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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

TODD GREENBERG, On Behalf of
Himself and All Others Similarly Situated,

Plaintiff,

v.

TARGET CORPORATION, a Minnesota
Corporation, INTERNATIONAL VITAMIN
CORPORATION, a New Jersey
Corporation, and PERRIGO COMPANY
OF SOUTH CAROLINA, INC., a South
Carolina company,

Defendants.

Case No.: 17-cv-01862-RS

**CORRECTED SECOND AMENDED CLASS
ACTION COMPLAINT FOR:**

1. VIOLATION OF THE UNFAIR
COMPETITION LAW, Business and
Professions Code §17200 *et seq.*; and
2. VIOLATION OF THE CONSUMERS
LEGAL REMEDIES ACT, Civil Code
§1750 *et seq.*

DEMAND FOR JURY TRIAL

1 Plaintiff Todd Greenberg brings this action on behalf of himself and all others similarly
 2 situated against Defendants Target Corporation (“Target”), International Vitamin Corporation
 3 (“IVC”), and Perrigo Company of South Carolina, Inc. (collectively, “Defendants”) and states:

4 NATURE OF ACTION

5 1. During the relevant time period, Defendants manufactured, marketed, sold, and
 6 distributed biotin supplements under the Up & Up brand. The products are: biotin 1000 mcg, biotin
 7 5000 mcg, and biotin 10,000 mcg (collectively, “Biotin Products”).¹ On the front of the Biotin
 8 Products, Defendants represent that the Biotin Products “help[] support healthy hair and skin.”
 9 These representations are collectively referred to as the “health benefit representations.”
 10 Defendants’ health benefit representations are false, misleading and reasonably likely to deceive the
 11 public.

12 2. The sole active ingredient in Defendants’ Biotin Products is biotin. Biotin is a
 13 colorless, water soluble B vitamin found in many foods, including several fruits and vegetables,
 14 liver, salmon, cereals, and other foods. Biotin serves as a biochemical co-factor (a helper of sorts)
 15 for certain enzymatic reactions and is involved in the metabolism of fats, carbohydrates, and amino
 16 acids.

17 3. The human body only requires a finite amount of biotin on a daily basis for it to
 18 perform its enzymatic functions as there are a finite number of enzymes that use biotin. Once there
 19 is sufficient biotin in the body, saturation occurs and the body just does not use this surplus biotin.
 20 The Institute of Medicine has set an adequate intake (AI) for biotin at 30 micrograms (mcg) per
 21 day for people 19 years and older and even less for younger people. Dietary Reference Intakes for
 22 Thiamin, Riboflavin, Niacin, Vitamin B6, Folate, Vitamin B12, Pantothenic Acid, Biotin, and
 23 Choline (“IOM Dietary Reference Intakes”), INSTITUTE OF MEDICINE, at pp. 374, 382, *available at*
 24 [http://www.nap.edu/catalog/6015/dietary-reference-intakes-for-thiamin-riboflavin-niacin-](http://www.nap.edu/catalog/6015/dietary-reference-intakes-for-thiamin-riboflavin-niacin-vitamin-b6-folate-vitamin-b12-pantothenic-acid-biotin-and-choline)
 25 [vitamin-b6-folate-vitamin-b12-pantothenic-acid-biotin-and-choline](http://www.nap.edu/catalog/6015/dietary-reference-intakes-for-thiamin-riboflavin-niacin-vitamin-b6-folate-vitamin-b12-pantothenic-acid-biotin-and-choline). More than sufficient biotin is
 26

27 ¹ Plaintiff reserves the right to add additional products upon completion of discovery.
 28

1 derived from the daily diets of the general U.S. population as healthy persons ingest anywhere from
2 30mcg-60mcg of biotin from their daily diets.

3 4. While persons (1) with exceedingly rare conditions that cause biotin deficiencies, or
4 (2) who chronically ingest inordinate amounts of raw egg whites, can require biotin
5 supplementation, other than these few rare exceptions, healthy people already have more than
6 adequate, if not excessive, amounts of biotin derived from their diet. In fact, average biotin intake
7 among North American adults is anywhere from 35-70 mcg per day. Yet, the 1000 mcg product is
8 over 30 times more than the AI, the 5000 mcg product is over 150 times more than the AI, and the
9 10,000 mcg product is over 300 times more than the AI. Thus, even though the IOM has yet to set
10 a DRI (daily recommended intake) for biotin, these mega-dose amounts are far beyond any
11 conceivable range that would ever be beneficial.

