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Theo Couderc

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

THEO COUDERC, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

DR. SQUATCH, LLC, YETI INTERMEDIATE HOLDINGS II, LLC; SUMMIT MASTER COMPANY, LLC; and CONOPCO, INC.,

Defendants.

Case No.: 5:26-cv-2332 (BKS/CBF)

CLASS ACTION
COMPLAINT FOR VIOLATIONS OF:

1) **NEW YORK DECEPTIVE PRACTICES ACT (N.Y. GEN. BUS. LAW § 349);**
2) **NEW YORK FALSE ADVERTISING LAW (N.Y. GEN. BUS. LAW § 350);**
3) **INTENTIONAL MISREPRESENTATION;**
4) **BREACH OF EXPRESS WARRANTY; and**
5) **UNJUST ENRICHMENT.**

JURY TRIAL DEMANDED

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INTRODUCTION

1. Plaintiff Theo Couderc ("Mr. Couderc" or "Plaintiff"), individually and on behalf of all other similarly situated individuals, brings this class action complaint ("Complaint") for damages and any other available legal or equitable remedies resulting from the unlawful actions of Defendants Dr. Squatch, LLC ("Dr. Squatch"); Yeti Intermediate Holdings II, LLC ("Yeti"); Summit Master Company, LLC ("Summit"); and Conopco, Inc. d/b/a Unilever ("Unilever"), doing business as Dr. Squatch (each a "Defendant," and collectively, the "Defendants").

2. This Complaint concerns the unlawful, unfair, and deceptive labeling, marketing, distribution and sale of Dr. Squatch's personal care products, including representations that the products are "Made in USA,"[1] without providing clear and adequate disclosure that they contain foreign ingredients and components, as required by state and federal laws and regulations.

3. The unlawfully and deceptively represented products were sold through multiple channels, including but not limited to direct-to-consumer sales on Defendant's website, Defendant's Amazon.com ("Amazon") store, and third-party merchants operating both brick-and-mortar retail locations and online storefronts. By way of non-exhaustive example, Defendants' products are also sold online as well as through conventional retail outlets including convenience stores, grocery stores and other third-party retailers such as Target; Walmart; Instacart; Ulta Beauty; CVS Pharmacy; Walgreens; Albertsons Companies, Inc., grocery chains like Albertsons and Vons; and Kroger Co. grocery chains like Ralphs.

4. Plaintiff, who purchased Defendants' personal care products, which were represented as being "Made in USA," alleges the following upon personal

[1] For purposes of this Complaint, the term "Made in USA," includes all synonymous, substantially similar, or derivative unqualified U.S.-origin representations, including, but not limited to, "Handcrafted in the USA," "Crafted in the USA," "Manufactured in the USA," and "Made in the USA."

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knowledge as to his own acts and experiences, and upon information and belief as to all other matters, based on the investigation conducted by his attorneys.

5. In the highly competitive personal care products industry, some companies seek to gain an unfair advantage by misleading consumers about their products. Defendants marketed their products as being of domestic origin without any qualification of the foreign ingredients or components contained therein. In truth, the products contained numerous foreign ingredients. As a result, Defendants' unqualified domestic origin claims, such as "Made in USA" were false, deceptive, misleading, and fraudulent, and consumers were harmed by paying a premium price for products that are not as represented. This practice violates federal regulations that require clear and adequate qualification of the foreign ingredients and components used in a product when domestic origin claims are made.

6. Numerous federal laws, rules, and regulations govern the labeling of consumer products, including products sold under the Dr. Squatch brand.

7. For example, the Federal Food, Drug, and Cosmetic Act ("FDCA"), and various state laws[2] that generally align with the FDCA govern the aspects of personal care product labeling discussed herein. These laws reflects a fundamental principle: **consumers have the right to know what they are purchasing**.

8. When companies misrepresent their products, or falsely claim their origin, they violate fundamental consumer protection laws. Such misconduct undermines consumer trust, distorts the marketplace, and grants an unfair competitive advantage.

9. Under both New York law[3] and the FDCA,[4] a product is considered misbranded if its labeling is false or misleading *in any particular*.

