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

SHOSHA KELLMAN and ABIGAIL STARR,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

WHOLE FOODS MARKET, INC.,

Defendant.

Case No. 4:17-cv-6584

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

1 Plaintiffs Shosha Kellman and Abigail Starr, by their attorneys, bring this class action
2 against Whole Foods Market, Inc. (“WF”), on their own behalf and on behalf of all others similarly
3 situated, and allege as follows:

4 **I. INTRODUCTION**

5 1. Whether an annoying patch of dry skin or an oozing rash that affects one’s social
6 life, as much as 70% of the U.S. population is allergic to at least one personal care product
7 ingredient. Most of these skin allergies are of unknown cause.

8 2. It is extremely difficult for people to identify what ingredient they are allergic to.
9 Allergic reactions are attenuated in both space and time. Some allergic reactions will not manifest
10 until a week after exposure to the allergen. Even worse – some allergic reactions will not manifest
11 on the body part exposed to the allergen. Instead, the immune system will sometimes “remember”
12 the first exposure and the allergic reaction will develop on the body part that was *first* exposed to
13 the allergen.

14 3. Thus, consumers increasingly seek hypoallergenic products. Those who do not
15 suffer from skin allergies seek hypoallergenic products to avoid developing a skin allergy. Those
16 who do suffer from a skin allergy seek hypoallergenic products to avoid the inflammatory cascade
17 caused by an unidentified skin allergen.

18 4. Since its founding, WF bases its brand as being a credible and trustworthy retailer,
19 offering information and advice to consumers desiring safe products or seeking to avoid certain
20 food ingredients or allergens.

21 5. In an effort to lure more customers, WF expanded to become not only a retailer and
22 educator, but also a manufacturer of household and body care products. These private labels
23 include 365 Everyday Value and WF product lines.

24 6. Seeking to capture the growing hypoallergenic market, WF prominently labels
25 many of its products as “hypoallergenic.” *See* Product Labels attached as Exhibit 1.

26 7. However, despite its marketing scheme, WF’s products are chock-full of known
27

1 skin sensitizers (allergens), agents that cause serious skin damage, chemicals that cause serious
2 eye damage lasting longer than 21 days, skin irritants, and eye irritants. Even more, WF's products
3 also contain known carcinogens, mutagens, reproductive toxins, and other chemicals extremely
4 hazardous to human health. *See* Exhibit 1, ¶¶ 79-107, *infra*.

5 8. This is a class action on behalf of a national class of consumers who purchased
6 WF's body care products that were falsely and misleadingly marketed as "hypoallergenic." These
7 products in fact contain a shocking array of compounds known to cause allergic responses. These
8 products also contain a plethora of other compounds known to cause severe skin corrosion, serious
9 eye damage, or are otherwise toxic or hazardous in the case of skin contact. These products are
10 also stuffed with other chemicals that have not been analyzed for their skin sensitization potential.
11 Finally, these products also contain ingredients known to cause cancer, genetic mutations, birth
12 defects, or are otherwise toxic or hazardous to human health or the environment.

13 9. Many of the ingredients are permitted body care products. Yet WF did not simply
14 claim that its household products are "legal." WF falsely and misleadingly claimed that the
15 ingredients in its products are "hypoallergenic" when they are not.

16 10. By deceiving consumers about the nature, quality, and/or ingredients of its
17 products, WF is able to command a premium price, increasing consumers' willingness to pay and
18 take away market share from competing products, thereby increasing its own sales and profits.

19 11. Consumers lack the ability to test or independently ascertain the toxicity of a
20 chemical, especially at the point of sale. Reasonable consumers must and do rely on the chemicals
21 company to honestly report the nature of the product's ingredients.

22 12. WF further encouraged consumers to rely on its representations, marketing itself as
23 an honest company that provides transparent and truthful information about its products'
24 ingredients.

25 13. WF intended for consumers to rely on its representations, and hundreds of
26 thousands of reasonable consumers did in fact so rely.
27

1 14. As a result of its false and misleading labeling, WF was able to sell these products
2 to hundreds of thousands of consumers throughout the United States and to profit handsomely
3 from these transactions.

4 15. WF's false and misleading representations and omissions violate state and federal
5 law, both civil and criminal, detailed more fully below, including California's Unfair Competition
6 Law, California's Consumer Legal Remedies Act, New York's General Business Law, similar
7 state statutes, and common law.

8 16. Plaintiffs bring this action to stop WF's deceptive and misleading practices.

9 **II. JURISDICTION AND VENUE**

10 17. This Court has personal jurisdiction over the parties in this case. Plaintiff Kellman
11 is a citizen of California. Plaintiff Starr is a citizen of New York.

12 18. This Court has subject matter jurisdiction pursuant to the Class Action Fairness Act
13 ("CAFA"), 28 U.S.C. § 1332(d). Jurisdiction under CAFA is met because the proposed number
14 of putative class members exceeds 100, at least one plaintiff and one defendant are citizens of
15 different states, and the amount in controversy, including, but not limited to the aggregate amount
16 of relief sought by absent class members, exclusive of interest and costs, exceeds \$5 million.

17 19. This Court has personal jurisdiction over WF because it is a corporation with
18 sufficient minimum contacts in California or otherwise intentionally avails itself of the laws of this
19 State through its marketing of the products at issue in California to consumers in California,
20 through its direct sales of the products at issue in California to consumers in California, so as to
21 render the exercise of jurisdiction by this Court consistent with traditional notions of fair play and
22 substantial justice.

23 20. Venue is proper in this District under 28 U.S.C. § 1391(a). Substantial acts in
24 furtherance of the alleged improper conduct, including the dissemination of false, misleading and
25 deceptive information regarding the nature, quality, and/or ingredients of the products, occurred
26 within this District.

1 21. No other forum would be more convenient for the parties and witnesses to litigate
2 this action.

3 **III. PARTIES**

4 22. Plaintiff Shosha Kellman is an individual consumer who, at all times material
5 hereto, was a citizen of the State of California and resident of Alameda. For approximately twenty-
6 four months, from early 2014 through early 2016, Plaintiff Kellman regularly purchased WF's 365
7 Gentle Skin Cleanser from the Whole Foods Market located at 3000 Telegraph Ave, Berkeley CA
8 94705 and from the Whole Foods Market located at 230 Bay Place, Oakland, CA 94612. Ms.
9 Kellman consistently used a credit card for her purchases. Plaintiff Kellman estimates that she
10 purchased the product every four to six weeks. In addition, Plaintiff Kellman purchased other WF
11 products. Plaintiff Kellman sometimes purchased WF's 365 moisturizing lotion during the same
12 24-month period of time.

13 23. In deciding to make these purchases, Plaintiff Kellman saw, relied upon, and
14 reasonably believed the label representation that the products were "hypoallergenic." These
15 representations were a significant reason for her purchases.

16 24. Plaintiff Kellman and her family members have all suffered skin irritation, eye
17 irritation, dermatitis, and/or an allergic skin reaction in the past.

18 25. In the case of common skin irritation or dermatitis, Plaintiff Kellman, like similarly
19 situated consumers, is unsure whether what seemed like skin or eye irritation or dermatitis was in
20 fact an allergic response to an ingredient in a personal care product.

21 26. Like similarly situated consumers, Plaintiff Kellman does not know the identity of
22 every ingredient she and her family are allergic to. Moreover, like similarly situated consumers,
23 Plaintiff Kellman does not know which ingredients she or her family may develop an allergy to.

24 27. Had Plaintiff Kellman known at the time that these products were not
25 hypoallergenic as promised, she would not have purchased these products.

26 28. Had Plaintiff Kellman known at the time that these products contained irritating,
27

1 toxic, hazardous, or otherwise harmful chemicals, she would not have purchased these products.

2 29. Plaintiff Kellman purchased, purchased more of, or paid more for, these products
3 than she would have had she known that the products contained skin sensitizers, irritants, toxins,
4 carcinogens, or otherwise harmful chemicals.

5 30. If WF's products were reformulated such that its representations were truthful,
6 Plaintiff Kellman would consider purchasing WF's products in the future.

7 31. The products that Plaintiff Kellman purchased are substantially similar to WF's
8 other products alleged to be falsely labeled.

9 32. Plaintiff Abigail Starr is an individual consumer who, at all times material hereto,
10 was a citizen of the State of New York and resident of Manhattan. During the class period, Plaintiff
11 Starr regularly purchased WF's 365 Moisturizing Lotion. She purchased these products in
12 Manhattan at the Union Square (4 Union Square South, New York, NY 10003) and/or Houston
13 Street (95 E. Houston St, New York, NY 10002) locations. She consistently uses her debit card
14 for all Whole Foods transactions. In addition, Plaintiff Starr purchased other WF products. On
15 multiple occasions during the class period, Ms. Starr purchased WF's 365 Bubble Bath, WF's 365
16 Facial Tissue, and 365 Paper Towels.

17 33. In deciding to make these purchases, Plaintiff Starr saw, relied upon, and
18 reasonably believed the label representation that the products were "hypoallergenic." These
19 representations were a significant reason for her purchases.

20 34. Plaintiff Starr and her family members have all suffered skin irritation, eye
21 irritation, dermatitis, and/or an allergic skin reaction in the past.

22 35. In the case of common skin irritation or dermatitis, Plaintiff Starr, like similarly
23 situated consumers, is unsure whether what seemed like skin or eye irritation or dermatitis was in
24 fact an allergic response to an ingredient in a personal care product.

25 36. Like similarly situated consumers, Plaintiff Starr does not know the identity of
26 every ingredient she and her family are allergic to. Moreover, like similarly situated consumers,
27

1 Plaintiff Starr does not know which ingredients she or her family may develop an allergy to.

2 37. Had Plaintiff Starr known at the time that these products were not hypoallergenic
3 as promised, she would not have purchased these products.

4 38. Had Plaintiff Starr known at the time that these products contained irritating, toxic,
5 hazardous, or otherwise harmful chemicals, she would not have purchased these products.

6 39. Plaintiff Starr purchased, purchased more of, or paid more for, these products than
7 she would have had she known that the products contained skin sensitizers, irritants, toxins,
8 carcinogens, or otherwise harmful chemicals.

9 40. If WF's products were reformulated such that its representations were truthful,
10 Plaintiff Starr would consider purchasing WF's products in the future.

11 41. The products that Plaintiff Starr purchased are substantially similar to WF's other
12 products alleged to be falsely labeled.

13 42. Defendant Whole Foods Market, Inc. is a corporation with its principal place of
14 business located at 550 Bowie Street, Austin, Texas. WF manufactures and/or causes the
15 manufacture of personal care and baby care products. WF labels these products under its own
16 name, and markets and distributes the products nationwide through its corporate parent's online
17 website (amazon.com) and through its retail stores located throughout the United States. WF has
18 85 stores in the State of California and 17 stores in the State of New York. 2016 Whole Foods
19 Annual Report at 14.

20 **IV. FACTUAL ALLEGATIONS**

21 **A. Consumers Actively Seek Hypoallergenic Body Care Products**

22 43. According to the Centers for Disease Control and Prevention ("CDC"), 8.8 million
23 children (12% of U.S. children) reported skin allergies in 2012. Skin allergies are even more
24 prevalent among young children; CDC reports that 14.2% of children between the ages of 0 and 4
25 suffered a skin allergy in 2012.

26 44. These numbers are likely to underreport the prevalence of allergic contact
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1 dermatitis; recent studies show that somewhere between 14-70% of children suffer from skin
2 allergies, based on positive patch skin tests.

3 45. Skin allergies are similarly prevalent among adults.

4 46. When skin is exposed to a sufficient amount of a chemical allergen, the skin is
5 “sensitized.” Upon re-exposure to the allergen, the skin initiates an inflammatory cascade, causing
6 skin changes associated with allergic contact dermatitis. These include redness, oedema (fluid
7 retention), scaling, fissures (cracking), vesicles (fluid-filled sacs), bullae (bubble-like cavity), and
8 eventually oozing.

9 47. Contact sensitization and related skin allergies can severely affect a person’s quality
10 of life, depending on the severity and the site of skin sensitization. People suffering from
11 noticeable skin allergies will try to hide the symptoms under clothing if possible, and if not, will
12 avoid public spaces entirely. In either case, skin allergies can dramatically affect a person’s
13 confidence and engagement in life.

14 48. It is difficult to identify the substance causing an allergic response. Allergic contact
15 dermatitis develops several days after exposure to a skin allergen. Some substances do not cause
16 symptoms until a week after exposure.

17 49. Even more, once an individual is sensitized to an allergen, future contact with the
18 allergen can trigger a response in the *original* site of sensitization. For example, if someone had
19 an allergic response to a product used on the face, and later used a different product containing the
20 same allergen on the legs, the allergic response will occur again on the *face* – even if the face was
21 never exposed to the second product.

22 50. When a consumer cannot identify the material to which they are allergic, allergic
23 contact dermatitis will persist, and, it is believed, will take longer to resolve even after the cause
24 is identified.

25 51. Thus, consumers will actively seek out hypoallergenic products – to avoid a skin
26 allergy from occurring at all and/or to prevent a known skin allergy from repeating the
27

1 inflammatory cascade.

2 **B. Definition of Hypoallergenic**

3 52. The scientific and regulatory definition of a skin sensitizer is a substance that causes
4 sensitization by skin contact in a substantial number of persons based on human evidence or
5 appropriate animal testing.

6 53. If a skin sensitizer makes up 0.1% or more of a product, or if the product contains
7 a sensitizer that may elicit an allergic response at concentrations smaller than 0.1% in individuals
8 who are already sensitized to the chemical, the *entire* product mixture is classified as a skin
9 sensitizer, *i.e.*, the product causes sensitization by skin contact in a substantial number of persons
10 based on human evidence or appropriate animal testing.

11 54. A product that is a skin sensitizer is not hypoallergenic.

12 55. Consumers believe and expect that a product that is labeled as hypoallergenic does
13 not contain skin sensitizers at a concentration that could elicit an allergic response in sensitized
14 individuals.

15 56. Once skin is sensitized, even a *minute* amount of the chemical allergen is enough
16 to cause a full-blown allergic response. Thus, consumers seeking hypoallergenic products also
17 commonly expect that the product does not contain *any* skin sensitizers.

18 57. All WF's products contain substances classified by reputable authorities as skin
19 sensitizers. *See infra* at ¶¶ 79-107 (identifying skin sensitizers) and Exhibit 1 (showing which
20 products contain these skin sensitizers).

21 58. All WF's products also contain skin sensitizers that are either present in Def's
22 products at concentrations larger than 0.1%, or that may elicit an allergic response at
23 concentrations smaller than 0.1% in sensitized individuals.

24 59. Thus, WF's products are not hypoallergenic.

25 60. Thus, WF's on-the-label promise that its products are "hypoallergenic" is false.

26 61. Consumers also believe and expect that a hypoallergenic product will not cause
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1 skin irritation, skin corrosion, or eye damage when used as directed.

2 62. Consumers also believe and expect that a product that is labeled as hypoallergenic
3 does not contain a significant amount of ingredients known to produce skin irritation, skin
4 corrosion, and/or eye damage.

5 63. WF's products contain significant amounts of ingredients classified by reputable
6 authorities as causing skin irritation, skin corrosion, and/or eye damage. *See infra* at ¶¶ 79-107
7 and Exhibit 1 (showing which products contain these ingredients).

8 64. Thus, WF's on-the-label promise that its products are "hypoallergenic" is *also*
9 misleading.

10 65. WF knows how consumers understand "hypoallergenic," and encourages this
11 understanding.

12 66. Because even a *minute* amount of a chemical allergen is enough to cause a full-
13 blown allergic response, consumers reasonably expect and believe that when a product is labeled
14 as "hypoallergenic," this representation is true not just for the final formulation, but to every
15 ingredient in the product.

16 67. WF knows and encourages this understanding.

17 68. WF knows that consumers rely upon it to not only test the final product formulation
18 for basic safety, but to select only those ingredients that it considers to be safe.

19 69. Advertising itself as "America's Healthiest Grocery Store," *see* Exhibit 2 (Google
20 ad); 2016 Annual Report at 1, Whole Foods promises its customers that it "maintain[s] the strictest
21 quality standards in the industry." Exhibit 3 ("Company Info").

22 70. Listing its "quality standards," Whole Foods identifies as its top standard: "We
23 carefully evaluate each and every product we sell." Exhibit 4 ("Quality Standards").

24 71. WF stresses not only product safety, but *ingredient* safety. As WF explains:

25 **OUR BODY CARE QUALITY STANDARDS**

26 We carry the finest, high-quality beauty, hair and body care products available
27

1 because we believe the quality of the items and ingredients you put on your body is as
2 important as the foods and nutritional supplements you put in your body. We evaluate the
3 quality of personal care products in terms of ingredients, experience, and efficacy.

4 Exhibit 5 (“Body Care Quality Standards”).

5 72. However, many ingredients in WF’s products have not been adequately studied for
6 safety. Moreover, very few have been assessed for their sensitization potential. *See* ¶¶ 79-107,
7 *infra*.

8 **C. WF’s False Representations**

9 73. On the products’ labels, and again on its retail website, WF represents that certain
10 of its products are “hypoallergenic.” These products, (collectively, the “Falsely Labeled Products”)
11 are all falsely labeled, as all of these products contain skin sensitizers, skin irritants, eye irritants,
12 and other deleterious compounds.

13 74. These products are:

- 14 365 Baby Foaming Wash
- 15 365 Baby Lotion
- 16 365 Baby Shampoo
- 17 365 Bubble Bath
- 18 365 Gentle Skin Cleanser
- 19 365 Kids' Foaming Wash
- 20 365 Maximum Moisture Body Lotion
- 21 365 Moisturizing Lotion
- 22 Whole Foods Market Baby Laundry Detergent
- 23 Whole Foods Market Organic Laundry Detergent
- 24 Wild Kratts Bubble Bath
- 25 Wild Kratts Kids Foaming Body Wash

26 75. The labels of these products are attached as Exhibit 1.

27 76. Further encouraging consumers’ reliance on WF’s “hypoallergenic” promise, WF
labels only *some* products as hypoallergenic, giving consumers the (false) impression that WF
carefully reviewed each ingredient in its products to ensure that the “hypoallergenic” promise was
made for only those products that truly are hypoallergenic. *See, e.g.*, Exhibit 6.

77. Yet, contrary to WF’s promise, *all* these products in fact contain known skin

1 sensitizers. They also *all* contain known skin or eye irritants, carcinogens, teratogens, mutagens,
2 or pollutants. Finally, they *all* contain substances that have not been adequately assessed for safety
3 or skin sensitization potential.

4 78. All WF's Falsely Labeled Products contain one or more of the following chemicals.

5 79. *Acacia senegal (organic gum arabic)* is classified as a Category 1 skin sensitizer,
6 based on positive animal and/or human testing demonstrating that repeated skin contact can be
7 expected to cause an allergic response in a substantial number of persons. It is known to cause
8 local contact dermatitis. It is a Category 2 skin irritant, meaning that it causes significant
9 erythema/eschar (redness and dead tissue) or edema (abnormal accumulation of fluid beneath the
10 skin) lasting more than three days, or skin inflammation lasting longer than 14 days. It is a
11 Category 2 eye irritant, causing adverse effects on the cornea, iris, and conjunctiva.

12 80. Some testing classifies *calendula officinalis flower extract* as a Category 1 skin
13 sensitizer, based on positive animal and/or human testing demonstrating that repeated skin contact
14 can be expected to cause an allergic response in a substantial number of persons. It is a Category
15 2 skin irritant, meaning that it causes significant erythema/eschar (redness and dead tissue) or
16 edema (abnormal accumulation of fluid beneath the skin) lasting more than three days, or skin
17 inflammation lasting longer than 14 days. It is a Category 2 eye irritant, causing adverse effects
18 on the cornea, iris, and conjunctiva.

19 81. *Caprylyl glycol* causes Category 1 eye damage, i.e., it causes serious damage to the
20 eye tissue or serious physical decay of vision which is not fully reversible within 21 days of
21 application.

22 82. *Cetearyl alcohol* is recognized as an allergen by the American Contact Dermatitis
23 Society. Its safety for use in bodycare products has not been adequately assessed. The limited
24 testing done, however, shows it to be a skin irritant and eye irritant, causing skin damage in less
25 than four hours and adverse effects on the cornea, iris, conjunctiva. It is inherently toxic to aquatic
26 life. It is also toxic to the mucous membranes, and is hazardous by definition under federal law.
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1 83. **Cetyl alcohol** has caused urticaria-like dermatitis in humans. It is also a skin and
2 eye irritant. It is also classified as an eye irritant, and it is inherently toxic to aquatic life with long-
3 lasting effects.

4 84. While **citric acid** is a common food ingredient, skin contact is known to cause
5 allergic reactions in humans. It has been reported to cause Category 1B skin corrosion, meaning
6 that it irreversibly damages the skin after short exposure; in animal tests, the substance caused
7 visible necrosis after less than 1 hour of exposure. Corrosive reactions are typified by ulcers,
8 bleeding, bloody scabs, and, by the end of observation at 14 days, by discoloration due to blanching
9 of the skin, complete areas of alopecia, and scars. It causes Category 1 eye damage, i.e., it causes
10 serious damage to the eye tissue or serious physical decay of vision which is not fully reversible
11 within 21 days of application.

12 85. Repeated use of **cocamidopropyl hydroxysultaine** has caused increased skin
13 irritation. In one test on human subjects, while no skin irritation was observed at the first
14 application of a 2.5% solution of cocamidopropyl hydroxysultaine, repeated applications caused
15 slight to moderate skin irritation in 45% of the subjects, with 5% of the subjects developing strong
16 irritation. It causes Category 1 eye damage, i.e., it causes serious damage to the eye tissue or
17 serious physical decay of vision which is not fully reversible within 21 days of application.

18 86. **Decyl glucoside** has caused sensitization in human testing and is recognized as an
19 allergen by the American Contact Dermatitis Society. It causes Category 1C skin corrosion,
20 meaning that it irreversibly damages the skin after short exposure; in animal tests, the substance
21 caused visible necrosis after less than 4 hours of exposure. Corrosive reactions are typified by
22 ulcers, bleeding, bloody scabs, and, by the end of observation at 14 days, by discoloration due to
23 blanching of the skin, complete areas of alopecia, and scars. It causes Category 1 eye damage, i.e.,
24 it causes serious damage to the eye tissue or serious physical decay of vision which is not fully
25 reversible within 21 days of application.

26 87. The sensitization potential of **gluconolactone** has not been assessed by any
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1 reputable authority. However, based on its chemical structure and similarity to other known skin
2 sensitizers, it is classified as a likely skin sensitizer.

3 88. *Glycerin (also listed as "organic glycerin")* is known to cause eczema in humans.
4 Based on its chemical structure and similarity to other known skin sensitizers, it is a suspected skin
5 sensitizer. Glycerin (also listed as "organic glycerin") is classified as a skin and eye irritant. It is a
6 mutagen, meaning that it is suspected of mutating human cells in a way that can be transmitted to
7 children conceived after exposure.

8 89. *Glyceryl stearate* is a skin and eye irritant. In animal testing (rabbits), it caused
9 erythema, edema, atonia, desquamation, and/or fissuring. It is also inherently toxic to aquatic life.

10 90. *Isopropyl palmitate* is classified as a skin and eye irritant. Moreover, it is an ester,
11 a class of chemicals known to be environmentally toxic.

12 91. Some testing classifies *mentha viridis (spearmint) leaf oil* as a Category 1 skin
13 sensitizer, based on positive animal and/or human testing demonstrating that repeated skin contact
14 can be expected to cause an allergic response in a substantial number of persons. *Mentha viridis*
15 (*spearmint*) leaf oil is classified as a fragrance allergen in the European Union. It is a Category 2
16 skin irritant, meaning that it causes significant erythema/eschar (redness and dead tissue) or edema
17 (abnormal accumulation of fluid beneath the skin) lasting more than three days, or skin
18 inflammation lasting longer than 14 days. It is a Category 2 eye irritant, causing adverse effects
19 on the cornea, iris, and conjunctiva.

20 92. WF does not disclose the identity of the fragrances it uses, listing only the generic
21 term "*natural fragrance*" on its product label. Many synthetic fragrances are known to be human
22 sensitizers, toxins and environmental hazards, and are associated with adverse reproductive
23 effects, genetic mutations, and other ill effects. As WF itself recognizes, "[p]hthalates have been
24 linked to cancer and endocrine system disruption and are currently covered under the umbrella
25 term "fragrance" in conventional products." Exhibit 7 ("What You Won't Find in Our Cleaning
26 Products").

1 93. ***Olea europaea (olive) oil*** is classified as a skin irritant. (Thus, masseurs are
2 discouraged from the external use of olive oil). It is also classified as an eye irritant.

3 94. The sensitization potential of ***panthenol*** has not been assessed by any reputable
4 authority. However, based on its chemical structure and similarity to other known skin sensitizers,
5 it is a likely skin sensitizer. In fact, it has produced allergic responses in some past testing on
6 humans. Panthenol is classified as a skin and eye irritant.

7 95. ***Phenoxyethanol*** is a skin and severe eye irritant. It has induced an allergic response
8 in both human and animal testing. It is recognized as an allergen by the American Contact
9 Dermatitis Society. It is toxic by all routes (inhalation, ingestion, and dermal contact). It is
10 extremely hazardous in case of eye contact and very hazardous in case of skin contact (defatting
11 the skin and causing skin inflammation characterized by itching, scaling, reddening, or,
12 occasionally, blistering). Even short exposure can cause serious temporary or residual injury. It
13 is toxic to the kidneys, the nervous system, and the liver, adversely affecting the central nervous
14 system and peripheral nervous system, causing headaches, tremors, and central nervous system
15 depression. It degrades into substances that are even more toxic. It is a germ cell mutagen,
16 suspected of mutating human cells in a way that can be transmitted to children conceived after
17 exposure. It is also a reproductive toxin, suspected of damaging fertility or the unborn child based
18 on human or animal evidence. Phenoxyethanol is an ethylene glycol ether, which is known to cause
19 wasting of the testicles, reproductive changes, infertility, and changes to kidney function.
20 Phenoxyethanol is also carcinogen, meaning that it is suspected to induce cancer or increase its
21 incidence. Case studies indicate that repeated exposure to phenoxyethanol results in acute
22 neurotoxic effects, as well as chronic solvent-induced brain syndrome, constant irritability,
23 impaired memory, depression, alcohol intolerance, episodes of tachycardia and dyspnea, and
24 problems with balance and rash. Phenoxyethanol is also toxic by definition under federal law, and
25 is regulated as a toxic compound. Its use is restricted in Europe.

26 96. ***Polysorbate 20*** is classified as a Category 1 skin sensitizer, based on multiple
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1 positive tests demonstrating that repeated skin contact can be expected to cause allergic response
2 in a substantial number of persons. It is also a Category 2 skin and eye irritant, causing skin damage
3 in less than four hours and adverse effects on the cornea, iris, and conjunctiva. It is made in part
4 with ethylene oxide, resulting in 1,4-dioxane as a trace contaminant, which is classified as a
5 possible carcinogen. It is a teratogen, meaning that it causes birth defects.

6 97. *Polysorbate 60* has caused urticaria (hives and swelling) on human subjects'
7 foreheads. In animal testing, polysorbate 60 is a skin irritant.

8 98. The sensitization potential of *potassium sorbate* has not been assessed by any
9 reputable authority. However, based on its chemical structure and similarity to other known skin
10 sensitizers, it is classified as a likely skin sensitizer. Some case studies show it to cause contact
11 urticaria. It is a Category 2 skin irritant, meaning that it causes significant erythema/eschar
12 (redness and dead tissue) or edema (abnormal accumulation of fluid beneath the skin) lasting more
13 than three days, or skin inflammation lasting longer than 14 days. Some studies show it to cause
14 Category 1A skin corrosion, meaning that it irreversibly damages the skin after short exposure; in
15 animal tests, the substance caused visible necrosis after less than 3 minutes of exposure. Corrosive
16 reactions are typified by ulcers, bleeding, bloody scabs, and, by the end of observation at 14 days,
17 by discoloration due to blanching of the skin, complete areas of alopecia, and scars. It is a
18 Category 2 eye irritant, causing adverse effects on the cornea, iris, and conjunctiva. It is also a
19 suspected mutagen.

