The Women of LUNA*

BREAST  
CANCER  
FUND  
PREVENTION STARTS HERE.

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**100%  
Recycled  
Paperboard**

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33406 004 R3







Nutrition Facts		Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*
Serv. Size 1 Bar (45g)		Total Fat	5g	8%	Cholesterol	<5mg	1%	Total Carb.	21g
Calories 170		Sat. Fat	3.5g	16%	Sodium	240mg	10%	Dietary Fiber	3g
Calories from Fat 45		Trans Fat	0g		Potassium	150mg	4%	Insoluble Fiber	1g
*Percent Daily Values (DV) are based on a 2,000 calorie diet.								Sugars	14g
								Other Carb.	4g
								Protein	12g
									23%

**INGREDIENTS:** Soy Protein Isolate, Organic Cane Syrup, Organic Dried Cane Syrup, Vegetable Glycerin, Palm Kernel Oil, Inulin (Chicory Extract), Cocoa\*, Natural Flavors, Macadamia Nut Butter, Whey Protein Concentrate, Dried Cane Syrup, Organic Alkalinized Cocoa, Organic Rice Flour, Unsweetened Chocolate\*, Water, Salt, Soy Lecithin, Cocoa Butter†, Organic Vanilla Extract, Vanilla Extract, **VITAMINS & MINERALS:** Calcium Carbonate, Ascorbic Acid (Vit. C), Tocopheryl Acetate (Vit. E), Ferric Orthophosphate (Iron), Beta Carotene (Vit. A), Niacinamide (Vit. B3), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12), Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6). **ALLERGEN STATEMENT: CONTAINS SOY, MILK, AND MACADAMIA NUTS. MAY CONTAIN TRACES OF OTHER TREE NUTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. CONTAINS 35% ORGANIC INGREDIENTS. GLUTEN FREE.** \*Rainforest Alliance Certified® (73% of total cocoa)

**LOW GLYCEMIC**  
Low glycemic foods digest slowly, helping to keep blood sugar levels stable and energy high.

**GLUTEN FREE**  
**LOW GLYCEMIC**  
**12g PROTEIN**

**LUNA**  
protein  
Mint Chocolate Chip  
HIGH PROTEIN BAR

CALCIUM • IRON • FOLIC ACID • VITAMIN D

NET WT 1.59 OZ/45g

As women, we sometimes feel like our daily routine is a sprint to the finish line. With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women's health, LUNA® Protein helps us keep pace with the day. Gluten free and boosted by calcium, iron, folic acid, and vitamin D, it's a delicious snack that has the nutrition we need to stay strong. — *The Women of LUNA*



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**BREAST CANCER FUND**  
PREVENTION STARTS HERE.

**17 JUN 16 0A 2**  
BEST BY

Nutrition Facts		Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*
Serv. Size 1 Bar (45g)		Total Fat	5g	7%	Cholesterol	<5mg	1%	Total Carb.	22g
Calories 170		Sat. Fat	2.5g	12%	Sodium	160mg	7%	Dietary Fiber	3g
Calories from Fat 45		Trans Fat	0g		Potassium	105mg	3%	Insoluble Fiber	0g
*Percent Daily Values (DV) are based on a 2,000 calorie diet.								Protein	12g
								Sugars	15g
								Other Carb.	4g

**LOW GLYCEMIC**  
Low glycemic means that this bar does not raise blood sugar levels as quickly as other foods.

**NEW FLAVOR**

# LUNA<sup>®</sup>

## protein

Berry Greek Yogurt  
naturally flavored

HIGH PROTEIN BAR

NET WT 1.59 OZ/45g

LOW GLYCEMIC 12g PROTEIN

GLUTEN FREE

CALCIUM • IRON • FOLIC ACID • VITAMIN D

As women, we sometimes feel like our daily routine is a sprint to the finish line. With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women's health, LUNA<sup>®</sup> Protein helps us keep pace with the day. Gluten free and boosted by calcium, iron, folic acid, and vitamin D, it's a delicious snack that has the nutrition we need to stay strong. — *The Women of LUNA*



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BREAST CANCER FUND

07OCT16OB2



**Nutrition Facts**

Serv. Size 1 Bar (45g)  
 Serv. per Container 6  
**Calories 170**  
 Calories from Fat 45  
 \*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Amount/Serving	%DV*	Amount/Serving	%DV*
<b>Total Fat</b> 5g	7%	<b>Total Carb.</b> 22g	7%
Sat. Fat 2.5g	12%	Dietary Fiber 3g	10%
Trans Fat 0g		Insoluble Fiber 0g	
<b>Cholesterol</b> <5mg	1%	<b>Sugars</b> 15g	
<b>Sodium</b> 160mg	7%	<b>Other Carb.</b> 4g	
<b>Potassium</b> 105mg	3%	<b>Protein</b> 12g	25%

Vit. A 10% • Vit. C 20% • Calcium 25% • Iron 15%  
 Vit. D 15% • Vit. E 30% • Thiamin (B1) 10%  
 Riboflavin (B2) 10% • Niacin (B3) 10%  
 Vit. B6 20% • Folate (B9) 30% • Vit. B12 20%

**INGREDIENTS:** Soy Protein Isolate, Organic Cane Syrup, Organic Dried Cane Syrup, Inulin (Chicory Extract), Vegetable Glycerin, Palm Kernel Oil, Almonds, Macadamia Nut Butter, Organic Honey, Whey Protein Concentrate, Dried Blueberries, Natural Flavors, Apple Juice Concentrate, Nonfat Dry Milk, Nonfat Yogurt Powder (Cultured Nonfat Milk), Greek Yogurt Flavored Powder (Nonfat Yogurt [Cultured Nonfat Milk], Milk Protein Concentrate), Whole Milk Powder, Water, Soy Lecithin, Dried Cane Syrup, Salt, Tapioca Starch, Lactic Acid, Citric Acid, Dried Honey.

**VITAMINS & MINERALS:** Calcium Carbonate, Ascorbic Acid (Vit. C), DL-Alpha Tocopheryl Acetate (Vit. E), Ferric Orthophosphate (Iron), Beta Carotene (Vit. A), Niacinamide (Vit. B3), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12), Ergocalciferol (Vit. D2), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6).

**ALLERGEN STATEMENT: CONTAINS SOY, MILK, ALMONDS, AND MACADAMIA NUTS. MAY CONTAIN TRACES OF OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. CONTAINS 32% ORGANIC INGREDIENTS. GLUTEN FREE.**

**LOW GLYCEMIC**  
 Low-glycemic-index foods digest slowly for prolonged levels of energy

**GLUTEN FREE**

**LUNA**  
 protein

**NEW FLAVOR**

*Berry Greek Yogurt*  
 naturally flavored  
 HIGH PROTEIN BAR

CALCIUM • IRON • FOLIC ACID • VITAMIN D

**12g PROTEIN**  
**LOW GLYCEMIC**



**6 Bars**

1.59 OZ/45g per bar

NET WT 9.54 OZ/270g



LP14.1322

6 Bars

LUNA protein



GLUTEN FREE

LUNA protein

Keeps you going strong...

12 GRAMS OF PROTEIN • GLUTEN FREE • LOW GLYCEMIC



Berry Greek Yogurt  
LUNA protein  
HIGH PROTEIN BAR

LOW GLYCEMIC  
12g PROTEIN

As women, we sometimes feel like our daily routine is a sprint to the finish line. With decadent nougat, 12 grams of protein, and vitamins and minerals essential to women's health, LUNA® Protein helps us keep pace with the day. Gluten free and boosted by calcium, iron, folic acid, and vitamin D, it's a delicious snack that has the nutrition we need to stay strong. — *The Women of LUNA*



555085 WS#2

23-1147-01

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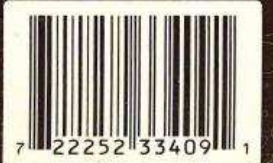


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1006085



# EXHIBIT C

1. **CLIF Kid Organic Chocolate Brownie Zbar**

- a. Healthy Statements (emphasis added)
  - i. “In raising our family, finding *nutritious* on-the-go snacks for our kids wasn’t easy. That’s why we created CLIF Kid—*wholesome*, delicious snacks made with organic ingredients *to keep kids* going, *growing*, and exploring.”
- b. Nutrient Content Statements
  - i. “3g Fiber”
  - ii. “12 Vitamins & Minerals”
  - iii. “3.5g total fat”
- c. Violations of FDA Regulations
  - i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 3.89 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
  - ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.67 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

2. **CLIF Kid Organic Chocolate Chip Zbar**

- a. Healthy Statements (emphasis added)
  - i. “In raising our family, finding *nutritious* on-the-go snacks for our kids wasn’t easy. That’s why we created CLIF Kid—*wholesome*, delicious snacks made with organic ingredients *to keep kids* going, *growing*, and exploring.”
- b. Nutrient Content Statements
  - i. “3g Fiber”
  - ii. “12 Vitamins & Minerals”
  - iii. “3.5g total fat”



c. Violations of FDA Regulations

- i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 3.89 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.67 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

3. **CLIF Kid Organic Iced Lemon Cookie Zbar**

a. Healthy Statements (emphasis added)

- i. “In raising our family, finding *nutritious* on-the-go snacks for our kids wasn’t easy. That’s why we created CLIF Kid—*wholesome*, delicious snacks made with organic ingredients to keep kids going, growing, and exploring.”

b. Nutrient Content Statements

- i. “3g Fiber”
- ii. “12 Vitamins & Minerals”
- iii. “4g total fat”

c. Violations of FDA Regulations

- i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 4.44 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.67 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

4. **CLIF Kid Organic Iced Oatmeal Cookie Cookie Zbar**

a. Healthy Statements (emphasis added)

- i. “In raising our family, finding nutritious on-the-go snacks for our kids wasn’t easy. That’s why we created CLIF Kid—wholesome, delicious snacks made with organic ingredients to keep kids going, growing, and exploring.”

b. Nutrient Content Statements

- i. “3g Fiber”
- ii. “12 Vitamins & Minerals”
- iii. “4g total fat”

c. Violations of FDA Regulations

- i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 4.44 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.11 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

5. **CLIF Kid Organic S’mores Cookie Zbar**

a. Healthy Statements (emphasis added)

- i. “In raising our family, finding nutritious on-the-go snacks for our kids wasn’t easy. That’s why we created CLIF Kid—wholesome, delicious snacks made with organic ingredients to keep kids going, growing, and exploring.”

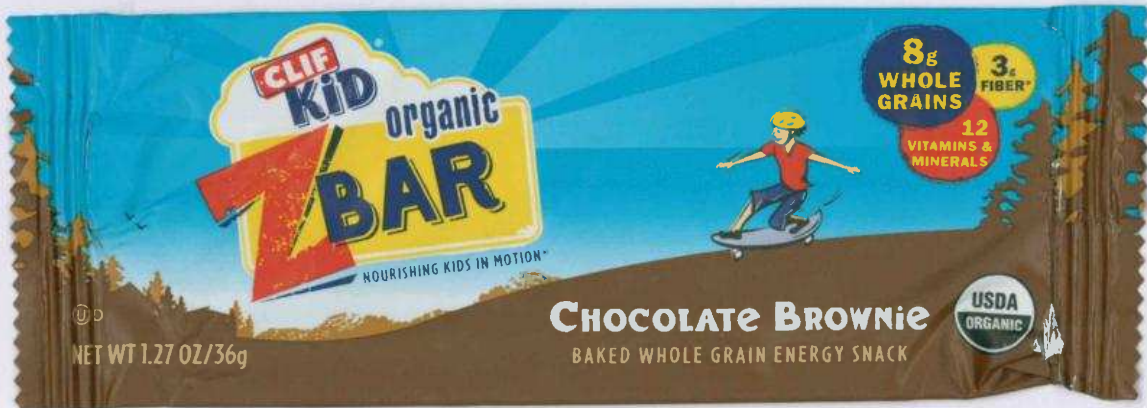
b. Nutrient Content Statements

- i. “3g Fiber”
- ii. “12 Vitamins & Minerals”
- iii. “3.5g total fat”

c. Violations of FDA Regulations

- i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 3.89 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.67 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).





In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created CLIF Kid® – wholesome, delicious snacks made with organic ingredients to keep kids going, growing, and exploring.

– Kit & Gary, Parents and Co-owners of Clif Bar & Company



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CERTIFIED ORGANIC BY QAI



INGREDIENTS: Organic Oat Blend (Organic Rolled Oats, Organic Oat Flour, Organic Oat Fiber), Organic Dibsika Syrup, Organic Chocolate Chips (Organic Unsweetened Chocolate, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract), Organic Cashew, Organic Fio Paste, Organic Cocoa, Organic Soy Butter (Organic Hydrolyzed Soybeans, Organic Soybean Oil, Salt), Natural Flavors, Organic Milled Flaxseed, Organic Sunflower Oil, Sea Salt, Baking Soda. VITAMINS & MINERALS: Calcium Carbonate, Dicalcium Phosphate, Ascorbic Acid (Vit. C), Ferric Orthophosphate (Iron), Zinc Oxide, Niacinamide (Vit. B3), Beta-Carotene (Vit. A), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12). ALLERGEN STATEMENT: CONTAINS SOY. MAY CONTAIN TRACES OF MILK, PEANUTS, WHEAT, AND TREE NUTS. NO SYNTHETIC INGREDIENTS THAT ARE NOT GENERALLY RECOGNIZED.

Joining our family, finding nutritious on-the-go snacks for our kids wasn't easy.



Nutrition Facts	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving				
Serv. Size 1 bar (36g)	Total Fat	3.5g	5%	Cholesterol	0mg	0%	Total Carb.	23g	8%	Sugars	11g
Calories 130	Sat. Fat	1.5g	8%	Sodium	140mg	6%	Dietary Fiber	3g	12%	Other Carb.	9g
Calories from Fat 30	Trans Fat	0g		Potassium	125mg	4%	Insoluble Fiber	2g		Protein	2g
*Percent Daily Values (DV) are based on a diet of other people's secrets.											
**Percent Daily Values (DV) are based on a diet of other people's secrets.											