12 5. Biotin is a co-factor for five carboxylase enzymes. A co-factor is a molecule that
13 interacts with an enzyme to facilitate that enzyme's ability to carry out its biochemical functions.
14 Biotin attaches itself to these enzymes, thereby helping each of them perform their respective
15 functions. The body only needs a finite amount of biotin on a daily basis to perform these
16 functions. Thus, biotin is not a "more is better" substance, nor is more biotin needed from
17 supplementation to complete these daily enzymatic functions. In short, once one consumes a
18 sufficient amount of biotin, which is easily met by the general population in their everyday diets,
19 the remainder becomes functionally superfluous and does not convey any additional health benefits.

20 6. Therefore, with the exception of the two exceedingly rare conditions discussed
21 above, for the general population the biotin supplements sold by Defendants are unneeded,
22 superfluous and will not provide any benefits, let alone support healthy hair and skin. That is
23 because the general population already consumes sufficient, if not excessive, amounts of biotin
24 from their daily diets.

25 7. The only apparent scientific support for biotin supplements affecting hair or skin is
26 from studies of people with what is called "frank" deficiency – e.g., those with rare biotin deficiency
27 conditions. Such persons, as a result of their conditions, experience a variety of symptoms

1 including hair loss along with skin problems. Some studies have shown that in persons with these
2 very rare conditions, biotin supplementation can improve hair/skin health. But these are persons
3 who already have serious and rare conditions and, most important, the results of these few studies
4 cannot be extrapolated to healthy persons in the general population, as persons in the general
5 population are not biotin deficient and, as noted above, already consume sufficient biotin in their
6 daily diets. Defendants also cannot represent that the Biotin Products help treat or cure the
7 symptoms of these diseases, as FDA law precludes manufacturers of dietary supplements from
8 representing that their dietary supplements treat or cure diseases.

9 8. In this regard, the 2000 Institute of Medicine Report from the National Academy of
10 Sciences on *Dietary Reference Intakes for Thiamin, Riboflavin, Niacin, Vitamin B6, Folate,*
11 *Vitamin B12, Pantothenic Acid, Biotin, and Choline* states that, “No definitive studies demonstrate
12 evidence of biotin deficiency in normal individuals in any group resulting from inadequate intakes.”
13 IOM Dietary Reference Intakes at p. 381. Thus, the IOM concluded in 2000, and this conclusion
14 remains true today, that while there was a limited amount of information regarding biotin intakes
15 this information indicates that “[T]here is little cause for concern about the adequacy of biotin
16 intake for healthy people...” *Id.* at pp. 385-86. Since there is little concern for the adequacy of
17 biotin intake for healthy people (e.g., people who do not have one of the rare biotin deficiencies
18 described above) and since the need for biotin is finite, Defendants’ Biotin Products are
19 superfluous, unneeded and certainly do not support the health of hair and skin as represented.

20 9. As a result of the foregoing, the mega-dose Biotin Products to be taken in daily
21 doses ranging from 1000 mcg to 10,000 mcg as sold by Defendants are superfluous and unneeded
22 and they will not and do not provide any benefits at all, let alone support healthy hair, skin and
23 nails.

24 10. Thus, Defendants’ health benefit representations are false, misleading and reasonably
25 likely to deceive consumers. As a result, consumers – including Plaintiff and members of the
26 proposed Classes – have purchased Biotin Products that do not perform as advertised.

27 11. Plaintiff brings this action on behalf of himself and other similarly situated
28

1 consumers who purchased the Biotin Products to halt the dissemination of this false, misleading,
2 and deceptive advertising message, correct the false and misleading perception it has created in the
3 minds of consumers, and obtain redress for those who have purchased the Biotin Products. Based
4 on violations of California unfair competition laws (detailed below), Plaintiff seeks injunctive and
5 restitutionary relief for consumers who purchased the Biotin Products.