20 99. Some testing classifies *sodium benzoate* as a Category 1 skin sensitizer, based on
21 positive animal and/or human testing demonstrating that repeated skin contact can be expected to
22 cause an allergic response in a substantial number of persons. It is also a skin irritant and causes
23 serious eye damage. It is a Category 2 eye irritant, causing adverse effects on the cornea, iris, and
24 conjunctiva. Some testing finds that it causes Category 1 eye damage, i.e., it causes serious damage
25 to the eye tissue or serious physical decay of vision which is not fully reversible within 21 days of
26 application. It is a teratogen, meaning that it causes birth defects. Its use in personal care products
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1 is limited in Europe.

2 100. *Sodium bicarbonate* is classified as a skin and eye irritant. Some tests show that it
3 causes Category 1 eye damage, i.e., it causes serious damage to the eye tissue or serious physical
4 decay of vision which is not fully reversible within 21 days of application. It is a teratogen,
5 meaning that it causes birth defects.

6 101. *Sodium carbonate* is a skin and eye irritant. It causes Category 1 eye damage, i.e.,
7 it causes serious damage to the eye tissue or serious physical decay of vision which is not fully
8 reversible within 21 days of application.

9 102. The sensitization potential of *sodium citrate* has not been assessed by any reputable
10 authority. However, based on its chemical structure and similarity to other known skin sensitizers,
11 it is classified as a suspected skin sensitizer. It is also classified as a skin and eye irritant, causing
12 significant erythema/eschar (redness and dead tissue) or edema (abnormal accumulation of fluid
13 beneath the skin) lasting more than three days, or skin inflammation lasting longer than 14 days,
14 and causing adverse effects on the cornea, iris, and conjunctiva.

15 103. The sensitization potential of *sodium myristoyl sarcosinate* has not been assessed
16 by any reputable authority. However, based on its chemical structure and similarity to other known
17 skin sensitizers, it is classified as a suspected skin sensitizer. It is a Category 2 skin irritant,
18 meaning that it causes significant erythema/eschar (redness and dead tissue) or edema (abnormal
19 accumulation of fluid beneath the skin) lasting more than three days, or skin inflammation lasting
20 longer than 14 days. It causes Category 1 eye damage, i.e., it causes serious damage to the eye
21 tissue or serious physical decay of vision which is not fully reversible within 21 days of
22 application.

23 104. The sensitization potential of *sodium oleate* has not been assessed by any reputable
24 authority. However, based on its chemical structure and similarity to other known skin sensitizers,
25 it is classified as a suspected skin sensitizer.

26 105. Though *xanthan gum* is safe as a food ingredient, it is not so safe for the
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1 skin. Some testing indicates that it is a skin sensitizer. It is a Category 2 skin irritant, meaning
2 that it causes significant erythema/eschar (redness and dead tissue) or edema (abnormal
3 accumulation of fluid beneath the skin) lasting more than three days, or skin inflammation lasting
4 longer than 14 days. It is a Category 2 eye irritant, causing adverse effects on the cornea, iris, and
5 conjunctiva.

6 106. *Cyamopsis tetragonolobus gum (organic guar gum)* is a contact
7 sensitizer. Additionally, it is a Category 2 eye irritant, causing adverse effects on the cornea, iris,
8 and conjunctiva.

9 107. *Avena sativa (oat) kernel flour, or avena sativa kernel flour* is classified as a
10 Category 1 skin sensitizer, based on positive animal and/or human testing demonstrating that
11 repeated skin contact can be expected to cause an allergic response in a substantial number of
12 persons.

13 **D. The Representations Are False, Deceptive, And Misleading**

14 108. WF's conduct deceived and/or was likely to deceive the public. Consumers were
15 deceived into believing that the Falsely Labeled Products were hypoallergenic, as labeled.

16 109. All these representations were false, as explained *supra*.

17 110. Consumers would not know the true nature of the ingredients merely by reading
18 the ingredient label. Its discovery requires investigation beyond the grocery store and knowledge
19 of chemistry beyond that of the average reasonable consumer.

20 **E. Location Of The Misrepresentations**

21 111. WF made the above false, deceptive, and misleading misrepresentations and
22 omissions on the package of the Falsely Labeled Products. *See* Exhibit 1.

23 112. WF repeated the above false, deceptive, and misleading misrepresentations and
24 omissions on its online retail product page for the Falsely Labeled Products. *See* Exhibit 1.

25 113. The misrepresentations and omissions were uniform and have actually been
26 communicated to Plaintiffs and to each member of the Class at every point of purchase and
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1 consumption.

2 **F. WF's Deceptive And Misleading Omissions**

3 114. WF deceptively and misleadingly conceals other material facts about the Falsely
4 Labeled Products, including:

- 5 a. the true nature of the Falsely Labeled Products' ingredients;
- 6 b. the identity of the Falsely Labeled Products' ingredients;
- 7 c. that the Falsely Labeled Products contain sensitizers, irritants, toxins,
8 carcinogens, pollutants, and/or otherwise hazardous substances;
- 9 d. the concentration of the sensitizers, irritants, toxins, carcinogens, pollutants,
10 and/or otherwise hazardous substances in the Falsely Labeled Products;
- 11 e. that the Falsely Labeled Products are not "hypoallergenic";
- 12 f. that the Falsely Labeled Products are not what a reasonable consumer would
13 consider to be "hypoallergenic;"
- 14 g. that the Falsely Labeled Products contain chemicals that a reasonable
15 consumer would not expect in a product labeled as "hypoallergenic."

16 115. Plaintiffs and the members of the Class are not at fault for failing to discover WF's
17 wrongs earlier, and had no actual or presumptive knowledge of facts sufficient to put them on
18 inquiry notice.

19 116. WF has concealed the identity of several ingredients. Discovery is therefore
20 necessary to determine their identity. These ingredients may also be sensitizers, irritants, or
21 otherwise toxic.

22 117. For example, WF adds "*fragrance*" or "*parfum*" to its products, but does not
23 identify what chemical is used. Many ingredients used as fragrances are known skin sensitizers.
24 Many are also extremely toxic to a person's skin, their overall health, and/or to the environment.

25 118. WF also does not disclose the ingredients in the following products, though it labels
26 them as "hypoallergenic:" 365 Diapers, 365 Sustainably Soft Bath Tissue, 365 Sustainably Soft
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1 Facial Tissue, 365 Facial Tissue, 365 Paper Towels, 365 Training Pants. Exhibit 8. These products
2 may also be included as “Falsely Labeled Products.”

3 119. Furthermore, WF has not disclosed the concentration of each ingredient in its
4 products. Further investigation and discovery is needed so that Plaintiffs can ascertain whether
5 entire products are also toxic.

6 120. WF has also concealed from consumers the nature of its products’ ingredients
7 despite consumers’ requests. The possible carcinogenic, toxic, and environmental effects of its
8 ingredients are still concealed from consumers today.

9 121. These facts are not ascertainable and are still not known to Plaintiffs, the Class
10 members, and reasonable consumers. WF’s concealment tolls the applicable statute of limitations.

11 122. To this day, WF continues to conceal and suppress the existence, true identity,
12 nature, and concentration of the sensitizers, irritants, toxins, carcinogens, pollutants, and/or
13 otherwise hazardous substances in the Falsely Labeled Products.

14 123. Similarly, to this day, WF continues to conceal and suppress the fact that the Falsely
15 Labeled Products are not “hypoallergenic” as promised.

16 124. WF represents elsewhere on the product label and on its website that the products
17 are “non-toxic,” “safe,” having “only the gentlest ingredients,” and/or causing “no tears,” etc.
18 Exhibit 1. This further obscures the fact that WF’s products are not hypoallergenic.

19 125. For example, in its “Official Whole Foods Market Blog,” WF encourages
20 consumers seeking to avoid allergens in cleaning products to purchase Whole Foods Market brand
21 products, as they lack the ingredients WF identifies in its in-house list of banned “unacceptable
22 ingredients” for body care, premium body care, and household cleaners. *See, e.g.*, Exhibit 7
23 (“What You Won’t Find in our Cleaning Products”).

24 126. WF fails to disclose, however, that many ingredients in its products are known skin
25 allergens, even though they are not banned by WF’s list of “unacceptable ingredients.”
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1 **G. WF Knew Its Representations Were False**

2 127. WF holds itself out to the public as trusted experts in the area of hypoallergenic,
3 safe, mild, and gentle personal care products.

4 128. WF knew what representations it made regarding the Falsely Labeled Products, as
5 all representations appear on the products' packages.

6 129. WF also knew what ingredients were added to each product, as (presumably) all
7 product ingredients listed on the product packages and are further disseminated on their websites.

8 130. WF is governed by and thus is presumed to know the federal regulations and state
9 laws that control the labeling of the Falsely Labeled Products, and thus is aware that many of the
10 ingredients have been federally declared to be chemical compounds that require inventory
11 reporting under the Toxic Substance Control Act, are hazardous or toxic compounds that require
12 special disclosures on safety data sheets, or are carcinogens or reproductive toxins that require
13 product label warnings under state law.

14 131. WF thus knew all the facts demonstrating that its Falsely Labeled Products contain
15 sensitizers, irritants, and otherwise toxic ingredients, and that these products were therefore falsely
16 labeled.

17 **H. WF Intended Consumers To Rely**

18 132. As WF knows, consumers prefer hypoallergenic products. As WF knows,
19 consumers will pay a premium for hypoallergenic products or would not purchase these products
20 at all unless they were hypoallergenic, as advertised.

21 133. WF encourages consumers' preference for hypoallergenic products – specifically
22 for WF's products – explaining to consumers that “we believe the quality of the items and
23 ingredients you put on your body is as important as the foods and nutritional supplements you put
24 in your body.” Exhibit 5 (“Body Care Quality Standards”).

25 134. WF's misleading affirmative statements (e.g., that the products were mild, gentle,
26 safe, caused “no more tears,” or were environmentally safe) further obscured what WF failed to
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1 disclose. Thus, reliance upon WF's misleading and deceptive representations and omissions may
2 be presumed.

3 135. WF made the false, deceptive, and misleading representations and omissions,
4 intending Plaintiffs and Class members to rely upon these representations and omissions in
5 purchasing and using one or more Falsely Labeled Products.

6 136. In making the false, misleading, and deceptive representations and omissions at
7 issue, WF knew and intended that consumers would purchase the WF products when consumers
8 would otherwise purchase a competing product or employ an alternate regimen (such as using an
9 oil for moisturizing).

10 137. In making the false, misleading, and deceptive representations and omissions at
11 issue, WF also knew and intended that consumers would pay a premium for hypoallergenic
12 products, furthering WF's private interest of increasing sales of its products and decreasing the
13 sales of products marketed by its competitors.

14 **I. Consumers Reasonably Relied**

15 138. Consumers frequently rely on ingredient representations and information in making
16 purchase decisions, especially in purchasing personal care products.

17 139. When Plaintiffs and the Class members purchased the Falsely Labeled Products,
18 Plaintiffs and the Class members saw the false, misleading, and deceptive representations detailed
19 above, and did not receive disclosure of the facts concealed, as detailed above.

20 140. These misrepresentations were uniform and were communicated to Plaintiffs and
21 every other member of the Class at every point of purchase and consumption.

22 141. Plaintiffs and the Class members were among the intended recipients of WF's
23 deceptive representations and omissions.

24 142. Plaintiffs and the Class members reasonably relied to their detriment on WF's
25 misleading representations and omissions.

26 143. WF's false, misleading, and deceptive misrepresentations and omissions deceived
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1 and misled, and are likely to continue to deceive and mislead, Plaintiffs, the Class members,
2 reasonable consumers, and the general public.

3 144. WF's misleading affirmative statements further obscured what it failed to disclose.
4 Thus, reliance upon WF's misleading and deceptive representations and omissions may be
5 presumed.

6 145. WF made the deceptive representations and omissions with the intent to induce
7 Plaintiffs and the Class members to purchase the Falsely Labeled Products. Plaintiffs' and the
8 Class members' reliance upon such representations and omissions may be presumed.

9 146. WF's deceptive representations and omissions are material in that a reasonable
10 person would attach importance to such information and would be induced to act upon such
11 information in making purchase decisions. Thus, Plaintiffs' and the Class members' reliance upon
12 such representations and omissions may be presumed as a matter of law. The materiality of those
13 representations and omissions also establishes causation between WF's conduct and the injuries
14 sustained by Plaintiffs and the Class members.

15 **J. WF's Wrongful Conduct Caused Plaintiffs' Injury**

16 147. As an immediate, direct, and proximate result of WF's false, misleading, and
17 deceptive representations and omissions, WF injured Plaintiffs and the Class members in that they:

- 18 a. paid a sum of money for a product that was not as represented;
19 b. paid a premium price for a product that was not as represented;
20 c. were deprived the benefit of the bargain because the Falsely Labeled
21 Products they purchased were different from what WF warranted;
22 d. were deprived the benefit of the bargain because the Falsely Labeled
23 Products they purchased had less value than what was represented;
24 e. did not receive a product that measured up to their expectations as created
25 by WF;
26 f. used (or caused their children to use) a substance that Plaintiffs and the
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1 members of the Class did not expect or consent to;

2 g. used (or caused their children to use) a product that was not hypoallergenic;

3 h. without their knowing consent, used (or caused their children to use) a
4 substance that is generally harmful to their health or their children's health;

5 i. without their knowing consent, used (or caused their children to use) a
6 substance that is a skin sensitizer, irritant, or a known or suspected toxin, carcinogen, mutagen,
7 teratogen, environmental pollutant, or otherwise is harmful to the environment and/or their health.

8 148. Had WF not made the false, misleading, and deceptive representations and
9 omissions, Plaintiffs and the Class members would not have been injured as listed above.
10 Accordingly, Plaintiffs and the Class members have suffered injury in fact as a result of WF's
11 wrongful conduct.

12 149. Plaintiffs and the Class members all paid money for the Falsely Labeled Products,
13 but did not obtain the full value of the advertised products due to WF's misrepresentations and
14 omissions. Plaintiffs and the Class members purchased, purchased more of, or paid more for, the
15 Falsely Labeled Products than they would have had they known the truth about the Falsely Labeled
16 Products. Accordingly, Plaintiffs and the Class members have suffered injury in fact and lost
17 money or property as a result of WF's wrongful conduct.

18 **K. WF Benefitted From Its Misleading And Deceptive Representations And Omissions**

19 150. As the intended, direct, and proximate result of WF's false, misleading, and
20 deceptive representations and omissions, WF has been unjustly enriched through more sales of
21 Falsely Labeled Products and higher profits at the expense of Plaintiffs and the Class members.
22 As a direct and proximate result of its deception, WF also unfairly obtained other benefits,
23 including the higher value associated with a "hypoallergenic" brand and the resulting higher stock
24 value, redirecting sales to it and away from its competitors, and increased sales of its other
25 products.

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V. CLASS ALLEGATIONS

151. Plaintiffs Kellman and Starr bring this action pursuant to Rule 23 of the Federal Rules of Civil Procedure on behalf of themselves and all other similarly situated United States residents who purchased the Falsely Labeled Products (as defined herein).

152. Plaintiff Kellman also brings this action on behalf of herself and all other similarly situated California residents who purchased the Falsely Labeled Products (as defined herein) (the “California Class”).

153. Plaintiff Starr also brings this action on behalf of herself and all other similarly situated New York residents who purchased the Falsely Labeled Products (as defined herein) (the “New York Class”).

154. Excluded from the Class are officers and directors of WF; members of the immediate families of the officers and directors of WF; WF’s legal representatives, heirs, successors, or assigns; and any entity in which they have or have had a controlling interest.

155. Plaintiffs bring each Class pursuant to Federal Rules of Civil Procedure 23(a), 23(b)(1), 23(b)(2), and 23(b)(3).

156. At this time, Plaintiffs do not know the exact number of the Class members; given the nature of the claims and the number of sales that WF has made of the Products, Plaintiffs believe that members of each Class are so numerous that joinder of all members is impracticable.

157. There is a well-defined community of interest in the questions of law and fact involved in this case. Questions of law and fact common to the members of the Class that predominate over questions that may affect individual Class members include:

- a. whether WF misrepresented and/or failed to disclose material facts concerning the Falsely Labeled Products;
- b. whether WF’s conduct was unfair and/or deceptive; and
- c. whether WF breached an express warranty created through the labeling and marketing of its Falsely Labeled Products.

1 158. Plaintiffs' claims are typical of those of the Class because Plaintiffs, like all
2 members of the Class, purchased one or more of WF's Falsely Labeled Products at a premium
3 price, relying on WF's false and misleading representations, and Plaintiffs sustained damages from
4 WF's wrongful conduct.

5 159. Plaintiffs will fairly and adequately protect the interests of the Class because
6 Plaintiffs are similarly situated with, and have suffered similar injuries as, the members of the
7 Class they seek to represent. Plaintiffs feel that they have been deceived, wish to obtain redress
8 of the wrong, and want WF to be stopped from perpetrating similar wrongs on others. Plaintiffs
9 are adequate representatives of the Class because their interests do not conflict with the interests
10 of the Class members they seek to represent, and they have retained counsel competent and
11 experienced in conducting complex class action litigation, who were the first to publicly uncover
12 the true scope and extent of WF's wrongs. Plaintiffs have no interests adverse to those of the Class
13 members, and will vigorously prosecute this litigation.

14 160. A class action is superior to other available methods for the fair and efficient
15 adjudication of this controversy. Specifically, no Class has a substantial interest in individually
16 controlling the prosecution of a separate action. The damages suffered by each individual Class
17 member likely will be relatively small, especially given the burden and expense of individual
18 prosecution of the complex litigation necessitated by WF's conduct. Thus, it would be virtually
19 impossible for the Class members individually to redress effectively the wrongs done to them.

20 161. The prerequisites to maintaining a class action for injunctive or equitable relief are
21 met as WF has acted or refused to act on grounds generally applicable to the Class, thereby making
22 appropriate final injunctive or equitable relief with respect to the Class as a whole.

23 162. Upon information and belief, there are no pending lawsuits concerning the products
24 at issue in this case. Concentration of the litigation concerning this matter in this Court is desirable,
25 and the difficulties likely to be encountered in the management of a class action are not great. The
26 resolution of the claims of all Class members in a single forum, and in a single proceeding, would
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1 be a fair and efficient means of resolving the issues raised in this litigation.

2 163. The prosecution of separate actions by Class would create a risk of establishing
3 inconsistent rulings and/or incompatible standards of conduct for WF.

4 164. WF's conduct is generally applicable to the Class as a whole and Plaintiffs seek,
5 *inter alia*, equitable remedies with respect to the Class as a whole. As such, WF's systematic
6 policies and practices make declaratory relief with respect to the Class as a whole appropriate.

7 165. The Class is specifically identifiable to facilitate provision of adequate notice and
8 there will be no significant problems managing this case as a class action. Notice to the Class can
9 be made through various means, such as in-store leaflets, website notices, Facebook notices,
10 notices on the labels of the packages, and/or direct notice to those consumers for which WF knows
11 the e-mail or physical mailing address.

12 **VI. CAUSES OF ACTION**

13 166. The allegations in each Cause of Action are repeated and realleged in every other
14 Cause of Action as if set forth in full therein.

15 **COUNT 1**

16 **Breach of Express Warranty**

17 *On Behalf of the Nationwide Class and, in the alternative,*
18 *the California Class and the New York Class*

19 167. WF provided Plaintiffs and other members of the Class with written express
20 warranties including, but not limited to, warranties that its Falsely Labeled Products were
21 "hypoallergenic."

22 168. These affirmations of fact or promises by WF relate to the goods and became part
23 of the basis of the bargain.

24 169. Plaintiffs and members of each Class purchased the Falsely Labeled Products,
25 believing them to conform to the express warranties.

26 170. WF breached these warranties. This breach resulted in damages to Plaintiffs and
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1 other members of the Class, who bought Falsely Labeled Products but did not receive the goods
2 as warranted.

3 171. As a proximate result of the breach of warranties by WF, Plaintiffs and the other
4 members of the Class did not receive goods as warranted. Plaintiffs and the members of the Class
5 therefore have been injured and have suffered damages in an amount to be proven at trial. Among
6 other things, Plaintiffs and members of the Class did not receive the benefit of the bargain and
7 have suffered other injuries as detailed above. Moreover, had Plaintiffs and the Class members
8 known the true facts, they would not have purchased the products, would have purchased fewer
9 products, or would not have been willing to pay the premium price WF charged for the products.

10 WHEREFORE, Plaintiffs pray for relief as set forth below.

11 **COUNT 2**

12 **Unjust Enrichment**

13 *On Behalf of the Nationwide Class and, in the alternative,*
14 *the California Class and the New York Class*

15 172. As a result of WF's deceptive, fraudulent, and misleading labeling, advertising,
16 marketing, and sales of the Falsely Labeled Products, WF was enriched at the expense of Plaintiffs
17 and the other members of the Class through the payment of the purchase price for WF's Falsely
18 Labeled Products.

19 173. Under the circumstances, it would be against equity and good conscience to permit
20 WF to retain the ill-gotten benefits that it received from Plaintiffs and the other members of the
21 Class, in light of the fact that the Falsely Labeled Products purchased by Plaintiffs and the other
22 members of the Class were not what WF purported them to be. Thus, it would be unjust or
23 inequitable for WF to retain the benefit without restitution to Plaintiffs and the other members of
24 the Class for the monies paid to WF for such Falsely Labeled Products.

25 WHEREFORE, Plaintiffs pray for relief as set forth below.
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COUNT 3

Unfair and Deceptive Acts and Practices

On Behalf of the Nationwide Class and, in the alternative, the California Class

174. This cause of action is brought pursuant to California’s Consumers Legal Remedies Act, Cal. Civ. Code §§ 1750-1785 (the “CLRA”) and similar statutes.

175. Plaintiffs and the other members of the Class are “consumers,” as the term is defined by California Civil Code § 1761(d) and similar statutes, because they bought the Falsely Labeled Products for personal, family, or household purposes. WF is a “person” under Cal. Civ. Code § 1761(c) and similar statutes.

176. The Falsely Labeled Products are “goods” under Cal. Civ. Code § 1761(a) and similar statutes. Plaintiffs, the other members of the Class, and WF have engaged in “transactions,” as that term is defined by California Civil Code § 1761(e) and similar statutes. For the California Class, these transactions all occurred on in the State of California.

177. The conduct alleged in this Complaint constitutes unfair methods of competition and unfair and deceptive acts and practices for the purposes of the CLRA and similar statutes, and the conduct was undertaken by WF in transactions intended to result in, and which did result in, the sale of goods to consumers.

178. WF’s false and fraudulent representations and omissions have violated, and continue to violate the CLRA and similar statutes because they extend to transactions that are intended to result, or have resulted, in the sale of goods to consumers, including the Plaintiffs and the Class members.

179. WF’s conduct violates Cal. Civ. Code § 1770(a)(5) and similar statutes, which prohibits “[r]epresenting that goods . . . have . . . characteristics [or] ingredients . . . which they do not have,” and Cal. Civ. Code § 1770(a)(7) and similar statutes, which prohibits: “[r]epresenting that goods . . . are of a particular standard, quality, or grade . . . if they are of another,” causing injury to Plaintiffs and the Class.

1 180. As a result of engaging in such conduct, WF has violated California Civil Code
2 § 1770(a)(5), (a)(7), and (a)(9) and similar statutes.

3 181. Plaintiffs will serve WF with notice of its CLRA violations by certified mail, return
4 receipt requested. If, after the requisite thirty days of receiving notice, WF continues to refuse to
5 correct its wrongs, Plaintiffs will amend this Complaint to include a claim for punitive damages
6 for WF's CLRA violations.

7 182. Plaintiffs and the Class members seek preliminary injunctive relief, and permanent
8 injunctive relief against WF's unfair and deceptive acts and conduct.

9 183. Pursuant to California Civil Code § 1780(a)(2) and (a)(5) and similar statutes,
10 Plaintiffs seek an order of this Court that includes, but is not limited to, an order enjoining WF
11 from continuing to engage in unlawful, unfair, or fraudulent business practices or any other act
12 prohibited by law.

13 184. Plaintiffs and the other Class members may be irreparably harmed and/or denied
14 an effective and complete remedy if such an order is not granted.

15 185. The unfair and deceptive acts and practices of WF, as described above, present a
16 serious threat to Plaintiffs and the other members of the Class.

17 WHEREFORE, Plaintiffs pray for relief as set forth below.

18 **COUNT 4**

19 **Violations of California's False Advertising Law and Similar Statutes**

20 ***On Behalf of the Nationwide Class and, in the alternative, the California Class***

21 186. This cause of action is brought pursuant to California's False Advertising Law (the
22 "FAL"), Cal. Bus. & Prof. Code § 17500 *et seq.* and similar statutes.

23 187. Such acts of WF, as described above, and each of them constitute unlawful,
24 deceptive, and fraudulent business acts and practices.

25 188. At all material times, WF engaged in a scheme of offering the Falsely Labeled
26 Products for sale to Plaintiffs and the other members of the Class by way of distributing within the
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1 State of California (or the residence) to the public, *inter alia*, commercial marketing and
2 advertising, the World Wide Web (Internet), Falsely Labeled Product packaging and labeling, and
3 other promotional materials and offered for sale the Falsely Labeled Products on a nationwide
4 basis, including in California.

5 189. The misrepresentations and non-disclosures by WF of the material facts detailed
6 above constitute false and misleading advertising, and therefore constitute a violation of Cal. Bus.
7 & Prof. Code § 17500, *et seq.* and similar statutes.

8 190. Said advertisements and inducements were made within the state of residence and
9 come within the definition of advertising contained in the FAL in that such promotional materials
10 were intended as inducements to purchase WF's Falsely Labeled Products and are statements
11 disseminated by WF to Plaintiffs and the other Class members. WF knew, or in the exercise of
12 reasonable care should have known, that these representations were misleading and deceptive.

13 191. Consumers, including Plaintiffs and the other Class members, necessarily and
14 reasonably relied on these materials concerning WF's Falsely Labeled Products. Consumers,
15 including Plaintiffs and the Class members, were among the intended targets of such
16 representations.

17 192. The above acts of WF did and were likely to deceive reasonable consumers,
18 including Plaintiffs and the other members of the Class, by obfuscating the nature, quality, and/or
19 ingredients of the Falsely Labeled Products, in violation of the "misleading" prong of the FAL and
20 similar statutes.

21 193. The business practices alleged above are unlawful under the CLRA and similar
22 statutes, which forbids misleading and deceptive advertising.

23 194. Plaintiffs and the other members of the Class have suffered injury in fact and have
24 lost money or property as a result of WF's violations of the FAL and similar statutes.

25 195. As a result, WF has been unjustly enriched at the expense of Plaintiffs and the other
26 members of the Class. Plaintiffs and the Class, pursuant to California Business and Professions
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1 Code § 17535 and similar statutes, are entitled to an order of this Court enjoining such future
2 conduct on the part of WF, and such other orders and judgments which may be necessary to
3 disgorge WF's ill-gotten gains and restore to any person in interest any money paid for its Falsely
4 Labeled Products as a result of the wrongful conduct of WF.

5 WHEREFORE, Plaintiffs pray for relief as set forth below.

6 **COUNT 5**

7 **Violation of California's Unfair Competition Law and Similar Statutes**

8 ***On Behalf of the Nationwide Class and, in the alternative, the California Class***

9 196. This cause of action is brought pursuant to California's Unfair Competition Law
10 (the "UCL"), Cal. Bus. & Prof. Code § 17200 *et seq.* and similar statutes.

11 197. By committing the acts and practices alleged herein, WF has engaged in deceptive,
12 unfair, and unlawful business practices in violation of the UCL and similar statutes.

13 198. Plaintiffs have standing to pursue this claim as they have suffered injury in fact and
14 have lost money or property as a result of WF's actions as set forth above. Class members also
15 have suffered injury in fact and have lost money or property as a result of WF's actions as set forth
16 above.

17 199. The violation of any law constitutes an "unlawful" business practice under Cal.
18 Bus. & Prof. Code § 17200 and similar statutes.