**INGREDIENTS:** Organic Oat Blend (Organic Rolled Oats, Organic Oat Flour, Organic Oat Fiber), Organic Tapioca Syrup, Organic Chocolate Chips (Organic Dried Cacao Syrup, Organic Unsweetened Chocolate, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract, Organic Cane Syrup, Organic Fig Paste, Organic Cocoa, Organic Soy Butter (Organic Roasted Soybeans, Organic Soybean Oil, Salt), Natural Flavors, Organic Milled Flaxseed, Organic Sunflower Oil, Sea Salt, Baking Soda), **VITAMINS & MINERALS:** Calcium Carbonate, Dicalcium Phosphate, Ascorbic Acid (Vit. C), Ferric Orthophosphate (Iron), Zinc Oxide, Niacinamide (Vit. B3), Beta Carotene (Vit. A), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12). **ALLERGEN STATEMENT: CONTAINS SOY. MAY CONTAIN TRACES OF MILK, PEANUTS, WHEAT, AND TREE NUTS.**

**WE SOURCE OUR INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED.**





12 Bars

**CLIF**  
**Kid** organic  
**Z'BAR**  
NOURISHING KIDS IN MOTION®

**8g**  
**WHOLE GRAINS**  
**3g**  
**FIBER\***  
**12**  
**VITAMINS & MINERALS**



**CHOCOLATE BROWNIE**  
BAKED WHOLE GRAIN ENERGY SNACK

**CLIF**  
**Kid** organic  
**Z'BAR**  
NOURISHING KIDS IN MOTION®

**8g**  
**WHOLE GRAINS**  
**3g**  
**FIBER\***  
**12**  
**VITAMINS & MINERALS**



**CHOCOLATE BROWNIE**  
BAKED WHOLE GRAIN ENERGY SNACK

ⓁD  
NET WT  
15.24 OZ/432g  
1.27 OZ/36g per bar

12 Bars

12 Bars

**CLIF**  
**Kid** organic  
**Z'BAR**  
NOURISHING KIDS IN MOTION®

**Nutrition Facts**  
Serv. Size 1 bar (36g)  
Serv. Per Container 12

Calories 130		*Percent Daily Values (DV) are based on a diet of 2000 calories a day.	
Calories from Fat 30			
<b>Amount/Serving</b>	<b>%DV**</b>	<b>Amount/Serving</b>	<b>%DV**</b>
Total Fat 3.5g	5%	Total Carb. 23g	8%
Sat. Fat 1.5g	8%	Dietary Fiber 3g	12%
Trans Fat 0g		Insoluble Fiber 2g	
Cholesterol 0mg	0%	Sugars 11g	
Sodium 140mg	6%	Other Carb. 9g	
Potassium 125mg	4%	Protein 2g	

Vit. A 6% • Vit. C 35% • Calcium 20% • Iron 10% • Thiamin (B1) 30%  
Riboflavin (B2) 15% • Niacin (B3) 20% • Vit. B6 20% • Folate 20%  
Vit. B12 10% • Phosphorus 2% • Zinc 15%

**INGREDIENTS:** Organic Oat Blend (Organic Rolled Oats, Organic Oat Flour, Organic Oat Fiber), Organic Tapioca Syrup, Organic Chocolate Chips (Organic Dried Cane Syrup, Organic Unsweetened Chocolate, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract), Organic Cane Syrup, Organic Fig Paste, Organic Cocoa, Organic Soy Butter (Organic Roasted Soybeans, Organic Soybean Oil, Salt), Natural Flavors, Organic Milled Flaxseed, Organic Sunflower Oil, Sea Salt, Baking Soda.  
**VITAMINS & MINERALS:** Calcium Carbonate, Dicalcium Phosphate, Ascorbic Acid (Vit. C), Ferric Orthophosphate (Iron), Zinc Oxide, Nicotinamide (Vit. B3), Beta Carotene (Vit. A), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Folic Acid (Vit. B9), Inositol Hexanic Acid (Vit. B6), Pantoic Acid (Vit. B5), Cyanocobalamin (Vit. B12).  
**ALLERGEN STATEMENT: CONTAINS SOY. MAY CONTAIN TRACES OF MILK, PEANUTS, WHEAT, AND TREE NUTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED.**  
\*Contains 3.5g total fat.



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In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created CLIF Kid<sup>®</sup>—wholesome, delicious snacks made with organic ingredients to keep kids going, growing, and exploring.  
 —Kit & Gary, Parents & Co-owners of Clif Bar & Company



NOURISHING KIDS IN MOTION<sup>®</sup>  
**THE CLIF KID PACT**

- ★ MADE WITH ORGANIC INGREDIENTS
- ★ VITAMINS AND MINERALS THAT ARE IMPORTANT FOR KIDS
- ★ RIGHT PORTION SIZE FOR KIDS
- ★ NONE OF THE NO-NO'S (SEE SIDE PANEL)

CLIF Kid Zbar<sup>®</sup> is an organic baked whole grain snack made with a nutritious blend of carbohydrates, fiber, protein, and fat to help maintain kids' energy... so kids can keep **Z**ipping and **Z**ooming along.

- ★ 8 Grams of Whole Grains
- ★ 12 Vitamins and Minerals
- ★ 3 Grams of Fiber\*

For more information, check out [clifkid.com](http://clifkid.com)



**8g**  
**WHOLE GRAINS**

**3g**  
**FIBER\***

**12**  
**VITAMINS & MINERALS**

- WE KEEP IT SIMPLE:**
- NO HIGH FRUCTOSE CORN SYRUP
  - NO PARTIALLY HYDROGENATED OILS
  - NO SYNTHETIC PRESERVATIVES
  - NO ARTIFICIAL FLAVORS
  - ZERO GRAMS TRANS FAT



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In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created CLIF Kid® – wholesome, delicious snacks made with organic ingredients to keep kids going, growing, and exploring.

– Kit & Gary, Parents and Co-owners of Clif Bar & Company



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Ingredients: Organic Cane Syrup, Organic Dates, Organic Raisins, Organic Vanilla, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract, Organic Fig Paste, Organic Cane Syrup, Organic Maple Syrup, Organic Soy Butter (Organic Refined Soybeans, Organic Soybean Oil, Salt), Organic Milled Flaxseed, Natural Flavors, Baking Soda, Sea Salt. **VITAMINS & MINERALS:** Calcium Carbonate, Dicalcium Phosphate, Ascorbic Acid (Vit. C), Ferric Orthophosphate (Iron), Zinc Oxide, Nicotinamide (Vit. B3), Beta-Carotene (Vit. A), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12). **ALLERGEN STATEMENT: CONTAINS SOY. MAY CONTAIN TRACES OF MILK, PEANUTS, WHEAT, AND TREE NUTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED.**

<b>Nutrition Facts</b>		Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving
Serv. Size 1 bar (36g)		<b>Total Fat</b> 3.5g	5%	<b>Cholesterol</b> 0mg	0%	<b>Total Carb.</b> 24g	8%	<b>Sugars</b> 12g
Calories 130		<b>Sat. Fat</b> 1.5g	8%	<b>Sodium</b> 100mg	4%	<b>Dietary Fiber</b> 3g	12%	<b>Other Carb.</b> 9g
Calories from Fat 30		<b>Trans Fat</b> 0g		<b>Potassium</b> 110mg	3%	<b>Insoluble Fiber</b> 2g		<b>Protein</b> 2g

\*\*Percent Daily Values (DV) are based on a diet of 2,000 calories.

**INGREDIENTS:** Organic Oat Blend (Organic Rolled Oats, Organic Oat Flour, Organic Oat Fiber), Organic Tapioca Syrup, Organic Chocolate Chips (Organic Unsweetened Chocolate, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract), Organic Fig Paste, Organic Cane Syrup, Organic Maple Syrup, Organic Soy Butter (Organic Rostered Soybeans, Organic Soybean Oil, Salt), Organic Milled Flaxseed, Natural Flavors, Baking Soda, Sea Salt, **VITAMINS & MINERALS:** Calcium Carbonate, Dicalcium Phosphate, Ascorbic Acid (Vit. C), Ferric Orthophosphate (Iron), Zinc Oxide, Nicotinamide (Vit. B3), Beta Carotene (Vit. A), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12) **ALLERGEN STATEMENT:** CONTAINS SOY. MAY CONTAIN TRACES OF MILK, PEANUTS, WHEAT, AND TREE NUTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED.







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12 Bars

**CLIF KID** organic **ZBAR**  
NOURISHING KIDS IN MOTION®

10g WHOLE GRAINS  
3g FIBER\*  
12 VITAMINS & MINERALS



**CHOCOLATE CHIP**  
BAKED WHOLE GRAIN ENERGY SNACK

**CLIF KID** organic **ZBAR**  
NOURISHING KIDS IN MOTION®

10g WHOLE GRAINS  
3g FIBER\*  
12 VITAMINS & MINERALS



**CHOCOLATE CHIP**  
BAKED WHOLE GRAIN ENERGY SNACK

NET WT  
15.24 OZ / 432g  
1.27 OZ / 36g per bar

12 Bars

**Nutrition Facts**

Serv. Size 1 bar (36g)  
Serv. Per Container 12

Calories		130	
Calories from Fat		30	
<small>**Percent Daily Values (DV) are based on a diet of 2,000 calories a day.</small>			
Amount/Serving	%DV**	Amount/Serving	%DV**
Total Fat 3.5g	5%	Total Carb. 24g	8%
Sat. Fat 1.5g	8%	Dietary Fiber 3g	12%
Trans Fat 0g		Insoluble Fiber 2g	
Cholesterol 0mg	0%	Sugars 12g	
Sodium 100mg	4%	Other Carb. 9g	
Potassium 110mg	3%	Protein 2g	

**INGREDIENTS:** Organic Oat Blend (Organic Rolled Oats, Organic Oat Flour, Organic Oat Fiber), Organic Tapioca Syrup, Organic Chocolate Chips (Organic Dried Cane Syrup, Organic Unsweetened Chocolate, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract), Organic Fig Paste, Organic Cane Syrup, Organic Maple Syrup, Organic Soy Butter (Organic Roasted Soybeans, Organic Soybean Oil, Salt), Organic Milled Flaxseed, Natural Flavors, Baking Soda, Sea Salt.  
**VITAMINS & MINERALS:** Calcium Carbonate, Dicalcium Phosphate, Ascorbic Acid (Vit. C), Ferric Orthophosphate (Iron), Zinc Oxide, Nicotinamide (Vit. B3), Beta Carotene (Vit. A), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12)  
**ALLERGEN STATEMENT:** CONTAINS SOY. MAY CONTAIN TRACES OF MILK, PEANUTS, WHEAT, AND TREE NUTS. WE SOURCE **INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED.**  
\*Contains 3.5g total fat.



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In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created CLIF Kid®—wholesome, delicious snacks made with organic ingredients to keep kids going, growing, and exploring.  
 —Kit & Gary, Parents & Co-owners of Clif Bar & Company



**NOURISHING KIDS IN MOTION™  
 THE CLIF KID PACT**

- ★ MADE WITH ORGANIC INGREDIENTS
- ★ VITAMINS AND MINERALS THAT ARE IMPORTANT FOR KIDS
- ★ RIGHT PORTION SIZE FOR KIDS
- ★ NONE OF THE NO-NO'S (SEE SIDE PANEL)

CLIF Kid Zbar® is an organic baked whole grain snack made with a nutritious blend of carbohydrates, fiber, protein, and fat to help maintain kids' energy...so kids can keep Zipping and Zooming along.

- ★ 10 Grams of Whole Grains
- ★ 12 Vitamins and Minerals
- ★ 3 Grams of Fiber\*



For more information, check out [clifkid.com](http://clifkid.com)



**10g WHOLE GRAINS**  
**3g FIBER\***  
**12 VITAMINS & MINERALS**

**WE KEEP IT SIMPLE:**  
 NO HIGH FRUCTOSE CORN SYRUP  
 NO PARTIALLY HYDROGENATED OILS  
 NO SYNTHETIC PRESERVATIVES  
 NO ARTIFICIAL FLAVORS  
 ZERO GRAMS TRANS FAT



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Nutrition Facts	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving
Serv. Size 1 bar (36g)	Total Fat 4g	6%	Cholesterol 0mg	0%	Total Carb. 24g	8%	Sugars 12g
Calories 140	Sat. Fat 1.5g	8%	Sodium 90mg	4%	Dietary Fiber 3g	12%	Other Carb. 9g
Calories from Fat 35	Trans Fat 0g		Potassium 80mg	2%	Insoluble Fiber 2g		Protein 2g

\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet. **INGREDIENTS:** Organic Oat Blend (Organic Rolled Oats, Organic Oat Flour, Organic Oat Fiber), Organic Tapioca Syrup, Organic White Chunks (Organic Dried Cane Syrup, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract), Organic Cane Syrup, Organic Fig Paste, Organic Soy Butter (Organic Roasted Soybeans, Organic Soybean Oil, Salt), Organic Milled Flaxseed, Organic Sunflower Oil, Natural Flavors, Baking Soda, Sea Salt. **VITAMINS & MINERALS:** Calcium Carbonate, Dicalcium Phosphate, Ascorbic Acid (Vit. C), Ferric Orthophosphate (Iron), Zinc Oxide, Niacinamide (Vit. B3), Beta Carotene (Vit. A), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12). **ALLERGEN STATEMENT: CONTAINS SOY. MAY CONTAIN TRACES OF MILK, PEANUTS, WHEAT, AND TREE NUTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED.**

\*Contains 4g total fat



**9g WHOLE GRAINS**  
**3g FIBER\***  
**12 VITAMINS & MINERALS**

NET WT 1.27 OZ/36g

**Iced Lemon Cookie**  
 WITH OTHER NATURAL FLAVORS  
 BAKED WHOLE GRAIN ENERGY SNACK



In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created CLIF Kid® – wholesome, delicious snacks made with organic ingredients to keep kids going, growing, and exploring.



- Kit & Gary, Parents and Co-owners of Clif Bar & Company BESTBY 14 FEB 16 62 13:07 A

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NOURISHING KIDS IN MOTION®

THE CLIF KID PACT

- ★ MADE WITH ORGANIC INGREDIENTS
- ★ VITAMINS AND MINERALS THAT ARE IMPORTANT FOR KIDS
- ★ RIGHT PORTION SIZE FOR KIDS
- ★ NONE OF THE NO-NO'S (SEE SIDE PANEL)

CLIF Kid Zbar® is an organic baked whole grain snack made with a nutritious blend of carbohydrates, fiber, protein, and fat to help maintain kids' energy...so kids can keep Zipping and Zooming along.

- ★ 9 Grams of Whole Grains
- ★ 12 Vitamins and Minerals
- ★ 3 Grams of Fiber\*



In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created CLIF Kid® — wholesome, delicious snacks made with organic ingredients to keep kids going, growing, and exploring.

— Kit & Gavy, Parents & Co-owners of CLIF Bar & Company



For more information, check out [clifkid.com](http://clifkid.com)



Nutrition Facts	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving
Serv. Size 1 bar (36g)	Total Fat 4g	6%	Cholesterol 0mg	0%	Total Carb. 24g	8%	Sugars 12g
Calories 140	Sat. Fat 1g	5%	Sodium 115mg	5%	Dietary Fiber 3g	12%	Other Carb. 9g
Calories from Fat 35	Trans Fat 0g		Potassium 95mg	3%	Insoluble Fiber 2g		Protein 2g

\*\*Percent Daily Values (DV) are based on a diet of 2,000 calories per day. Vit. A 6% • Vit. C 35% • Calcium 20% • Iron 10% • Thiamin (B1) 30% • Riboflavin (B2) 15% • Niacin (B3) 20% • Vit. B6 20% • Folate 20% • Vit. B12 10% • Phosphorus 2% • Zinc 15%

**INGREDIENTS:** Organic Oat Blend (Organic Rolled Oats, Organic Oat Flour, Organic Oat Fiber), Organic Tapioca Syrup, Organic Cane Syrup, Organic Fig Paste, Organic Soy White Chocolate (Organic Dried Cane Syrup, Organic Cocoa Butter, Organic Soy Flour, Organic Soy Lecithin, Organic Vanilla Extract), Organic Soy Butter (Organic Roasted Soybeans, Organic Soybean Oil, Salt), Organic White Coating (Organic Dried Cane Syrup, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract), Organic Milled Flaxseed, Organic Sunflower Oil, Natural Flavors, Baking Soda, Sea Salt, Organic Cinnamon. **VITAMINS & MINERALS:** Calcium Carbonate, Dicalcium Phosphate, Ascorbic Acid (Vit. C), Ferric Orthophosphate (Iron), Zinc Oxide, Niacinamide (Vit. B3), Beta Carotene (Vit. A), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12). **ALLERGEN STATEMENT:** CONTAINS SOY. MAY CONTAIN TRACES OF MILK, PEANUTS, WHEAT, AND TREE NUTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED.