10. For example, Dr. Squatch's Men's Natural Soap, one of its best-selling products, which was purchased by Plaintiff, was falsely represented as being "Made

[2] *See* N.Y. Educ. Law §§ 6818(2)(a), 6811(9)
[3] *Id.*
[4] *See* 21 USC § 362(a).

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in USA," despite containing numerous foreign ingredients and components, including key ingredients. Dr. Squatch's "Made in USA" representation was also bolstered with iconography of the American flag on the products' packaging and in their marketing. These unqualified representations misled consumers, as detailed further herein.

11. Defendants marketed, advertised, and/or sold their products through express representations that they are "Made in USA," without any qualification or disclosure of foreign ingredients or components used therein. These claims appeared on the products themselves and in marketing materials, including those related to the products purchased by Plaintiff.

12. Upon information and belief, Defendants have also advertised and/or marketed the Class Products as being of domestic origin, without qualification of foreign ingredients or components, through channels beyond their labels, website and Amazon store, including but not limited to blogs, email newsletters, social media platforms, public relations driven press or media coverage, and out-of-home advertising. The full scope, content, and dissemination of Defendants' misleading and deceptive marketing is within the exclusive knowledge, control, and possession of Defendants and their agents, and therefore cannot be fully ascertained or pleaded without the benefit of discovery.

13. Defendants' conduct of labeling, marketing and/or selling deceptively labeled products bearing the aforementioned misrepresentations violates: (1) New York's Deceptive Practices Act ("DPA," N.Y. Gen. Bus. Law § 349); (2) New York's False Advertising Law ("FAL," N.Y. Gen. Bus. Law § 350); and constitutes (3) intentional misrepresentation, (4) breach of express warranty, and (5) unjust enrichment.

14. Defendants' conduct of labeling, marketing and/or selling deceptively labeled products bearing the representation that such products are "Made in USA" without qualification also violates N.Y. Educ. Law § 6818(2)(a), § 6811(9), the FDCA and 16 C.F.R. § 323 (Federal Trade Commission 2021) (the "MUSA Rule").

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15. This conduct caused Plaintiff, and other similarly situated consumers, damages and requires restitution in the alternative to damages.

16. In addition to the false and misleading claims regarding the specific products purchased by Plaintiff, e.g., Pine Tar, Fresh Falls, Birchwood Breeze, Wood Barrel Bourbon, Gold Moss, Grapefruit IPA, Cold Brew Cleanse, Deep Sea Goats Milk, Fight Scrub, Nautical Nonsense, Viserion's Freeze, Thousand Sword Scrub, Dragon's Blaze, Count Sudsula, Drunk'n Pumpkin, and Headless Rinse scent variations of Defendants' Men's Natural Soap (together, the "Products"), Dr. Squatch's other products, including, but not limited to, those identified in **Exhibit A** (the "Class Products"), were likewise labeled and/or marketed with the same deceptive representations, including unqualified claims that they were "Made in USA," and are subject to this lawsuit.

JURISDICTION AND VENUE

17. This Court has jurisdiction over this matter pursuant to the Class Action Fairness Act (CAFA), 28 U.S.C. § 1332(d), because: (1) there is minimal diversity as Plaintiff is a citizen of New York; Dr. Squatch, LLC and Yeti Intermediate Holdings II, LLC are both Delaware limited liability companies with their principal places of business in California;[5] Summit Master Company, LLC is a Delaware entity with its principal place of business in Massachusetts;[6] and Conopco, Inc. is a

[5] According to Dr. Squatch's most recent Statement of Information filing with the California Secretary of State (filed on April 18, 2024), which was last accessed on November 2, 2026, both Dr. Squatch and Yeti Intermediate Holdings II, LLC, are Delaware companies located at 4065 Glencoe Avenue, Suite 300B, Marina Del Rey, California 90292.

[6] Summit Master Company, LLC's most recent Statement of Information (filed on May 19, 2025), which was accessed on November 2, 2026, states that it is located at 222 Berkley Street, 18th Floor, Boston, Massachusetts 02116 and that it is a Delaware company.

New York corporation with its principal place of business in New Jersey[7]; (2) the amount in controversy in this matter exceeds $5 million, exclusive of interest and costs; and (3) there are more than one hundred (100) people in the putative class.