6 JURISDICTION AND VENUE

7 12. This Court has original jurisdiction pursuant to 28 U.S.C. §1332(d)(2). The matter
8 in controversy, exclusive of interest and costs, exceeds the sum or value of \$5,000,000 and is a
9 class action in which there are in excess of 100 class members and some members of the Class are
10 citizens of a state different from at least one Defendant.

11 13. This Court has personal jurisdiction over Defendants because Defendants are
12 authorized to conduct and do conduct business in California, including this District. Defendants
13 marketed, promoted, distributed, and sold the Biotin Products in California, and Defendants have
14 sufficient minimum contacts with this State and/or sufficiently availed themselves of the markets
15 in this State through their promotion, sales, distribution, and marketing within this State, including
16 this District, to render the exercise of jurisdiction by this Court permissible.

17 14. Venue is proper in this Court pursuant to 28 U.S.C. §§1391(a) and (b) because a
18 substantial part of the events giving rise to Plaintiff's claims occurred while he resided in this
19 judicial district. Venue is also proper under 18 U.S.C. §1965(a) because Defendants transact
20 substantial business in this District.

21 PARTIES

22 15. During the relevant time period, Plaintiff Todd Greenberg resided in Mill Valley,
23 California. On or around May 5, 2015, Plaintiff Greenberg was exposed to, saw and relied upon
24 Defendants' health benefit representations by reading the Up & Up biotin 5000 mcg label. He
25 purchased a bottle of the biotin 5000 mcg product at a Target in Novato, California in reliance on
26 Defendants' health benefit representations. He paid approximately \$8 for the Product. The Biotin
27 Product Plaintiff Greenberg purchased did not and could not provide the represented health
28

benefits. Had Plaintiff Greenberg known the truth about Defendants' misrepresentations, he would not have purchased the Biotin Product. As a result, Plaintiff Greenberg suffered injury in fact and lost money at the time of purchase.

16. Defendant Target Corporation is incorporated under the laws of the state of Minnesota. Defendant Target's corporate headquarters is located at 1000 Nicollet Mall, Minneapolis, Minnesota 55403. Defendant Target markets and sells the Up & Up Biotin Products to tens of thousands of consumers in California and throughout the United States.

17. Defendant International Vitamin Corporation is incorporated under the laws of the state of New Jersey. Defendant IVC's corporate headquarters is located at 1 Park Plaza, Suite 800, Irvine, California 92614. During the relevant time period, Defendant IVC manufactured, marketed, and distributed the Up & Up Biotin Products to tens of thousands of consumers in California and throughout the United States from its California corporate headquarters where it also maintained consumer service operations.

18. Defendant Perrigo Company of South Carolina, Inc. is a South Carolina company whose corporate headquarters is located at 4615 Dairy Drive, Greenville, SC 29607. Defendant Perrigo Company of South Carolina, Inc. manufactured, marketed, and distributed the Up & Up Biotin Products to tens of thousands of consumers in California and throughout the United States during the relevant time period. Upon information and belief, in 2016, Perrigo Company of South Carolina, Inc. was purchased by IVC.

FACTUAL ALLEGATIONS

The Biotin Products

19. During the relevant time period, Defendants manufactured, distributed, marketed, and sold over-the-counter Biotin products under the Up & Up brand. This lawsuit concerns three of those products — biotin 1000 mcg, biotin 5000 mcg, and biotin 10,000 mcg (collectively, "Biotin Products"). The Biotin Products are marketed as supplements with the purpose of providing certain health benefits. The Biotin Products are sold in Target stores across in the country, including in California. A single container of the Biotin Products retails for approximately \$6-\$12.

The Uniform Health Benefits Message

20. Throughout the relevant time period, Defendants have consistently conveyed the health benefits message to consumers throughout California and the United States.

Consumer Exposure to the Health Benefits Message

21. Each and every consumer who purchases the Biotin Products is exposed to the deceptive health benefit representations, which appear prominently and conspicuously on the front of each Biotin Product as shown below:



Copies of representative labels are attached hereto as Exhibit A.