19 200. Each of WF's false representations alleged herein violates U.S.C. § 331; Cal. Civ.
20 Code § 1709; Cal. Civ. Code § 1750 *et seq.*; and Cal. Bus. & Prof. Code § 17500 *et seq.*, and
21 similar statutes.

22 201. WF has violated the UCL's proscription against engaging in unlawful conduct as a
23 result of its violations of (i) the CLRA and similar statutes, as alleged above, and (ii) the FAL and
24 similar statutes, as alleged above.

25 202. In addition, WF has violated the UCL's proscription against engaging in unlawful
26 conduct as a result of its violations of the Sherman Law, Cal. Health & Safety Code § 109875 *et*
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1 *seq.*, and similar statutes, which forbid (1) misbranding of any cosmetic, *id.* at §§ 110398 and
2 111445, and (2) manufacturing, selling, delivering, holding, or offering for sale any cosmetic that
3 is misbranded or delivering or proffering such for delivery. Cal. Health & Safety Code §§ 110390,
4 110395, 110398, 110400, 110550, 110585, 110620, 110625, 110660, 110770, 110705, 110740,
5 110760, 110765, 110770, 111445, and 111450.

6 203. The Sherman Law defines a “person” as “any individual, firm, partnership, trust,
7 corporation, limited liability company, company, estate, public or private institution, association,
8 organization, group, city, county, city and county, political subdivision of this state, other
9 governmental agency within the state, and any representative, agent, or agency of any of the
10 foregoing.” Cal. Health & Safety Code § 109995. WF is a “person” within the meaning of the
11 Sherman Law.

12 204. As more fully described herein, WF’s misleading marketing, advertising,
13 packaging, and labeling of the Falsely Labeled Products is likely to deceive a reasonable consumer.
14 Indeed, Plaintiffs and the other Class members were unquestionably deceived regarding the
15 characteristics of WF’s Falsely Labeled Products, as WF’s marketing, advertising, packaging, and
16 labeling of the Falsely Labeled Products misrepresents and/or omits the true nature, quality, and/or
17 ingredients of the Falsely Labeled Products.

18 205. There is no benefit to consumers or competition from deceptively marketing and
19 labeling products. Indeed, the harm to consumers and competition is substantial. Plaintiffs and
20 the other members of the Class who purchased the Falsely Labeled Products suffered a substantial
21 injury as alleged herein.

22 206. Plaintiffs and the other members of the Class who purchased the Falsely Labeled
23 Products had no way of reasonably knowing that the Falsely Labeled Products they purchased
24 were not as marketed, advertised, packaged, and labeled. Thus, they could not have reasonably
25 avoided the injury each of them suffered.

26 207. WF’s acts and omissions alleged above constitute unfair business practices under
27

1 Cal. Bus. & Prof. Code § 17200 and similar statutes because the gravity of the consequences of
2 WF's conduct as described above outweighs any justification, motive, or reason therefor,
3 particularly considering the available legal alternatives which exist in the marketplace, and such
4 conduct is immoral, unethical, unscrupulous, offends established public policy, or is substantially
5 injurious to Plaintiffs and the other members of the Class. WF's false and misleading
6 representations and omissions also violate legislatively declared policy as they have violated
7 numerous state and federal laws. Moreover, the gravity of the harm to Plaintiffs and Class members
8 resulting from WF's conduct outweighs WF's legitimate reasons, justifications and/or motives for
9 engaging in such deceptive acts and practices

10 208. Each false and misleading representation and omission constitutes fraudulent
11 business practices under Cal. Bus. & Prof. Code § 17200 and similar statutes because the
12 representations and omissions were false. Even if these representations were true, WF's
13 representations and deceptive concealment were nonetheless fraudulent under the statute because
14 they were misleading and were likely to and did deceive the reasonable consumer, including
15 Plaintiffs and the Class members.

16 209. WF's violations continue to this day.

17 210. Pursuant to California Business and Professions Code § 17203 and similar statutes,
18 Plaintiffs and the other members of the Class seek an order of this Court that includes, but is not
19 limited to, an order enjoining such future conduct on the part of WF and such other orders and
20 judgments which may be necessary to disgorge WF's ill-gotten gains and to restore to any person
21 in interest any money paid for WF's Falsely Labeled Products as a result of the wrongful conduct
22 of WF.

23 WHEREFORE, Plaintiffs pray for relief as set forth below.
24
25
26
27

1 **COUNT 6**

2 **Violation of New York’s General Business Law § 349 and Similar Statutes**

3 ***On Behalf of the Nationwide Class and, in the alternative, the New York Class***

4 211. This cause of action is brought pursuant to New York General Business Law § 349
5 on Plaintiffs’ behalf and on behalf of the Class and New York Class.

6 212. Such acts of WF, as described above, constitute unlawful, deceptive, and fraudulent
7 business acts and practices.

8 213. WF has violated, and continues to violate, § 349 of the New York General Business
9 Law, which makes deceptive acts and practices unlawful. As a direct and proximate result of WF’s
10 violation of § 349, Plaintiffs and other members of the Class and New York Class have suffered
11 damages in an amount to be determined at trial.

12 214. Pursuant to New York General Business Law § 349, Plaintiffs seek an order of this
13 Court that includes, but is not limited to, an order enjoining WF from continuing to engage in
14 unlawful, unfair, or fraudulent business practices or any other act prohibited by law.

15 215. Plaintiffs and the other members of the Class and New York Class may be
16 irreparably harmed and/or denied an effective and complete remedy if such an order is not granted.

17 216. The unfair and deceptive acts and practices of WF, as described above, present a
18 serious threat to Plaintiffs and the other members of the Class and New York Class.

19 WHEREFORE, Plaintiffs pray for relief as set forth below.

20 **COUNT 7**

21 **Violation of New York’s General Business Law § 350 and Similar Statutes**

22 ***On Behalf of the Nationwide Class and, in the alternative, the New York Class***

23 217. WF’s acts constitute unlawful, deceptive, and fraudulent business acts and
24 practices.

25 218. WF’s misleading marketing, advertising, packaging, and labeling of the Falsely
26 Labeled Products is false advertising likely to deceive a reasonable consumer. Indeed, Plaintiffs
27

1 and the other Class members were deceived regarding the characteristics of WF's Falsely Labeled
2 Products, as WF's marketing, advertising, packaging, and labeling of the Falsely Labeled Products
3 misrepresents and/or omits the true nature, quality, and/or ingredients of the Falsely Labeled
4 Products.

5 219. There is no benefit to consumers or competition from deceptively marketing and
6 labeling products. Indeed, the harm to consumers and competition is substantial.

7 220. Plaintiffs and the other members of the Class who purchased the Falsely Labeled
8 Products suffered a substantial injury as alleged herein. Plaintiffs and the other members of the
9 Class who purchased the Falsely Labeled Products had no way of reasonably knowing that the
10 Falsely Labeled Products they purchased were not as marketed, advertised, packaged, and labeled.
11 Thus, they could not have reasonably avoided the injury each of them suffered.

12 221. WF has violated, and continues to violate, § 350 of the New York General Business
13 Law, which makes false advertising unlawful. As a direct and proximate result of WF's violation
14 of § 350, Plaintiffs and other members of the Class have suffered damages in an amount to be
15 determined at trial. Had Plaintiffs and the Class members known the true facts, they would not
16 have purchased the products, would have purchased fewer products, or would not have been
17 willing to pay the premium price WF charged for the products.

18 222. Pursuant to New York General Business Law § 350-e, Plaintiffs seek to recover
19 their actual damages or \$500, whichever is greater, and seek to have these damages trebled.

20 223. Pursuant to New York General Business Law § 350, Plaintiffs also seek an order
21 of this Court that includes, but is not limited to, an order enjoining WF from continuing to engage
22 in false advertising or any other act prohibited by law.

23 224. Plaintiffs and the other members of the Class may be irreparably harmed and/or
24 denied an effective and complete remedy if such an order is not granted.

25 225. The unfair and deceptive acts and practices of WF, as described above, present a
26 serious threat to Plaintiffs and the other members of the Class.

1 WHEREFORE, Plaintiffs pray for relief as set forth below.

2 **PRAYER FOR RELIEF**

3 **WHEREFORE**, Plaintiffs demand judgment on behalf of herself and the proposed Class
4 providing such relief as follows:

5 A. Certification of the Class proposed herein under Federal Rule of Civil Procedure
6 23(a), (b)(1), (b)(2), and (b)(3); appointment of Plaintiff Kellman as representative of the
7 California Class, Plaintiff Starr as representative of the New York Class, and Plaintiffs Kellman
8 and Starr as representatives of the Nationwide Class; and appointment of their undersigned counsel
9 as counsel for the Classes;

10 B. A declaration that WF is financially responsible for notifying members of the
11 Classes of the pendency of this suit;

12 C. An order requiring an accounting for, and imposition of a constructive trust upon,
13 all monies received by WF as a result of the unfair, misleading, fraudulent, and unlawful conduct
14 alleged herein;

15 D. Restitution, disgorgement, refund, and/or other monetary damages, together with
16 costs and disbursements, including reasonable attorneys' fees pursuant to the applicable statutes
17 and prejudgment interest at the maximum rate allowable by law;

18 E. Injunctive relief on behalf of the Classes, enjoining WF's unlawful and deceptive
19 acts;

20 F. Statutory damages in the maximum amount provided by law;

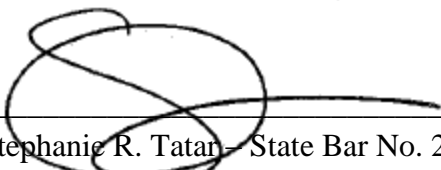
21 G. Punitive damages in accordance with proof and in an amount consistent with
22 applicable precedent; and

23 H. Such further relief as this Court may deem just and proper.
24
25
26
27

JURY TRIAL DEMANDED

Plaintiffs and the Class members hereby demand a trial by jury.

DATED: November 14, 2017



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Tel. (323) 744-1146
Fax. (888) 778-5695
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Washington, D.C. 20036
Tel: (866) 298-4150, ext. 101
Fax: (928) 441-8250

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Fax. (215) 950-8000

TURKE & STRAUSS, LLP

Samuel J. Strauss (*pro hac vice* forthcoming)
613 Williamson Street #209
Madison, WI 53703
Tel: 608.237.1775
Fax: 608.509.4423

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2ml)

INGREDIENTS: AQUA (WATER), BRASSICA OLERACEA SEED OIL, BETA-CAROTENE, ISOPROPYL PALMITATE, ETHYL ALCOHOL, ALLYL METHYLCARBONATE, DIMETHYL DIMETHYLAMMONIUM CHLORIDE, ETHYL GLYCERYL STEARATE, POLYPROPYLENE TEREPHTHALATE, XANTHAN GUM, FRAGRANCE, NATURAL FLAVOR, PANTHOYL-L-ASPARTON, L-IMINOGLUCOSAMINE, L-LEUCYL L-MALONAMIDE, FERULIC ACID, MAGADAMIA SEED OIL, POLYGLYCERIN POLYMYRISTATE, VITAMIN E, BUTYROSEBUM, SODIUM POTASSIUM TARTRATE, POTASSIUM OLIVATE, POTASSIUM

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CONTACT PHYSICIAN. KEEP OUT OF REACH OF CHILDREN.

Certified
 PLEASE RECYCLE
Gluten-Free HDPE

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PANTHE...
LITON...
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MARKET**

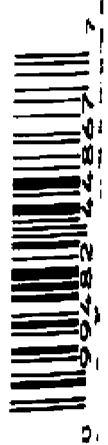
100% FOREIGN INGREDIENTS

FOR MORE INFORMATION

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WATER, IF IRRITATION PERSISTS,
KEEP FROM REACH OF CHILDREN.

 PLEASE RECYCLE

Dispense by
rub on each
...
When you get
make a
...
specialty
and...



Dispense lotion into hand and rub on body.

What you put on your body does make a difference. Our maximum moisture body lotions are specially designed to be effective and lightweight while also being

gentle on you and on our world. Our products contain fragrances derived from essential oils and the mildest of preservatives.

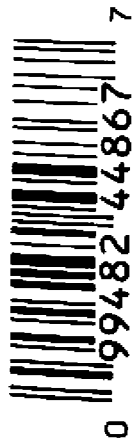
Gentle & Effective
Moisturizing

Hypoallergenic

Dermatologist Tested

No Added Parabens

Made Without
Animal Ingredients



ma

mo

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1.75 FL

Amazon.com: 365 Everyday

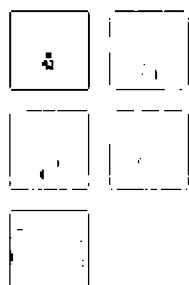
Secure | <https://www.amazon.com/365-Everyday-Value-Maximum-Moisture/dp/B074MFNNFJ>

prime pantry

365 Everyday Value, Maximum Moisture Body Lotion Travel Size, 1.75 Ounce

by 365 Everyday Value

1 customer review | 0 answered questions

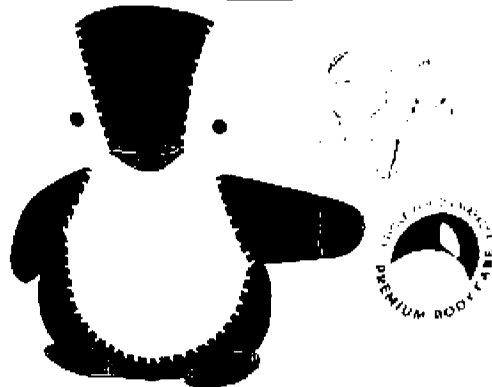
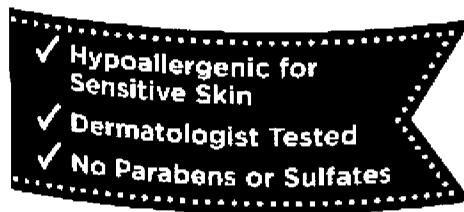


About the product

- Brought to you by Whole Foods Market
- Gentle & effective moisturizing
- Hypoallergenic
- Dermatologist tested
- No added parabens

INGREDIENTS: AQUA (WATER), BRASSICA CAMPESTRIS OLEIFERA (RAPESEED) OIL, ISOPROPYL PALMITATE, CETEARYL ALCOHOL, CETYL ALCOHOL, POLYSORBATE 60, GLYCERIN, GLUCONIC ACID, SESAMUM INDICUM (SESAME) SEED OIL, GLYCERYL STEARATE, POLYSORBATE 20, SODIUM BENZOATE, XANTHAN GUM, FRAGRANCE (NATURAL)*, SODIUM CITRATE, PANTHENOL, ALLANTOIN, SIMMONDSIA CHINENSIS (JOJOBA) SEED OIL, MACADAMIA TERNIFOLIA (MACADAMIA) SEED OIL, ALOE BARBADENSIS LEAF JUICE, TOCOPHEROL (VITAMIN E), BUTYROSPERMUM PARKII (SHEA) BUTTER, POTASSIUM SORBATE, TETRASODIUM GLUTAMATE DIACETATE.







- ✓ Hypoallergenic for Sensitive Skin
- ✓ Dermatologist Tested
- ✓ No Parabens or Sulfates

Invert bottle and squeeze foam into hand. Massage onto skin as needed and rinse with water.

INGREDIENTS: AQUA (WATER), GLYCERIN, P-ENOXYETHANE, CAPRYLYL GLYCOL, PANTHENOYL SODIUM MYRISTOYL CARBOXYLATE, COCAMIDOPROPYL HYDROXYSULTAINYL ALDE BARBADENSIS, XANTHAN GUM, SODIUM COCOAMPHOACETATE, NATURAL FRAGRANCE, CALLENDRA OFFICINALIS FLOWER EXTRACT, SODIUM CITRATE, CITRIC ACID, SIMMONDSIA CHINENSIS (QUINUA) SEED OIL, BUTYROSPERMUM PARU (SHEA BUTTER), AVENA SATIVA KERNEL FLOUR.

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✓ **Hypoallergenic
for Sensitive Skin**

✓ **Dermatologist
Tested**

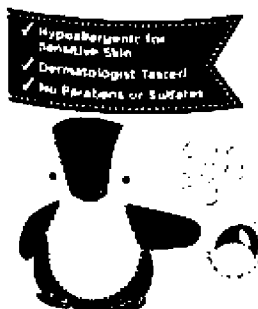
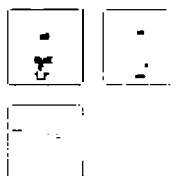
✓ **No Parabens
or Sulfates**

25th Airborne immune support supplement

Health & Household ▸ Baby & Child Care ▸ Personal Care ▸ Baby Bath

365 Everyday Value, Baby Foaming Wash, 10 fl oz 365 Everyday Value

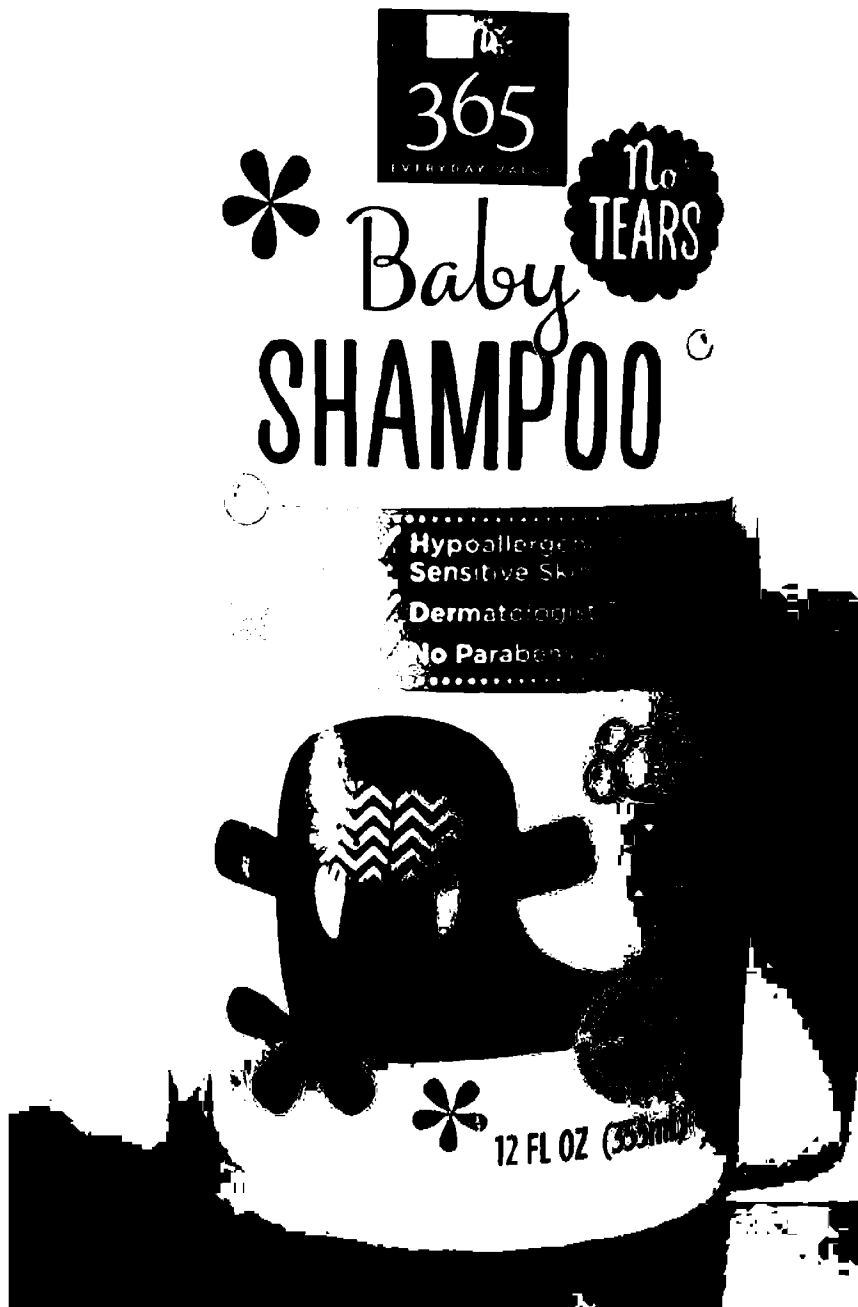
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About the product

- Brought to you by Whole Foods Market
- Hypoallergenic for sensitive skin
- Dermatologist tested
- No parabens or sulfates

... WATER, Glycerin, PHENOXYETHANOL,
... SODIUM MYRISTOYL SARCOSINATE,
... SQUALANE, ALOE BARBADENSIS,
... STYRENE, NATURAL FRAGRANCE,
... EXTRACT, SODIUM CITRATE, CITRIC
... SEED OIL, BUTYROSPERMUM
... KERNEL FLOUR.





Baby SHAMPOO

Invert bottle and squeeze shampoo into hand. Massage into hair as needed and rinse with water.

INGREDIENTS: AQUA (WATER), GLYCERIN, SODIUM MYRISTOYL SARCOSINATE, COCAMIDOPROPYL HYDROXYSULTAINE, XANTHAN GUM, PHENOXYETHANOL, SODIUM COCOAMPHOACETATE, CAPRYLYL GLYCOL, PANTHENOL, ALOE BARBADENSIS, SODIUM CITRATE, CITRIC ACID, NATURAL FRAGRANCE, CALENDULA OFFICINALIS FLOWER EXTRACT, SIMMONDSIA CHINENSIS, JOJOBA SEED OIL, BUTYROSPERMUM PARKII (SHEA BUTTER), AVENA SATIVA KERNEL FLOUR

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KEEP OUT OF REACH OF CHILDREN. DO NOT USE IF INNER SEAL IS BROKEN OR MISSING.

PLEASE RECYCLE

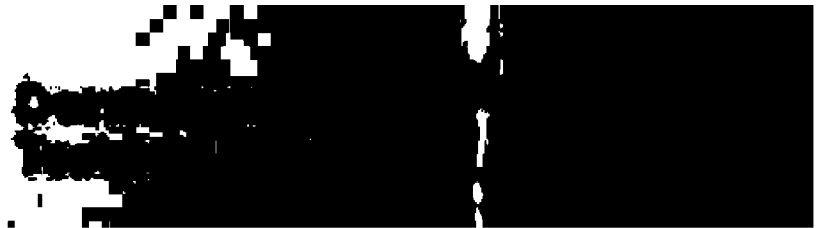


0 99482 45467 8

hypoallergenic
for Sensitive Skin



DERMATOLOGIST
TESTED





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Deals

Snacks

Breakfast

Warm Beverages

Cold Beverages

Cooking Staples

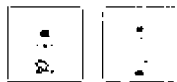
Baby Food

25° Airborne immune support supplement

Health & Household › Baby & Child Care › Personal Care › Baby Bath

365 Everyday Value, Baby Shampoo, 12 fl oz 365 Everyday Value

Be the first to review this item



About the product

- Brought to you by Whole Foods Market
- Hypoallergenic for sensitive skin
- Dermatologist tested
- No parabens or sulfates

INGREDIENTS: AQUA (WATER), GLYCERIN, SODIUM MYRISTOYL SARCOSINATE, COCAMIDOPROPYL HYDROXYSULTAINE, XANTHAN GUM, PHENOXYETHANOL, SODIUM COCOAMPHOACETATE, CAPRYLYL GLYCOL, PANTHENOL, ALOE BARBADENSIS, SODIUM CITRATE, CITRIC ACID, NATURAL FRAGRANCE, CALENDULA OFFICINALIS FLOWER EXTRACT, SIMMONDSIA CHINENSIS (JOJOBA) SEED OIL, BUTYROSPERMUM PARKII (SHEA BUTTER), AVENA SATIVA KERNEL FLOUR.





365
EVERYDAY VALUE





Directions for Use:
Massage into skin as needed.

INGREDIENTS: AQUA (WATER), OLA EUROPAEA (OLIVE) OIL, GLYCERIN, CETEARYL ALCOHOL, CETYL ALCOHOL, POLYSORBATE 60, ISOPROPYL PALMITATE, GLYCERYL STEARATE, PHENOXYETHANOL, CAPRYLYL GLYCOL, POLYSORBATE 20, ALOE BARBADENSIS, SODIUM CITRATE, NATURAL FRAGRANCE, CALENDULA OFFICINALIS FLOWER EXTRACT, XANTHAN GUM, CITRIC ACID, PANTHENOL, TOCOPHEROL (VITAMIN E), BUTYROSPERMUM PARKII (SHEA BUTTER), SIMMONDSIA CHINENSIS (JOJOBA) SEED OIL, AVENA SATIVA KERNEL FLOUR.

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✓ No Problems

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Food



Beverages



Household & Pets



Beauty & Grooming



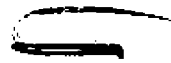
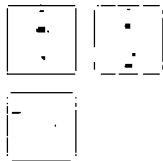
prime pantry



Buy 5 select items

365 Everyday Value, Baby Lotion, 12 Fl Oz by 365 Everyday Value

Be the first to review this item | 0 answered questions



About the product

- Brought to you by Whole Foods Market
- Hypoallergenic for sensitive skin

INGREDIENTS: AQUA (WATER), OLEA EUROPAEA (OLIVE) OIL, GLYCERIN, CETEARYL ALCOHOL, CETYL ALCOHOL, POLYSORBATE 60, ISOPROPYL PALMITATE, GLYCERYL STEARATE, PHENOXYETHANOL, CAPRYLYL GLYCOL, POLYSORBATE 20, ALOE BARBADENSIS, SODIUM CITRATE, NATURAL FRAGRANCE, CALENDULA OFFICINALIS FLOWER EXTRACT, XANTHAN GUM, CITRIC ACID, PANTHENOL, TOCOPHEROL (VITAMIN E), BUTYROSPERMUM PARKII (SHEA BUTTER), SIMMONDSIA CHINENSIS (JOJOBA) SEED OIL, AVENA SATIVA KERNEL FLOUR.



kids'
**foaming
wash**
bubble gum



© 2017 Walmart



kid's
**foaming
wash**
whole foods

Directions for Use

Invert bottle and squeeze foam into hand. Massage onto skin as needed and rinse with water.

INGREDIENTS: AQUA (WATER), GLYCERIN, CAPRYLYL GLYCOL, PANTHENOL, SODIUM MYRISTOYL SARCOSONATE, COCAMIDOPROPYL HYDROXYSULTAIN, ALOE BARBADENSIS, XANTHAN GUM, SODIUM COCAMPHOACETATE, NATURAL FRAGRANCE, PHENOXYETHANOL, CALENDULA OFFICINALIS FLOWER EXTRACT, SODIUM CITRATE, CITRIC ACID, SIMMONDSIA CHINENSIS (JOJOBA) SEED OIL, BUTYROSPERMUM PERSEA (SHEA BUTTER), AVENA SATIVA (OAT) KERNEL FLOUR.

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0 99482 45736 5

J

• HYPOLLENSING FOR SENSITIVE SKIN

• DERMATOLOGIST TESTED

• NO PROBLEMS OR IRRITATION

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Prime Pantry

Departments

Your Pickup Location

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Kevin's Amazon.com

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Gift Cards & Registry

prime pantry

Food



Beverages



Household & Pets



Beauty & Grooming



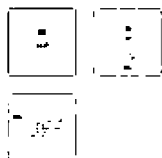
prime pantry



Buy 5 select items, save 5%

365 Everyday Value, Kids' Foaming Wash Bubblegum Scent, 10 Fl Oz by 365 Everyday Value

Be the first to review this item | 0 answered questions



About the product

- Brought to you by Whole Foods Market
- Dermatologist tested
- Hypoallergenic for sensitive skin

.....
INGREDIENTS: AQUA (WATER), GLYCERIN, CAPRYLIC GLYCERIN, PANOTHENOL, SODIUM MYRISTOYL SARCOGINATE, COENZYME Q10, HYDROXYSULTAINE, ALOE BARBADENSIS, XANTHAN GUM, COCOAMPHOACETATE, NATURAL FRAGRANCE, PHENYLETHANOL, CALENDULA OFFICINALIS FLOWER EXTRACT, SODIUM HYDROXYLACID, SIMMONDSIA CHINENSIS (JOJOBA) SEED OIL, BUTYROSPERMUM PARKII (SHEA BUTTER), AVENA SATIVA (OAT) KERNEL OIL



kid's
**foaming
wash**
grape



HYPOALLERGENIC
FOR SENSITIVE SKIN
DERMATOLOGIST
TESTED
NO PARABENS OR
SULFATES





foaming
wash
grape

Directions for Use:
Invert bottle and squeeze foam into hand. Massage onto skin as needed and rinse with water.