**9g WHOLE GRAINS**  
**3g FIBER\***  
**12 VITAMINS & MINERALS**

NET WT 1.27 OZ/36g

**Iced Oatmeal Cookie**  
 BAKED WHOLE GRAIN ENERGY SNACK



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— Kit & Gary, Parents and Co-owners of Clif Bar & Company



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 \*Includes 2g fiber from whole grain flaxseed. CLIF Bar & Company is proud to be a **CERTIFIED ORGANIC BY QAI**



12 Bars

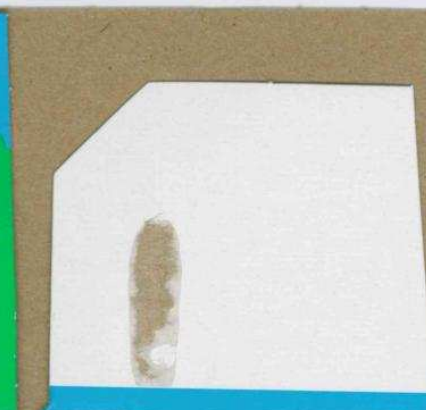


9g WHOLE GRAINS  
3g FIBER\*  
12 VITAMINS & MINERALS



USDA ORGANIC

**Iced Oatmeal Cookie**  
BAKED WHOLE GRAIN ENERGY SNACK




9g WHOLE GRAINS  
3g FIBER\*  
12 VITAMINS & MINERALS



USDA ORGANIC

**Iced Oatmeal Cookie**  
BAKED WHOLE GRAIN ENERGY SNACK

NET WT  
15.24 OZ/432g  
1.27 OZ/36g per bar

12 Bars

12 Bars



NOURISHING KIDS IN MOTION®

**Nutrition Facts**  
Serv. Size 1 bar (36g)  
Serv. Per Container 12  
Calories

Amount/Serving	%DV**	Amount/Serving	%DV**
Total Fat 4g	8%	Total Carb. 24g	8%
Sat. Fat 1g	2%	Dietary Fiber 3g	12%
Trans Fat 0g	0%	Insoluble Fiber 2g	
Cholesterol 0mg	0%	Sugars 12g	
Sodium 115mg	5%	Other Carb. 9g	
Potassium 95mg	3%	Protein 2g	

\*\*Percent Daily Values (DV) are based on a diet of 2,000 calories a day.

Vit. A 6% • Vit. C 35% • Calcium 20% • Iron 10% • Thiamin (B1) 30%  
Riboflavin (B2) 15% • Niacin (B3) 20% • Vit. B6 20% • Folate 20%  
Vit. B12 10% • Phosphorus 2% • Zinc 15%

**INGREDIENTS:** Organic Oat Blend (Organic Rolled Oats, Organic Oat Flour, Organic Oat Fiber), Organic Tapioca Syrup, Organic Cane Syrup, Organic Pig Paste, Organic Soy White Chocolate (Organic Dried Cane Syrup, Organic Cocoa Butter, Organic Soy Flour, Organic Soy Lecithin, Organic Vanilla Extract), Organic Soy Butter (Organic Roasted Soybeans, Organic Soybean Oil, Salt), Organic White Coating (Organic Dried Cane Syrup, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract), Organic Milled Flaxseed, Organic Sunflower Oil, Natural Flavors, Baking Soda, Sea Salt, Organic Cinnamon.

**VITAMINS & MINERALS:** Calcium Carbonate, Dicalcium Phosphate, Ascorbic Acid (Vit. C), Ferric Orthophosphate (Iron), Zinc Oxide, Nicotinamide (Vit. B3), Beta Carotene (Vit. A), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12).

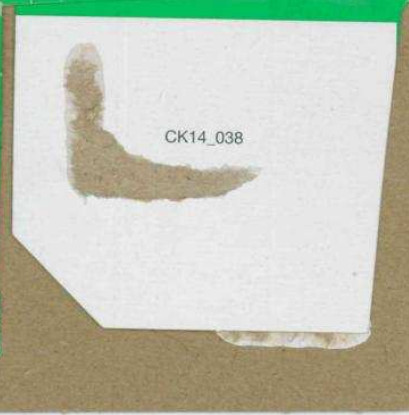
**ALLERGEN STATEMENT: CONTAINS SOY. MAY CONTAIN TRACES OF MILK, PEANUTS, WHEAT, AND TREE NUTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED.**

\*Contains 4g total fat.



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BEST BY: 10OCT16 FB 15:00 2





In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created CLIF Kid<sup>®</sup>— wholesome, delicious snacks made with organic ingredients to keep kids going, growing, and exploring.

—Kit & Gary, Parents & Co-owners of Clif Bar & Company



NOURISHING KIDS IN MOTION<sup>™</sup>  
**THE CLIF Kid PACT**

- ★ MADE WITH ORGANIC INGREDIENTS
- ★ VITAMINS AND MINERALS THAT ARE IMPORTANT FOR KIDS
- ★ RIGHT PORTION SIZE FOR KIDS
- ★ NONE OF THE NO-NO'S (SEE SIDE PANEL)

CLIF Kid Zbar<sup>™</sup> is an organic baked whole grain snack made with a nutritious blend of carbohydrates, fiber, protein, and fat to help maintain kids' energy... so kids can keep **Z**ipping and **Z**ooming along.

- ★ 9 Grams of Whole Grains
- ★ 12 Vitamins and Minerals
- ★ 3 Grams of Fiber\*

For more information, check out [clifkid.com](http://clifkid.com)

**9g**  
**WHOLE GRAINS**

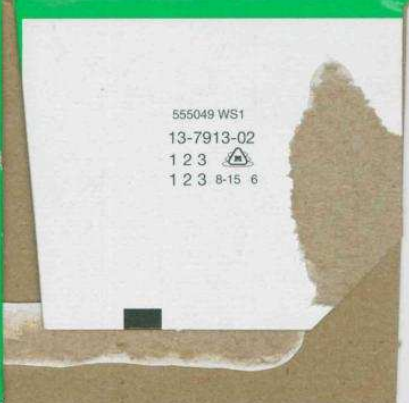
**3g**  
**FIBER\***

**12**  
**VITAMINS & MINERALS**

**WE KEEP IT SIMPLE:**

- NO HIGH FRUCTOSE CORN SYRUP
- NO PARTIALLY HYDROGENATED OILS
- NO SYNTHETIC PRESERVATIVES
- NO ARTIFICIAL FLAVORS
- ZERO GRAMS TRANS FAT

**USDA ORGANIC**



555049 WS1  
13-7913-02  
1 2 3   
1 2 3 8-15 6





In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created CLIF Kid® – wholesome, delicious snacks made with organic ingredients to keep kids going, growing, and exploring.

– Kit & Gary, Parents and Co-owners of Clif Bar & Company

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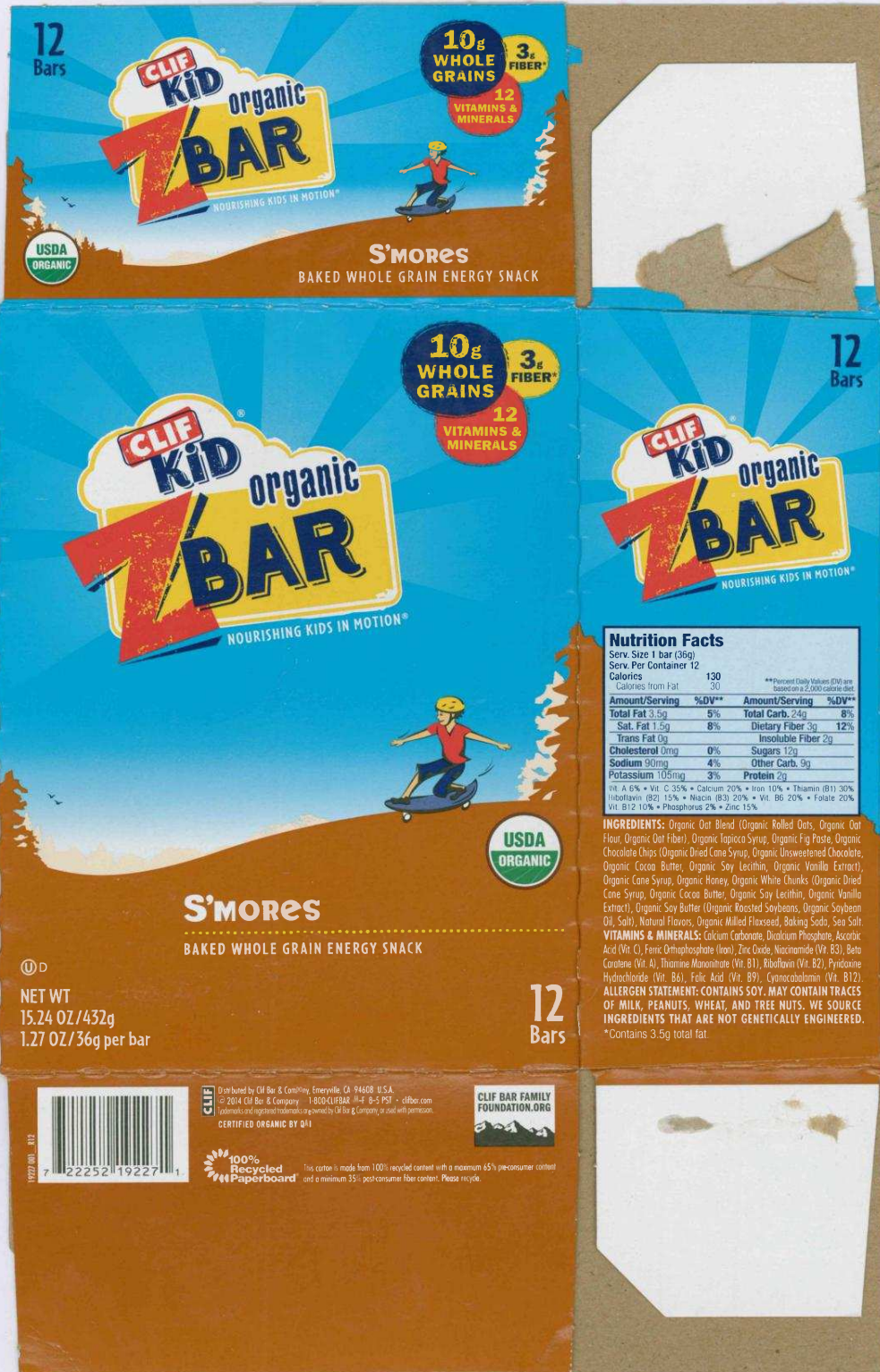
**CERTIFIED ORGANIC BY QAI**



Syrup, Organic Unsweetened Chocolate, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract, Organic Cane Syrup, Organic Honey, Organic White Chunks (Organic Dried Cane Syrup, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract), Organic Soy Butter (Organic Roasted Soybeans, Organic Soybean Oil, Salt), Natural Flavors, Organic Milled Flaxseed, Baking Soda, Sea Salt. **VITAMINS & MINERALS:** Calcium Carbonate, Dicalcium Phosphate, Ascorbic Acid (Vit. C), Ferric Orthophosphate (Iron), Zinc Oxide, Niacinamide (Vit. B3), Beta Carotene (Vit. A), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12).

<b>Nutrition Facts</b>	<b>Amount/Serving</b>	<b>%DV**</b>	<b>Amount/Serving</b>	<b>%DV**</b>	<b>Amount/Serving</b>	<b>%DV**</b>	<b>Amount/Serving</b>
<b>Serv. Size 1 bar (36g)</b>	<b>Total Fat</b> 3.5g	<b>5%</b>	<b>Cholesterol</b> 0mg	<b>0%</b>	<b>Total Carb.</b> 24g	<b>8%</b>	<b>Sugars</b> 12g
<b>Calories 130</b>	<b>Sat. Fat</b> 1.5g	<b>8%</b>	<b>Sodium</b> 90mg	<b>4%</b>	<b>Dietary Fiber</b> 3g	<b>12%</b>	<b>Other Carb.</b> 9g
<b>Calories from Fat 30</b>	<b>Trans Fat</b> 0g		<b>Potassium</b> 105mg	<b>3%</b>	<b>Insoluble Fiber</b> 2g		<b>Protein</b> 2g
<b>**Percent Daily Values (DV) are based on a 2,000 calorie diet.</b>	<b>Vit. A 6% • Vit. C 35% • Calcium 31% • Iron 11% • Thiamin (B1) 30% • Riboflavin (B2) 15% • Niacin (B3) 20% • Vit. B6 20% • Folate 20% • Vit. B12 10% • Phosphorus 2% • Zinc 15%</b>						
<b>INGREDIENTS:</b> Organic Oat Blend (Organic Rolled Oats, Organic Oat Flour, Organic Oat Fiber), Organic Tapioca Syrup, Organic Fig Paste, Organic Chocolate Chips (Organic Dried Cane Syrup, Organic Unsweetened Chocolate, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract), Organic Cane Syrup, Organic Honey, Organic White Chunks (Organic Dried Cane Syrup, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract), Organic Soy Butter (Organic Roasted Soybeans, Organic Soybean Oil, Salt), Natural Flavors, Organic Milled Flaxseed, Baking Soda, Sea Salt. <b>VITAMINS &amp; MINERALS:</b> Calcium Carbonate, Dicalcium Phosphate, Ascorbic Acid (Vit. C), Ferric Orthophosphate (Iron), Zinc Oxide, Niacinamide (Vit. B3), Beta Carotene (Vit. A), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12).							





12 Bars

**CLIF KID** organic  
**ZBAR**  
NOURISHING KIDS IN MOTION®

10g WHOLE GRAINS  
3g FIBER\*  
12 VITAMINS & MINERALS



**S'mores**  
BAKED WHOLE GRAIN ENERGY SNACK

**CLIF KID** organic  
**ZBAR**  
NOURISHING KIDS IN MOTION®

10g WHOLE GRAINS  
3g FIBER\*  
12 VITAMINS & MINERALS



**S'mores**  
BAKED WHOLE GRAIN ENERGY SNACK

NET WT  
15.24 OZ/432g  
1.27 OZ/36g per bar

12 Bars

12 Bars

**CLIF KID** organic  
**ZBAR**  
NOURISHING KIDS IN MOTION®

**Nutrition Facts**

Serv. Size 1 bar (36g)  
Serv. Per Container 12

Calories		130	***Percent Daily Values (DV) are based on a diet of 2,000 calories.	
Calories from Fat		30		
<b>Total Fat</b> 3.5g	<b>%DV**</b>	<b>Amount/Serving</b>	<b>%DV**</b>	
Sat. Fat 1.5g	6%	Total Carb. 24g	8%	
Trans Fat 0g		Dietary Fiber 3g	12%	
<b>Cholesterol</b> 0mg	<b>0%</b>	Sugars 12g		
<b>Sodium</b> 90mg	<b>4%</b>	Other Carb. 9g		
<b>Potassium</b> 105mg	<b>3%</b>	<b>Protein</b> 2g		

Vit. A 6% • Vit. C 35% • Calcium 20% • Iron 10% • Thiamin (B1) 30%  
 Riboflavin (B2) 15% • Niacin (B3) 20% • Vit. B6 20% • Folate 20%  
 Vit. B12 10% • Phosphorus 2% • Zinc 15%

**INGREDIENTS:** Organic Oat Blend (Organic Rolled Oats, Organic Oat Flour, Organic Oat Fiber), Organic Tapioca Syrup, Organic Fig Paste, Organic Chocolate Chips (Organic Dried Cane Syrup, Organic Unsweetened Chocolate, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract), Organic Cane Syrup, Organic Honey, Organic White Chunks (Organic Dried Cane Syrup, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract), Organic Soy Butter (Organic Roasted Soybeans, Organic Soybean Oil, Salt), Natural Flavors, Organic Milled Flaxseed, Baking Soda, Sea Salt.

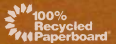
**VITAMINS & MINERALS:** Calcium Carbonate, Dicalcium Phosphate, Ascorbic Acid (Vit. C), Ferric Orthophosphate (Iron), Zinc Oxide, Nicotinamide (Vit. B3), Beta Carotene (Vit. A), Thiamine Mononitrate (Vit. B1), Riboflavin (Vit. B2), Pyridoxine Hydrochloride (Vit. B6), Folic Acid (Vit. B9), Cyanocobalamin (Vit. B12).

**ALLERGEN STATEMENT: CONTAINS SOY. MAY CONTAIN TRACES OF MILK, PEANUTS, WHEAT, AND TREE NUTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED.**

\*Contains 3.5g total fat.



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CK14-964

In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created CLIF Kid<sup>®</sup>— wholesome, delicious snacks made with organic ingredients to keep kids going, growing, and exploring.