The Impact of Defendants' Wrongful Conduct

22. Plaintiff and Class members have been and will continue to be deceived or misled by Defendants' deceptive health benefit representations. Plaintiff and the Class members have been damaged in their purchases of the Biotin Products and have been deceived into purchasing the

1 Biotin Products that they believed, based on Defendants' representations, would provide them
2 health benefits, when, in fact, they do not.

3 **CLASS DEFINITION AND ALLEGATIONS**

4 23. Plaintiff brings this action on behalf of himself and all other similarly situated
5 consumers pursuant to Rule 23(a), (b)(2) and (b)(3) of the Federal Rules of Civil Procedure and
6 seeks certification of the following Class:

7 **Multi-State Class Action**

8 All consumers who, within the applicable statute of limitations
9 period until the date notice is disseminated, purchased Biotin Products
10 in California, Illinois, Massachusetts, Michigan, Minnesota, Missouri,
New Jersey, New York, and Washington.

11 Excluded from this Class are Defendants and their officers,
12 directors, employees and those who purchased Biotin Products
for the purpose of resale.

13 24. In the alternative, Plaintiff seeks certification of the following Class:

14 **California-Only Class Action**

15 All California consumers who within the applicable statute of
16 limitations period until the date notice is disseminated, purchased
Biotin Products.

17 Excluded from this Class are Defendants and their officers, directors
18 and employees, and those who purchased Biotin Products for the
purpose of resale.

19 25. **Numerosity.** The members of the Classes are so numerous that joinder of all
20 members of the Classes is impracticable. Plaintiff is informed and believes that the proposed
21 Classes contain thousands of purchasers of Biotin Products who have been damaged by
22 Defendants' conduct as alleged herein. The precise number of Class members is unknown to
23 Plaintiff.

24 26. **Existence and Predominance of Common Questions of Law and Fact.** This
25 action involves common questions of law and fact, which predominate over any questions affecting
26 individual Class members. These common legal and factual questions include, but are not limited
27 to, the following:

(a) whether Defendants' health benefit representations discussed above are misleading, or objectively reasonably likely to deceive;

(b) whether Defendants' alleged conduct is unlawful;

(c) whether the alleged conduct constitutes violations of the laws asserted;

(d) whether Defendants engaged in false or misleading advertising; and

(e) whether Plaintiff and Class members are entitled to appropriate remedies, including restitution, corrective advertising, and injunctive relief.

27. **Typicality.** Plaintiff's claims are typical of the claims of the members of the Classes because, *inter alia*, all Class members were injured through the uniform misconduct described above and were subject to Defendants' deceptive health benefit representations on the front of each and every Biotin Product container. Plaintiff is also advancing the same claims and legal theories on behalf of himself and all members of the Classes.

28. **Adequacy of Representation.** Plaintiff will fairly and adequately protect the interests of the members of the Classes. Plaintiff has retained counsel experienced in complex consumer class action litigation, and Plaintiff intends to prosecute this action vigorously. Plaintiff has no adverse or antagonistic interests to those of the Classes.

29. **Superiority.** A class action is superior to all other available means for the fair and efficient adjudication of this controversy. The damages or other financial detriment suffered by individual Class members is relatively small compared to the burden and expense that would be entailed by individual litigation of their claims against Defendants. It would thus be virtually impossible for members of the Classes, on an individual basis, to obtain effective redress for the wrongs done to them. Furthermore, even if Class members could afford such individualized litigation, the court system could not. Individualized litigation would create the danger of inconsistent or contradictory judgments arising from the same set of facts. Individualized litigation would also increase the delay and expense to all parties and the court system from the issues raised by this action. By contrast, the class action device provides the benefits of adjudication of these issues in a single proceeding, economies of scale, and comprehensive supervision by a single court,

1 and presents no unusual management difficulties under the circumstances here.

2 30. Plaintiff seeks preliminary and permanent injunctive and equitable relief on behalf
3 of the entire Classes, on grounds generally applicable to the entire Classes, to enjoin and prevent
4 Defendants from engaging in the acts described, and requiring Defendants to provide full restitution
5 to Plaintiff and Class members.

6 31. Unless a Class is certified, Defendants will retain monies received as a result of their
7 conduct that were taken from Plaintiff and Class members.