INGREDIENTS: AQUA (WATER), GLYCERIN, CAPRYLYL GLYCOL, PANTHENOL, SODIUM MYRISTEYL SARCOGINATE, COCAMIDOPROPYL HYDROXYLSULTAIN, ALOE BARBADENSIS, XANTHAN GUM, SODIUM COCOAMPHOACETATE, NATURAL FRAGRANCE, PHENOXYETHANOL, CALENDULA OFFICINALIS FLOWER EXTRACT, SODIUM CITRATE, CITRIC ACID, SIMMONDSIA (CHINENSI) SEED OIL, BUTYROSPERMUM PARKII (SHEA BUTTER), AVENA SATIVA (OAT) KERNEL FLOUR.

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• **HYPOALLERGENIC FOR SENSITIVE SKIN**





Grocery & Gourmet Food

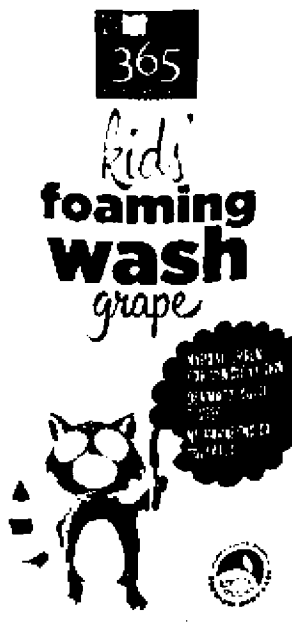
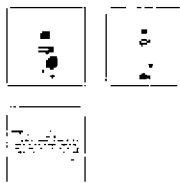
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Grocery · Deals · Snacks · Breakfast · Warm Beverages · Cold Beverages · Cooking Staples · Baby Food

Health & Household · Baby & Child Care · Personal Care · Baby Bath

365 Everyday Value, Kids' Foaming Wash Grape Scent, 10 fl oz 365 Everyday Value

Be the first to review this item



About the product

- Brought to you by Whole Foods Market
- Dermatologist tested
- Hypoallergenic for sensitive skin
- No tears

INGREDIENTS: AQUA (WATER), GLYCERIN, PANTHENOL, SODIUM MYRISTYL SULFONATE, HYDROXYSULTAINIUM, ALCOHOL, COCOAMPHOACETATE, NATURAL FLAVONOID EXTRACT, CALENDULA OFFICINALIS FLOWER EXTRACT, CITRIC ACID, SIMMONDSIA CHINENSIS (SHEA BUTTER), AVENA SATIVA (OAT FLAKE),



FOR ALL SKIN TYPES



16 FL OZ (473mL)



365
Moisturizer
with Vitamin E

Moisturizer with Vitamin E is a rich cream that hydrates and soothes skin. It's perfect for restoring moisture to dry skin.

Moisturizer with Vitamin E is a rich cream that hydrates and soothes skin. It's perfect for restoring moisture to dry skin.

DIRECTIONS: APPLY LIBERALLY TO SKIN DAILY, AS NEEDED, OR AS DIRECTED BY YOUR HEALTH CARE PRACTITIONER.

INGREDIENTS: AQUA (WATER), GLYCERIN, BRASSICA CAMPESTRIS OLEIFERA (RAPESEED OIL), MACADAMIA TERNIFOLIA SEED OIL, CETEARYL ALCOHOL, CETYL ALCOHOL, ISOPROPYL PALMITATE, POLYSORBATE 60, GLUCONOLACTONE, GLYCERYL STEARATE, POLYSORBATE 20, SODIUM BENZOATE, XANTHAN GUM, SODIUM CITRATE, PANTHENOL, TOCOPHEROL (VITAMIN E).

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PRODUCT OF USA

**BOTTLE IS MADE FROM
50% POST CONSUMER RECYCLED CONTENT**



**•Independent lab results show this daily maintenance
is hypoallergenic and non-comedogenic**



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365 Everyday Value, Moisturizing Lotion, 16 oz 365 Everyday Value

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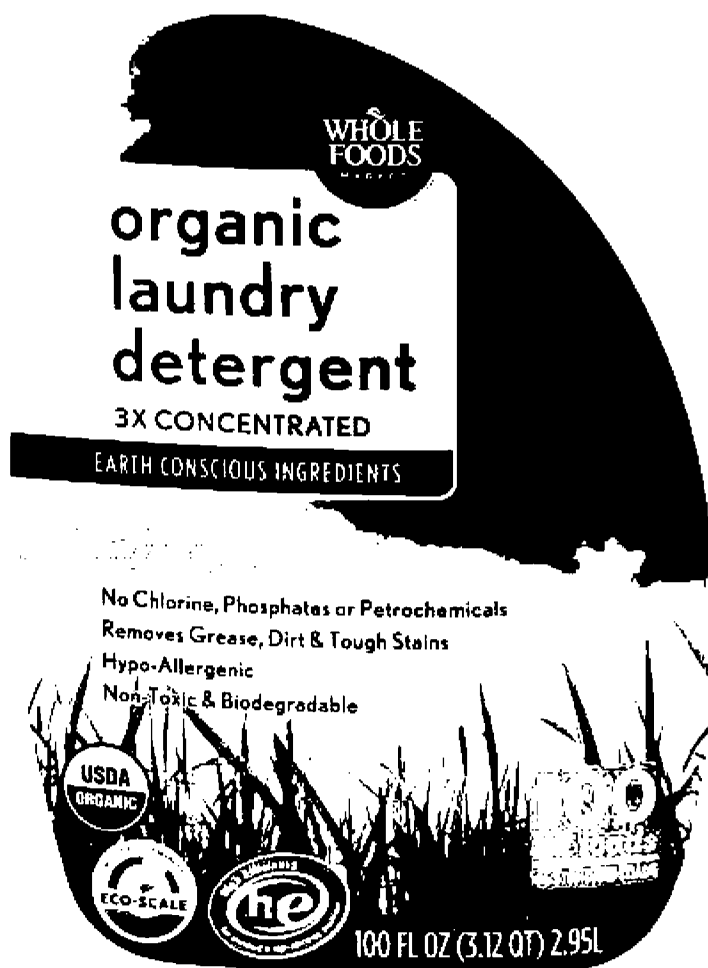


16 FL OZ (473ml)

About the product

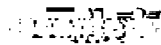
- Brought to you by Whole Foods Market
- Whole Foods Market premium body care
- Fragrance-free formula is perfect for restoring moisture to face, hands and body
- Skin is left feeling soft, smooth and hydrated - not sticky or greasy
- Independent lab results show this daily moisturizer is hypoallergenic and non-comedogenic







organic laundry detergent 3X CONCENTRATED



- Protects Colors
- Biodegradable
- 3X Concentrated
- Not Tested on Animals
- Low-Sudsing Formula
- No Chlorine, Phosphates or Petrochemicals
- Hypo-Allergenic
- Safe For Septic & Grey Water Systems
- Non-Toxic
- Removes Grease, Dirt & Tough Stains

DIRECTIONS FOR USE

For garment care instructions found on tag, along with instructions for your washing machine. Always test hidden area for colorfastness. Pretreat areas as needed before washing.

Top Loading (Standard) Machines: For medium loads, fill measuring cap to line 2 (1.5 oz). For large or heavily soiled loads, use a full measuring cap (2.25 oz). **NOTE:** Always add detergent to the water prior to adding clothes. The detergent is very water soluble and should rinse out easily on a normal cycle setting without extra rinse.

Front Loading, High Efficiency "HE" Machines: For medium loads, fill measuring cap to line 1 (1oz). For large or heavily soiled loads, fill measuring cap to line 2 (1.5 oz).

STORAGE & DISPOSAL

Store at room temperature. Do not reuse bottle to store any other type of liquid.

SAFETY & PRECAUTIONS

Keep this and all cleaning products out of the reach of children. If detergent comes in contact with your skin, simply rinse off with warm water. Eye irritant. In case of eye contact, flush eye with cool water for at least 15 minutes. Contact a physician if irritation continues. If detergent is ingested, drink plenty of water and do not induce vomiting. Consult a physician or health care professional.

INGREDIENT DECLARATION: AQUA (FILTERED WATER), SAPRODUS MUKONOSUS (ORGANIC SOAP NOTES), SAPONIFIED (ORGANIC) SEED OIL (SAPONIFIED ORGANIC COCONUT OIL), ALICE BAMBARINOUS (ORGANIC ALOE VERA LEAF POWDER), SEA SALT, SODIUM BEAUBONNATI (ORGANIC) (ARBOREAL), HANSHUO (GUM ALGATA SIBERICA) (ORGANIC GUM ARABIC), CYAMOPSIS TETRAGONOLOBUS (ORGANIC) (CHICKPEA), DREMI (L) (YEAST).

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BOTTLE IS MADE FROM
50% PCR MATERIAL



■ Protects Colors

■ 3X Concentrated



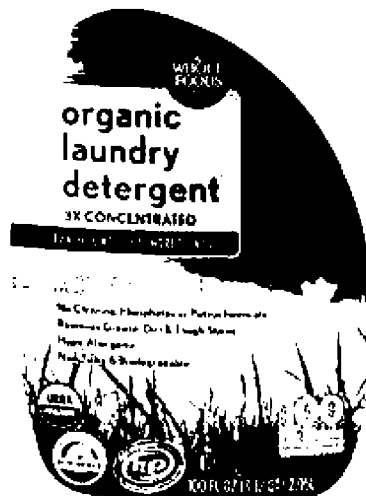
Amazon.com : Whole Foods Market

Secure <https://www.amazon.com/Whole-Foods-Market-Detergent-Concentrated/dp/B074H7KL7R>

Whole Foods Market, Organic Laundry Detergent 3X Concentrated, Unscented, 100 fl oz

Whole Foods Market

Be the first to review this item



About the product

- Brought to you by Whole Foods Market
- Non-toxic & biodegradable
- Hypo-allergenic
- Removes grease, dirt & tough stains





organic laundry detergent

3X CONCENTRATED

EARTH CONSCIOUS INGREDIENTS

mountain fresh

No Chlorine, Phosphates, or Petrochemicals

Removes Grease, Dirt & Tough Stains

Hypo-Allergenic

Non-Toxic & Biodegradable



200
HE loads
(12 STANDARD LOADS)

200 FL OZ (1.56 GAL) 5.91L



organic
laundry detergent

3X CONCENTRATED

mountain fresh

- Protects Colors
- 3X Concentrated
- Low-Sudsing Formula
- Hypo-Allergenic
- Non-Toxic
- Biodegradable
- Not Tested on Animals
- No Chlorine, Phosphates or Petrochemicals
- Safe for Septic & Grey Water Systems
- Removes Grease, Dirt & Tough Stains

DIRECTIONS FOR USE

Follow garment care instructions found on tag, along with instructions for your washing machine. Always test hidden area for colorfastness. Pretreat areas as needed before washing.

Top Loading (Standard) Machines: For medium loads, fill measuring cap to line 1 (1.5 oz.). For large or heavily soiled loads, fill measuring cap to line 3 (2.25 oz.). **NOTE:** Always add detergent to the water prior to adding clothes. The detergent is very water soluble and should rinse out easily on a normal cycle setting without extra rinse.

Front Loading, High Efficiency "HE" Machines: For medium loads, fill measuring cap to line 0 (1 oz.). For large or heavily soiled loads, fill measuring cap to line 1 (1.5 oz.).

STORAGE & DISPOSAL

Store at room temperature. Do not reuse bottle to store any other type of liquid.

SAFETY & PRECAUTIONS

Keep this and all cleaning products out of the reach of children. If detergent comes in contact with your skin, simply rinse off with warm water. Eye irritant. In case of eye contact, flush eye with cool water for at least 15 minutes. Contact a physician if irritation continues. If detergent is ingested, drink plenty of water and do not induce vomiting. Consult a physician or health care professional.

OUR FULL INGREDIENT DECLARATION: AQUA (FILTERED WATER), SAPONACE, MUNG BEAN (ORGANIC), SOAP NUTS, SAPONIFIED COCO OIL, APHACOL, SAPONIN, ORGANIC COCONUT OIL, AGRIC BARK EXTRACT, ORGANIC LIME, VEGETABLE OIL POWDER, SEAWATER, SODIUM BICARBONATE, SODIUM LAURYL SULFONATE, CITRIC ACID, CITRALENE, ORGANIC CINNAMON LEAF EXTRACT, TETRACONOLIC ACID, BENZYL ALCOHOL, DIMETHYL TETRAACONOLIC ACID, DIMETHYL ORGANIC GUM, ORGANIC CLOVE OIL, ORGANIC MOUNTAIN FLOWER FRAGRANCE

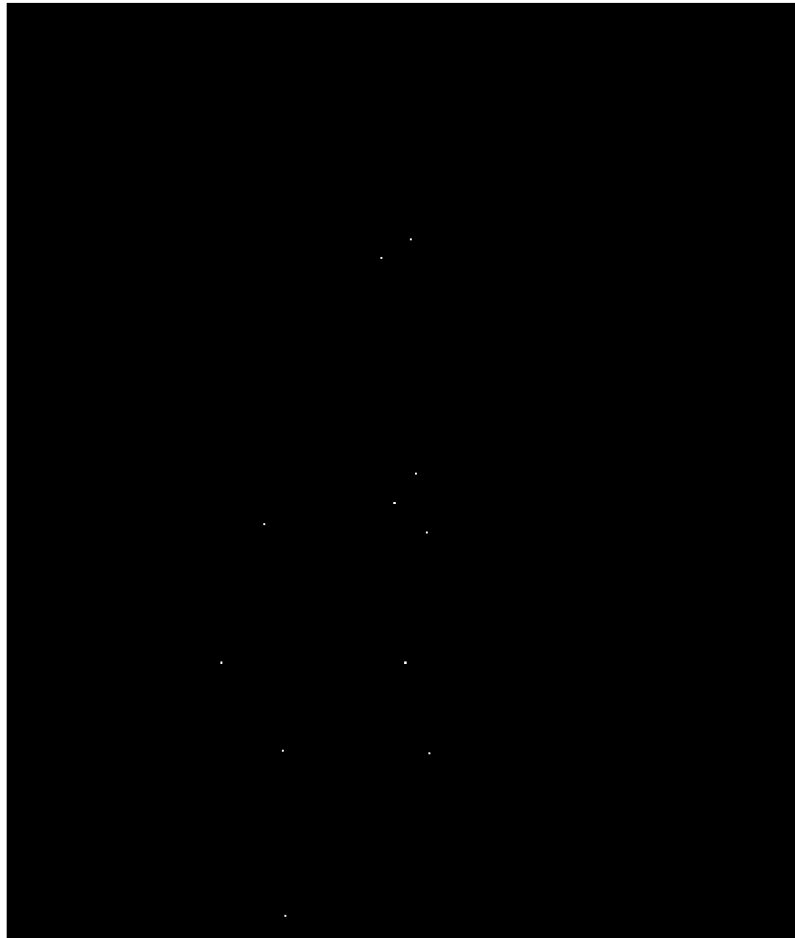
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BOTTLE IS MADE FROM
50% PCR MATERIAL





mountain fresh

No Chlorine, Phosphates or Petrochemicals

Removes Grease, Dirt & Tough Stains

Hypo-Allergenic

Non-Toxic & Biodegradable

...detergent is ingested, drink plenty of water for at least 15 minutes.
...cool water for at least 15 minutes.
...do not induce vomiting.

...agua (filtered water), SAPIINDUS MUKOROSSII (ORGANIC SOAP NUTS), SAPONIFIED COCOS NUCIFERA OIL (SAPONIFIED ORGANIC
...ALOE VERA LEAF JUICE POWDER), SEA SALT, SODIUM BICARBONATE, SODIUM CARBONATE, XANTHAN GUM, ACACIA SENEGAL
...SAPINDUS MUKOROSSII GUM (ORGANIC GUAR GUM), ORGANIC GLYCERIN, ORGANIC MOUNTAIN FLOWER FRAGRANCE.

WHOLE



kids'
**foaming
wash**





foaming wash

Hand Foaming Wash

Invert bottle and squeeze foam into hand. Massage onto skin as needed and rinse with water.

INGREDIENTS: AQUA (WATER), GLYCERIN, CAPRYLYL GLYCOL, PANTHENOL, SODIUM MYRISTOYL SARCOSINATE, COCAMIDOPROPYL HYDROXYSULTANATE, ALOE BARBADENSIS, XANTHAN GUM, SODIUM COCOAMPHOALETATE, NATURAL FRAGRANCE, PHENOXYETHANOL, CALENDULA OFFICINALIS FLOWER EXTRACT, SODIUM CITRATE, CITRIC ACID, SIMMONDSIA CHINENSIS (JOJOBA) SEED OIL, BUTYROSPERMUM PARKII (SHEA BUTTER), AVENA SATIVA (OAT) KERNEL FLOUR.

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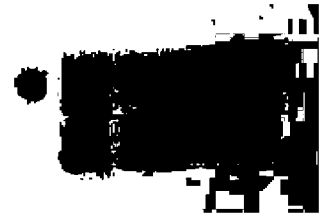
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KEEP OUT OF REACH OF CHILDREN.

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- HYPOALLERGENIC FOR SENSITIVE SKIN

- DERMATOLOGIST TESTED



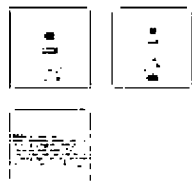
Amazon.com: 365 Everyday Value x

Secure https://www.amazon.com/365-Everyday-Value-Foaming-Melon/dp/B074MGKHJD/

prime pantry

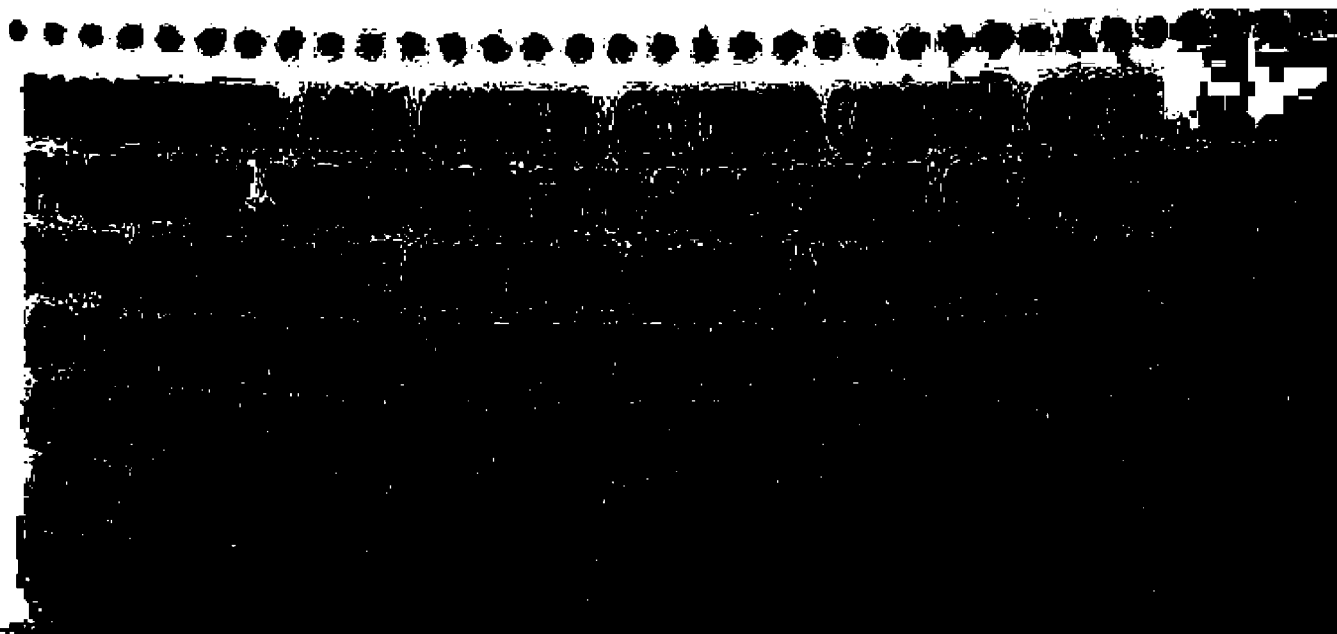
365 Everyday Value, Kids' Foaming Wash Melon Mango Scent, 10 Fl Oz by 365 E

★★★★★ 1 customer review | 0 answered questions



About the product

- Brought to you by Whole Foods Market
- Dermatologist tested
- Hypoallergenic for sensitive skin
- No tears





NO TEARS!
WILD KRATTS
FOAMING
BODY WASH
TROPICAL TWIST

• HYPOALLERGENIC FOR SENSITIVE SKIN • DERMATOLOGIST TESTED • NO PARABENS OR SULFATES

DIRECTIONS FOR USE:

Invert bottle and squeeze foam into hand. Massage onto skin, yell "Creature Power!" and rinse with water.

INGREDIENTS: AQUA (WATER), GLYCERIN, PHENOXYETHANOL, CAPRYLYL GLYCOL, PANTHENOL, SODIUM HYRISTOYL SARCOSINATE, COCAMIDOPROPYL HYDROXYLSULTAINIUM, ORGANIC ALDE BARBADENSIS LEAF JUICE, XANTHAN GUM, SODIUM COCOAMPHOACETATE, CALENDULA OFFICINALIS FLOWER EXTRACT, SODIUM CITRATE, CITRIC ACID, SIMMONDSIA CHINENSIS (JOJOBA) SEED OIL, BUTYROSPERMUM PARKII (SHEA BUTTER), AVEENA SATIVA (OAT) KERNEL FLOUR, NATURAL FRAGRANCE.

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MADE IN USA USING DOMESTIC AND FOREIGN INGREDIENTS
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TROPICAL TWIST

- HYPOALLERGENIC FOR SENSITIVE SKIN
- DERMATOLOGIST TESTED
- NO PARABENS OR SULFATES

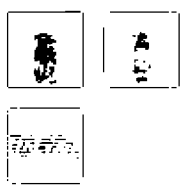
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WILD KRATTS, Kids Foaming Body Wash Tropical Twist, 10 fl oz WILD KRATTS

Be the first to review this item



About the product

- Brought to you by Whole Foods Market
- Hypoallergenic for sensitive skin
- Dermatologist tested
- No parabens or sulfates
- No tears!

INGREDIENTS: AQUA (WATER), GLYCERIN, PHENOXYETHANOL, CAPRYLYL GLYCOL, PANTHENOL, SODIUM MYRISTOYL SARCOINATE, COCAMIDOPROPYL HYDROXYSULTAINATE, ORGANIC ALOE BARBADENSIS LEAF JUICE, XANTHAN GUM, SODIUM COCOAMPHOACETATE, CALENDULA OFFICINALIS FLOWER EXTRACT, SODIUM CITRATE, CITRIC ACID, SIMMONDSIA CHINENSIS (JOJOBA) SEED OIL, BUTYROSPERMUM PARKII (SHEA BUTTER), AVENA SATIVA (OAT) KERNEL FLOUR, NATURAL FRAGRANCE.







TROPICAL TWIST

- HYPOALLERGENIC FOR SENSITIVE SKIN
- DERMATOLOGIST TESTED
- NO PARABENS OR SULFATES

DIRECTIONS FOR USE:

Pour 1/2 fl. oz. of bubble bath under warm running water and veil "Creature Power!"

INGREDIENTS: AQUA (WATER), DECYL GLUCOSIDE, P-ANISYDIOETHANOL, CAPRYLYL GLYCOL, CITRIC ACID, XANTHAN GUM, PANTHENOL, ORGANIC ALOE BARBADENSIS LEAF JUICE, BUTYROSPERMUM PARKII (SHEA BUTTER), ARCTIUM LAPPACEAE (GOOSEBERRY EXTRACT), NATURAL FRAGRANCE.

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CAUTION: USE ONLY AS DIRECTED. EXCESSIVE USE OR PROLONGED EXPOSURE MAY CAUSE IRRITATION TO SKIN AND URINARY TRACT. DISCONTINUE USE IF RASH, REDNESS OR ITCHING OCCURS. CONSULT YOUR PHYSICIAN IF IRRITATION PERSISTS. KEEP OUT OF REACH OF CHILDREN EXCEPT UNDER ADULT SUPERVISION.

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Certified



Gluten-Free



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TROPICAL TWIST

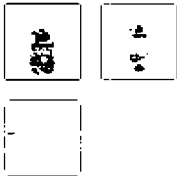
- **HYPDALLERGENIC FOR SENSITIVE SKIN**
- **DERMATOLOGIST TESTED**
- **NO PARABENS OR SULFATES**

Grocery Deals Snacks Breakfast Warm Beverages Cold Beverages Cooking Staples Baby Food

Beauty & Personal Care Personal Care Bath & Bathing Accessories Bath Bubble Bath

WILD KRATTS, Bubble Bath Tropical Twist, 15 fl oz WILD KRATTS

Be the first to review this item



About the product

- Brought to you by Whole Foods Market
- Hypoallergenic for sensitive skin
- Dermatologist tested
- No parabens or sulfates
- No tears!

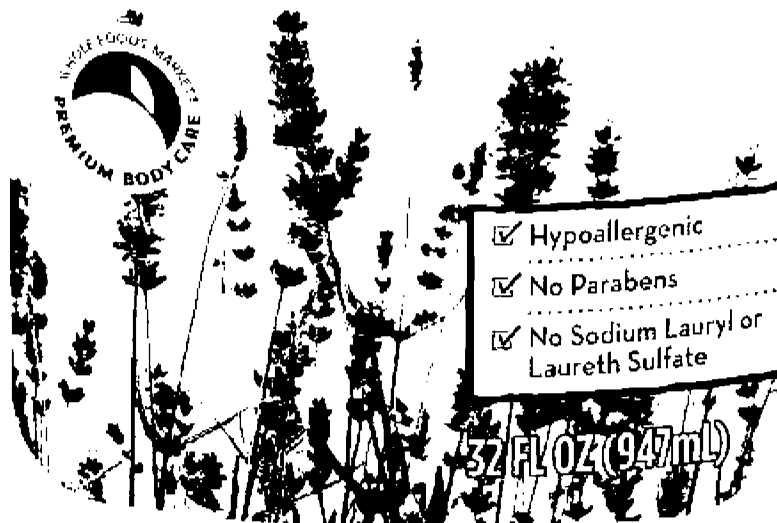
INGREDIENTS: AQUA (WATER), DECYL GLUCOSIDE, PHENOXYETHANOL, CAPRYLYL GLYCOL, CITRIC ACID, XANTHAN GUM, PANTHENOL, ORGANIC ALOE BARBADENSIS LEAF JUICE, BUTYROSPERMUM PARKII (SHEA BUTTER), ARCTIUM LAPPA (BURDOCK ROOT EXTRACT), NATURAL FRAGRANCE





Lavender

Handmade in the USA





Lavender

SHAMPOO

Relax and recharge with calming lavender and moisturizing shea butter.

Our Premium Body Care standards ensure luxuriously safe suds, carefully sourced for purity, efficacy and sustainability. Go ahead and soak in blissful bubbles with only the gentlest ingredients: no parabens, harsh preservatives or sodium lauryl and laureth sulfates.

INGREDIENTS: AQUA (WATER), DECYL GLUCOSIDE, PHENOXYETHANOL, CAPRYLYL GLYCOL, CITRIC ACID, XANTHAN GUM, PANTHENOL, ALOE BARBADENSIS, BUTYROSPERMUM PARKII (SHEA BUTTER), ARCTIUM LAPPA (BURDOCK ROOT EXTRACT), NATURAL FRAGRANCE.

DIRECTIONS: POUR 1-2 CAPFULS OF BUBBLE BATH UNDER WARM RUNNING WATER.

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HDPE
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MADE IN USA

CAUTION: USE ONLY AS DIRECTED. EXCESSIVE USE OR PROLONGED EXPOSURE MAY CAUSE IRRITATION TO SKIN AND URINARY TRACT. DISCONTINUE USE IF RASH, REDNESS OR ITCHING OCCURS. CONSULT YOUR PHYSICIAN IF IRRITATION PERSISTS. KEEP OUT OF REACH OF CHILDREN.