—Kit & Gary, Parents & Co-owners of Clif Bar & Company



NOURISHING KIDS IN MOTION<sup>™</sup>  
**THE CLIF KID PACT**

- ★ MADE WITH ORGANIC INGREDIENTS
- ★ VITAMINS AND MINERALS THAT ARE IMPORTANT FOR KIDS
- ★ RIGHT PORTION SIZE FOR KIDS
- ★ NONE OF THE NO-NO'S (SEE SIDE PANEL)

CLIF Kid Zbar<sup>™</sup> is an organic baked whole grain snack made with a nutritious blend of carbohydrates, fiber, protein, and fat to help maintain kids' energy...so kids can keep **Z**ipping and **Z**ooming along.

- ★ 10 Grams of Whole Grains
- ★ 12 Vitamins and Minerals
- ★ 3 Grams of Fiber\*



For more information, check out [clifkid.com](http://clifkid.com)



BEST BY  
23OCT156104139F

**10g**  
**WHOLE GRAINS**

**3g**  
**FIBER\***

**12**  
**VITAMINS & MINERALS**

**WE KEEP IT SIMPLE:**

- NO HIGH FRUCTOSE CORN SYRUP
- NO PARTIALLY HYDROGENATED OILS
- NO SYNTHETIC PRESERVATIVES
- NO ARTIFICIAL FLAVORS
- ZERO GRAMS TRANS FAT



551460 WS1  
23-0857-01  
1 2 3 4-15 8

# EXHIBIT D



1. **CLIF Kid Chocolate Chip Protein ZBar**

1. Healthy Statements (emphasis added)

a. “In raising our family, finding *nutritious* on-the-go snacks for our kids wasn’t easy. That’s why we created CLIF Kid—*wholesome*, delicious snacks made with organic whole grains *to keep kids* going, *growing*, and exploring.”

2. Nutrient Content Statements

a. “5g Protein”

b. “3g Fiber”

3. Violations of FDA Regulations

a. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.11 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

2. **CLIF Kid Chocolate Mint Protein ZBar**

1. Healthy Statements (emphasis added)

a. “In raising our family, finding *nutritious* on-the-go snacks for our kids wasn’t easy. That’s why we created CLIF Kid—*wholesome*, delicious snacks made with organic whole grains *to keep kids* going, *growing*, and exploring.”

2. Nutrient Content Statements

a. “5g Protein”

b. “3g Fiber”

3. Violations of FDA Regulations

a. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.11 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

3. **CLIF Kid Peanut Butter Chocolate Protein ZBar**

1. Healthy Statements (emphasis added)

- a. “In raising our family, finding *nutritious* on-the-go snacks for our kids wasn’t easy. That’s why we created CLIF Kid—*wholesome*, delicious snacks made with organic whole grains *to keep kids* going, *growing*, and exploring.”

2. Nutrient Content Statements

- a. “5g Protein”
- b. “3g Fiber”

3. Violations of FDA Regulations

- a. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 4.44 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- b. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.67 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

Nutrition Facts	Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*
Serv. Size 1 bar (36g)	<b>Total Fat</b> 2.5g	4%	<b>Cholesterol</b> 5mg	2%	<b>Total Carb.</b> 23g	8%	<b>Sugars</b> 9g	
Calories 130	<b>Sat. Fat</b> 1g	5%	<b>Sodium</b> 95mg	4%	<b>Dietary Fiber</b> 3g	12%	<b>Other Carb.</b> 11g	
Calories from Fat 20	<b>Trans Fat</b> 0g		<b>Potassium</b> 85mg	2%	<b>Insoluble Fiber</b> 1g		<b>Protein</b> 5g	10%
*Percent Daily Values (DV) are based on a 2,000 calorie diet.	Vitamin A 0% • Vitamin C 0% • Calcium 20% • Iron 10% • Vitamin D 10% • Zinc 10%							

**INGREDIENTS:** Crisp Blend (Organic Brown Rice Crisps (Organic Brown Rice Flour, Organic Dried Cane Syrup, Organic Malt Extract, Salt), Dairy Crisps (Whey Protein Concentrate, Rice Flour)), Organic Tapioca Syrup, Chocolate Flavored Coating (Organic Dried Cane Syrup, Organic Cocoa, Palm Kernel Oil, Organic Palm Kernel Solids, Organic Soy Lecithin, Organic Vanilla Extract, Organic Toasted Oats (Organic Rolled Oats, Organic Dried Cane Syrup, Ascorbic Acid, Vitamin E (Antioxidant)), Organic Cane Syrup, Inulin (Chicory Extract), Organic Oat Flour, Whey Protein Isolate, Organic Oat Fiber, Vegetable Glycerin, Pea Protein, Organic Chocolate Chips (Organic Dried Cane Syrup, Organic Unsweetened Chocolate, Organic Cocoa Butter, Organic Soy Lecithin, Natural Flavors), Organic Sunflower Oil, Natural Flavors, Organic Cocoa, Sea Salt, Organic Alkalinized Cocoa. **VITAMINS & MINERALS:** Calcium Carbonate, Ferric Orthophosphate (Iron), Zinc Citrate, Ergocalciferol (Vit. D2). **ALLERGEN STATEMENT:** CONTAINS SOY AND MILK. MAY CONTAIN TRACES OF WHEAT. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED



NET WT 1.27 OZ/36g

**CHOCOLATE CHIP**  
WHOLE GRAIN PROTEIN SNACK



In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created CLIF Kid® – wholesome, delicious snacks made with organic whole grains to keep kids going, growing, and exploring.

– Kit & Gary, Parents and Co-owners of Clif Bar & Company



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**CERTIFIED ORGANIC BY QAI**

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**5**  
WHOLE GRAIN  
PROTEIN SNACK  
Bars



**CHOCOLATE  
CHIP**

**5g PROTEIN**  
**3g FIBER**

**MADE WITH  
ORGANIC  
WHOLE GRAINS**



Nutrition Facts	
Srv. Size 1 bar (36g)	
Srvs. Per Container 5	
Amount/Serving	
Calories	130
Calories from Fat 20	
% Daily Value*	
Total Fat 2.5g	4%
Sat. Fat 1g	5%
Trans Fat 0g	
Cholesterol 5mg	2%
Sodium 95mg	4%
Potassium 85mg	2%
Total Carb. 29g	6%
Dietary Fiber 3g	12%
Insoluble Fiber 1g	
Sugars 9g	
Other Carb. 11g	10%
Protein 5g	
Vitamin A 0% Calcium 20% Vitamin D 10%	
*Percent Daily Values (DV) are based on a diet of organic whole grains.	

**INGREDIENTS:** Crisp Blend (Organic Brown Rice Crips (Organic Brown Rice Flour, Organic Dried Cane Syrup, Organic Malt Extract, Salt), Dairy Crips (Whey Protein Concentrate, Rice Flour)), Organic Tapioca Syrup, Chocolate Flavored Coating (Organic Dried Cane Syrup, Organic Cocoa Palm Kernel Oil, Organic Palm Kernel Solids, Organic Soy Lecithin, Organic Vanilla Extract), Organic Invert Cane (Organic Refined Cane, Organic Dried Cane Syrup, Acetic Acid, Vitamin E (Tocopherol)), Organic Cane Syrup, Inulin (Chicory Extract), Organic Car Flour, Whey Protein Isolate, Organic Car Fiber, Vegetable Glycerin, Pea Protein, Organic Chocolate Chips (Organic Dried Cane Syrup, Organic Unsweetened Chocolate, Organic Cocoa Butter, Organic Soy Lecithin, Natural Flavors), Organic Sunflower Oil, Natural Flavors, Organic Cocoa, Sea Salt, Organic Alkalinized Cocoa, Organic Cane Syrup, Organic Tapioca Syrup).  
**VITAMINS & MINERALS:** Calcium Carbonate, Ferrous Orthophosphate (Iron), Zinc Oxide, Ergocalciferol (Vit. D2).  
**ALLERGEN STATEMENT: CONTAINS SOY AND MILK. MAY CONTAIN TRACES OF WHEAT. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED.**

**NOURISHING KIDS  
IN MOTION®**



**WE KEEP IT SIMPLE:**

- NO HIGH FRUCTOSE CORN SYRUP
- NO PARTIALLY HYDROGENATED OILS
- NO SYNTHETIC PRESERVATIVES
- NO ARTIFICIAL FLAVORS
- ZERO GRAMS TRANS FAT

**CHOCOLATE CHIP**

WHOLE GRAIN PROTEIN SNACK

**5 Bars**



NET WT  
**6.35 OZ / 180g**  
**1.27 OZ / 36g per bar**



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**CERTIFIED ORGANIC BY QAI**

BEST BY  
01001EWS 10:57



KURUKO®  
BOX AND/OR MACHINE  
MADE IN CANADA AND OTHER  
COUNTRIES



In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created CLIF Kid®—wholesome, delicious snacks made with organic whole grains to keep kids going, growing, and exploring.

—Kit & Gary, Parents & Co-owners of Clif Bar & Company

NOURISHING KIDS IN MOTION®

### THE CLIF KID PACT

MADE WITH ORGANIC WHOLE GRAINS

- ★ VITAMINS AND MINERALS THAT ARE IMPORTANT FOR KIDS
- ★ RIGHT PORTION SIZE FOR KIDS
- ★ NONE OF THE NO-NO'S (SEE SIDE PANEL)

CLIF Kid Zbar® Protein is a delicious whole grain protein snack made with nutritious building blocks for kids' growing bodies... so kids can keep **Z**ipping and **Z**ooming along.

- ★ 5g of Protein
- ★ 8g of Whole Grains
- ★ 3g of Fiber
- ★ Excellent Source of Calcium
- ★ Good Source of Vitamin D, Iron, and Zinc



CK14\_916

For more information, check out [clifkid.com](http://clifkid.com)

554679 WS1

23-0300-02

4 2 3 1 2 3 10-15 1



10 Bars



CHOCOLATE CHIP

WHOLE GRAIN PROTEIN SNACK



5g PROTEIN 3g FIBER

MADE WITH ORGANIC WHOLE GRAINS



**Nutrition Facts**

Serv. Size 1 bar (36g)  
Serv. Per Container 10

Amount/Serving	
Calories	130
Calories from Fat	20
	<b>% Daily Value*</b>
Total Fat 2.5g	4%
Sat. Fat 1g	5%
Trans Fat 0g	
Cholesterol 5mg	2%
Sodium 95mg	4%
Potassium 85mg	2%
Total Carb. 23g	8%
Dietary Fiber 3g	12%
Insoluble Fiber 1g	
Sugars 9g	
Other Carb. 11g	
<b>Protein 5g</b>	<b>10%</b>

Vitamin A 0% • Vitamin C 0%  
Calcium 20% • Iron 10%  
Vitamin D 10% • Zinc 10%

\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

**INGREDIENTS:** Crisp Blend (Organic Brown Rice Crisps (Organic Brown Rice Flour, Organic Dried Cane Syrup, Organic Malt Extract, Salt), Dairy Crisps (Whey Protein Concentrate, Rice Flour)), Organic Tapioca Syrup, Chocolate Flavored Coating (Organic Dried Cane Syrup, Organic Cocoa, Palm Kernel Oil, Organic Palm Kernel Solids, Organic Soy Lecithin, Organic Vanilla Extract), Organic Toasted Oats (Organic Rolled Oats, Organic Dried Cane Syrup, Ascorbic Acid, Vitamin E (Antioxidant)), Organic Cane Syrup, Inulin (Chicory Extract), Organic Oat Flour, Whey Protein Isolate, Organic Oat Fiber, Vegetable Glycerin, Pea Protein, Organic Chocolate Chips (Organic Dried Cane Syrup, Organic Unsweetened Chocolate, Organic Cocoa Butter, Organic Soy Lecithin, Natural Flavors), Organic Sunflower Oil, Natural Flavors, Organic Cocoa, Sea Salt, Organic Alkalinized Cocoa. **VITAMINS & MINERALS:** Calcium Carbonate, Ferric Orthophosphate (Iron), Zinc Citrate, Ergocaliferol (Vit. D2). **ALLERGEN STATEMENT: CONTAINS SOY AND MILK. MAY CONTAIN TRACES OF WHEAT. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED.**

CHOCOLATE CHIP

WHOLE GRAIN PROTEIN SNACK

UD

NET WT  
12.70 OZ/360g  
1.27 OZ/36g per bar

10 Bars



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CK14-790

In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created CLIF Kid™— wholesome, delicious snacks made with organic whole grains to keep kids going, growing, and exploring.

—Kit & Gary, Parents & Co-owners of Clif Bar & Company



NOURISHING KIDS IN MOTION™  
**THE CLIF KID PACT**

- ★ MADE WITH ORGANIC WHOLE GRAINS
- ★ VITAMINS AND MINERALS THAT ARE IMPORTANT FOR KIDS
- ★ RIGHT PORTION SIZE FOR KIDS
- ★ NONE OF THE NO-NO'S (SEE SIDE PANEL)

CLIF Kid Zbar® Protein is a delicious whole grain protein snack made with nutritious building blocks for kids' growing bodies... so kids can keep **Z**ipping and **Z**ooming along.

- ★ 5g of Protein
- ★ 8g of Whole Grains
- ★ 3g of Fiber
- ★ Excellent Source of Calcium
- ★ Good Source of Vitamin D, Iron, and Zinc



For more information, check out [clifkid.com](http://clifkid.com)



**5g PROTEIN** **3g FIBER**  
MADE WITH ORGANIC WHOLE GRAINS

- WE KEEP IT SIMPLE:**
- NO HIGH FRUCTOSE CORN SYRUP
  - NO PARTIALLY HYDROGENATED OILS
  - NO SYNTHETIC PRESERVATIVES
  - NO ARTIFICIAL FLAVORS
  - ZERO GRAMS TRANS FAT

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COUNTRIES

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Nutrition Facts		Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*
Serv. Size 1 bar (36g)		Total Fat 2.5g	4%	Cholesterol 5mg	2%	Total Carb. 23g	8%	Sugars 9g	
Calories 130		Sat. Fat 1g	5%	Sodium 95mg	4%	Dietary Fiber 3g	12%	Other Carb. 11g	
Calories from Fat 25		Trans Fat 0g		Potassium 105mg	3%	Insoluble Fiber 1g		Protein 5g	10%

\*Percent Daily Values (DV) are based on a 2,000 calorie diet.  
 Vitamin A 0% • Vitamin C 0% • Calcium 20% • Iron 10% • Vitamin D 10% • Zinc 10%

**INGREDIENTS** Crisp Blend (Organic Brown Rice Crisps [Organic Brown Rice Flour, Organic Dried Cane Syrup, Organic Malt Extract, Salt], Dairy Crisps [Whey Protein Concentrate, Rice Flour], Organic Tapioca Syrup, Chocolate Flavored Coating (Organic Dried Cane Syrup, Organic Cocoa, Palm Kernel Oil, Organic Palm Kernel Solids, Organic Soy Lecithin, Organic Vanilla Extract), Organic Toasted Oats (Organic Rolled Oats, Organic Dried Cane Syrup, Ascorbic Acid, Vitamin E [Antioxidant]), Organic Cane Syrup, Inulin (Chicory Extract), Whey Protein Isolate, Organic Alkalized Cocoa Powder, Organic Oat Flour, Organic Oat Fiber, Vegetable Glycerin, Pea Protein, Organic Sunflower Oil, Natural Flavors, Sea Salt. **VITAMINS & MINERALS:** Calcium Carbonate, Ferric Orthophosphate (Iron), Zinc Citrate, Ergocalciferol (Vit. D2). **ALLERGEN STATEMENT:** CONTAINS SOY AND MILK. MAY CONTAIN TRACES OF WHEAT. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED.



NET WT 1.27 OZ/36g



**CHOCOLATE MINT**  
WHOLE GRAIN PROTEIN SNACK

In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created CLIF Kid® – wholesome, delicious snacks made with organic whole grains to keep kids going, growing, and exploring.