8 32. Unless an injunction is issued, Defendants will continue to commit the violations
9 alleged, and the members of the Classes and the general public will continue to be deceived.

10 **COUNT I**

11 **Violation of Business & Professions Code §17200, *et seq.***
12 **Fraudulent Business Acts and Practices**
(On Behalf of the Multi-State or California-Only Class)

13 33. Plaintiff repeats and re-alleges the allegations contained in the paragraphs above, as
14 if fully set forth herein.

15 34. Plaintiff brings this claim individually and on behalf of the Classes.

16 35. As alleged herein, Plaintiff has suffered injury in fact and lost money or property as
17 a result of Defendants' conduct because he purchased Defendants' Biotin Product in reliance on
18 Defendants' claim that the Biotin Product would provide him with health benefits, but did not
19 receive a Biotin Product that provides those benefits.

20 36. Plaintiff suffered that injury at the time of his purchase, when he bought a product
21 that does not deliver the benefits Defendants promise.

22 37. The Unfair Competition Law, Business & Professions Code §17200, *et seq.*
23 ("UCL") prohibits any "fraudulent" business act or practice and any false or misleading advertising.

24 38. In the course of conducting business, Defendants committed "fraudulent business
25 act[s] or practices" and false, deceptive or misleading advertising by, *inter alia*, making the health
26 benefit representations (which also constitutes advertising within the meaning of §17200) regarding
27 the Biotin Products on the Biotin Products' labeling, as set forth more fully herein.

1 39. Defendants' actions, claims and misleading statements, as more fully set forth
2 above, are false, misleading and/or likely to deceive the consuming public within the meaning of
3 Business & Professions Code §17200, *et seq.*

4 40. Plaintiff and other members of the Classes have in fact been deceived as a result of
5 their reliance on Defendants' material health benefit representations. Plaintiff and the other Class
6 members have suffered injury in fact and lost money as a result of their purchase(s) of Defendants'
7 Biotin Products that do not provide health benefits.

8 41. Unless restrained and enjoined, Defendants will continue to engage in the above
9 described conduct. Accordingly, injunctive relief is appropriate.

10 42. Plaintiff, on behalf of himself, all others similarly situated, and the general public,
11 seeks restitution of all money obtained from Plaintiff and the members of the Classes collected as
12 a result of unfair competition, an injunction prohibiting Defendants from continuing such practices,
13 corrective advertising, and all other relief this Court deems appropriate, consistent with Business
14 & Professions Code §17203.

15 **COUNT II**
16 **Violations of the Consumers Legal Remedies Act – Civil Code §1750 *et seq.***
17 **(On Behalf of the California-Only Class)**

18 43. Plaintiff repeats and re-alleges the allegations contained in the paragraphs above, as
19 if fully set forth herein.

20 44. Plaintiff brings this claim individually and on behalf of the California-Only Class.

21 45. This cause of action is brought pursuant to the Consumers Legal Remedies Act,
22 California Civil Code §1750, *et seq.* (the "Act").

23 46. Plaintiff is a consumer as defined by California Civil Code §1761(d). The Biotin
24 Products are "goods" within the meaning of the Act.

25 47. Defendants violated and continue to violate the Act by engaging in the following
26 practices proscribed by California Civil Code §1770(a) in transactions with Plaintiff and the
27 California-Only Class which were intended to result in, and did result in, the sale of the Biotin

1 Products:

2 (5) Representing that [the Biotin Products have] . . . characteristics, . . . uses [and]
3 benefits . . . which [they do] not have

4 * * *

5 48. Pursuant to California Civil Code §1782(d), Plaintiff and the California-Only Class
6 seek a Court order enjoining the above described wrongful acts and practices of Defendants and for
7 restitution and disgorgement.

8 49. Pursuant to §1782 of the Act, Plaintiff notified Defendants in writing by certified
9 mail of the particular violations of §1770 of the Act and demanded that Defendants rectify the
10 problems associated with the actions detailed above and give notice to all affected consumers of
11 Defendants' intent to so act.

12 50. Defendants failed to rectify or agree to rectify the problems associated with the
13 actions detailed above and give notice to all affected consumers pursuant to §1782 of the Act. Thus,
14 Plaintiff further seeks actual, punitive, and statutory damages, as appropriate.