STORE IN A COOL, DRY PLACE
BIODEGRADABLE INGREDIENTS
NO PARABENS
NO SODIUM LAURYL OR LAURETH SULFATE
NO ARTIFICIAL FRAGRANCE
NO ANIMAL INGREDIENTS OR TESTING

BOTTLE IS MADE FROM
50% POST-CONSUMER RECYCLED PLASTIC





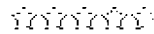
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Beauty & Personal Care ▸ Personal Care ▸ Bath & Bathing Accessories ▸ Bath ▸ Bubble Bath

365 Everyday Value Relaxing Lavender Bubble Bath

 ▾ 3 customer reviews



INGREDIENTS: AQUA (WATER), DECYL GLUCOSIDE, PANTHENOL, XANTHAN GUM, PANTHENOL, ALOE BARBADENSIS (ALOE VERA) LEAF EXTRACT, ARCTIUM LAPPA (BURDOCK ROOT EXTRACT),



FOR ALL SKIN TYPES

*Fragrance free & non-comedogenic
for sensitive skin.*

*Gentle enough for daily use, but
effective.*



16 FL OZ (473mL)



GENTLE
SKIN
CLEANSER

*As a result, show this gentle skin
cleanser and its ingredients
the gentlest way. Only cleaning at regular
intervals.
Gentle skin cleanser is easily washed away. This
cleanser is gentle and pore-clogging residue.*

DIRECTIONS: WET SKIN WITH WATER. USE A SOFT WET OR DRY CLOTH TO GENTLY MASSAGE DESIRED AMOUNT OF CLEANSER ONTO SKIN. RINSE AND GENTLY BLOT DRY WITH TOWEL.

INGREDIENTS: AQUA (WATER), CETYL ALCOHOL, BRASSICA CAMPESTRIS OLEIFERA (RAPESEED OIL), GLYCERYL STEARATE, CETEARYL ALCOHOL, SODIUM MYRISTOYL SARCOSSINATE, PHENOXYETHANOL, CAPRYLYL GLYCOL, CITRIC ACID

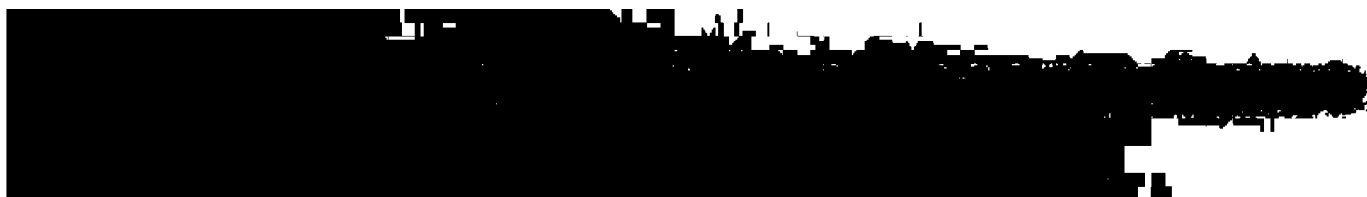
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www.wholefoodsmarket.com



PRODUCT OF USA

**BOTTLE IS MADE FROM
50% POST CONSUMER RECYCLED CONTENT**







WHOLE
FOODS

100% ESSENTIAL OILS
100% CONSCIOUS INGREDIENTS

magnolia & poppy

100% ESSENTIAL OILS
100% CONSCIOUS INGREDIENTS

100

HE 100

100% ESSENTIAL OILS
100% CONSCIOUS INGREDIENTS



organic laundry detergent

3X CONCENTRATED

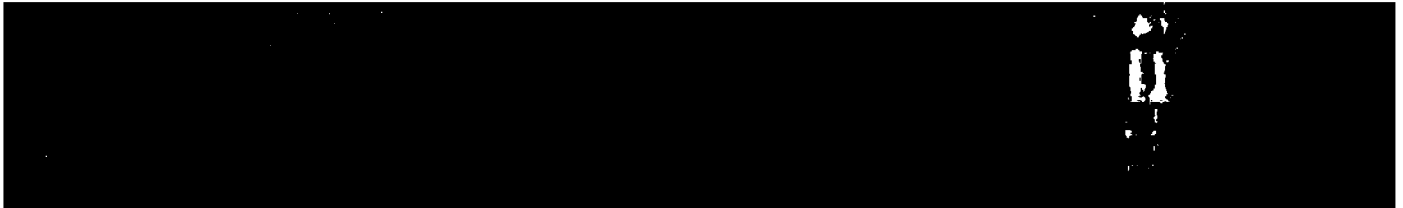
magnolia & poppy

- Protects Colors
- 3X Concentrated
- Low-Sudsing Formula
- Hypo-Allergenic
- Non-Toxic
- Biodegradable
- Not Tested on Animals
- No Chlorine, Phosphates or Petrochemicals
- Safe For Septic & Gray Water Systems
- Removes Grease, Dirt & Tough Stains

DIRECTIONS FOR USE:

Follow garment care instructions. Add 1/2 cup (120 mL) to the detergent compartment of your washing machine. For front-loading machines, add 1/4 cup (60 mL) to the detergent compartment. For top-loading machines, add 1/2 cup (120 mL) to the detergent compartment. For hand washing, add 1/4 cup (60 mL) to the water. For use in a clothesline, add 1/4 cup (60 mL) to the water. For use in a dryer, add 1/4 cup (60 mL) to the dryer. For use in a dishwasher, add 1/4 cup (60 mL) to the detergent compartment. For use in a sink, add 1/4 cup (60 mL) to the water. For use in a bathtub, add 1/4 cup (60 mL) to the water. For use in a shower, add 1/4 cup (60 mL) to the water. For use in a toilet, add 1/4 cup (60 mL) to the water. For use in a sink, add 1/4 cup (60 mL) to the water. For use in a bathtub, add 1/4 cup (60 mL) to the water. For use in a shower, add 1/4 cup (60 mL) to the water. For use in a toilet, add 1/4 cup (60 mL) to the water.

-
- **Protects Colors**
 - **3X Concentrated**
 - **Low-Sudsing Formula**
 - **Hypo-Allergenic**
 - **Non-Toxic**





baby laundry detergent

2X CONCENTRATED

EARTH CONSCIOUS INGREDIENTS

Hypo-Allergenic & Free of Dyes
Removes Grease, Dirt & Tough Stains
No Phosphates, Phthalates, Chlorine
or Petrochemicals



MADE WITH 100% RECYCLED MATERIALS

50 FL. OZ. (1.5 L)



baby
laundry detergent
2X CONCENTRATED

- Non-Toxic & Biodegradable
- Not Tested on Animals
- No Chlorine, Phosphates or Petrochemicals
- Safe For Septic & Grey Water Systems
- Removes Grease, Dirt & Tough Stains

DIRECTIONS FOR USE

Follow garment care instructions found on tag, along with instructions for your washing machine. Always test hidden area for colorfastness. Pretreat areas as needed before washing. Always add detergent to the water prior to adding clothes. The detergent is very water soluble and should rinse out easily on a normal cycle setting without extra rinse.

Top Loading (Standard) and Front Loading, High Efficiency "HE" Machines: For medium loads, use 1/2 measuring cap (middle line 1.5 oz). For large or heavily soiled loads, use a full cap (top line 3 oz).

STORAGE & DISPOSAL

Store at room temperature. Do not reuse bottle to store any other type of liquid.

SAFETY & PRECAUTIONS

Keep this and all cleaning products out of the reach of children. If detergent comes in contact with your skin, simply rinse off with warm water. Eye irritant. In case of eye contact, flush eyes with cool water for at least 15 minutes. Contact a physician if irritation continues. Harmful if swallowed. If detergent is ingested, drink plenty of water and do not induce vomiting. Consult a physician or healthcare professional.

OUR FULL INGREDIENT DECLARATION: AQUA (FILTERED WATER), GELCYL SULFONOSIDE (PLANT-DERIVED NON-IONIC SURFACTANT), SODIUM CARBONATE (PH CONTROL), SODIUM LAURYL SULFATE (PLANT-BASED ANTI-FORMING AGENT), DENATURED ALCOHOL (SOLVENT), SODIUM CITRATE (COMPLEXING AGENT), POTASSIUM SORBATE (PRESERVATIVE), NEMOHA VIRIDIS (SPRINKLE LEAF OIL) (DETERGENT).

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MADE IN CANADA



Amazon.com: Whole Foods Market

Secure | <https://www.amazon.com/Whole-Foods-Market-Detergent-Concentrated/op/B0195NERYW>

Health & Household › Household Supplies › Laundry › Liquid Detergent

Whole Foods Market, Austin TX Baby Laundry Detergent 2X Concentrated, Unscented

Whole Foods Market

Be the first to review this item

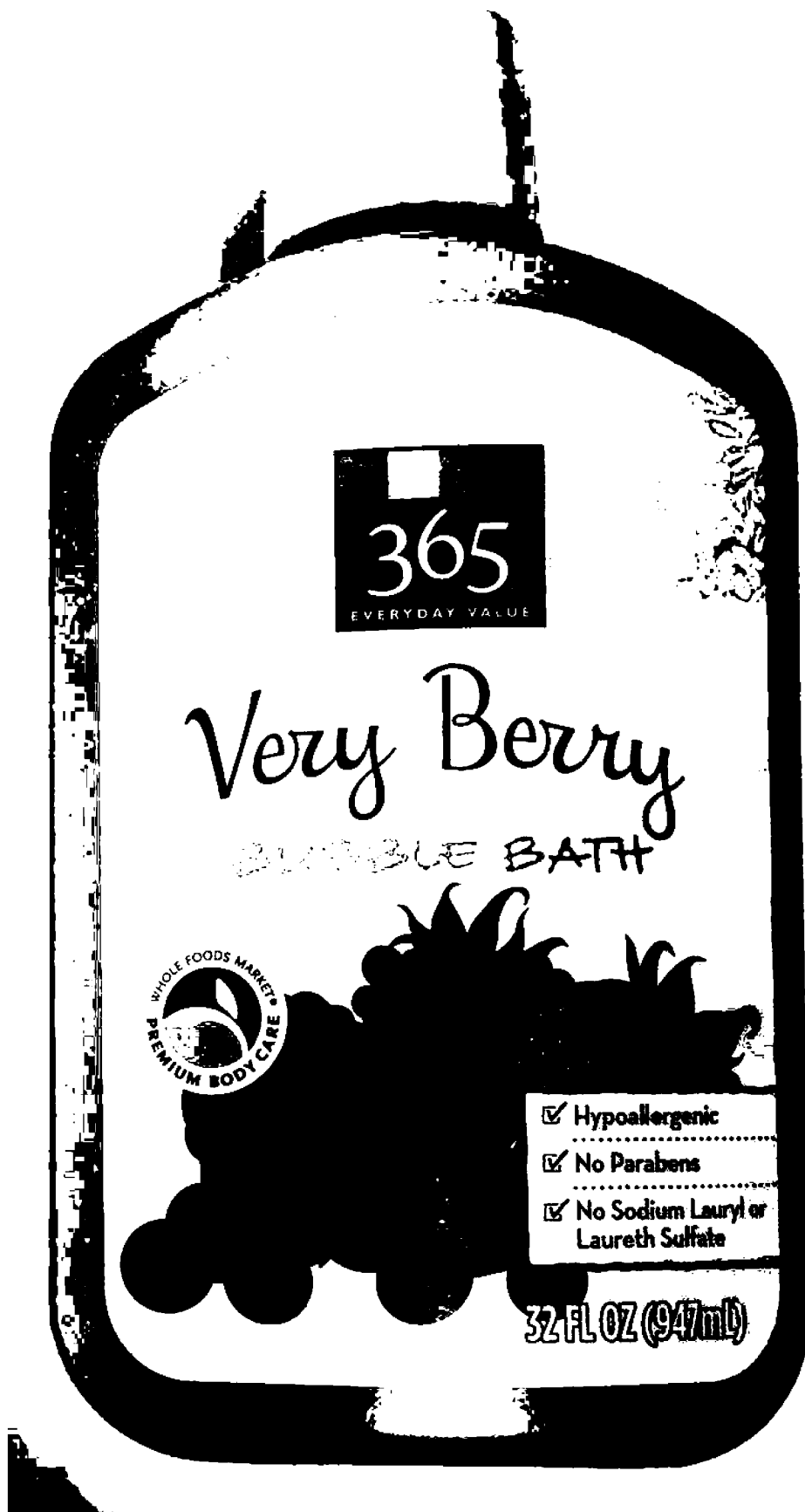


About the product

- Whole foods baby laundry detergent 2x concentrated - unscented
- Hypo-allergenic and free of dyes, removes grease, dirt and tough stains
- No phosphates, phthalates, chlorine or petrochemicals

OUR FULL INGREDIENT DECLARATION: AQUA (FILTERED WATER), DECYL GLUCOSIDE (PLANT-DERIVED NON-IONIC SURFACTANT), SODIUM CARBONATE (PH CONTROL), SODIUM OLEATE (PLANT-BASED ANTI-FOAMING AGENT), DENATURED ALCOHOL (SOLVENT), SODIUM CITRATE (COMPLEXING AGENT), POTASSIUM SORBATE (PRESERVATIVE), MENTHA VIRIDIS (SPEARMINT) LEAF OIL (DENATURANT).

|||



365
EVERYDAY VALUE

Very Berry

BUBBLE BATH

WHOLE FOODS MARKET'S
PREMIUM BODY CARE

- Hypoallergenic
- No Parabens
- No Sodium Lauryl or Laureth Sulfate

32 FL OZ (947ml)



Very Berry

BUBBLE BATH

After a long day of school, work or play, unwind with berry-scented bubbles. Our Premium Body Care standards ensure luxuriously safe suds, carefully sourced for purity, efficacy and sustainability. Go ahead and soak in blissful bubbles with only the gentlest ingredients: no parabens, harsh preservatives or sodium lauryl and laureth sulfates.

INGREDIENTS: AQUA (WATER), DECYL GLUCOSIDE, PHENOXYETHANOL, CAPRYLYL GLYCOL, CITRIC ACID, XANTHAN GUM, PANTHENOL, ALOE BARBADENSIS, BUTYROSPERMUM PARKII (SHEA BUTTER), ARCTIUM LAPPA (BURDOCK ROOT EXTRACT), NATURAL FRAGRANCE.

DIRECTIONS: POUR 1-2 CAPFULS OF BUBBLE BATH UNDER WARM RUNNING WATER.

DISTRIBUTED BY:
WHOLE FOODS MARKET
AUSTIN, TX 78703
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www.wholefoodsmarket.com



100%
PLEASE RECYCLE

MADE IN USA

CAUTION: USE ONLY AS DIRECTED. EXCESSIVE USE OF PROLONGED EXPOSURE MAY CAUSE IRRITATION TO SKIN AND URINARY TRACT. DISCONTINUE USE IF RASH, REDNESS OR ITCHING OCCURS. CONSULT YOUR PHYSICIAN IF IRRITATION PERSISTS. KEEP OUT OF REACH OF CHILDREN EXCEPT UNDER ADULT SUPERVISION.

STORE IN A COOL, DRY PLACE

- BIODEGRADABLE INGREDIENTS
- NO PARABENS
- NO SODIUM LAURYL OR LAURETH SULFATE
- NO ARTIFICIAL FRAGRANCE
- NO ANIMAL INGREDIENTS OR TESTING

**BOTTLE IS MADE FROM
50% POST-CONSUMER RECYCLED PLASTIC**



99482 44947 6

Amazon.com : 365 Everyday

Secure <https://www.amazon.com/Everyday-Value-Very-Berry-Bubble/dp/B00YDJFBTO>



Beauty & Personal Care

Departments

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Gift Cards & Registry

Sell

Help

All Beauty

Luxury Beauty

Makeup

Skin Care

Hair Care

Fragrance

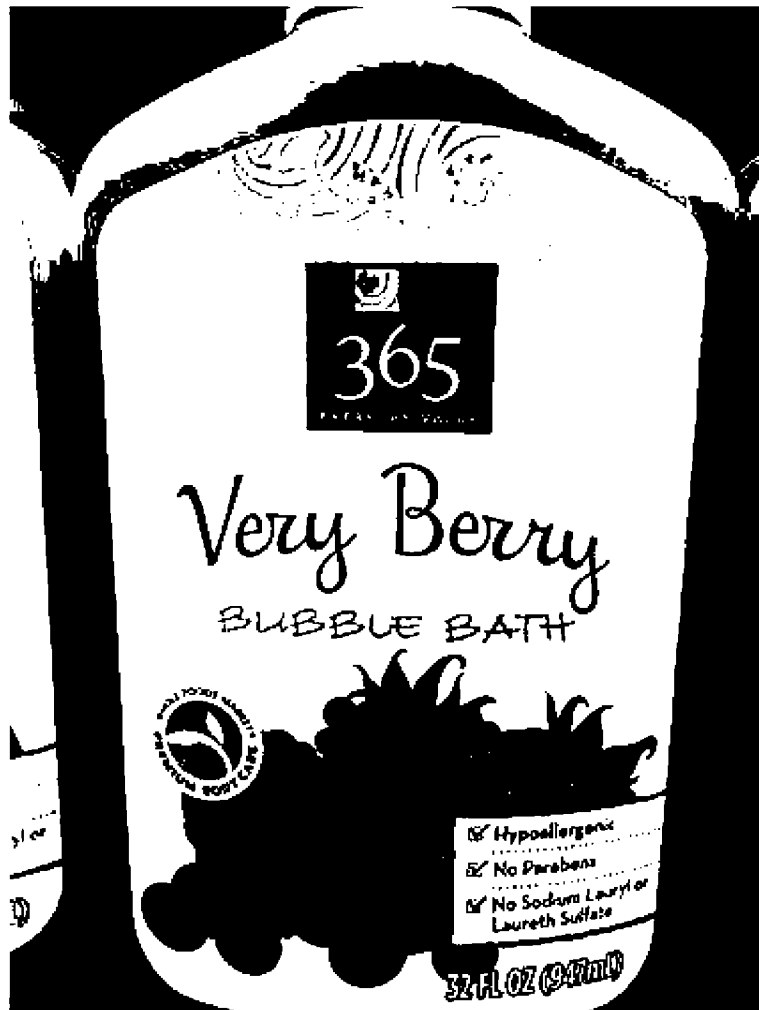
Tools & Accessories

Per

Beauty & Personal Care > Personal Care > Bath & Bathing Accessories > Bath > Bubble Bath

365 Everyday Value Very Berry Bubble Bath

Be the first to review this item



**INGREDIENTS: AQUA (WATER), DECYL GLUCOSIDE, PANTHENOYL
ACID, XANTHAN GUM, PANTHENOL, ALOE BARBADENSIS
ARCTIUM LAPP (BURDOCK ROOT EXTRACT), NIACINAMIDE**



365
EVERYDAY VALUE

Sweet Apple

BUBBLE BATH

WHOLE FOODS MARKET'S
PREMIUM BODY CARE

- Hypoallergenic
- No Parabens
- No Sodium Lauryl or Laureth Sulfate

32 FL OZ (947ml)

365

Sweet Apple

BUBBLE BATH

Gently cleanse from head to toe and enjoy the crisp, sweet scent of apples. Our Premium Body Care standards ensure luxuriously safe suds, carefully sourced for purity, efficacy and sustainability. Go ahead and soak in blissful bubbles with only the gentlest ingredients: no parabens, harsh preservatives or sodium lauryl and laureth sulfates.

INGREDIENTS: AQUA (WATER), DECYL GLUCOSIDE, PHENOXYETHANOL, CAPRYLYL GLYCOL, CITRIC ACID, XANTHAN GUM, PANTHENOL, ALOE BARBADENSIS, BUTYROSPERMUM PARKII (SHEA BUTTER), ARCTIUM LAPPA (BURDOCK ROOT EXTRACT), NATURAL FRAGRANCE.

DIRECTIONS: POUR 1-2 CAPFULS OF BUBBLE BATH UNDER WARM RUNNING WATER.

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PLEASE RECYCLE

MADE IN USA

CAUTION: USE ONLY AS DIRECTED. EXCESSIVE USE OR PROLONGED EXPOSURE MAY CAUSE IRRITATION TO SKIN AND URINARY TRACT. DISCONTINUE USE IF RASH, REDNESS OR ITCHING OCCURS. CONSULT YOUR PHYSICIAN IF IRRITATION PERSISTS. KEEP OUT OF REACH OF CHILDREN EXCEPT UNDER ADULT SUPERVISION.

STORE IN A COOL, DRY PLACE

BIODEGRADABLE INGREDIENTS
NO PARABENS
NO SODIUM LAURYL OR LAURETH SULFATE
NO ARTIFICIAL FRAGRANCE
NO ANIMAL INGREDIENTS OR TESTING

BOTTLE IS MADE FROM
50% POST-CONSUMER RECYCLED PLASTIC



0 99482 44948 3

.....

INGREDIENTS: AQUA (WATER), DECYL GUANIDINE
ACID, XANTHAN GUM, PANTHENOL, ALDE
ARCTIUM LAPP (BURDOCK ROOT EXTRACT),





Whole Foods



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Whole Foods Market | America's Healthiest Grocery Store

www.wholefoodsmarket.com/ ▾

Are you hungry for better? When it comes to what we put in and on our bodies, Whole Foods Market® believes the full story of those products is important as we ...

Exhibit 3



COMPANY INFO

America's Healthiest Grocery Store™

Who are we? Well, we seek out the finest natural and organic foods available, maintain the strictest quality standards in the industry, and have an unshakeable commitment to sustainable agriculture. Add to that the excitement and fun we bring to shopping for groceries, and you start to get a sense of what we're all about. Oh yeah, we're a mission-driven company too.



Whole Foods History

Wow! What a ride. Back in 1980, we started out with one small store in Austin, Texas. Today, we're the world's leader in natural and organic foods, with 473 stores in North America and the United Kingdom.

[Read the complete Whole Foods Market history](#)



Info for Potential Suppliers

Want to sell to Whole Foods Market? We are very interested in receiving information about your company and your products. The following is the information you need to proceed.

[Learn how to become a vendor](#)

QUICK LINKS:

[Core Values](#)

<http://www.wholefoodsmarket.com/mission-values/core-values>

What's truly important to us as an organization.

[Quality Standards](#)

<http://www.wholefoodsmarket.com/about-our-products/quality-standards>

We carefully evaluate each and every product we sell.

[Caring for Communities](#)

<http://www.wholefoodsmarket.com/mission-values/caring-communities>

We give over 5% of our total net profits.

[Environmental Stewardship](#)

<http://www.wholefoodsmarket.com>



Info for Current Suppliers

Whether you are a new supplier to Whole Foods Market or just need a refresher on our processes, this page will answer some of the most frequently asked questions we hear. Got a question not covered? Reach out to your authorized Whole Foods Market buyer.

[Answers to your suppliers questions](#)

[/mission-values/environmental-stewardship\)](#)

Going beyond the three Rs.

[Real Estate](#)

[/company-info/real-estate\)](http://www.wholefoodsmarket.com/company-info/real-estate)

Become our Landlord



Real Estate (Become Our Landlord)

Do you have the perfect site for a Whole Foods Market? Become our landlord.

[Become our landlord](#)

[Regional Offices](#)

[/company-info/regional-offices\)](http://www.wholefoodsmarket.com/company-info/regional-offices)

[US National Offices](#)

[/company-info/us-national-offices\)](http://www.wholefoodsmarket.com/company-info/us-national-offices)



US National Offices

[Browse a list of our US National Office locations](#)



Regional Offices

[Browse a list of our Regional Office locations](#)



Careers

Whole Foods Market has more than 350 retail and non-retail locations in the US, Canada and UK — and even more stores in development. Come grow with us!

[Create a career at Whole Foods Market](#)



Leadership Team

[Learn about our fearless leaders](#)



John Mackey's Blog

An occasional blogger, John Mackey actively seeks and responds to feedback on his thoughts about creating a new business paradigm, addressing issues facing the natural and organic food industry, exploring the nature of human development and much more.

[Read John Mackey's blog](#)



Newsroom

Check out the latest company news and resources. Sign up to receive news via email and/or RSS feeds.

[Review Whole Foods Market's latest news releases](#)



Caring for Communities

As part of the local and global community, Whole Foods Market has programs that create economic partnerships with the poor, support schools in providing nutrition education, and offer low-interest loans to small local producers.

[Learn about our economic partnerships](#)



Contact Us

We want to satisfy and delight our customers — every single one. We design our stores, train our Team Members and select our products with that goal in mind.

[Get in touch](#)



Whole Foods Market Hall of Fame

Our Hall of Fame program honors past Team Members or Board Members for their outstanding contributions to our company.

[Learn more about our Hall of Fame members](#)



Investor Relations & Corporate Governance

The things that make Whole Foods Market special to our customers make us special to our investors.

[Read our financial and corporate documentation](#)

Exhibit 4



QUALITY STANDARDS

Standards that aren't standard anywhere else

Every year there's more demand for "sustainable food" and "natural food products." We're here for you! In developing our standards, we research everything from food additives to antibiotics in meat production, sustainable seafood to organic skin care. If you want to know what goes into the products you buy, our standards make it easy, because if it doesn't meet the standards, we don't sell it.

Have a question for our customer service team? [Contact us \(/customer-service\)](#).



Food Ingredients: We Did the Work for You

Wouldn't it be more fun to shop for groceries if you didn't have to worry about what food additives to avoid? Good news, we're looking out for you. For starters, we don't allow hydrogenated fats or artificial colors, flavors, preservatives or sweeteners in any food we sell.

[See our list of unacceptable food ingredients](#)

Our Quality Standards

We carefully evaluate each and every product we sell.

We feature foods that are free of artificial preservatives, colors, flavors, sweeteners, and hydrogenated fats.

We are passionate about great tasting food and the pleasure of sharing it with others.

We are committed to foods that are fresh, wholesome and safe to eat.

We seek out and promote organically grown foods.

We provide food and nutritional



Fresh Produce and Flowers

Pesticide use in growing fruits and vegetables are a concern for many people, so behind the scenes we're working to reduce them. Our Responsibly Grown sourcing program rewards farmers by purchasing first from those who grow using more sustainable practices.

[Get to know Responsibly Grown.](#)



Animal Welfare and Meat Quality

Did you know that “natural meat” only means the meat itself has no additives? That’s why we go a lot further with our standards in the meat department. From free-range to grass-fed beef, it comes from animals raised with no added hormones and no antibiotics, ever. And the farmers and ranchers we partner with are committed to animal welfare standards.

[Here’s how we raise the bar on raising animals for meat](#)

products that support health and well-being.



Seeking the Most Sustainable Seafood

Seafood lovers want the freshest fish, shellfish and mollusks. That’s just part of the story here. Consider our standards your sustainable seafood guide with the best choices for your values and your plate. In our seafood department you’ll find farmed seafood that’s Responsibly Farmed – including farm-raised salmon – and wild seafood that’s rated for ecological sustainability.

[Navigate your way to seafood sustainability](#)



Body Care You Can Believe In

There are very few regulations for body-care ingredients, yet millions of people looking for “natural” body-care products. We’ve stepped up with standards for what we put on our shelves to help you feel confident about what you put on your body. For example, there are 100+ potentially harmful chemicals and other body-care ingredients that we don’t allow. We also offer industry-leading standards for organic skin care.

[Discover what makes our body care better](#)



Cleaner Cleaning Products

“Non-toxic cleaning products” is one of the top searches when it comes to household cleaners. Whether you’re thinking about your family, your planet or both, you probably want to know what’s in your cleaning products, and so do we. Our Eco-Scale® rating system requires ingredient listings on every label and bans more than 40 ingredients at the base level.

[Check the levels of our Eco-Scale® rating system for cleaning products](#)



Let’s Get Real About Eggs

All whole eggs that we sell are cage-free – and have been since 2004. For the past several years, we’ve been working with our farmers to develop standards for the health and wellbeing of laying hens. We are introducing these new standards with our 365 Everyday Value® eggs.