– Kit & Gary, Parents and Co-owners of Clif Bar & Company



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**CLIF KID PROTEIN BAR**

**THE CLIF KID PACT**

MADE WITH ORGANIC WHOLE GRAINS

- ★ VITAMINS AND MINERALS THAT ARE IMPORTANT FOR KIDS
- ★ RIGHT PORTION SIZE FOR KIDS
- ★ NONE OF THE NO-NO'S (SEE SIDE PANEL)

CLIF Kid Zbar-Protein is a delicious whole grain protein snack made with nutritious building blocks for kids' growing bodies... so kids can keep **Z**ipping and **Z**ooming along.

- ★ 5g of Protein
- ★ 8g of Whole Grains
- ★ 3g of Fiber
- ★ Excellent Source of Calcium
- ★ Good Source of Vitamin D, Iron, and Zinc

In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created CLIF Kid™—wholesome, delicious snacks made with organic whole grains to keep kids going, growing, and exploring.  
—Kit & Garry, Parents & Co-owners of Clif Bar & Company

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Nutrition Facts		Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	
Serv. Size 1 bar (36g)		Total Fat	4g	6%	Cholesterol	<5mg	2%	Total Carb.	22g	7%
Calories 140		Sat. Fat	1.5g	8%	Sodium	95mg	4%	Dietary Fiber	3g	12%
Calories from Fat 35		Trans Fat	0g		Potassium	95mg	3%	Insoluble Fiber	1g	
**Percent Daily Values (DV) are based on a 2,000 calorie diet.								Protein	5g	10%

**INGREDIENTS:** Crisp Blend (Organic Brown Rice Crisps [Organic Brown Rice Flour, Organic Dried Cane Syrup, Organic Malt Extract Salt], Dairy Crisps [Whey Protein Concentrate, Rice Flour], Organic Tapioca Syrup, Chocolate Flavored Coating [Organic Dried Cane Syrup, Organic Cocoa, Palm Kernel Oil, Organic Palm Kernel Solids, Organic Soy Lecithin, Organic Vanilla Extract], Organic Toasted Oats [Organic Rolled Oats, Organic Dried Cane Syrup, Ascorbic Acid, Vitamin E (Antioxidant)], Organic Peanut Butter [Organic Dry Roasted Peanuts, Salt], Organic Cane Syrup, Inulin (Chicory Extract), Vegetable Glycerin, Organic Oat Flour, Organic Oat Fiber, Organic Peanut Flour, Natural Flavors, Whey Protein Isolate, Pea Protein, Sea Salt, Vitamin E (Antioxidant)). **VITAMINS & MINERALS:** Calcium Carbonate, Ferric Orthophosphate (Iron), Zinc Citrate, Ergocalciferol (Vit. D2). **ALLERGEN STATEMENT:** CONTAINS SOY, MILK, AND PEANUTS. MAY CONTAIN TRACES OF WHEAT AND TREE NUTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED.

\*Contains 4g total fat.



NET WT 1.27 OZ/36g

PEANUT BUTTER CHOCOLATE  
WHOLE GRAIN PROTEIN SNACK



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**PEANUT BUTTER CHOCOLATE**

**5g PROTEIN**

**3g FIBER\***

**MADE WITH ORGANIC WHOLE GRAINS**



WHOLE GRAIN PROTEIN SNACK

**5 Bars**



NOURISHING KIDS IN MOTION®



**WE KEEP IT SIMPLE:**

- NO HIGH FRUCTOSE CORN SYRUP
- NO PARTIALLY HYDROGENATED OILS
- NO SYNTHETIC PRESERVATIVES
- NO ARTIFICIAL FLAVORS
- ZERO GRAMS TRANS FAT

**PEANUT BUTTER CHOCOLATE**

WHOLE GRAIN PROTEIN SNACK

**5 Bars**

NET WT  
6.35 OZ/180g  
1.27 OZ/36g per bar

Nutrition Facts	
Serv. Size 1 bar (36g)	
Serv. Per Container 5	
Amount/Serving	140
Calories	35
Calories from Fat	
Total Fat 4g	6%
Sat. Fat 1.5g	8%
Trans Fat 0g	
Cholesterol <5mg	2%
Sodium 95mg	4%
Potassium 95mg	3%
Total Carb. 22g	7%
Dietary Fiber 3g	12%
Insoluble Fiber 1g	
Sugars 8g	
Other Carb. 11g	
Protein 5g	10%
Vitamin A 0%	Vitamin C 0%
Calcium 20%	Iron 10%
Vitamin D 10%	Zinc 10%

**INGREDIENTS:** Crisp Blend (Organic Brown Rice Crisps (Organic Brown Rice Flour, Organic Dried Cane Syrup, Organic Malt Extract, Salt), Dairy Crisps (Whey Protein Concentrate, Rice Flour)), Organic Apricot Syrup, Chocolate Flavored Coating (Organic Dried Cane Syrup, Organic Cocoa, Palm Kernel Oil, Organic Palm Kernel Salts, Organic Soy Lecithin, Organic Vanilla Extract), Organic Toasted Oats (Organic Rolled Oats, Organic Dried Cane Syrup, Ascorbic Acid, Vitamin E (Antioxidant)), Organic Peanut Butter (Organic Dry Roasted Peanuts, Salt), Organic Cane Syrup, Inulin (Chicory Extract), Vegetable Glycerin, Organic Oat Flour, Organic Oat Fiber, Organic Peanut Flour, Natural Flavors, Whey Protein Isolate, Fine Powder, Sea Salt, Vitamin E (Antioxidant)),  
**VITAMINS & MINERALS:** Calcium, Choline, Chromium, Folic Acid, Inositol, Magnesium, Manganese, Nickel, Potassium, Selenium, Zinc  
**ALLERGEN STATEMENT: CONTAINS SOY, MILK, AND PEANUTS. MAY CONTAIN TRACES OF WHEAT AND TREE NUTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED.**  
 \*Contains 4g total fat.



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—Kit & Gary, Parents & Co-owners of Clif Bar & Company

NOURISHING KIDS IN MOTION®

### THE CLIF KID PACT

- ★ MADE WITH ORGANIC WHOLE GRAINS
- ★ VITAMINS AND MINERALS THAT ARE IMPORTANT FOR KIDS
- ★ RIGHT PORTION SIZE FOR KIDS
- ★ NONE OF THE NO-NO'S (SEE SIDE PANEL)

CLIF Kid Zbar® Protein is a delicious whole grain protein snack made with nutritious building blocks for kids' growing bodies... so kids can keep **Z**ipping and **Z**ooming along.

- ★ 5g of Protein
- ★ 8g of Whole Grains
- ★ 3g of Fiber\*
- ★ Excellent Source of Calcium
- ★ Good Source of Vitamin D, Iron, and Zinc



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10  
Bars



PEANUT BUTTER CHOCOLATE

WHOLE GRAIN PROTEIN SNACK



**5g PROTEIN** **3g FIBER\***

MADE WITH ORGANIC WHOLE GRAINS



Nutrition Facts	
Serv. Size 1 bar (36g)	
Serv. Per Container 10	
Amount/Serving	
Calories	140
Calories from Fat	35
	<b>% Daily Value**</b>
Total Fat 4g	8%
Sat. Fat 1.5g	8%
Trans Fat 0g	
Cholesterol <5mg	2%
Sodium 95mg	4%
Potassium 95mg	3%
Total Carb. 22g	7%
Dietary Fiber 3g	12%
Insoluble Fiber 1g	
Sugars 8g	
Other Carb. 11g	
Protein 5g	10%
Vitamin A 0%	Vitamin C 0%
Calcium 20%	Iron 10%
Vitamin D 10%	Zinc 10%

\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

**INGREDIENTS:** Crisp Blend (Organic Brown Rice Crisps (Organic Brown Rice Flour, Organic Dried Cane Syrup, Organic Malt Extract, Salt), Dairy Crisps (Whey Protein Concentrate, Rice Flour)), Organic Tapioca Syrup, Chocolate Flavored Coating (Organic Dried Cane Syrup, Organic Cocoa, Palm Kernel Oil, Organic Palm Kernel Solids, Organic Soy Lecithin, Organic Vanilla Extract), Organic Toasted Oats (Organic Rolled Oats, Organic Dried Cane Syrup, Ascorbic Acid, Vitamin E (Antioxidant)), Organic Peanut Butter (Organic Dry Roasted Peanuts, Salt), Organic Cane Syrup, Inulin (Chicory Extract), Vegetable Glycerin, Organic Oat Flour, Organic Oat Fiber, Organic Peanut Flour, Natural Flavors, Whey Protein Isolate, Pea Protein, Sea Salt, Vitamin E (Antioxidant)).

**VITAMINS & MINERALS:** Calcium Carbonate, Ferric Orthophosphate (Iron), Zinc Citrate, Ergocalciferol (Vit. D2).

**ALLERGEN STATEMENT: CONTAINS SOY, MILK, AND PEANUTS. MAY CONTAIN TRACES OF WHEAT AND TREE NUTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED.**

\*Contains 4g total fat.

PEANUT BUTTER CHOCOLATE

WHOLE GRAIN PROTEIN SNACK

NET WT  
12.70 OZ/360g  
1.27 OZ/36g per bar

10 Bars



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NOURISHING KIDS IN MOTION®  
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CLIF Kid Zbar® Protein is a delicious whole grain protein snack made with nutritious building blocks for kids' growing bodies... so kids can keep **Zipping** and **Zooming** along.

- ★ 5g of Protein
- ★ 8g of Whole Grains
- ★ 3g of Fiber\*
- ★ Excellent Source of Calcium
- ★ Good Source of Vitamin D, Iron, and Zinc



For more information, check out [clifkid.com](http://clifkid.com)

**5g** PROTEIN  
**3g** FIBER\*

MADE WITH ORGANIC WHOLE GRAINS

**WE KEEP IT SIMPLE:**

- NO HIGH FRUCTOSE CORN SYRUP
- NO PARTIALLY HYDROGENATED OILS
- NO SYNTHETIC PRESERVATIVES
- NO ARTIFICIAL FLAVORS
- ZERO GRAMS TRANS FAT

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# EXHIBIT E

1. **CLIF MOJO Sweet and Salty Dark Chocolate Almond Coconut Trail Mix Bar**

1. Healthy Statements (emphasis added)

a. “Ready to go whenever and wherever you are, CLIF MOJO combines simple and organic ingredients that are **good for** both **our bodies** and the planet.”

2. Nutrient Content Statements

a. “8g Protein”

b. “3g Fiber”

c. “12g total fat”

3. Violations of FDA Regulations

a. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 10.67 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).

b. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 5.33 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

2. **CLIF MOJO Sweet and Salty Mountain Mix Trail Mix Bar**

1. Healthy Statements (emphasis added)

a. “Ready to go whenever and wherever you are, CLIF MOJO combines simple and organic ingredients that are **good for** both **our bodies** and the planet.”

2. Nutrient Content Statements

a. “8g Protein”

3. Violations of FDA Regulations

a. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 8 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).

- b. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.33 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

3. **CLIF MOJO Sweet and Salty Peanut Butter Pretzel Trail Mix Bar**

- 1. Healthy Statements (emphasis added)
  - a. “Ready to go whenever and wherever you are, CLIF MOJO combines simple and organic ingredients that are ***good for*** both ***our bodies*** and the planet.”
- 2. Nutrient Content Statements
  - a. “9g Protein”
- 3. Violations of FDA Regulations
  - a. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 8 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
  - b. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 1.78 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).



Contains 12g total fat

**Nutrition Facts**

Serv. Size 1 bar (45g)  
 Calories 200  
 Calories from Fat 110

Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**
Total Fat 12g	18%	Monounsat. Fat 4.5g		Total Carb. 20g	7%	Other Carb. 7g	
Sat. Fat 6g	30%	Cholesterol 0mg	0%	Dietary Fiber 3g	12%	Protein 8g	16%
Trans Fat 0g		Sodium 180mg	8%	Insoluble Fiber 2g			
Polyunsat. Fat 1.5g		Potassium 170mg	5%	Sugars 10g			

\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Vitamin A 0% • Vitamin C 0% • Calcium 10% • Iron 8% • Vitamin E 15% • Magnesium 10% • Selenium 2%

LOW GLYCEMIC

Contains 12g total fat

**INGREDIENTS:** Organic Brown Rice Syrup, Organic Almonds, Soy Rice Crisps (Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate), Organic Chocolate Chunks (Organic Dried Cane Syrup, Organic Unsweetened Chocolate, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla), Organic Coconut, Almond Butter, Organic Roasted Soybeans, Organic Oat Syrup Solids, Vegetable Glycerin, Organic Coconut Oil, Sea Salt, Organic Gum Arabic, Natural Flavor, Natural Vitamin E (Antioxidant). **ALLERGEN STATEMENT:** CONTAINS SOY, COCONUT, ALMONDS, AND TRACES OF MILK. MAY CONTAIN PEANUTS AND OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.



**DARK CHOCOLATE ALMOND COCONUT**

**70% ORGANIC**  
**8g PROTEIN > 3g FIBER\* > LOW GLYCEMIC**  
 SEE NUTRITION INFORMATION FOR SATURATED FAT CONTENT



NET WT 1.6 OZ (45g) © D

**NOT YOUR ORDINARY SNACK**

CLIF MOJO® Sweet and Salty Trail Mix Bar is made for mixing it up and discovering all the good stuff the day has to offer. Ready to go whenever and wherever you are, CLIF MOJO combines simple and organic ingredients that are good for both our bodies and the planet. CLIF MOJO is a delicious way to energize your day. Grab a MOJO and go!

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Nutrition Facts		Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*
Serv. Size 1 bar (45g)		<b>Total Fat</b> 9g	14%	Monounsat. Fat	4.5g	<b>Total Carb.</b> 21g	7%	Other Carb.	7g
<b>Calories</b> 190		Sat. Fat	1.5g	8%	<b>Cholesterol</b> 0mg	0%	Dietary Fiber	2g	8%
Calories from Fat 80		Trans Fat	0g		<b>Sodium</b> 200mg	8%	Insoluble Fiber	1g	
		Polysat. Fat	2.5g		<b>Potassium</b> 180mg	5%	<b>Sugars</b> 12g		
*Percent Daily Values (DV) are based on a 2,000 calorie diet.		Vitamin A 0% • Vitamin C 0% • Calcium 6% • Iron 8% • Vitamin E 15% • Magnesium 10% • Selenium 2%							

**LOW GLYCEMIC**

Low Glycemic Index (GI) means that this bar provides a steady release of energy and keeps you feeling full longer.

**INGREDIENTS:** Organic Brown Rice Syrup, Soy Rice Crisps (Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate), Organic Peanuts, Organic Raisins, Almonds, Organic Chocolate Chips (Organic Dried Cane Syrup, Organic Unsweetened Chocolate, Organic Cocoa Butter, Organic Soy Lecithin, Organic Vanilla Extract), Organic Pretzels (Organic Wheat Flour, Salt, Organic Canola Oil, Organic Malt), Organic Peanut Butter, Organic Roasted Soybeans, Pumpkin Seeds, Sunflower Seeds, Organic Oat Syrup Solids, Vegetable Glycerin, Organic Sunflower Oil, Sea Salt, Organic Gum Arabic, Natural Vitamin E (Antioxidant).  
**ALLERGEN STATEMENT:** CONTAINS SOY, PEANUTS, ALMONDS, WHEAT, AND TRACES OF MILK. MAY CONTAIN OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.

**CLIF** **MOJO** *SWEET and SALTY* **MOUNTAIN MIX**  
 TRAIL MIX BAR  
**70% ORGANIC**  
**8g PROTEIN > LOW GLYCEMIC**



NET WT 1.6 OZ (45g) U D

**NOT YOUR ORDINARY SNACK\***  
 CLIF MOJO® Sweet and Salty Trail Mix Bar is made for mixing it up and discovering all the good stuff the day has to offer. Ready to go whenever and wherever you are, CLIF MOJO combines simple and organic ingredients that are good for both our bodies and the planet.  
 CLIF MOJO is a delicious way to energize your day. Grab a MOJO and go!