15 **PRAYER FOR RELIEF**

16 Wherefore, Plaintiff prays for a judgment:

17 A. Certifying the Classes as requested herein;

18 B. Awarding actual, statutory, and punitive damages to Plaintiff and the California
19 Class members, as appropriate;

20 C. Awarding restitution and disgorgement of Defendants' revenues to Plaintiff and the
21 proposed Class members;

22 D. Awarding injunctive relief as permitted by law or equity, including: enjoining
23 Defendants from continuing the unlawful practices as set forth herein;

24 E. Ordering Defendants to engage in a corrective advertising campaign;

25 F. Awarding attorneys' fees and costs; and

26 G. Providing such further relief as may be just and proper.

EXHIBIT A





biotin

1000 mcg

helps support healthy
hair and skin**



100 TABLETS
DIETARY SUPPLEMENT

**This statement has not been evaluated by the Food and Drug Administration.
This product is not intended to diagnose, treat, cure, or prevent any disease.



Facts

% Daily Value

333%

Cellulose,
Sodium

lactose, sugar,

RESTORE

Biotin plays a role in hair and skin health.* In addition, biotin is essential for carbohydrate, protein and fat metabolism.*

Directions: Adults, take one tablet daily with the meal of your choice.

Caution: If you are pregnant or nursing a baby, or if you are taking any medication or have a medical condition, consult your doctor before taking this product.

KEEP OUT OF REACH OF CHILDREN.

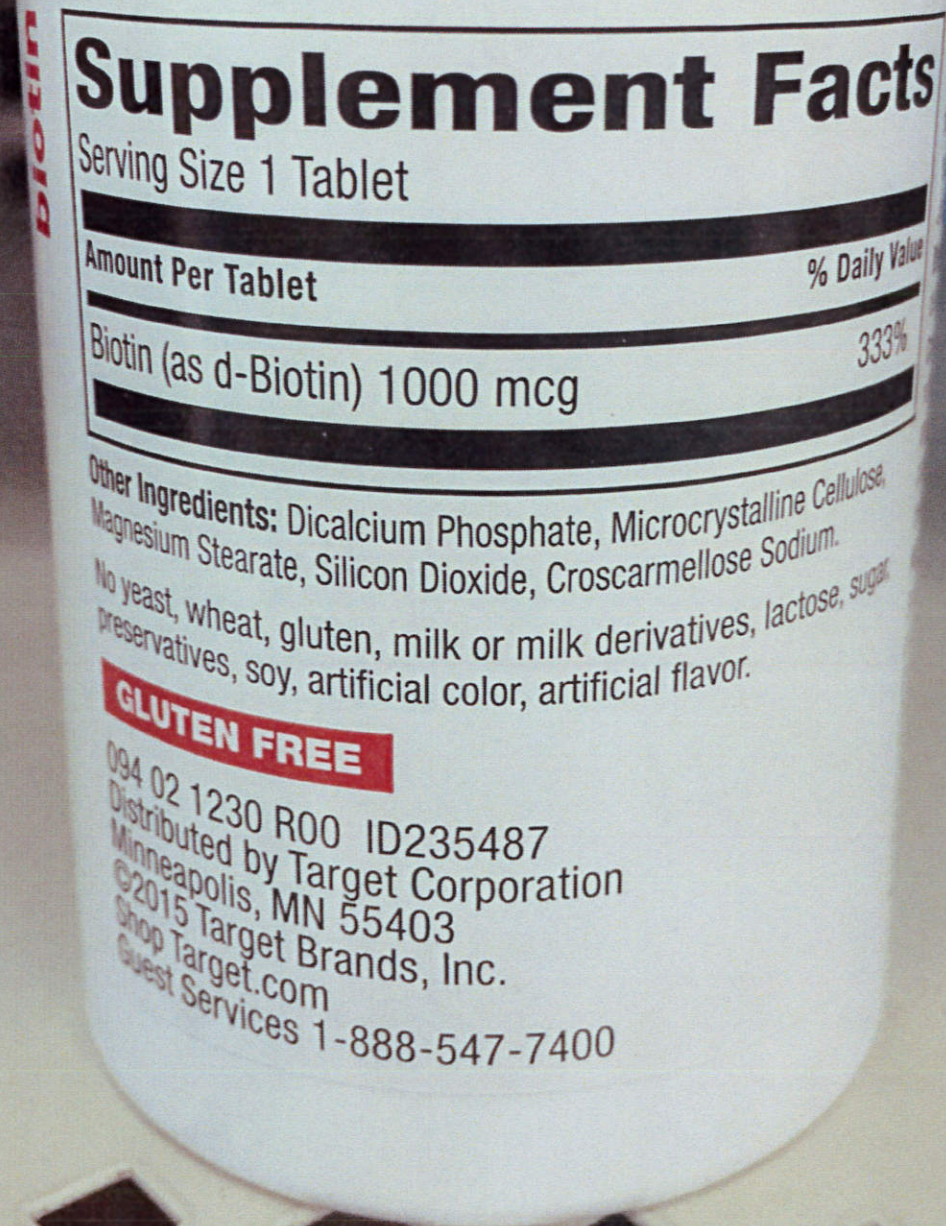
Store in a dry place
at room temperature
(59°F-86°F).