[Learn about the different labels on our egg cartons](#)

RELATED BLOG POSTS



[It’s Non-GMO Month: Our Progress on GMO Transparency \(/blog/its-non-gmo-month-our-progress-gmo-transparency\)](#)



[CLARIFYING MY COMMENTS ON GMO LEGISLATION \(/blog/clarifying-my-comments-gmo-legislation\)](#)



[10 Ways to Reduce Your Food Waste Footprint \(/blog/10-ways-reduce-your-food-waste-footprint\)](#)



[Taking Action on BPA \(/blog/taking-action-bpa\)](#)



[Talking About: Food for Tomorrow \(/blog/talking-about-food-tomorrow\)](#)



[Need to Know: House Bill Could Affect GMO Labeling \(/blog/need-know-house-bill-could-affect-gmo-labeling\)](#)

Exhibit 5

OUR BODY CARE QUALITY STANDARDS

We carry the finest, high-quality beauty, hair and body care products available because we believe the quality of the items and ingredients you put on your body is as important as the foods and nutritional supplements you put in your body. We evaluate the quality of personal care products in terms of ingredients, experience, and efficacy.

- We carefully evaluate each and every product we sell.
- We are passionate about aromatic, luxurious, effective personal care products and the pleasure of sharing them with others.
- We encourage our vendor partners to use plant-based and naturally derived ingredients, pure essential oil fragrances, gentle preservatives and non-petroleum ingredients.
- We are committed to high-quality body care products that have a proven track record.
- We only sell personal care products that have not been tested on animals.
- We provide personal care products that support health and well-being.



Our stores carry hundreds of brands of products (in addition to our own Private Label brands) and the selection from store to store may vary. If you have a question about a particular product, please ask for assistance at the store where you shop.

Body Care Ingredients We Don't Sell

Currently, there are 100+ ingredients common in conventional body care products that are not allowed in any body care products we sell. That includes phthalates, microbeads, triclosan, BHT, BHA, aluminum chlorohydrate, and many more. However, creating a product with no unacceptable ingredients does not guarantee that Whole Foods Market will sell it. Our buyers are passionate about seeking out the freshest, most healthful, minimally processed products available.

2-Bromo-2-Nitropropane-1(and) 3-Diol

A Acetone

Alcloxa

Aluminum Chloride Hexahydrate

Aluminum Chlorohydrate

Ammonia

Ammonium Xylene Sulfonate

B	Benzalkonium Chloride	H	Hexachlorophene
	Benzethonium Chloride		Hexylresorcinol
	Benzocaine		Hydroquinone
	Benzophenone-3		
	BHA (Butylated Hydroxyanisole)	I	Imidazolidinyl Urea
	BHT (Butylated Hydroxytoluene) Butoxyethanol		Iodine complex with ammonium ether sulfate and polyoxyethylene sorbitan monolaurate
C	CBD		Iodine complex with phosphate ester of alkylaryloxy polyethylene glycol
	Chlorphenesin		Iodopropynyl Butylcarbamate
	Cloflucarban		Isododecane
	Cocamide DEA		Isoeicosane
	Coal tar		
	Copper Disodium EDTA	L	Lead acetate
D	Diazolidinyl Urea		Lidocaine
	Diethanolamine (DEA)	M	Melanin
	Dimethyl phenylbutanol		Methyl Nicotinate
	Dimethylmethoxy Chromanyl Palmitate		Methylbenzethonium chloride
	Disodium EDTA		Methylchloroisothiazolinone
	DMDM Hydantoin		Methylene bis-benzotriazolyl tetramethylbutylphenol
E	EDTA		Methylene glycol
	Emu Oil		Methylisothiazolinone
	Equine Oil		Microbeads
F	Fluorosalan		Myristamide DEA
	Formaldehyde	N	Nonylphenoxypoly (ethyleneoxy) ethanoliodine

O	Oleamide DEA	S	Secondary amyltricrosols
	Oxybenzone		Sh-oligopeptide-1
			Silver Citrate
P	Perfluoroisohexane		Sodium Bisulfite
	Perfluorodecalin		Sodium Dodecylbenzenesulfonate
	Phenol		Sodium Hydroxymethylglycinate
	Phenylethyl resorcinol		Sodium Oxychlorosene
	Phthalates		Sodium xylene sulfonate
	Picaridin		Soyamide DEA
	Poloxamer—iodine complex		Synthetic Fluorphlogopite
	Polyethylene Terephthalate		
	Polyimide-1	T	TBHQ (tertiary butylhydroquinone)
	Polymethyl Methacrylate		Tetrasodium EDTA
	Polyperfluoroethoxymethoxy Difluoroethyl Peg		Tetrasodium Etidronate
	Phosphate		Toluene
	Polypropylene		Tribromsalan
	Povidone-iodine		Triclocarban
	PTFE		Triclosan
Q	Quaternium 15		Triple dye
			Trisodium EDTA
		U	Undecoylium chloride iodine complex
		V	Vanillyl Butyl Ether

Organic Body Care Standards

There are no mandatory government standards for "organic" label claims on body care products, [so we had to create our own!](#) At Whole Foods Market, we set high standards to make sure that “organic” really means organic in every aisle of our store.

Premium Body Care™ Standards

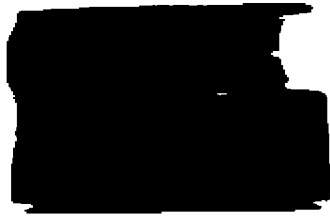
Our experts review the latest research on body care ingredients with possible impacts on the environment or human health, such as phthalates and parabens. They've identified 400+ ingredients that are unacceptable in our [Premium Body Care™](#) products. Look for the seal to help find the best body care for you and your family.



maximum
moisture
BODY LOTION

© 2017 P&G





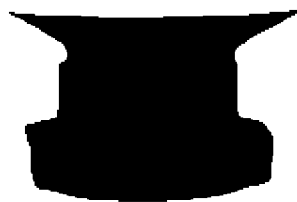
**MOISTURIZING
SHAMPOO**

Chestnut extract, argan oil and shea
butter maximize moisture and add shine

97% PLANT-DERIVED



10 FL OZ (296ml)





lavender SHOWER GEL

The new formula with
essential oils for
a touch of natural
fragrance.

12.37 (473mL)





2X CONCENTRATED

100 HEAVY DUTY DISHWASHERS

100% Free of Fragrances, Dyes & Chemicals
No Toxic Laundry Substitutes
No Phosphates, Bleaches or Chlorine

**100
HE LOADS**

100 FL OZ (2.95L)

ECO SCALE





Exhibit 7

New Lower Price

\$2.99
12 CT

SEE MORE SALES

365 Everyday Value®
Beyond Cage-Free
White Grade A Egg

U.S. ONLY. NOT VALID IN WHOLE FOODS MARKET 365™ STORES.

WHOLE STORY (/BLOG/WHOLE-
THE OFFICIAL WHOLE FOODS MARKET® BLOG

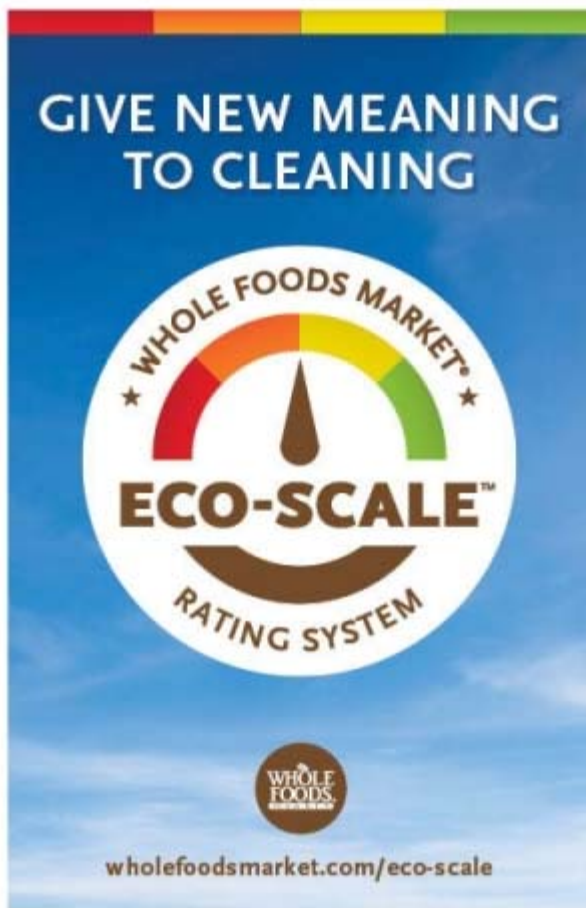
What You Won't Find in our Cleaning Products

Like 1

Tweet

G+

By Anna Madrona, October 16, 2011 | [More posts by Anna Madrona](#)



The “Goals Gals” were coming to my house. The three of us

have been meeting for more than six years, supporting one another with new career, volunteer and hobby goals. A few years ago, one of our trio developed chemical sensitivities after a bad experience with a bug bomb when trying to rid her house of fleas. My friend Ella (not her real name) now reacts negatively to air fresheners, incense, artificial scents, most conventional cleaning products, plastic, paint and carpet that off-gasses — a condition sometimes called Multiple Chemical Sensitivities (MCS). When Ella comes in contact with these materials she says it’s like her “brain just starts sizzling, like it is frying and I simply cannot concentrate on anything.” While our group typically meets outdoors, this time it was my house and I didn’t want to let Ella down. Nor, frankly, was I interested in spraying questionable chemicals in my living quarters. Thanks to Ella’s influence, I stopped using air fresheners (and even conventional perfumes) years ago. I have bamboo floors and the last time any walls were painted was 11 years ago, so I felt like those elements were under control. But I’d let a few things slip over our long, hot summer and I now had 24 hours to tidy my house in a mindful way, removing dust and grime, while using products that wouldn’t cause Ella distress. Last year I deliberately removed all conventional cleaning products from the house. Everything that remains in my housekeeping caddy comes from Whole Foods Market, where our Quality Standards extend even to things like cleaning supplies. As I’ve used up products, I’ve upgraded to those that are categorized as Yellow or Green on our Eco-Scale. But I have to admit, I hadn’t

read the labels very carefully.



Before I spritzed the

first spray, though, I wanted to double check on the fragrance component. I remembered that manufacturers of conventional cleaning products sometimes use phthalates to enhance the longevity of a product's scent. Phthalates have been linked to cancer and endocrine system disruption and are currently covered under the umbrella term "fragrance" in conventional products, where ingredient transparency is not currently required. I consulted our Eco-Scale Unacceptable Ingredients list which told me that any products in our Eco-Scale Orange level can contain artificial fragrance, but no phthalates. Ella reacts to almost any kind of artificial fragrance, though. I checked to see what my counter spray cleaner listed. Citrus blend essential oils. Good, I could use that one safely — no artificial fragrance OR phthalates. Whew! While tossing the guest and kitchen towels into the washing machine, I read labels again. I wanted to make sure that none of my cleaners or laundry products contained any bleach, which has an odor (and chemical composition) my friend would likely react to. Although popular as a conventional disinfectant and fabric whitener, even diluted sodium hypochlorite can be extremely harsh on skin and can actually contribute to the formation of organochlorines, such as the chlorofluorocarbons that damage the ozone layer. Talk about a potentially volatile substance! Sodium hypochlorite is another compound Whole Foods Market doesn't allow in the cleaning supplies listed on our Eco-Scale, so I was covered



on that one, too.

But what about phosphates? Laundry

detergents are often full of these chemicals, which soften water and increase cleaning power but also encourage algae growth in waterways and decrease the oxygen content in standing water. While the phosphates wouldn't bother Ella, they bother me. A check of the Eco-Scale reveals — no phosphates. Floor mopping was simple. My all-in-one mop consists of a microfiber pad for the head (reusable and no one-use pads going to the landfill) and a refillable tank into which I poured all-purpose citrus-based cleaner with some water. No worries about the cat sauntering across the wet floor and getting questionable chemicals on her paws. Besides, like most cats, she detests the odor of citrus — she stayed out of the kitchen. Finally, the sinks. They're big, they're porcelain and they needed some elbow grease. Thankfully, I had a scent-free gentle scrubber on hand that used calcium carbonate as a mild abrasive. Unlike the bleach-boosted powder cleansers I used in the past, this cleaner also shined fixtures that tend to show every hard water spot and was pleasant to use. How did I do with my mindful cleaning efforts? The Goals Gals stayed for three hours, with Ella experiencing nary a brain sizzle. We accomplished much toward our goals and the house smelled and felt much cleaner — in a healthy way. As a result of my Saturday scrubbing efforts I have a better understanding of just how useful our Eco-Scale and the ingredient transparency that backs it can be. I'm even more impressed with what we don't allow in our cleaners. Could anyone who visits — or lives in — your house (perhaps someone with asthma) benefit from “less” in your cleaners?

Leave a reply

To provide feedback or ask a question about our company, a store or a product, please visit our [Customer Service](#) page.

For more information about posting comments to our blog, please see our [Comment Posting Guidelines](#).

YOUR NAME ***E-MAIL ***

The content of this field is kept private and will not be shown publicly.

HOME PAGE**COMMENT *****SAVE****PREVIEW***13 COMMENTS*

Comments

LAUREN SAYS ...

My son and I are allergic to basically everything chemical. He has a ton of allergies, food, environmental, asthma etc., we use vegetable based detergents, cleaners, shampoos etc. I recently (in June) bought a new car and have been covered in eczema since... I think whatever the leather seats were treated with is a chemical I am reacting to! All in all, it could be worse and we live super healthy lives!

Tue, 2011-10-18 10:26

SUZ SAYS ...

I just have to comment because I am staying at a condo for the week on vacation and the minute I walked in the door, my nose stopped up. I don't have very many allergies, but I do react significantly to cleaning products with "flavors." Not long ago, I realized even unscented clothes detergents were giving me a rash, so I changed to the hypoallergenic kind and it made all the difference. So, after my nose stopped up, I looked in the laundry room and the detergent was Apple Mango Tango. Seriously? Who uses that? The bed was awful - I could hardly sleep in the wash of sickly sweet fruit. Tonight I washed the sheets twice in my own detergent and they still smell! Clearly I should have bought replacement sheets rather than just new detergent. I am so glad I read this and I can't wait to check out WF's selection!

Wed, 2011-10-19 00:16

DEBRA SAYS ...

Unlike the others that have commented, myself and family do not have MCS. However, I do notice that we do get sick more often and our immune systems are not as strong as they should be. I would like to make our home clean and healthy. Thank you for educating me. I am going to start making these changes in my home. I think it will not only make us healthier but it will teach them to do the same in their home when they grow up.

Sat, 2011-10-22 20:50

BARBARA SAYS ...

Although I've never been 'diagnosed' with MCS, I know I have it. My husband has had asthma all his life and reports that he is much better since we've been together. Unfortunately, I'm so sensitive that I need products with no scent of any kind. Too much citrus smell or any other smell including cooking smells, will set me off. I applaud Whole Foods for bringing these issues to the public!

Mon, 2011-10-17 08:41

R. MCELMURRY SAYS ...

Phosphates have not been allowed in home laundry detergents for at least 20 years. They are still a major component of commercial laundry soap. Also formulas containing phosphates will not leave chemical residue behind in the clothes after the rinse cycle. Residue left in clothes causes them to wear sooner and also can cause skin allergies in some people.

Tue, 2011-10-18 07:08

JUDITH SAYS ...

I have MCS. unlike the respect that this woman gives her friend, I don't get that. people I know don't "get it". often they think that what I don't know won't hurt. I know. Whole Foods "gets it". I can go in there and just place groceries in my cart and not worry that something I'm buying will make me sick. I really appreciate Whole Foods. thank you.

Tue, 2011-10-18 10:40

KERRY SAYS ...

I have severe Multiple Chemical Sensitivities (MCS) to the point of ER visits due to reactions and throat closure to exposure. It is scary and it is a condition that is hard to share with others. I am limited to places I can go because I must be aware of the elements that I will be exposed to and stay in "safe" area. It is difficult. This article was a sigh of relief to me and I assume other sufferers. This disorder is not one that a lot of people discuss and makes me feel like what I experience is extremely abnormal. It feels better to know that I am not the only suffer and thank you for companies like Whole Foods that recognize and realize the issue that some people have to chemicals. Thank you!

Tue, 2011-10-18 22:22

KADEE SAYS ...

Great timing on this article! My boyfriend Mother is in town visiting us and she has severe MCS. I've been working hard to have a very green-clean home for a long time now, as we have our own sensitivities and environmental concerns. To my dismay in spite of all my efforts and non-toxic all natural products I use, she is still having issues in our home. I use only natural bio-safe laundry soap, dish-soap and everything else is pretty much unscented and we always keep our windows open when we can to air things out. I use only baking soda for an abrasive cleaner and vinegar for everything else besides laundry and dishes. I think it may be things beyond our control perhaps the paint our landlords used about two months ago to paint the interior of the house we rent. It's amazing how many chemicals are literally in everything in our homes that can contribute to someone's sensitivity. It is so great your friend Ella was comfortable in your home. Kudos to you! :)

Wed, 2011-10-19 14:36

WWW.CHEMICALPRODUCTS.NET SAYS ...

Environmentally friendly products are definitely something which people will want to start using now that MCS is more widely known. Thanx for this post it's really useful.

Mon, 2012-01-09 11:16

CLEANING SAYS ...

We're a group of volunteers and opening a brand new scheme in our community. Your site provided us with helpful information to work on. You have performed a formidable task and our entire neighborhood will be thankful to you.

Thu, 2011-11-10 19:54

MICHAEL STREMI SAYS ...

A brief history on the emergence of disinfection byproducts as a health

Tue, 2012-03-13 20:50

LAURA SMITH SAYS ...

Do you carry calcium carbonate or can you order it? I would like to make my own laundry soap. Thank you.

Tue, 2013-11-05 14:52

NIKKI - COMMUNITY MODERATOR SAYS ...

@LAURA - Check with your local store to find out if this is something they typically have in stock. If not, they can look in to special ordering it for you. Whole Body will be the best department to start with at your local store!


Tue, 2013-11-05 16:40



365

Sustainably Soft
facial tissue

- Hypo-allergenic
- Whitened without Chlorine Bleach
- Fragrance Free

 MIX
Paper from responsible sources
Papier issu de sources responsables
FSC C104812

100-2 PLY TISSUES
8.6 IN X 8.4 IN (21.8 cm X 21.3 cm)
50-2 SQ FT (4.7 m²) TOTAL AREA

365

Sustainably Soft Papiers-mouchoirs

- Hypoallergénique
- Blanchi sans chlore
- Non parfumé

100 MOUCHOIRS 2 ÉPAISSEURS
21,8 cm X 21,3 cm (8,6 po X 8,4 po)
SUPERFICIE TOTALE DE 4,7 m² (50,2 pi²)

Whitened without Chlorine Bleach

Many facial tissues are bleached with chlorine, including some brands made with recycled paper or responsibly sourced. When paper is bleached with chlorine, dangerous chemicals can be released into the environment. Our Facial Tissues are whitened using a safer, environmentally progressive whitening process.

Blanchi sans chlore

Bon nombre de papiers mouchoirs sont blanchis au chlore, dont certaines marques fabriquées avec du papier recycle ou de source d'approvisionnement durable. Lorsque le papier est blanchi au chlore, des produits chimiques dangereux peuvent être libérés dans l'environnement. Le blanchiment de nos Papiers mouchoirs emploie un processus progressif plus sûr sur le plan environnemental.

DISTRIBUTED BY/DISTRIBUÉ PAR :
 WHOLE FOODS MARKET
 AUSTIN, TX 78703 USA
 © 2014 WHOLE FOODS MARKET IP, LP
www.wholefoodsmarket.com

PRODUCT OF USA/PRODUIT DES É.-U.A.

PLEASE  RECYCLE

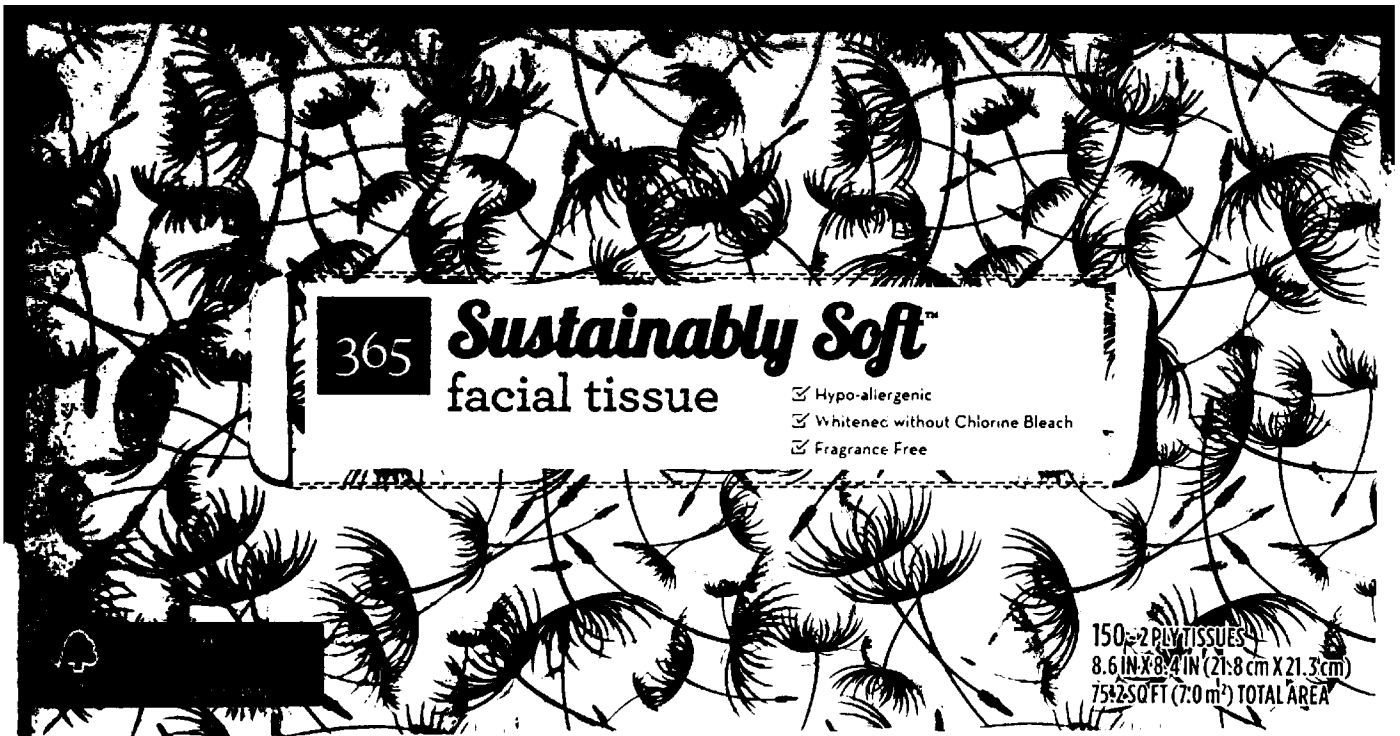
VEUILLEZ  RECYCLER

**WHOLE
FOODS.**



**100%
Recycled
Paperboard**





365

Sustainably Soft[™] Papiers-mouchoirs

- Hypoallergénique
- Blanchi sans chlore
- Non parfumé

150 MOUCHOIRS 2 ÉPAISSEURS
 21,8 cm X 21,3 cm (8,6 po X 8,4 po)
 SUPERFICIE TOTALE DE 7,0 m² (75,2 pF)

Whitened without Chlorine Bleach

Many facial tissues are bleached with chlorine, including some brands made with recycled paper or responsibly sourced. When paper is bleached with chlorine, dangerous chemicals can be released into the environment. Our Facial Tissues are whitened using a safer, environmentally progressive whitening process.

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PLEASE RECYCLE
 PLEASE RECYCLE
 PLEASE RECYCLE





365

365
JUMBO

Sustainably Strong

Jumbo Paper Towels

Layers Bonded for Maximum Strength & Absorbency
Whitened without Chlorine Bleach
Hypo-allergenic & Fragrance Free



365 SHEETS PER ROLL

13.5 IN (27.9 cm) x 14 cm

100% 100% Recycled Paper

WARNING: TO AVOID DANGER OF INJURY OR SUFFOCATION, KEEP THIS PACKAGING AWAY FROM BABIES AND CHILDREN. CAUTION: IMPROPER MICROWAVE USE CAN CAUSE ANY PAPER PRODUCT TO BURN. OBSERVE PRECAUTIONS IN THE MICROWAVE OVEN OWNER'S MANUAL. IN CASE OF FIRE, TURN MICROWAVE OFF AND LEAVE DOOR CLOSED.

MISE EN GARDE : POUR ÉVITER LES RISQUES DE BLESSURE OU DE SUFFOCATION, TENIR CET EMBALLAGE HORS DE PORTÉE DES BÉBÉS ET DES ENFANTS. ATTENTION : UNE UTILISATION INAPPROPRIÉE DU MICRO-ONDES PEUT FAIRE BRÛLER TOUT PRODUIT DE PAPIER. RESPECTER LES PRÉCAUTIONS DÉCRITES DANS LE MANUEL DE L'UTILISATEUR DU MICRO-ONDES. EN CAS DE FEU, ÉTEINDRE LE MICRO-ONDES ET LAISSER LA PORTE FERMÉE.

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PRODUCT OF USA/PRODUIT DES É.-U.A.



Please attempt to recycle plastic wrap if facilities exist in your area.
Veuillez recycler l'emballage en plastique si les installations nécessaires existent dans votre région.





WHITENED WITHOUT CHLORINE BLEACH

Many paper towels are bleached with chlorine, including some brands made with recycled paper or responsibly sourced. When paper is bleached with chlorine, dangerous chemicals can be released into the environment. Our Paper Towels are whitened using a safer, environmentally progressive whitening process.

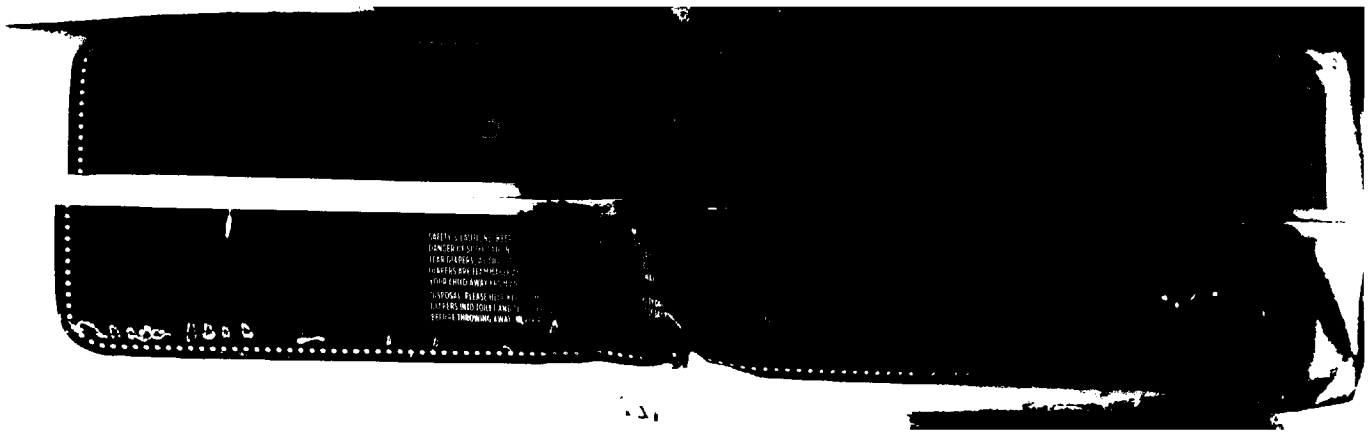
BLANCHI SANS CHLORE

Bon nombre d'essuie-tout sont blanchis au chlore, dont certaines marques fabriquées avec du papier recyclé ou de source d'approvisionnement durable. Lorsque le papier est blanchi au chlore, des produits chimiques dangereux peuvent être libérés dans l'environnement. Le blanchiment de nos Essuie-tout emploie un processus progressif plus sûr sur le plan environnemental.