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Nutrition Facts		Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*
Serv. Size 1 bar (45g)		<b>Total Fat</b> 9g	14%	Monounsat. Fat 3.5g		<b>Total Carb.</b> 20g	7%	Other Carb. 9g	
<b>Calories</b> 190		Sat. Fat 2g	10%	<b>Cholesterol</b> 0mg	0%	Dietary Fiber 2g	8%	<b>Protein</b> 9g	18%
Calories from Fat 80		Trans Fat 0g		<b>Sodium</b> 220mg	9%	Insoluble Fiber 1g			
		Polyunsat. Fat 2.5g		<b>Potassium</b> 125mg	4%	<b>Sugars</b> 9g			
*Percent Daily Values (DV) are based on a 2,000 calorie diet.		Vitamin A 0% • Vitamin C 0% • Calcium 6% • Iron 6% • Vitamin E 8% • Magnesium 8% • Selenium 0%							

**LOW GLYCEMIC**

Low glycemic foods impact blood sugar and levels of saturated fat.

**INGREDIENTS:** Organic Brown Rice Syrup, Organic Peanuts, Soy Rice Crisps (Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate), Peanut Butter-Filled Pretzels (Enriched Wheat Flour [Niacin, Reduced Iron, Thiamin Mononitrate, Riboflavin, Folic Acid], Peanut Butter, Salt, Baking Soda), Peanut Butter Chips (Dried Cane Syrup, Palm Kernel Oil, Peanut Flour, Soy Lecithin), Organic Pretzels (Organic Wheat Flour, Salt, Organic Canola Oil, Organic Malt), Organic Peanut Butter, Organic Roasted Soybeans, Organic Oat Syrup Solids, Vegetable Glycerin, Peanut Flour, Organic Sunflower Oil, Roasted Peanut Extract, Sea Salt, Organic Gum Arabic, Natural Vitamin E (Antioxidant). **ALLERGEN STATEMENT: CONTAINS SOY, PEANUTS, WHEAT, AND TRACES OF MILK. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.**



**MOJO** *SWEET and SALTY*  
TRAIL MIX BAR

**PEANUT BUTTER PRETZEL**

**70% ORGANIC**  
**9g PROTEIN > LOW GLYCEMIC**

NET WT 1.6 OZ (45g) U D

**NOT YOUR ORDINARY SNACK\***

CLIF MOJO® Sweet and Salty Trail Mix Bar is made for mixing it up and discovering all the good stuff the day has to offer. Ready to go whenever and wherever you are, CLIF MOJO combines simple and organic ingredients that are good for both our bodies and the planet. CLIF MOJO is a delicious way to energize your day. Grab a MOJO and go!

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**CERTIFIED ORGANIC BY QAI**

BEST BY

18SEP16M61



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**CLIF**  
**MOJO** SWEET and SALTY  
 TRAIL MIX BAR  
 70% ORGANIC  
 9g PROTEIN • LOW GLYCEMIC

PEANUT BUTTER PRETZEL

**NOT YOUR ORDINARY SNACK\***

CLIF MOJO® Sweet and Salty Trail Mix Bar is made for mixing it up and discovering all the good stuff the day has to offer. Ready to go whenever and wherever you are, CLIF MOJO combines simple and organic ingredients that are good for both our bodies and the planet. CLIF MOJO is a delicious way to energize your day. Grab a MOJO and go!

Nutrition Facts		Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*	Amount/Serving	%DV*
Serv. Size 1 bar (45g)		Total Fat	9g	14%	Monounsat. Fat	3.5g	Total Carb.	20g	7%
Serv. Per Container 12		Sat. Fat	2g	10%	Cholesterol	0mg	Dietary Fiber	2g	8%
Calories 190		Trans Fat	0g		Sodium	220mg	Insoluble Fiber	1g	18%
Calories from Fat 80		Polysat. Fat	2.5g		Potassium	125mg	Sugars	9g	
*Percent Daily Values (DV) are based on a 2,000 calorie diet.		Vitamin A	0%	Vitamin C	0%	Calcium	6%	Iron	6%
								Vitamin E	8%
								Magnesium	8%
								Selenium	0%

**INGREDIENTS:** Organic Brown Rice Syrup, Organic Peanuts, Soy Rice Crisps (Soy Protein Isolate, Organic Rice Flour, Calcium Carbonate), Peanut Butter-Filled Pretzels (Enriched Wheat Flour (Niacin, Reduced Iron, Thiamin Mononitrate, Riboflavin, Folic Acid), Peanut Butter, Salt, Baking Soda), Peanut Butter Chips (Dried Cane Syrup, Palm Kernel Oil, Peanut Flour, Soy Lecithin), Organic Pretzels (Organic Wheat Flour, Salt, Organic Canola Oil, Organic Malt), Organic Peanut Butter, Organic Roasted Soybeans, Organic Oat Syrup Solids, Vegetable Glycerin, Peanut Flour, Organic Sunflower Oil, Roasted Peanut Extract, Sea Salt, Organic Gum Arabic, Natural Vitamin E (Antioxidant). **ALLERGEN STATEMENT:** CONTAINS SOY, PEANUTS, WHEAT, AND TRACES OF MILK. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. 70% ORGANIC INGREDIENTS.

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BEST BY  
 10/2015 - 1/1/16

PEANUT BUTTER PRETZEL  
 PEANUT BUTTER CHIPS & PEANUTS

539644 W/S  
 13-7591-02  
 1 2 3 1 2 3 7 15 2

CLIF MOJO®  
 BOX AND/OR MACHINE  
 PEANUT BUTTER  
 CHIPS AND PEANUTS  
 COUNTIES

MJ13\_278

# EXHIBIT F



1. **CLIF Dark Chocolate Almond Sea Salt Organic Trail Mix Bar**

- a. Healthy Statements (emphasis added)
  - i. “Combining simple and organic ingredients that are **good for** both **our bodies** and the planet, our trail mix bar comes in flavors for just about every occasion—no matter where the trail takes you.”
- b. Nutrient Content Statements
  - i. “3g Fiber”
- c. Violations of FDA Regulations
  - i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 13 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
  - ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 3 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

2. **CLIF Dark Chocolate Cherry Almond Organic Trail Mix Bar**

- a. Healthy Statements (emphasis added)
  - i. “Combining simple and organic ingredients that are **good for** both **our bodies** and the planet, our trail mix bar comes in flavors for just about every occasion—no matter where the trail takes you.”
- b. Nutrient Content Statements
  - i. “4g Fiber”
  - ii. “Low Sodium”
  - iii. “9g total fat”
- c. Violations of FDA Regulations
  - i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 9 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).

- ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 2.5 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

3. **CLIF Dark Chocolate Peanut Butter Organic Trail Mix Bar**

- a. Healthy Statements (emphasis added)
  - i. “Combining simple and organic ingredients that are ***good for*** both ***our bodies*** and the planet, our trail mix bar comes in flavors for just about every occasion—no matter where the trail takes you.”
- b. Nutrient Content Statements
  - i. “3g Fiber”
  - ii. “Low Sodium”
  - iii. “13g total fat”
- c. Violations of FDA Regulations
  - i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 13 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
  - ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 3 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

4. **CLIF Dark Chocolate Pomegranate Raspberry Organic Trail Mix Bar**

- a. Healthy Statements (emphasis added)
  - i. “Combining simple and organic ingredients that are ***good for*** both ***our bodies*** and the planet, our trail mix bar comes in flavors for just about every occasion—no matter where the trail takes you.”
- b. Nutrient Content Statements
  - i. “3g Fiber”
  - ii. “Low Sodium”

iii. “11g total fat”

c. Violations of FDA Regulations

i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 11 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).

ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 3 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

5. **CLIF Cranberry Almond Organic Trail Mix Bar**

a. Healthy Statements (emphasis added)

i. “Combining simple and organic ingredients that are ***good for*** both ***our bodies*** and the planet, our trail mix bar comes in flavors for just about every occasion—no matter where the trail takes you.”

b. Nutrient Content Statements

i. “4g Fiber”

ii. “Low Sodium”

iii. “9g total fat”

c. Violations of FDA Regulations

i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 9 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).

6. **CLIF Wild Blueberry Almond Organic Trail Mix Bar**

a. Healthy Statements (emphasis added)

i. “Combining simple and organic ingredients that are ***good for*** both ***our bodies*** and the planet, our trail mix bar comes in flavors for just about every occasion—no matter where the trail takes you.”



b. Nutrient Content Statements

- i. “4g Fiber”
- ii. “Low Sodium”
- iii. “8g total fat”

c. Violations of FDA Regulations

- i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 8 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).

7. **CLIF Coconut Almond Peanut Organic Trail Mix Bar**

a. Healthy Statements (emphasis added)

- i. “Combining simple and organic ingredients that are good for both our bodies and the planet, our trail mix bar comes in flavors for just about every occasion—no matter where the trail takes you.”

b. Nutrient Content Statements

- i. “Low Sodium”
- ii. “4g Fiber”

c. Violations of FDA Regulations

- i. Exceeds the maximum 3 grams of fat per 40 grams of total weight requirement outlined at ¶ 22(a) herein because it contains 13 grams of fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(b)(2).
- ii. Exceeds the 1 gram of saturated fat per 40 grams total weight requirement outlined at ¶ 22(b) herein because it contains 4 grams of saturated fat per 40 grams of total product. *See* 21 C.F.R. § 101.62(c)(2).

**Nutrition Facts**

Serv. Size 1 bar (40g)  
**Calories 200**  
 Calories from Fat 120

\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV*	Amount/Serving	%DV**	Amount/Serving	%DV**
Total Fat 13g	20%	Polyunsat. Fat 2.5g		Sodium 160mg	7%	Dietary Fiber 3g	12%	Other Carb. 7g	
Sat. Fat 3g	15%	Monounsat. Fat 7g		Potassium 170mg	5%	Insoluble Fiber 2g		Protein 5g	
Trans Fat 0g		Cholesterol 0mg	0%	Total Carb. 19g	6%	Sugars 9g			
Vitamin A 0% • Vitamin C 0% • Calcium 4% • Iron 6% • Vitamin E 15% • Magnesium 10% • Selenium 2%									

LOW GLYCEMIC

Low glycemic index foods digest slowly for prolonged levels of energy.

**INGREDIENTS:** ORGANIC ALMONDS, ORGANIC TAPIOCA SYRUP, ORGANIC PECANS, ORGANIC DARK CHOCOLATE (DRIED CANE SYRUP\*, UNSWEETENED CHOCOLATE\*, COCOA BUTTER\*, SOY LECITHIN, VANILLA EXTRACT\*), ORGANIC COATING (DRIED CANE SYRUP\*, PALM KERNEL OIL\*, COCOA\*, SOY LECITHIN\*, VANILLA EXTRACT\*), ORGANIC CASHEWS, ORGANIC ROASTED SOYBEANS, ORGANIC RICE CRISPS (RICE FLOUR\*, DRIED CANE SYRUP\*, SALT, CALCIUM CARBONATE), ORGANIC INULIN, ORGANIC ALMOND BUTTER, ORGANIC SUNFLOWER OIL, SEA SALT, MIXED TOCOPHEROLS (ANTIOXIDANT). **ALLERGEN STATEMENT:** CONTAINS SOY, ALMONDS, CASHEWS, AND PECANS. MAY CONTAIN TRACES OF MILK AND OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. \*ORGANIC



Gluten Free  
 Low Glycemic  
 3g Fiber

SEE NUTRITION INFORMATION FOR TOTAL FAT CONTENT



**DARK CHOCOLATE ALMOND SEA SALT**

NET WT 1.41 OZ (40g) U D

A delicious way to energize your day, CLIF® Organic Trail Mix Bar is made for mixing it up and discovering all the good stuff the day has to offer. Combining simple and organic ingredients that are good for both our bodies and the planet, our trail mix bar comes in flavors for just about every occasion—no matter where the trail takes you.

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 CERTIFIED ORGANIC BY OAI

BEST BY  
 10AUG16/2016





**NEW**

**CLIF ORGANIC**  
-TRAIL MIX BAR-

- Gluten Free
- Low Glycemic
- 3g Fiber

SEE NUTRITION INFORMATION FOR TOTAL FAT CONTENT

DARK CHOCOLATE ALMOND SEA SALT

**4**

BARS NET WT 5.64 OZ (160g) | 1.41 OZ (40g) per bar



100 25396



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100% recycled paperboard  
100% recycled materials.  
Paperboard contains no glass  
fibers or other harmful chemicals.  
Recycle with style.

BEST BY  
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**CLIF ORGANIC**  
-TRAIL MIX BAR-

- Gluten Free
- Low Glycemic
- 3g Fiber

SEE NUTRITION INFORMATION FOR TOTAL FAT CONTENT



**CLIF ORGANIC**  
-TRAIL MIX BAR-

- Gluten Free
- Low Glycemic
- 3g Fiber

SEE NUTRITION INFORMATION FOR TOTAL FAT CONTENT



DARK CHOCOLATE ALMOND SEA SALT





**CLIF ORGANIC**  
- TRAIL MIX BAR -

DARK CHOCOLATE ALMOND SEA SALT

Gluten Free  
Low Glycemic  
3g Fiber



A delicious way to energize your day, CLIF® Organic Trail Mix Bar is made for mixing it up and discovering all the good stuff the day has to offer. Combining simple and organic ingredients that are good for both our bodies and the planet, our trail mix bar comes in flavors for just about every occasion—no matter where the trail takes you.

**DARK CHOCOLATE ALMOND SEA SALT**

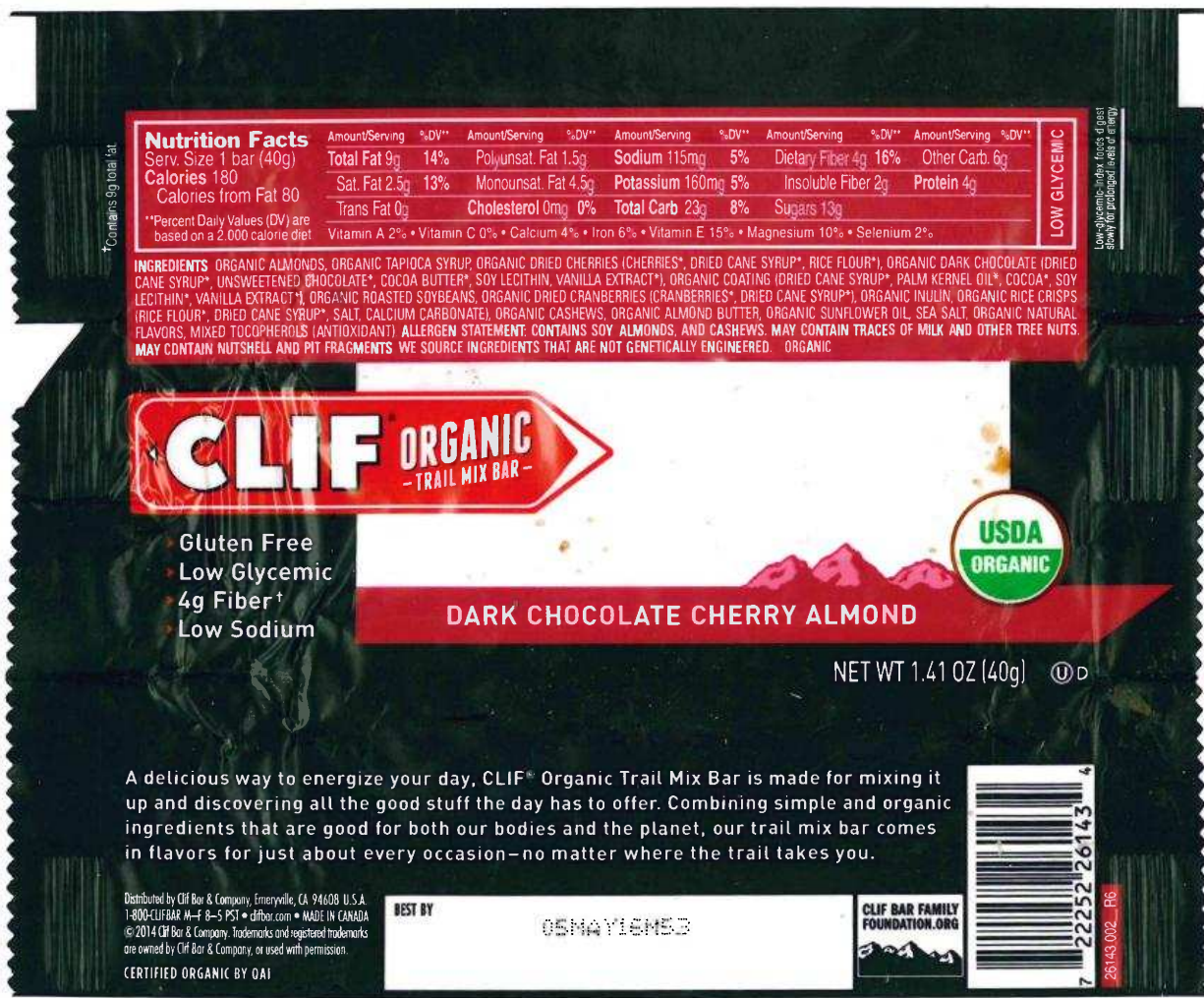
Nutrition Facts		Amount/ Serving		%DV*	
Serving Size 1 Bar (40g)		Total Fat	15g	30%	Micronutrient
Calories 200		Salt	5g	15%	Cholesterol
% Daily Value*		Trans Fat	0g	0%	Sodium
Total Fat	15g	Polyunsat. Fat	2.5g	5%	Potassium
Sat. Fat	5g	Vitamin A	0%	0%	Vitamin C
Cholesterol	0mg	Vitamin E	15%	15%	Magnesium
Sodium	150mg	Iron	5%	5%	Selenium
Total Carb.	19g				
Dietary Fiber	3g				
Other Carb.	7g				
Protein	5g				