18. Venue is proper in the United States District Court for the Northern District of New York pursuant to 28 U.S.C. § 1391 for the following reasons: (i) Plaintiff resides in Onondaga County, New York which is within this judicial district; (ii) a substantial part of the conduct complained of herein occurred within this judicial district; and (iii) Defendants conducted business within this judicial district at all relevant times.

PARTIES

19. Mr. Couderc is, and at all times mentioned herein was, a natural person, an individual citizen and resident of Onondaga County, New York.

20. Dr. Squatch, LLC, is a Delaware limited liability company, with its principal place of business at 4065 Glencoe Avenue, Suite 300B, Marina Del Rey, California 90292.

21. Yeti Intermediate Holdings II, LLC, is a Delaware limited liability company, which is, on information and belief, located at 4065 Glencoe Avenue, Suite 300B, Marina Del Rey, California 90292.[8]

22. Summit Master Company, LLC, is a Delaware limited liability company with its principal place of business at 222 Berkeley Street, 18th Floor, Boston, Massachusetts. At times during the Class Period, Defendant Summit owned and controlled Dr. Squatch when the conduct described herein occurred.

[7] According to Defendant Conopco, Inc.'s most recent Statement of Information filing with the California Secretary of State, dated May 6, 2026.

[8] Yeti Intermediate Holdings II, LLC, does not have an active profile on the California Secretary of State's website. However, Dr. Squatch's last-filed Statement of Information identifies Yeti Intermediate Holdings II, LLC, as Dr. Squatch's member/manager and indicates that it is located at the same address as Dr. Squatch.

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23. Conopco, Inc., is a New York corporation with its principle place of business at 111 River Street, 8th Floor, Hoboken, New Jersey 07030. At times during the Class Period, Defendant Unilever owned and controlled Dr. Squatch when the conduct described herein occurred.

24. Defendants have formulated, marketed, and/or sold personal care products and: (a) conducted business direct-to-consumer through Dr. Squatch's website and Amazon store; (b) conducted business through the websites of third-party vendors, including, but not limited to, Walmart.com, Target.com, and Instacart.com; and (c) distributed their products to be sold in brick and mortar stores including, but not limited to, grocery stores, convenience stores, pharmacies, and elsewhere.

25. Plaintiff alleges that at all relevant times Defendants conducted business throughout the State of New York, including within Onondaga County, and within this judicial district.

26. Unless otherwise indicated, the use of Defendants' name in this Complaint includes all agents, employees, officers, members, directors, heirs, successors, assigns, principals, trustees, sureties, subrogees, representatives, and insurers of the Defendants, respectively.

NATURE OF THE CASE

27. Founded in 2013, Defendant Dr. Squatch has grown into one of the leading, if not the leading, startup personal care brands in the United States. By as early as 2020, Dr. Squatch had reportedly crossed the $100 million per year revenue threshold,[9] underscoring the substantial scale, commercial reach, and market

[9] *See* Dr. Squatch Scales to $100 Million with Natural Soaps for Men, Practical Ecommerce (Jan. 22, 2021), https://www.practicalecommerce.com/dr-squatch-a-mens-soap-brand-scales-to-100-million ("Fast forward to 2021, and Dr. Squatch, Haldrup's company, sells its own natural soaps and other grooming products for men. Revenue in 2020 was roughly $100 million, having exploded from $5 million just 18 months earlier.").

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penetration of its products.

28. In June 2025, as a result of Dr. Squatch's commercial success, Defendant Unilever acquired Dr. Squatch for a reported $1.5 billion.[10]

29. Summit is a private investment firm headquartered in Boston, Massachusetts. The firm focuses on investments in technology, healthcare, life sciences, and other growth-oriented industries. Upon information and belief, Summit manages approximately $35 billion in assets under management and acquired a majority ownership interest in Dr. Squatch in 2022, giving it the ability to influence and control the company's business operations, policies, and practices.

30. Unilever is a multinational consumer packaged goods company with operations throughout the world. Upon information and belief, Unilever generates annual revenues in excess of $50 billion. Unilever's acquisition of Dr. Squatch has resulted in ownership and control over Dr. Squatch's business operations, assets, marketing, and product portfolio.