365
EVERYDAY VALUE

4
SOFT
ROLLS

Sustainably Soft™

TOILET TISSUE

- Embossed for Ultimate Softness
- Whitened without Chlorine Bleach
- Hypo-allergenic & Fragrance Free



286-2PLY PER ROLL
 411x411 (10.4x10.4cm)
 121 SOFT QUILTED AREA

**WARNING: TO AVOID DANGER OF INJURY OR SUFFOCATION,
KEEP THIS PACKAGING AWAY FROM BABIES AND CHILDREN.**

**MISE EN GARDE : POUR ÉVITER LES RISQUES DE BLESSURE
OU DE SUFFOCATION, TENIR CET EMBALLAGE HORS DE
PORTÉE DES BÉBÉS ET DES ENFANTS.**

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AUSTIN, TX 78703 USA
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PRODUCT OF USA/PRODUIT DES É.-U.A.

**Please attempt to recycle plastic
if facilities exist in your area.
Veuillez recycler l'emballage en plastique
si les installations nécessaires existent
dans votre région.**





WHITENED WITHOUT CHLORINE BLEACH

Many bathroom tissues are bleached with chlorine. Our recycled paper is bleached with a chemical-free process.

Our Bathroom Tissues are safe for your environment.

BLANCHÉ

Bon nombre

blanchés

fabriqués

d'approvisionnement

est blanchés

dangereux pour

ronnement

hygiénique

plus sûr

amazon

Grocery & Gourmet Food

Departments - Your Amazon.com Today's Deals Gift Cards & Registry Sell Help

Grocery Deals Snacks - Breakfast - Warm Beverages Cold Beverages Cooking Staples - Baby Food -

Health & Household > Household Supplies > Paper & Plastic > Toilet Paper, Wipes & Sprays > Toilet Paper

365 Everyday Value, Sustainably Soft Bath Tissue, 4 ct

Be the first to review this item



About the product

- Brought to you by Whole Foods Market
- Embossed for ultimate softness
- 4 soft rolls



365

chlorine free
DIAPERS

12-18 lb
(5-8kg)

size
2

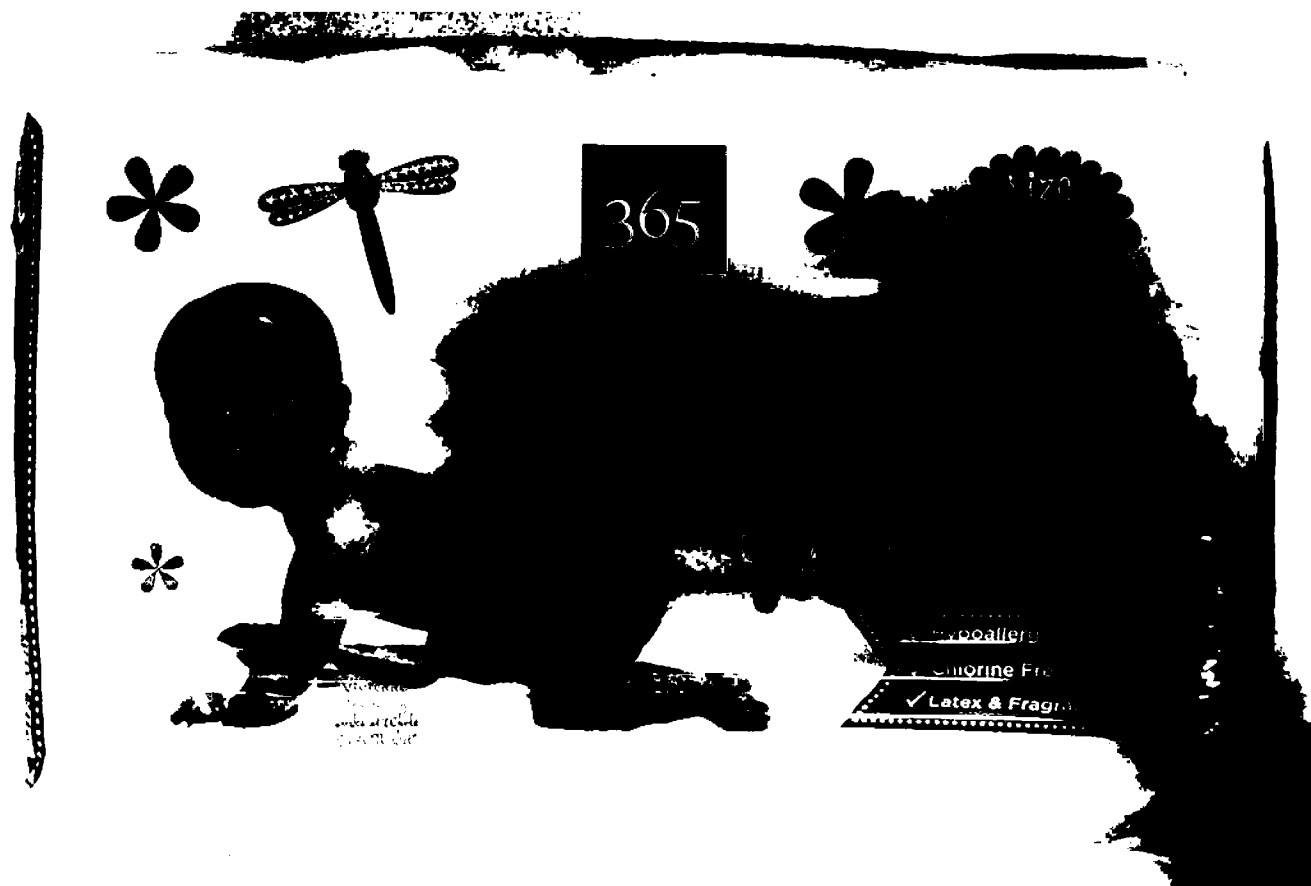
42



cutouts

accept











365

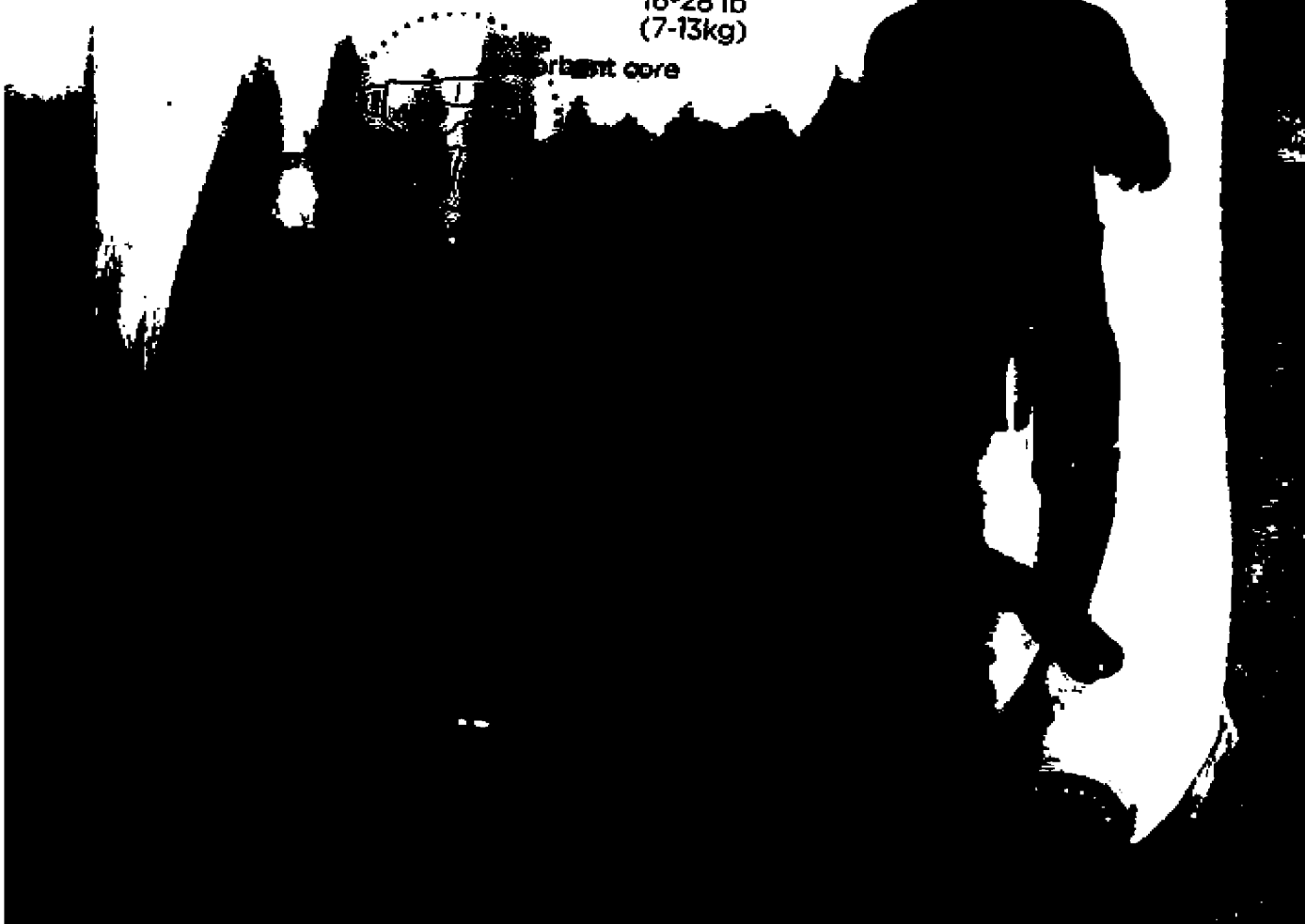


chlorine free
DIAPERS

16-28 lb
(7-13kg)



perbant core



size
3
36

365
EVERY DAY

chlorine free
DIAPER

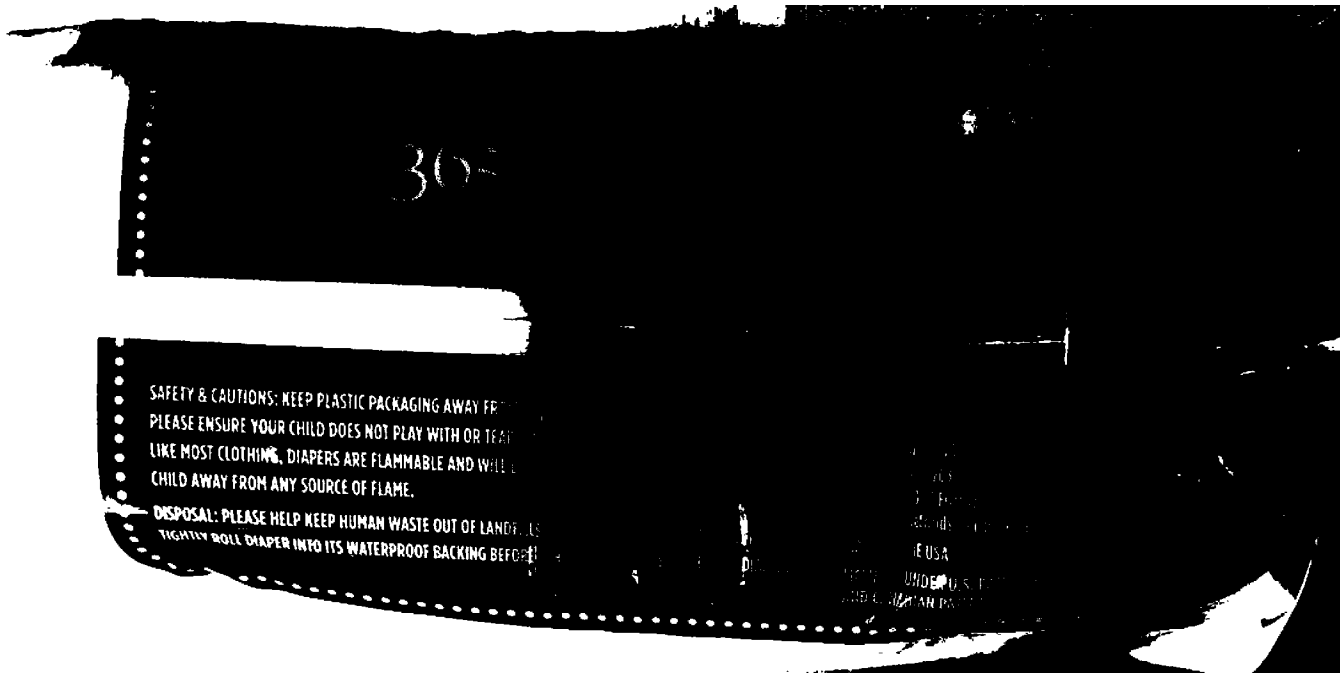
16-28 lb
(7-13kg)



- ✓ Hypoallergenic
- ✓ Chlorine Free
- ✓ Latex & Fragrance Free

Lucas
"my daddy
works at Whole
Foods Market"





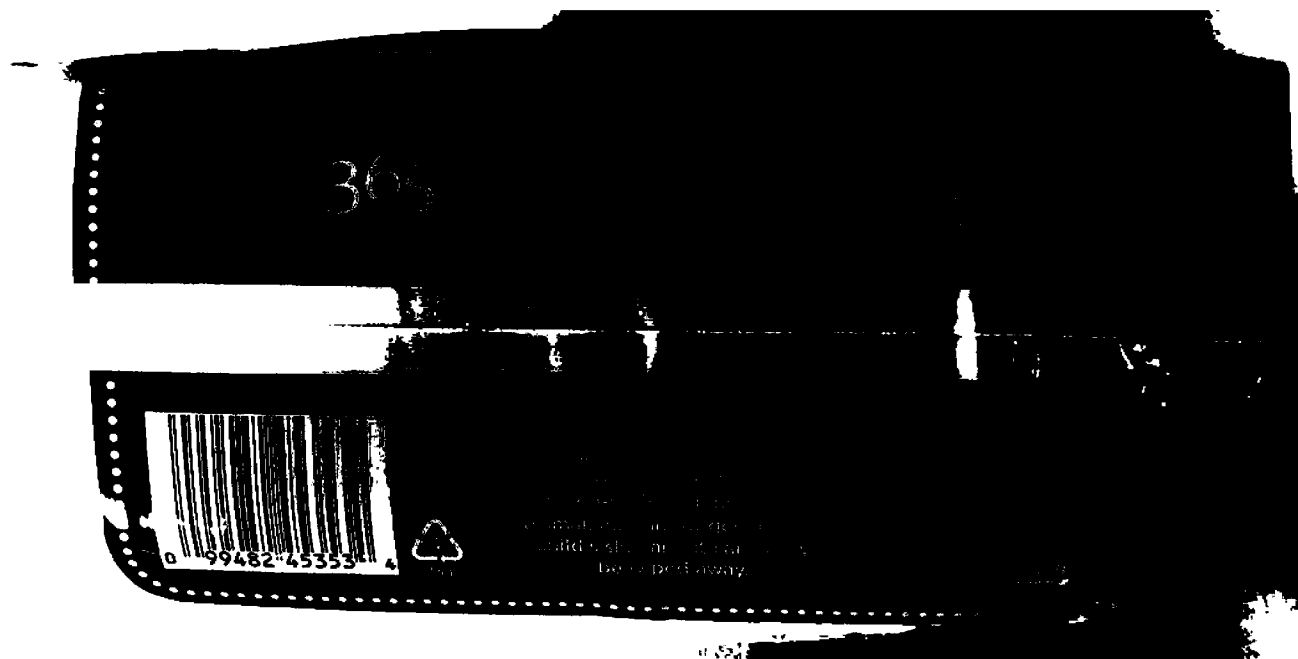
30

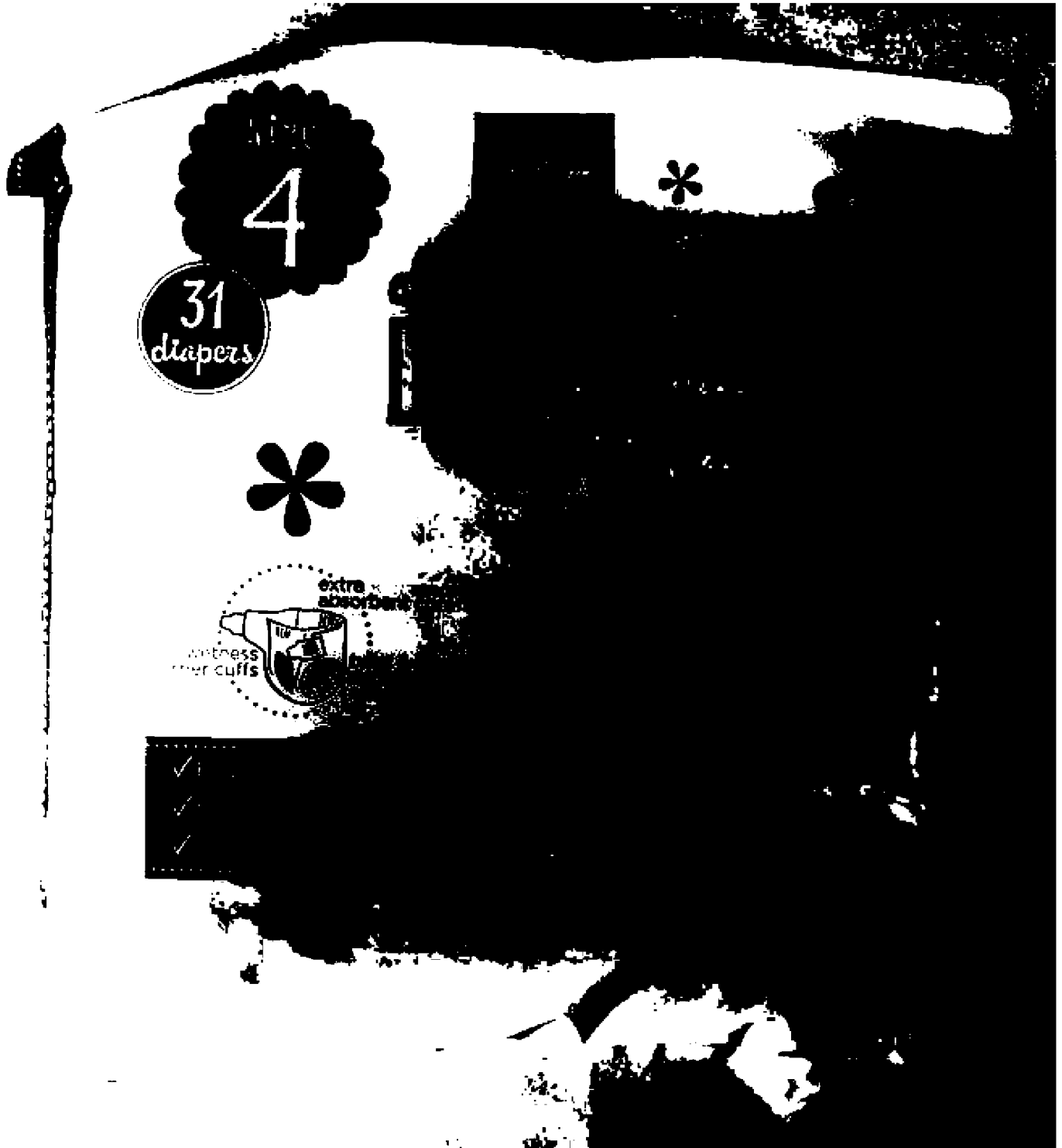
SAFETY & CAUTIONS: KEEP PLASTIC PACKAGING AWAY FROM CHILD.
PLEASE ENSURE YOUR CHILD DOES NOT PLAY WITH OR TEAR PLASTIC BACKING.
LIKE MOST CLOTHING, DIAPERS ARE FLAMMABLE AND WILL BURN. KEEP CHILD AWAY FROM ANY SOURCE OF FLAME.

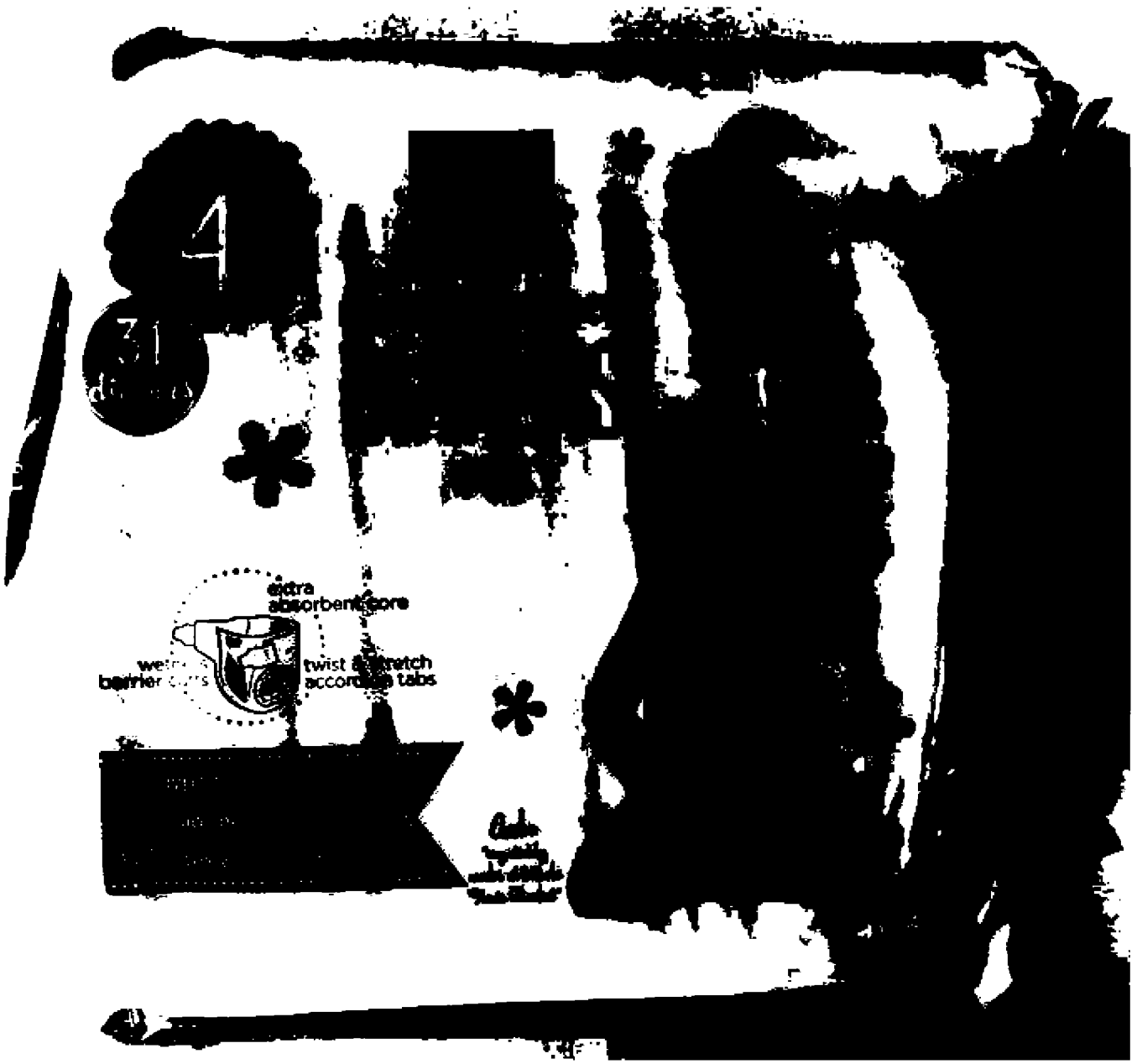
DISPOSAL: PLEASE HELP KEEP HUMAN WASTE OUT OF LANDFILLS.
TIGHTLY ROLL DIAPER INTO ITS WATERPROOF BACKING BEFORE DISPOSING.

MADE IN THE USA

UNDER U.S. PATENT AND FOREIGN PATENTS

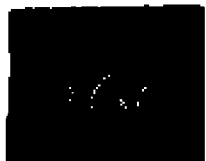
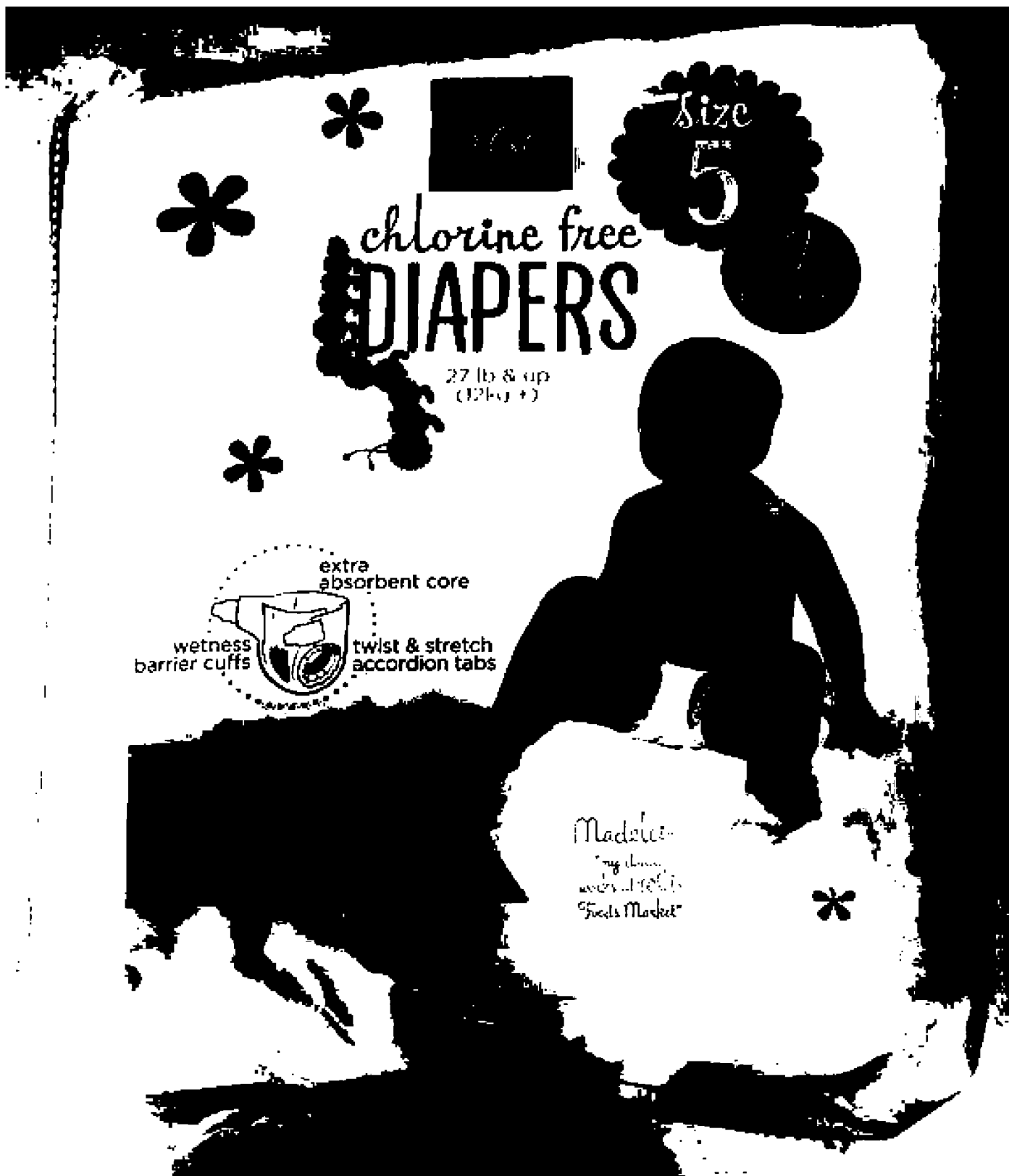