INGREDIENTS: ORGANIC ALMONDS, ORGANIC DARK CHOCOLATE, ORGANIC DARK CHOCOLATE, DRIED CAKE STRIP, UNSWEETENED CHOCOLATE, ORGANIC CASHEWS, ORGANIC ROASTED SOYBEANS, ORGANIC RICE CRISPS, RICE FLOUR, DRIED CAKE STRIP, SALT, CALCIUM CARBONATE, ORGANIC MILK, ORGANIC ALMOND BUTTER, ORGANIC SUGAR, ORGANIC OIL, SEA SALT, TAHEO, TROPICPERLS, VANILLA, GUAVA. ALLERGEN STATEMENT: CONTAINS SOY, ALMONDS, CASHEWS, AND PEANUTS. MAY CONTAIN TRACES OF MILK AND OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. WE SOURCE INGREDIENTS THAT ARE AS SUSTAINABLE AS POSSIBLE.

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MADE IN THE U.S.A.  
ORIGINALLY ENGINEERED  
IN CANADA AND OTHER  
COUNTRIES

TMB14846



\*Contains 9g total fat.

**Nutrition Facts**

Serv. Size 1 bar (40g)  
**Calories 180**  
 Calories from Fat 80

\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**
<b>Total Fat</b> 9g	14%	<b>Polyunsat. Fat</b> 1.5g		<b>Sodium</b> 115mg	5%	<b>Dietary Fiber</b> 4g	16%	<b>Other Carb.</b> 6g	
<b>Sat. Fat</b> 2.5g	13%	<b>Monounsat. Fat</b> 4.5g		<b>Potassium</b> 160mg	5%	<b>Insoluble Fiber</b> 2g		<b>Protein</b> 4g	
<b>Trans Fat</b> 0g		<b>Cholesterol</b> 0mg	0%	<b>Total Carb</b> 23g	8%	<b>Sugars</b> 13g			

Vitamin A 2% • Vitamin C 0% • Calcium 4% • Iron 6% • Vitamin E 15% • Magnesium 10% • Selenium 2%

LOW GLYCEMIC

Low Glycemic Index. For more details, please refer to the packaging for more information.

**INGREDIENTS** ORGANIC ALMONDS, ORGANIC TAPIOCA SYRUP, ORGANIC DRIED CHERRIES (CHERRIES\*, DRIED CANE SYRUP\*, RICE FLOUR\*), ORGANIC DARK CHOCOLATE (DRIED CANE SYRUP\*, UNSWEETENED CHOCOLATE\*, COCOA BUTTER\*, SOY LECITHIN, VANILLA EXTRACT\*), ORGANIC COATING (DRIED CANE SYRUP\*, PALM KERNEL OIL\*, COCOA\*, SOY LECITHIN\*, VANILLA EXTRACT\*), ORGANIC ROASTED SOYBEANS, ORGANIC DRIED CRANBERRIES (CRANBERRIES\*, DRIED CANE SYRUP\*), ORGANIC INULIN, ORGANIC RICE CRISPS (RICE FLOUR\*, DRIED CANE SYRUP\*, SALT, CALCIUM CARBONATE), ORGANIC CASHEWS, ORGANIC ALMOND BUTTER, ORGANIC SUNFLOWER OIL, SEA SALT, ORGANIC NATURAL FLAVORS, MIXED TOCOPHEROLS (ANTIOXIDANT). **ALLERGEN STATEMENT: CONTAINS SOY, ALMONDS, AND CASHEWS. MAY CONTAIN TRACES OF MILK AND OTHER TREE NUTS. MAY CONTAIN NUTSHELL AND PIT FRAGMENTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. ORGANIC**



- Gluten Free
- Low Glycemic
- 4g Fiber†
- Low Sodium



**DARK CHOCOLATE CHERRY ALMOND**

NET WT 1.41 OZ (40g) U D

A delicious way to energize your day, CLIF® Organic Trail Mix Bar is made for mixing it up and discovering all the good stuff the day has to offer. Combining simple and organic ingredients that are good for both our bodies and the planet, our trail mix bar comes in flavors for just about every occasion—no matter where the trail takes you.

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**CLIF ORGANIC**  
- TRAIL MIX BAR -

Gluten Free  
Low Glycemic  
4g Fiber†  
Low Sodium

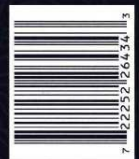
**CLIF ORGANIC**  
- TRAIL MIX BAR -

Gluten Free  
Low Glycemic  
4g Fiber†  
Low Sodium



**DARK CHOCOLATE CHERRY ALMOND**

**4** BARS NET WT 5.64 OZ (160g) | 1.41 OZ (40g) per bar



**CLIF**  
CERTIFIED ORGANIC BY OAI

100% Recycled Paperboard  
100% Recycled Paperboard  
100% Recycled Paperboard  
100% Recycled Paperboard

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**USDA ORGANIC**

**CLIF ORGANIC**  
- TRAIL MIX BAR -

**DARK CHOCOLATE CHERRY ALMOND**

Gluten Free  
Low Glycemic  
4g Fiber†  
Low Sodium

**USDA ORGANIC**

**USDA ORGANIC**



**CLIF ORGANIC**  
- TRAIL MIX BAR -

Gluten Free  
Low Glycemic  
4g Fiber†  
Low Sodium

**DARK CHOCOLATE CHERRY ALMOND**

**NEW**







**Nutrition Facts**

Serv. Size 1 bar (40g)  
 Calories 200  
 Calories from Fat 120

Amount/Serving	%DV*	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**
Total Fat 13g	20%	Polyunsat. Fat 3.5g		Sodium 130mg	5%	Dietary Fiber 3g	12%	Other Carb. 7g	
Sat. Fat 3g	15%	Monounsat. Fat 6g		Potassium 190mg	5%	Insoluble Fiber 2g		Protein 6g	
Trans Fat 0g		Cholesterol 0mg	0%	Total Carb. 18g	6%	Sugars 8g			

\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet  
 Vitamin A 0% • Vitamin C 0% • Calcium 4% • Iron 6% • Vitamin E 15% • Magnesium 10% • Selenium 2%

LOW GLYCEMIC

**INGREDIENTS:** ORGANIC PEANUTS, ORGANIC TAPIOCA SYRUP, ORGANIC ALMONDS, ORGANIC DARK CHOCOLATE (DRIED CANE SYRUP\*, UNSWEETENED CHOCOLATE\*, COCOA BUTTER\*, SOY LECITHIN, VANILLA EXTRACT\*), ORGANIC COATING (DRIED CANE SYRUP\*, PALM KERNEL OIL\*, COCOA\*, SOY LECITHIN\*, VANILLA EXTRACT\*), ORGANIC ROASTED SOYBEANS, ORGANIC RICE CRISPS (RICE FLOUR\*, DRIED CANE SYRUP\*, SALT, CALCIUM CARBONATE), ORGANIC PEANUT BUTTER, ORGANIC INULIN, ORGANIC SUNFLOWER OIL, SEA SALT, IRON, TILUCOPHEROLS (ANTIOXIDANT). **ALLERGEN STATEMENT:** CONTAINS SOY, PEANUTS, AND ALMONDS. MAY CONTAIN TRACES OF MILK AND OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. ORGANIC



- Gluten Free
- Low Glycemic
- 3g Fiber†
- Low Sodium



**DARK CHOCOLATE PEANUT BUTTER**

NET WT 1.41 OZ (40g)

A delicious way to energize your day, CLIF® Organic Trail Mix Bar is made for mixing it up and discovering all the good stuff the day has to offer. Combining simple and organic ingredients that are good for both our bodies and the planet, our trail mix bar comes in flavors for just about every occasion—no matter where the trail takes you.

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BEST BY

11MAY16M53

CLIF BAR FAMILY FOUNDATION.ORG









\*Contains 11g fiber!

Nutrition Facts		Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**
Serv. Size 1 bar (40g)		<b>Total Fat</b> 11g	17%	<b>Polysat. Fat</b> 2g		<b>Sodium</b> 100mg	4%	<b>Dietary Fiber</b> 3g	12%	<b>Other Carb.</b> 8g	
<b>Calories</b> 190		<b>Sat. Fat</b> 3g	15%	<b>Monounsat. Fat</b> 6g		<b>Potassium</b> 150mg	4%	<b>Insoluble Fiber</b> 2g		<b>Protein</b> 4g	
<b>Calories from Fat</b> 100		<b>Trans Fat</b> 0g		<b>Cholesterol</b> 0mg	0%	<b>Total Carb</b> 21g	7%	<b>Sugars</b> 10g			
**Percent Daily Values (DV) are based on a 2,000 calorie diet.		Vitamin A 0% • Vitamin C 0% • Calcium 4% • Iron 8% • Vitamin E 10% • Magnesium 10% • Selenium 2%									

LOW GLYCEMIC

Low Glycemic Index Foods digest slowly for prolonged use of energy

**INGREDIENTS** ORGANIC CASHEWS, ORGANIC TAPIOCA SYRUP, ORGANIC ALMONDS, ORGANIC DARK CHOCOLATE (DRIED CANE SYRUP\*, UNSWEETENED CHOCOLATE\*, COCOA BUTTER\*, SOY LECITHIN, VANILLA EXTRACT\*), ORGANIC COATING (DRIED CANE SYRUP\*, PALM KERNEL OIL\*, COCOA\*, SOY LECITHIN\*, VANILLA EXTRACT\*), ORGANIC DRIED POMEGRANATE ARILS (POMEGRANATE ARILS\*, DRIED CANE SYRUP\*, CITRIC ACID, LEMON JUICE CONCENTRATE\*, POMEGRANATE JUICE CONCENTRATE\*), ORGANIC RICE CRISPS (RICE FLOUR\*, DRIED CANE SYRUP\*, SALT, CALCIUM CARBONATE), ORGANIC ROASTED SOYBEANS, ORGANIC INULIN, ORGANIC ALMOND BUTTER, ORGANIC SUNFLOWER OIL, SEA SALT, CITRIC ACID, ORGANIC RASPBERRY POWDER, NATURAL FLAVORS, MIXED TOCOPHEROLS (ANTIOXIDANT) **ALLERGEN STATEMENT: CONTAINS SOY, ALMONDS, AND CASHEWS. MAY CONTAIN TRACES OF MILK AND OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. \*ORGANIC**



- Gluten Free
- Low Glycemic
- 3g Fiber†
- Low Sodium



**DARK CHOCOLATE POMEGRANATE RASPBERRY**

NET WT 1.41 OZ (40g) U D

A delicious way to energize your day, CLIF® Organic Trail Mix Bar is made for mixing it up and discovering all the good stuff the day has to offer. Combining simple and organic ingredients that are good for both our bodies and the planet, our trail mix bar comes in flavors for just about every occasion—no matter where the trail takes you.

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CERTIFIED ORGANIC BY OAI

BEST BY  
6UN651











\*Contains 9g total fat.

**Nutrition Facts**

Serv. Size 1 bar (40g)  
**Calories** 180  
 Calories from Fat 80

Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**
<b>Total Fat</b> 9g	14%	Polyunsat. Fat 2.5g		<b>Sodium</b> 110mg	5%	Dietary Fiber 4g	16%	Other Carb. 7g	
Sat. Fat 1g	5%	Monounsat. Fat 6g		<b>Potassium</b> 160mg	5%	Insoluble Fiber 2g		<b>Protein</b> 5g	
Trans Fat 0g		<b>Cholesterol</b> 0mg	0%	<b>Total Carb.</b> 22g	7%	Sugars 11g			

\*\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

Vitamin A 0% • Vitamin C 0% • Calcium 6% • Iron 6% • Vitamin E 20% • Magnesium 15% • Selenium 2%

**INGREDIENTS:** ORGANIC ALMONDS, ORGANIC DRIED CRANBERRIES (CRANBERRIES\*, DRIED CANE SYRUP\*), ORGANIC TAPIOCA SYRUP, ORGANIC RICE CRISPS (RICE FLOUR\*, DRIED CANE SYRUP\*, SALT, CALCIUM CARBONATE), ORGANIC ROASTED SOYBEANS, ORGANIC INULIN, ORGANIC SUNFLOWER OIL, SEA SALT, CITRIC ACID, MIXED TOCOPHEROLS (ANTIOXIDANT). **ALLERGEN STATEMENT:** CONTAINS SOY AND ALMONDS. MAY CONTAIN TRACES OF OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. \*ORGANIC



Gluten Free  
 4g Fiber†  
 Low Sodium



CRANBERRY ALMOND

NET WT 1.41 OZ (40g) U D

A delicious way to energize your day, CLIF® Organic Trail Mix Bar is made for mixing it up and discovering all the good stuff the day has to offer. Combining simple and organic ingredients that are good for both our bodies and the planet, our trail mix bar comes in flavors for just about every occasion—no matter where the trail takes you.

Distributed by Clif Bar & Company, Emeryville, CA 94608 U.S.A.  
 1-800-CLIFBAR M-F 8-5 PST • clifbar.com • MADE IN CANADA  
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CERTIFIED ORGANIC BY OAI

BEST BY

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†Contains 8g total fat.

Nutrition Facts		Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**		
Serv. Size 1 bar (40g)		Total Fat	8g	12%	Polyunsat. Fat	2g	Sodium	110mg	5%	Dietary Fiber	4g	16%	
Calories 160		Sat. Fat	1g	5%	Monounsat. Fat	4.5g	Potassium	210mg	6%	Insoluble Fiber	2g	Protein	4g
Calories from Fat 70		Trans Fat	0g		Cholesterol	0mg	0%	Total Carb.	23g	8%	Sugars	12g	
**Percent Daily Values (DV) are based on a 2,000 calorie diet		Vitamin A 0% • Vitamin C 0% • Calcium 4% • Iron 6% • Vitamin E 15% • Magnesium 10% • Selenium 2%											

**INGREDIENTS:** ORGANIC ALMONDS, ORGANIC ZANTE CURRANTS, ORGANIC TAPIOCA SYRUP, ORGANIC DRIED BLUEBERRIES (WILD BLUEBERRIES\*, DRIED CANE SYRUP\*), ORGANIC CASHEWS, ORGANIC RICE CRISPS (RICE FLOUR\*, DRIED CANE SYRUP\*, SALT, CALCIUM CARBONATE), ORGANIC ROASTED SOYBEANS, ORGANIC INULIN, ORGANIC SUNFLOWER OIL, SEA SALT, CITRIC ACID, NATURAL FLAVORS, MIXED TOCOPHEROLS (ANTIOXIDANT) ALLERGEN STATEMENT: CONTAINS SOY, ALMONDS, AND CASHEWS. MAY CONTAIN TRACES OF OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. \*ORGANIC



- Gluten Free
- 4g Fiber†
- Low Sodium



WILD BLUEBERRY ALMOND

NET WT 1.41 OZ (40g) © D

A delicious way to energize your day, CLIF® Organic Trail Mix Bar is made for mixing it up and discovering all the good stuff the day has to offer. Combining simple and organic ingredients that are good for both our bodies and the planet, our trail mix bar comes in flavors for just about every occasion—no matter where the trail takes you.