31. Upon information and belief, both Summit and Unilever possessed substantial resources, sophisticated compliance capabilities, and extensive experience conducting due diligence in connection with the acquisition, ownership, operation, and oversight of consumer products companies. Through their respective ownership interests in Dr. Squatch, and through the diligence, compliance, reporting, and oversight processes ordinarily attendant to such transactions and investments, Summit and Unilever knew or should have known of the labeling, marketing, sourcing, and supply-chain practices relating to the Class Products, including the unqualified U.S.-origin representations challenged herein. Notwithstanding such knowledge, Summit and Unilever permitted, approved,

[10] *See* Unilever Just Dropped $1.5 Billion on a Soap Brand—Here's Why It Might Be Genius, Yahoo Finance (June 27, 2025), https://finance.yahoo.com/news/unilever-just-dropped-1-5-023628712.html ("Unilever (UN) is making a $1.5 billion move into the premium men's grooming game quietly snapping up Dr. Squatch…").

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ratified, and/or failed to prevent the continued marketing and sale of the Class Products with the misleading representations described in this Complaint.

32. Defendant Yeti is the sole entity identified as a "Member/Manager" of Defendant Dr. Squatch in filings with the California Secretary of State.[11] Upon information and belief, Defendant Yeti held an ownership interest in and/or exercised control over Defendant Dr. Squatch throughout the Class Period.

33. Defendants marketed and sold a portfolio of products through multiple distribution channels including, but not limited to, Dr. Squatch's own website,[12] Dr. Squatch's Amazon store,[13] through third-party retailers online as well as in brick and mortar stores.

34. Upon information and belief, Dr. Squatch currently generates annual revenues in the hundreds of millions of dollars.

35. Upon information and belief, the Class Products with a "Made in USA" representation continue to be sold in the stream of commerce.

36. As a result of its commercial success, Defendant Dr. Squatch possesses financial and professional resources that far exceed those available to typical emerging or startup consumer product companies, especially considering the resources at its disposal from Defendants Summit and Unilever.

37. Given Defendants' substantial resources and operational sophistication, it is difficult to conceive how Defendants could so blatantly disregard the well-established laws, rules, and regulations governing the labeling, marketing, and sale of personal care products.

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[11] *See, supra*, n.10.

[12] *See* https://www.drsquatch.com

[13] *See* https://www.amazon.com/stores/DrSquatch/page/06543539-37D8-4A25-986B-5A60BA6C9815?ref_=cm_sw_r_ud_ast_store_KDYW27M4S99CNH322GWS

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38. At all relevant times, Defendants and their agents made material misrepresentations regarding the Class Products.

39. Defendants advertised, marketed, promoted, distributed and sold the Class Products as being "Made in USA," without disclosing that they contained foreign-sourced ingredients, including key components. These representations are false, unlawful, unfair, and deceptive.

40. Each consumer, including Plaintiff, was exposed to the same material misrepresentations, as virtually identical labels, packaging, and marketing materials were used in the promotion and sale of all Class Products nationwide, including within the State of New York.

41. Federal and state laws, rules, and regulations governing the truthful and accurate marketing and labeling of consumer products are well-established and clearly defined. Specifically, under the FDCA and N.Y. Educ. Law § 6818(2)(a), a product is considered *misbranded* if its labeling is false or misleading in any particular. New York law also prohibits manufacturing, selling, delivering for sale, holding for sale, or offering for sale a misbranded product. N.Y. Educ. Law § 6811(9). 21 U.S.C. § 321(m) states that the term "labeling" encompasses not only labels on the product or its container, but also *all written, printed, or graphic matter that accompanies the product*, including promotional brochures, advertising copies, and marketing materials, thereby bringing Defendants' off-package marketing claims, including those made on its social media accounts, within the scope of the statute.

42. Federal laws and regulations regarding the use of "Made in the United States" claims, including any synonymous claims, whether express or implied, are well-established and clearly defined with respect to products and services as discussed herein.

43. As a direct result of Defendants' unfair and deceptive practices, Plaintiff and other similarly situated consumers purchased the Class Products in reasonable

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reliance on Defendants' misrepresentations.

44. As a result, Plaintiff and other similarly situated consumers overpaid for the Class Products, purchased the Class Products over the products of competitors, and/or purchased the Class Products under the belief that the Defendants' representations were accurate, truthful and lawful. This includes initial and repeat purchases of the Class Products.