*These statements have
not been evaluated by
the Food and Drug
Administration. This
product is not intended
to diagnose, treat, cure,
or prevent any disease.

EXP08118

6LN1436

: JNB78 UW F2





the meal of

Facts

Daily Value

1667%

crystalline

RESTORE

Biotin plays a role in hair and skin health.* In addition, biotin is essential for carbohydrate, protein and fat metabolism.*

CAUTION: If you are pregnant or nursing a baby, or if you are taking any medication or have a medical condition, consult your doctor before taking this product.

KEEP OUT OF REACH OF CHILDREN.

Store in a cool, dry place.

Questions? Call 1-888-547-7400

*These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.

EXP07/18
6LN2019

140276 UW F2

Directions: Adults, take 1 tablet daily with the meal of your choice.

Supplement Facts

Serving Size: 1 Tablet

Amount Per Serving

% Daily Value

Biotin (as d-Biotin) 5000 mcg

1667%

Other Ingredients: Dicalcium Phosphate, Microcrystalline Cellulose, Stearic Acid, Croscarmellose Sodium, Magnesium Stearate, Silicon Dioxide.

GLUTEN FREE

094 02 0862 R00 ID235487
Distributed by Target Corporation
Minneapolis, MN 55403
©2015 Target Brands, Inc.
Shop Target.com
Guest Services 1-800-910-6874

biotin

10,000 mcg

helps support healthy hair and skin**
quick dissolve melts in your mouth



60 TABLETS
DIETARY SUPPLEMENT

**These statements have not been evaluated by the Food and Drug Administration.
This product is not intended to diagnose, treat, cure, or prevent any disease.



GRAPE
FLAVOR



ENERGY
METABOLISM

60

TABLETS

Facts

Daily Value

3,333%

...one, Beet
...ate,

ENERGY METABOLISM**

Biotin plays a role in hair and skin health.** In addition, biotin is essential for carbohydrate, protein and fat metabolism.**

Suggested Use: Adults, take one tablet daily. Allow tablet to dissolve in your mouth, or chew tablet, before swallowing. Do not exceed recommended dose.

Caution: If you are pregnant or nursing a baby, taking any medication, or have a medical condition, consult your doctor before taking this product.

KEEP OUT OF REACH OF CHILDREN.

Store in a dry place
at room temperature
(59°F-86°F).

**These statements have not
been evaluated by the Food
and Drug Administration.
This product is not intended
to diagnose, treat, cure, or
prevent any disease.

EXP09/18
6MN0985

72072 UW FJ

BIOTIN

Supplement Facts

Serving Size 1 Tablet

Amount Per Serving

% Daily Value

Biotin (as d-Biotin) 10,000 mcg

3,333%

Ingredients: Mannitol, Dicalcium Phosphate, Crospovidone, Beet Color, Microcrystalline Cellulose, Biotin, Magnesium Stearate, Carmine Color, Sucralose, Stearic Acid, Natural Flavor.

Questions? Call 1-888-547-7400

GLUTEN FREE

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