Distributed by Clif Bar & Company, Emeryville, CA 94608 U.S.A.  
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Nutrition Facts		Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**	Amount/Serving	%DV**			
Serv. Size 1 bar (40g) Calories 200 Calories from Fat 120		Total Fat	13g	20%	Polysat. Fat	3g	Sodium	125mg	5%	Dietary Fiber	4g	16%	Other Carb	7g
**Percent Daily Values (DV) are based on a diet of 2,000 calories.		Sat. Fat	4g	20%	Monosat. Fat	6g	Potassium	170mg	5%	Insoluble Fiber	2g	8%	Protein	8g
		Trans Fat	0g	0%	Cholesterol	0mg	Total Carb.	17g	6%	Sugars	6g			
		Vitamin A 0% • Vitamin C 0% • Calcium 4% • Iron 4% • Vitamin E 15% • Magnesium 15% • Selenium 4%												

LOW GLYCEMIC

Low glycemic index foods & sweeteners for prolonged levels of energy

INGREDIENTS: ORGANIC PEANUTS, ORGANIC TAPIOCA SYRUP, ORGANIC ALMONDS, ORGANIC COCONUT, ORGANIC RICE CRISPS (RICE FLOUR\*, DRIED CANE SYRUP\*, SALT, CALCIUM CARBONATE), ORGANIC INULIN, ORGANIC HONEY, ORGANIC ROASTED SOYBEANS, ORGANIC COCONUT OIL, SEA SALT, NATURAL FLAVORS, MIXED TOCOPHEROLS (ANTIOXIDANT).  
ALLERGEN STATEMENT: CONTAINS SOY, PEANUTS, ALMONDS, AND COCONUT. MAY CONTAIN TRACES OF OTHER TREE NUTS. MAY CONTAIN NUTSHELL FRAGMENTS. WE SOURCE INGREDIENTS THAT ARE NOT GENETICALLY ENGINEERED. \*ORGANIC



- Gluten Free
- Low Glycemic
- Low Sodium
- 4g Fiber

SEE NUTRITION INFORMATION FOR TOTAL FAT CONTENT



COCONUT ALMOND PEANUT

NET WT 1.41 OZ (40g) U D

A delicious way to energize your day, CLIF® Organic Trail Mix Bar is made for mixing it up and discovering all the good stuff the day has to offer. Combining simple and organic ingredients that are good for both our bodies and the planet, our trail mix bar comes in flavors for just about every occasion—no matter where the trail takes you.

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# EXHIBIT G

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN FRANCISCO**

GREG PERIEFF and LINDA  
CHESLOW, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

vs.

CLIF BAR & COMPANY, a California  
corporation,

Defendant.

**CASE NO.:**

**VENUE DECLARATION OF GREG  
PERIEFF PURSUANT TO CAL. CIV.  
CODE SECTION 1780(d)**



1 I, Greg Perieff, hereby declare:

2 1. I am a named plaintiff in the above-captioned action.

3 2. I make this declaration based on my personal knowledge, and if called as a witness, I  
4 could and would testify competently to the facts stated herein.

5 3. The purpose of this declaration is to substantiate the allegation in my Complaint that  
6 is filed contemporaneously herewith in the above-captioned action that venue is proper in San  
7 Francisco County under Cal. Civ. Code § 1780(d).

8 4. Defendant Clif Bar & Company sells CLIF Bars and is otherwise doing business in  
9 San Francisco County, California.

10 5. Between February 2013 and September 2015, I purchased CLIF Bars in San  
11 Francisco County, California, and a substantial portion of the CLIF Bars at issue in the above-  
12 captioned action were purchased San Francisco County, California.

13 I certify (or declare) under penalty of perjury under the laws of the State of California that  
14 the foregoing is true and correct.

15 Executed FEBRUARY 24<sup>TH</sup>, 2016, in San Francisco, California.

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN FRANCISCO**

GREG PERIEFF and LINDA  
CHESLOW, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

vs.

CLIF BAR & COMPANY, a California  
corporation,

Defendant.

**CASE NO.:**

**VENUE DECLARATION OF LINDA  
CHESLOW PURSUANT TO CAL. CIV.  
CODE SECTION 1780(d)**

1 I, Linda Cheslow, hereby declare:

2 1. I am a named plaintiff in the above-captioned action.

3 2. I make this declaration based on my personal knowledge, and if called as a witness, I  
4 could and would testify competently to the facts stated herein.

5 3. The purpose of this declaration is to substantiate the allegation in my Complaint that  
6 is filed contemporaneously herewith in the above-captioned action that venue is proper in San  
7 Francisco County under Cal. Civ. Code § 1780(d).

8 4. Defendant Clif Bar & Company sells LUNA Bars and CLIF Bars and is otherwise  
9 doing business in San Francisco County, California.

10 5. Between February 2013 and December 2015, I purchased LUNA Bars and CLIF Bars  
11 in San Francisco County, California, and a substantial portion of the LUNA Bars and CLIF Bars at  
12 issue in the above-captioned action were purchased San Francisco County, California.

13 I certify (or declare) under penalty of perjury under the laws of the State of California that  
14 the foregoing is true and correct.

15 Executed February 18 2016, in Santa Rosa, California.

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18 Linda Cheslow

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# EXHIBIT H

**U.S. Food and Drug Administration**  
Protecting and Promoting *Your* Health

# Minerva Dairy Inc 10/9/14



Department of Health and Human Services

Public Health Service  
Food and Drug Administration  
Cincinnati District Office  
Central Region  
6751 Steger Drive  
Cincinnati, OH 45237-3097  
Telephone: (513) 679-2700

FAX: (513) 679-2775

## Via United Parcel Service

October 9, 2014

Adam P. Mueller, President  
Minerva Dairy, Inc.  
430 Radloff Avenue  
Minerva, Ohio 44657

## **WARNING LETTER** **CIN-15-431214-02**

Dear Mr. Mueller:

The U.S. Food and Drug Administration (FDA) conducted an inspection of your cheese and butter manufacturing facility located at 430 Radloff Avenue, Minerva, OH 44657, from February 28, 2014 through March 10, 2014. During the inspection of your facility, we collected product labels for your Greek yogurt butter products. We have reviewed your product labels and find that your labels cause certain products to be misbranded within the meaning of section 403 [21 U.S.C. § 343] of the Federal Food, Drug, and Cosmetic Act (the Act) and the implementing regulations under Title 21, Code of Federal Regulations, Part 101 (21 CFR 101). You may find the Act and FDA's regulations through links on FDA's home page at [www.fda.gov](http://www.fda.gov) (<http://www.fda.gov>).

Our review identified the following violations:

1. Your All Natural Ilios Greek Yogurt Butter is misbranded within the meaning of section 403(r)(1)(A) of the Act [21 U.S.C. § 343(r)(1)(A)] because the product label bears nutrient content claims, but the product does not meet the requirements to make the claims.

Under section 403(r)(1)(A) of the Act [21 U.S.C. § 343(r)(1)(A)], a claim that characterizes the level of a nutrient which is of the type required to be in the labeling of the food must be made in accordance with a regulation authorizing the use of such a claim. Characterizing the level of a nutrient on food labeling without complying with the specific requirements pertaining to the nutrient content claims for that nutrient misbrands the product under section 403(r)(1)(A) of the Act.

The label of your All Natural Ilios Greek Yogurt Butter product bears an implied nutrient content claim because it displays statements suggesting that the product may be useful in maintaining healthy dietary practices. Those statements are made in connection with claims or statements about nutrients. Specifically, the label of your All Natural Ilios Greek Yogurt Butter product bears the claim “A Healthy Butter!” in connection with the following statements under the “Nutritional Facts” on your product label, which compare the fat, calorie, cholesterol, and sodium content of your product to that of butter: “15% less fat” (“When compared to butter”), “15% less cholesterol,” “10% less calories,” and “50% less sodium.”

However, this product does not meet the requirements for the use of the nutrient content claim “healthy” that are set forth in 21 CFR 101.65(d)(2). In accordance with 21 CFR 101.65(d)(2), you may use the term “healthy” as an implied nutrient content claim on the label or labeling of a food provided that the food, among other requirements, is “low saturated fat” as defined in 21 CFR 101.62(c)(2) (i.e., the food has a saturated fat content of 1 g or less per Reference Amount Customarily Consumed (RACC) and no more than 15 percent of calories from saturated fat).

According to the Nutrition Facts panel, your All Natural Ilios Greek Yogurt Butter contains 6 g of saturated fat per 14 g serving of the food. This amount exceeds the maximum of 1 g of saturated fat per RACC and the maximum of 15% of calories from saturated fat in the “low saturated fat” definition. See 21 CFR 101.62(c)(2).

Furthermore, in accordance with 21 CFR 101.65(d)(2), you may use the term “healthy” as an implied nutrient content claim on the label or labeling of a food provided that the food, among other requirements, contains at least 10 percent of the Reference Daily Intake or the Daily Reference Value per RACC of one or more of the following nutrients: vitamin A, vitamin C, calcium, iron, protein, or fiber. Your All Natural Ilios Greek Yogurt Butter product contains 6% Vitamin A, 0% Vitamin C, 5% Calcium, 0% Iron, 0.5 mg of Protein, and no declared value for fiber and thus does not meet the minimum requirement of at least 10% of the percent Daily value per RACC for one or more of these nutrients. Accordingly, this product does not meet the requirement for use of the implied nutrient content claim “healthy” on a food label [21 CFR 101.65(d)(2)]. We further note that the label includes an additional implied nutrient content claim “good for you,” which is an unauthorized synonym for “healthy.”

In addition, in accordance with 21 CFR 101.62(b)(4)(i), to bear the nutrient content claim “less fat,” a food such as your All Natural Ilios Greek Yogurt Butter must contain at least 25% less fat per RACC than the reference food. According to the product label, this product contains only “15% less fat (When Compared to Butter).” Accordingly, this product does not meet the requirement for use of the nutrient content claim “less fat” on a food label [21 CFR 101.62(b)(4)(i)].

In accordance with 21 CFR 101.62(d)(4), to bear the nutrient content claim “less cholesterol,” a food such as your All Natural Ilios Greek Yogurt Butter must contain at least 25% less cholesterol per RACC than the reference food, and it must contain less than 2 g of saturated fat per RACC. According to the product label, this product contains only “15% less cholesterol (When Compared



to Butter)” and 6 g of saturated fat. Accordingly, this product does not meet the requirement for use of the nutrient content claim “less cholesterol” on a food label [21 CFR 101.62(d)(4)].

In accordance with 21 CFR 101.60(a), a claim about the calorie content of a food may only be made on the label or labeling of a food if, among other requirements, the claim uses one of the terms defined in 21 CFR 101.60 in accordance with the definition for that term. 21 CFR 101.60(b)(4) authorizes the use of the terms “reduced calorie,” “reduced in calories,” “calorie reduced,” “fewer calories,” “lower calorie,” and “lower in calories” for foods that contain at least 25% fewer calories per RACC than the reference food. Even if “less calories” were authorized under 21 CFR 101.60(b)(4), your All Natural Ilios Greek Yogurt Butter does not contain at least 25% fewer calories than the reference food. According to the product label, this product contains “10% less calories (When Compared to Butter).” Accordingly, the claim “less calories” is not authorized.

In accordance with 21 CFR 101.61(b)(6)(ii)(B), to bear the nutrient content claim “less sodium,” a food such as this yogurt butter product must, in part, declare the quantitative information comparing the level of sodium in the product per labeled serving with that of the reference food, and it must be declared adjacent to the “less sodium” claim. However, the product label for this All Natural Ilios Greek Yogurt Butter product does not include this information; accordingly, the product does not meet the requirement for use of the nutrient content claim “less sodium” on a food label [21 CFR 101.61(b)(6)(ii)(B)].

2. Your All Natural Ilios Greek Yogurt Butter and **(b)(4)** products are misbranded within the meaning of section 403(i)(1) of the Act [21 U.S.C. § 343(i)(1)] because the labels fail to bear the common or usual name of the food in accordance with 21 CFR 101.3(b). Specifically, the labels declare “Greek Yogurt Butter” as the statement of identity; however, butter is not an appropriately descriptive term or phrase that adequately describes the basic nature of the product. The Act of March 4, 1923 (21 U.S.C. 321a), defines butter as “the food product usually known as butter, and which is made exclusively from milk or cream, or both, with or without common salt, and with or without additional coloring matter, and containing not less than 80 per centum by weight of milk fat, all tolerances having been allowed for.” This definition does not include the addition of other ingredients. According to the product formulation sheets, yogurt powder is added to the butter during the last stage of the churning process.

3. Your All Natural Ilios Greek Yogurt Butter and **(b)(4)** products are misbranded within the meaning of section 403(i)(2) of the Act [21 U.S.C. § 343(i)(2)] because they are fabricated from two or more ingredients, but the label fails to bear the common or usual name of each ingredient, as required by 21 CFR 101.4(b)(2)(ii). For example, your products are manufactured using lactic acid; however, you fail to declare lactic acid in the ingredient statements.

4. Your All Natural Ilios Greek Yogurt Butter product is misbranded within the meaning of Section 403(q) of the Act [21 U.S.C. § 343(q)] in that the nutrition facts information is not in an appropriate format. For example:

- The label fails to declare dietary fiber as required by 21 CFR 101.9(c)(6)(i).
- The label fails to declare sugars as required by 21 CFR 101.9(c)(6)(ii).

The above violations are not meant to be an all-inclusive list of violations that may exist in connection with your products or their labeling. It is your responsibility to ensure that your products comply with the Act and its implementing regulations. You should take prompt action to correct the

violations. Failure to promptly correct the violations may result in regulatory action without further notice, including, without limitation, seizure and injunction.

**COMMENTS:**

- The Illios product label includes the phrase “pure rBST free cream”; however, the required accompanying statement, “not significant difference has been shown between milk derived from rbST-treated and non-rbST treated cow” is not included (Interim Guidance on the Voluntary Labeling of Milk and Milk Products From Cows That Have Not Been Treated With Recombinant Bovine Somatotropin, 59 FR 6279).
- The firm name and address on the Illios product and Dutch Farm product labels does not include a street address as required by 21 CFR 101.5(d).

Please respond to this letter within 15 days from receipt with the actions you plan to take in response to this letter, including an explanation of each step being taken to correct the current violations and prevent similar violations. Include any documentation necessary to show that correction has been achieved. If you cannot complete corrective action within 15 working days, state the reason for the delay and the time within which you will complete the corrections.

Please send your reply to the Food and Drug Administration, Attention: Allison C. Hunter, Compliance Officer, 6751 Steger Drive, Cincinnati, Ohio 45237. If you have questions regarding any issues in this letter, please contact Allison C. Hunter, Compliance Officer at (513) 679-2700 extension 2134.

Sincerely,  
/S/  
Paul J. Teitell  
District Director  
Cincinnati District

**Close Out Letter**

- **[Minerva Dairy Inc - Close Out Letter 7/28/15](#)**  
**[\(/ICECI/EnforcementActions/WarningLetters/2015/ucm456373.htm\)](#)**

**More in 2014**

**[\(/ICECI/EnforcementActions/WarningLetters/2014/default.htm\)](#)**