45. Despite clearly established and well-defined federal laws, rules, and regulations, including consumer protection laws, governing the labeling, marketing, and sale of products such as the Class Products in the United States, Defendants falsely, unfairly, and deceptively advertised, marketed, and sold their products, including the Products purchased by Plaintiff, as further detailed herein.

46. Had Plaintiff and other similarly situated consumers been aware that the labeling and marketing of the Class Products contained false, unfair and deceptive misrepresentations, they would have paid less for the Class Products.

47. As a result of Defendants' false, unfair, and deceptive statements and/or their failure to disclose the true contents of the Class Products, along with the other conduct described herein, Plaintiff and similarly situated consumers purchased hundreds of thousands of units of the Class Products across the United States, including in New York, and have suffered harm, including the loss of money and/or property.

48. Defendants' conduct regarding the labeling, marketing, distribution and sale of the Class Products, as alleged herein, violates multiple federal and New York laws, rules, and regulations, as detailed below.

49. This action seeks, among other things, in the alternative to damages and other remedies in law, equitable relief, restitution of all amounts unlawfully retained by Defendants, and disgorgement of all ill-gotten profits resulting from Defendants' alleged wrongdoing.

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FACTUAL ALLEGATIONS

50. Plaintiff re-alleges and incorporates by reference all preceding paragraphs of this Complaint as though fully set forth herein, and further alleges as follows:

51. At all relevant times, including as of the filing of this Complaint, Defendants and/or their agents have made material misrepresentations regarding the Class Products.

False U.S. Origin Claims

52. Defendants have produced, marketed, advertised, distributed and/or sold the Class Products, including the Products purchased by Plaintiff, as "Made in USA," without clear or adequate qualification.

53. The MUSA Rule clearly defines the meaning of "Made in the United States" or any synonymous representation[14] and outlines when such designations may be used without qualification. Specifically, clear and adequate qualifications must notify consumers if the good or service contains or is made with ingredients or components that are not made or sourced in the United States.[15]

54. Despite the clearly established and well-defined federal laws and regulations,

[14] *See* 16 C.F.R. § 323.1(a) ("**The term Made in the United States means any unqualified representation,** express or implied, **that a product or service**, or a specified component thereof, **is of U.S. origin**, **including**, but not limited to, a representation that such product or service is "**made**," "**manufactured**," "built," "produced," "created," or "**crafted**" **in the United States** or in America, **or any other unqualified U.S.-origin claim**.") (emphasis added).

[15] *See* 16 C.F.R. § 323.2 Prohibited Acts ("In connection with promoting or offering for sale any good or service, in or affecting commerce as "commerce" is defined in section 4 of the Federal Trade Commission Act, 15 U.S.C. 44, **it is an unfair or deceptive act or practice** within the meaning of section 5(a)(1) of the Federal Trade Commission Act, 15 U.S.C. 45(a)(1), **to label any product as Made in the United States unless** the final assembly or processing of the product occurs in the United States, all significant processing that goes into the product occurs in the United States, ***and*** **all or virtually all ingredients or components of the product are made and sourced in the United States**. (emphasis added).

including consumer protection laws, regarding U.S. origin claims, Defendants falsely, unfairly and deceptively advertised, marketed and sold the Class Products, including the Products purchased by Plaintiff, as "Made in USA" without clear and adequate qualification informing consumers of the presence of foreign ingredients and/or components as further discussed herein.

55. Despite their unqualified "Made in USA" representations, the Class Products have been made using numerous ingredients and components that are neither domestically grown, sourced, nor produced.

56. For the Class Products, Defendants prominently and uniformly made substantially similar and unqualified U.S.-origin claims on product labeling, packaging, and advertising, including statements such as "Handcrafted in the USA," "Crafted in the USA," "Manufactured in the USA," and/or "Made in the USA." On product labeling and packaging, these representations frequently appeared in contrasting text and were visually separated from surrounding content, thereby emphasizing and reinforcing the message that the Class Products and their ingredients were of U.S. origin.