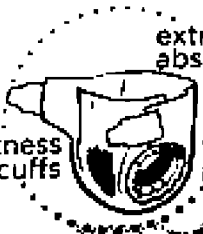






chlorine free
DIAPERS

27 lb & up
(12kg +)



wetness
barrier cuffs

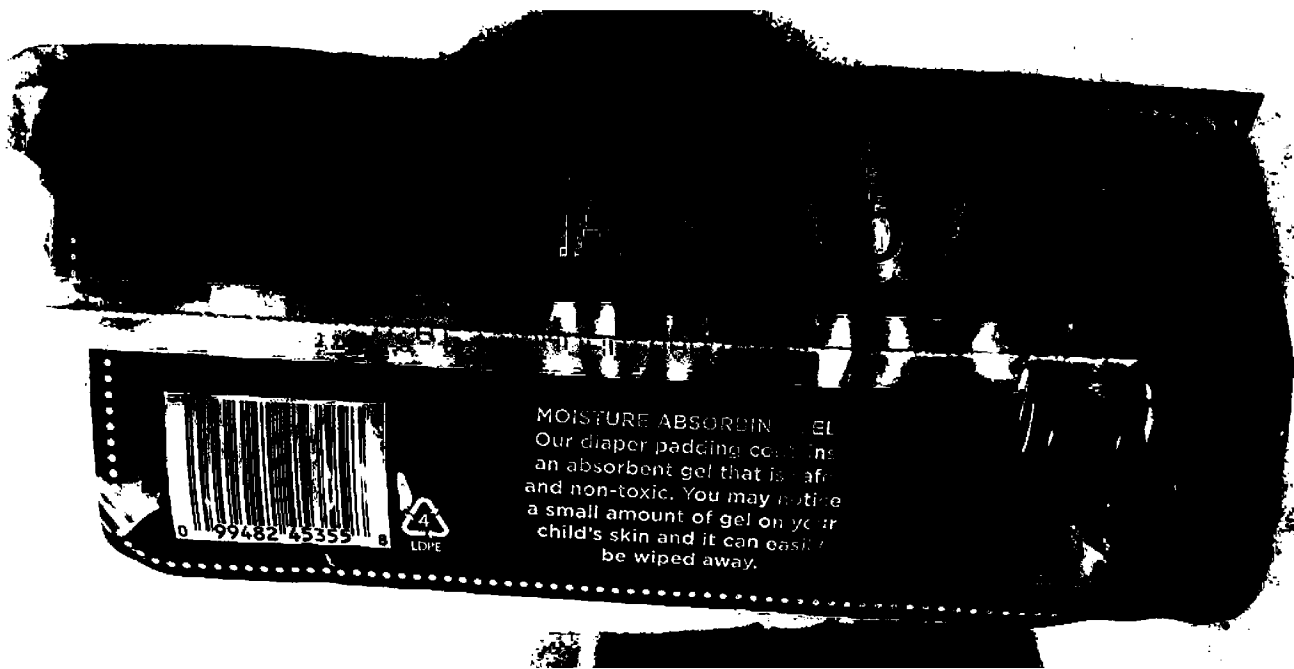
extra
absorbent core

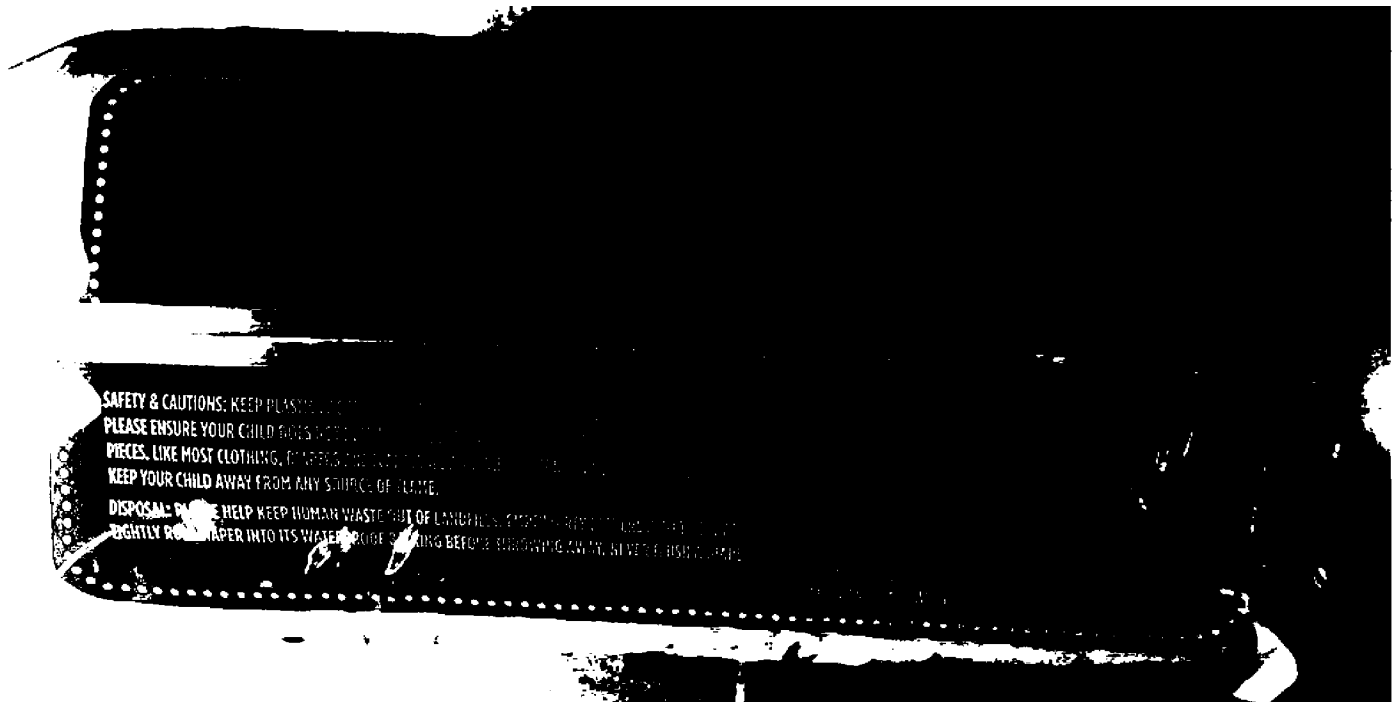
twist & stretch
accordion tabs

Made with
my love
at the
Foods Market











size
2t-3t

26

365

chlorine free
**TRAINING
PANTS**

for boys and girls





2t-3t


365



chlorine free
TRAINING PANTS

for

wetness barrier cuffs



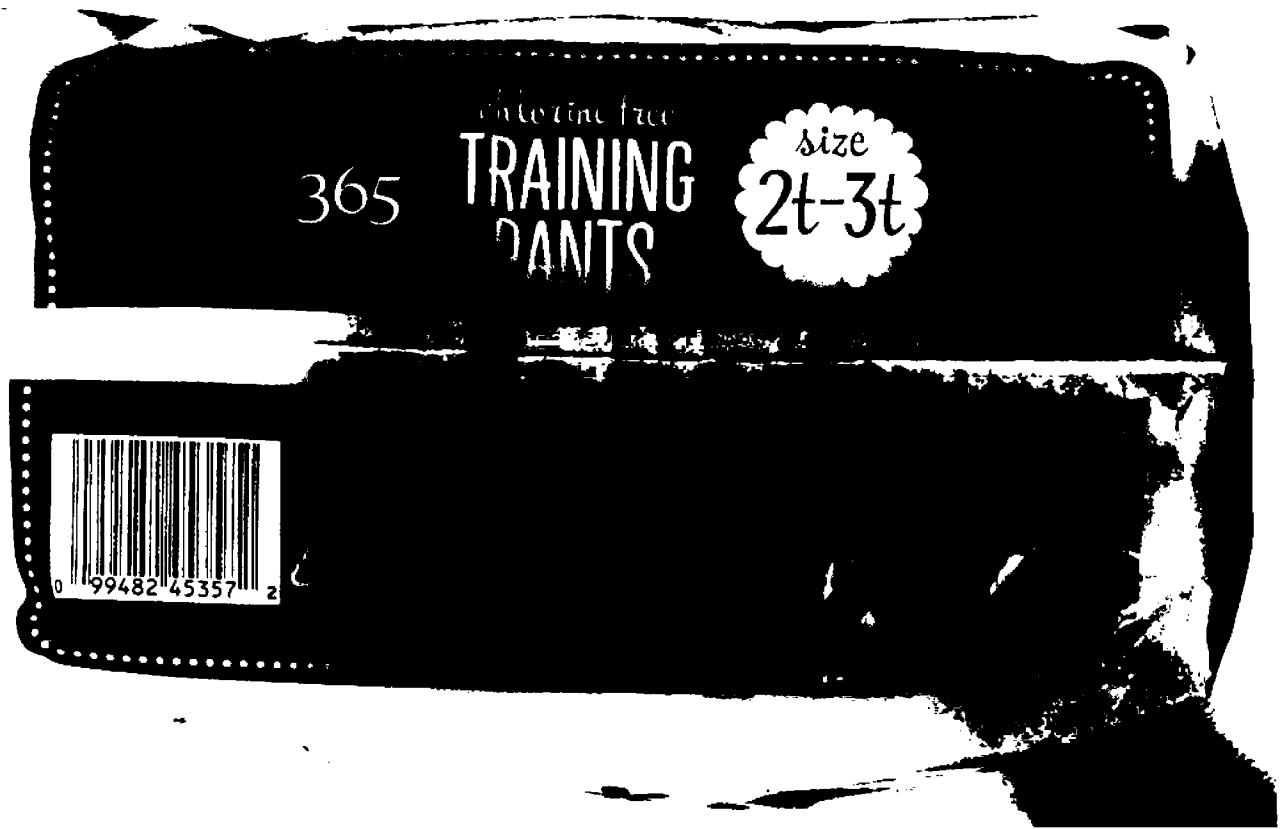
latex & fragrance free

ultra soft, snug-stretch sides

- ✓ Hypoallergenic
- ✓ Chlorine Free
- ✓ Latex & Fragrance Free



365





365 Everyday Value, Training

Secure | <https://www.amazon.com/365-Everyday-Value-Training-Pants/dp/B074J8D58V>

365 Everyday Value, Training Pants Size 2T-3T, 26 ct 365 Everyday Value

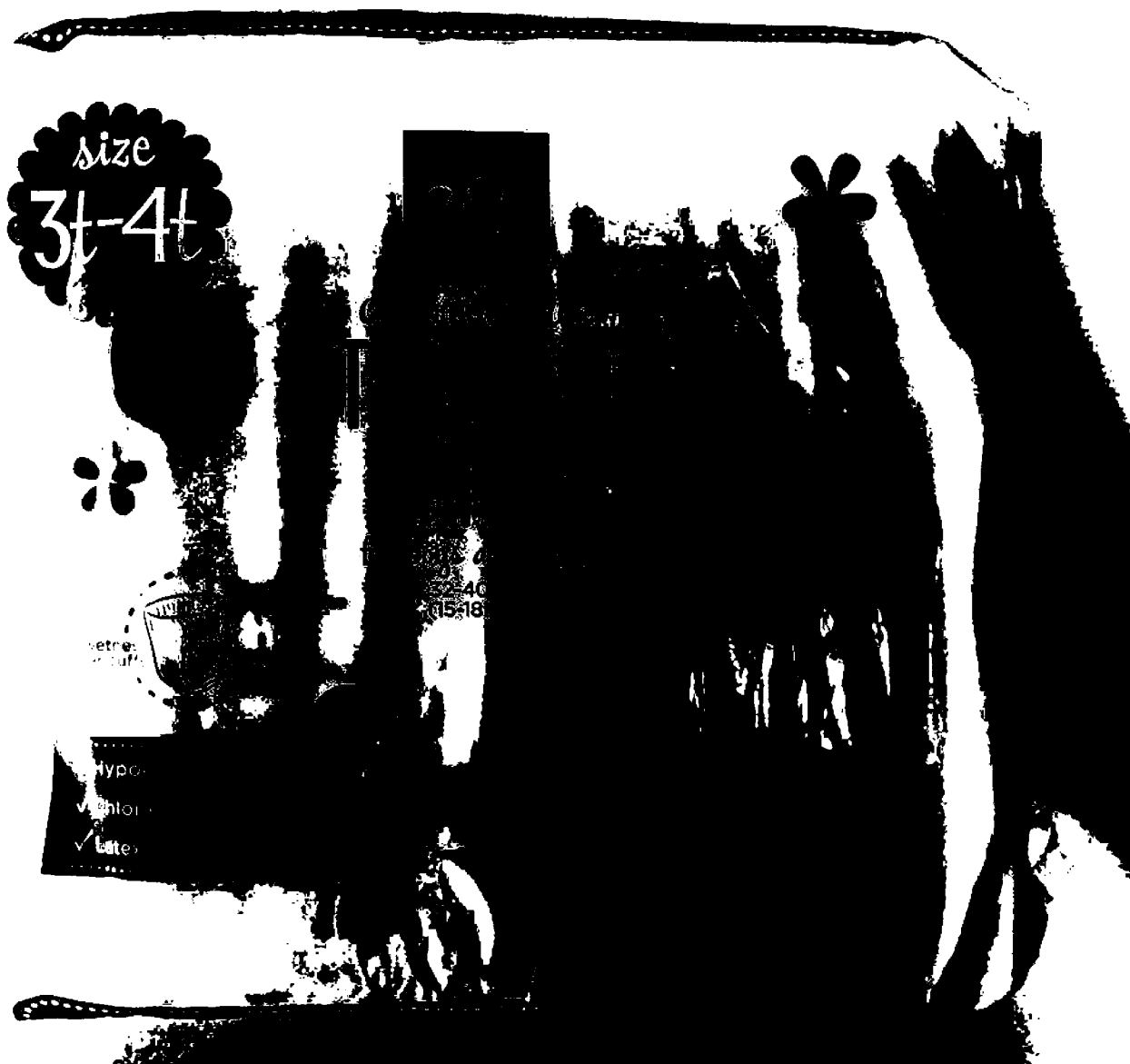
Be the first to review this item

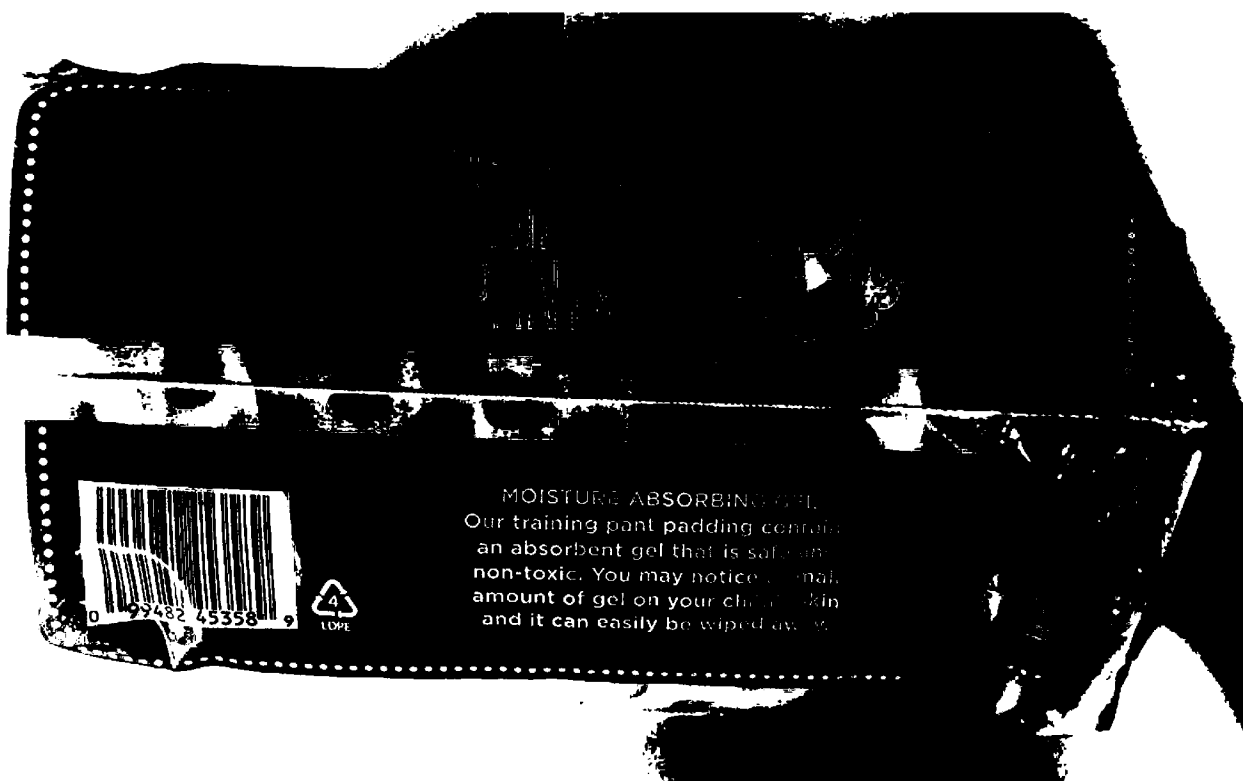


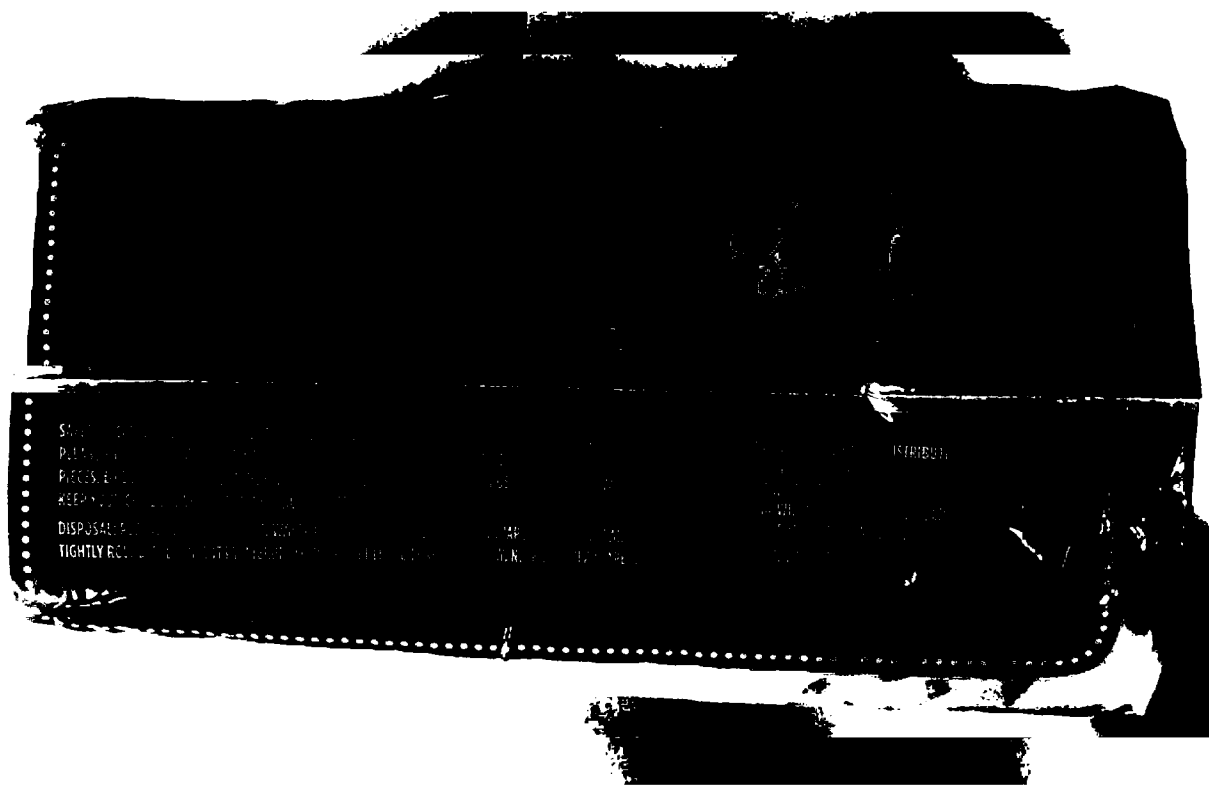
About the product

- Brought to you by Whole Foods Market
- Ultra soft, snug-stretch sides
- Wetness barrier cuffs









amazon

Grocery & Gourmet Food

Departments - Your Amazon.com Today's Deals Gift Cards & Registry Sell Help

Grocery Deals Snacks - Breakfast - Warm Beverages Cold Beverages Cooking Staples - Baby Food

Baby Products > Potty Training > Training Pants

365 Everyday Value, Training Pants Size 3T-4T, 23 ct 365 Everyday Value

Be the first to review this item



About the product

- Brought to you by Whole Foods Market
- Ultra soft, snug-stretch sides
- Wetness barrier cuffs






size
4t-5t

19

365

chlorine free
TRAINING

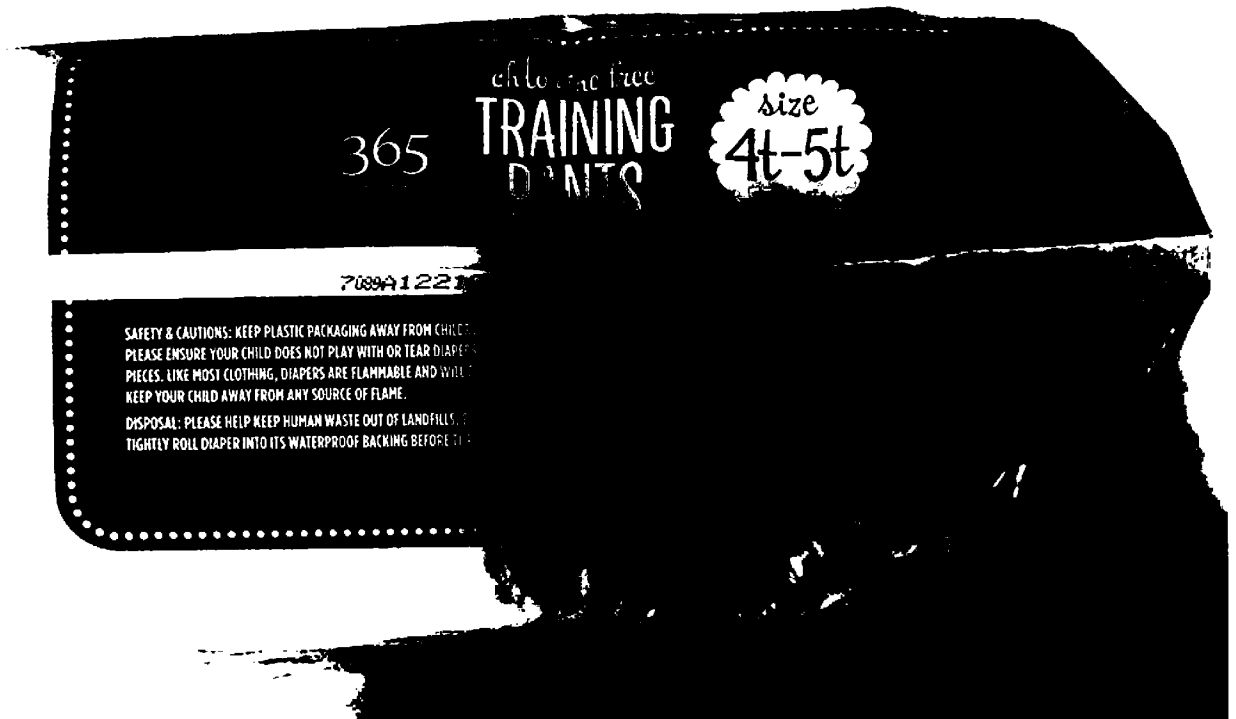
wetness barrier cuffs



latex & fragrance free

ultra soft, snug-stretch sides

- ✓ Hypoallergenic
- ✓ Chlorine Free
- ✓ Latex & Fragrance Free



365

ek to the free
**TRAINING
PANTS**

size
4t-5t

7089A1221

SAFETY & CAUTIONS: KEEP PLASTIC PACKAGING AWAY FROM CHILDREN.
PLEASE ENSURE YOUR CHILD DOES NOT PLAY WITH OR TEAR DIAPER
PIECES. LIKE MOST CLOTHING, DIAPERS ARE FLAMMABLE AND WILL
KEEP YOUR CHILD AWAY FROM ANY SOURCE OF FLAME.
DISPOSAL: PLEASE HELP KEEP HUMAN WASTE OUT OF LANDFILLS.
TIGHTLY ROLL DIAPER INTO ITS WATERPROOF BACKING BEFORE DISPOSING.



amazon

Grocery & Gourmet Food

Departments - Your Amazon.com Today's Deals Gift Cards & Registry Sell Help

Grocery Deals Snacks - Breakfast - Warm Beverages Cold Beverages Cooking Staples - Baby Food

Baby Products > Potty Training > Training Pants

365 Everyday Value, Training Pants Size 4T-5T, 19 ct 365 Everyday Value

Be the first to review this item



About the product

- Brought to you by Whole Foods Market
- Ultra soft, snug-stretch sides
- Wetness barrier cuffs

CIVIL COVER SHEET

The JS-CAND 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Shosa Kellman and Abigail Starr

(b) County of Residence of First Listed Plaintiff Alameda County, California (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) Stephanie R. Tatar, Tatar Law Firm, APC, 3500 W. Olive Ave., Suite 300, Burbank, CA 91505, Tel: 323-744-1146

DEFENDANTS

Whole Foods Market, Inc.

County of Residence of First Listed Defendant Travis County, Texas (IN U.S. PLAINTIFF CASES ONLY)

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

Attorneys (If Known)

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

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

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

Table with columns for PTF and DEF for Citizen of This State, Citizen of Another State, and Citizen or Subject of a Foreign Country.

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

Large table with columns for CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, HABEAS CORPUS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, and OTHER STATUTES.

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

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District, 6 Multidistrict Litigation-Transfer, 8 Multidistrict Litigation-Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): Class Action Fairness Act, 28 U.S.C. § 1332(d)
Brief description of cause: Class action for alleged fraudulent false advertising

VII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, Fed. R. Civ. P. DEMAND \$

CHECK YES only if demanded in complaint: JURY DEMAND: X Yes No

VIII. RELATED CASE(S), IF ANY (See instructions):

JUDGE DOCKET NUMBER

IX. DIVISIONAL ASSIGNMENT (Civil Local Rule 3-2)

(Place an "X" in One Box Only) X SAN FRANCISCO/OAKLAND SAN JOSE EUREKA-MCKINLEYVILLE

DATE 11/13/2017

SIGNATURE OF ATTORNEY OF RECORD

/s/ Stephanie Tatar

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS-CAND 44

Authority For Civil Cover Sheet. The JS-CAND 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I. a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the “defendant” is the location of the tract of land involved.)
- c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section “(see attachment).”
- II. Jurisdiction.** The basis of jurisdiction is set forth under Federal Rule of Civil Procedure 8(a), which requires that jurisdictions be shown in pleadings. Place an “X” in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- (1) United States plaintiff. Jurisdiction based on 28 USC §§ 1345 and 1348. Suits by agencies and officers of the United States are included here.
 - (2) United States defendant. When the plaintiff is suing the United States, its officers or agencies, place an “X” in this box.
 - (3) Federal question. This refers to suits under 28 USC § 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 - (4) Diversity of citizenship. This refers to suits under 28 USC § 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS-CAND 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an “X” in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an “X” in one of the six boxes.
- (1) Original Proceedings. Cases originating in the United States district courts.
 - (2) Removed from State Court. Proceedings initiated in state courts may be removed to the district courts under Title 28 USC § 1441. When the petition for removal is granted, check this box.
 - (3) Remanded from Appellate Court. Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 - (4) Reinstated or Reopened. Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 - (5) Transferred from Another District. For cases transferred under Title 28 USC § 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 - (6) Multidistrict Litigation Transfer. Check this box when a multidistrict case is transferred into the district under authority of Title 28 USC § 1407. When this box is checked, do not check (5) above.
 - (8) Multidistrict Litigation Direct File. Check this box when a multidistrict litigation case is filed in the same district as the Master MDL docket. Please note that there is no Origin Code 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC § 553. Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an “X” in this box if you are filing a class action under Federal Rule of Civil Procedure 23. Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction. Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS-CAND 44 is used to identify related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.
- IX. Divisional Assignment.** If the Nature of Suit is under Property Rights or Prisoner Petitions or the matter is a Securities Class Action, leave this section blank. For all other cases, identify the divisional venue according to Civil Local Rule 3-2: “the county in which a substantial part of the events or omissions which give rise to the claim occurred or in which a substantial part of the property that is the subject of the action is situated.”
- Date and Attorney Signature.** Date and sign the civil cover sheet.