57. Defendants likewise disseminated the same unqualified U.S.-origin claims through their marketing and advertising channels, including social media platforms and third-party reseller websites. These representations were accompanied by prominent imagery of the American flag, further reinforcing and amplifying the message of domestic origin conveyed to consumers.

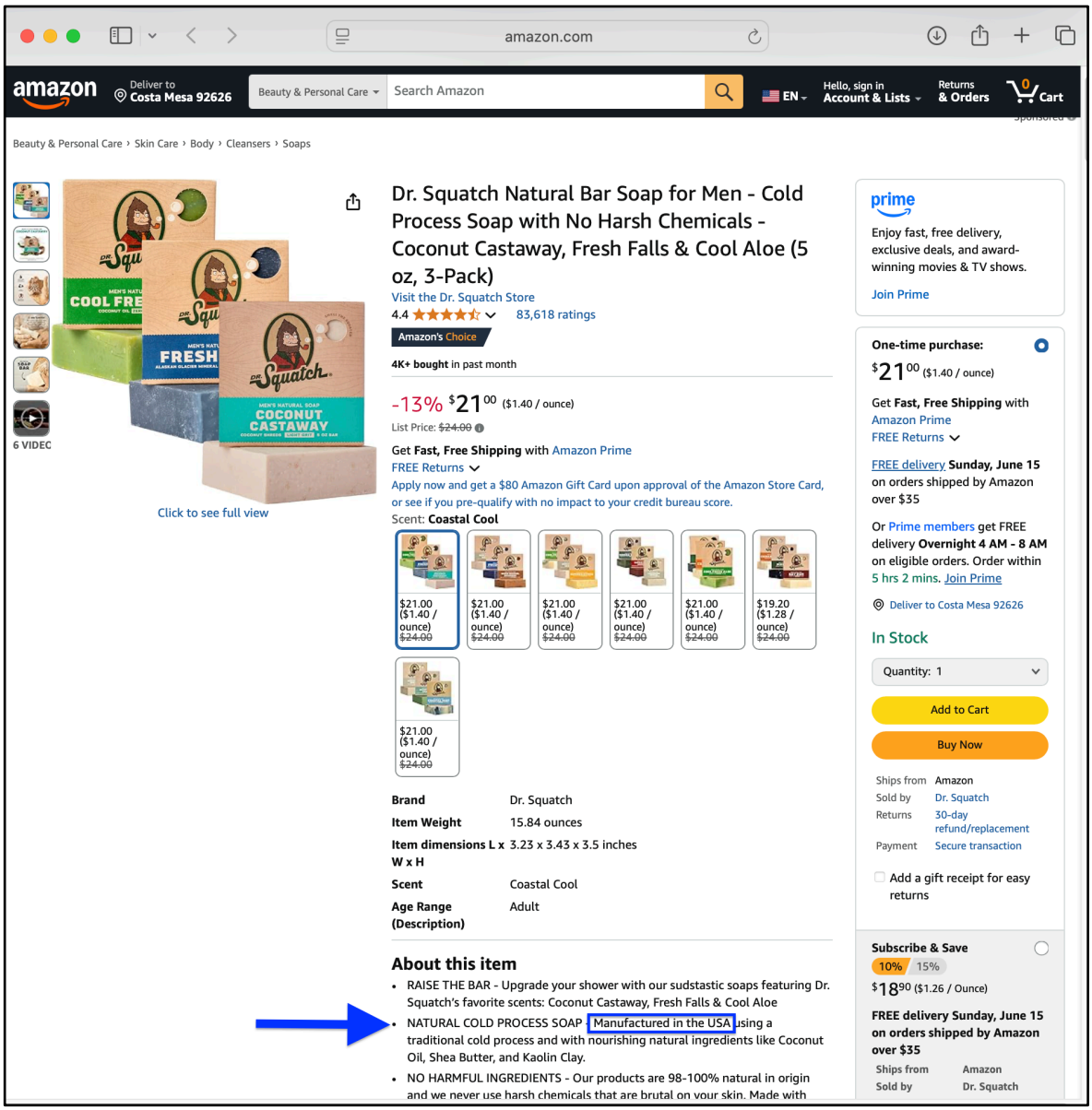
58. Below are non-exhaustive examples of the aforementioned misrepresentations regarding the Class Products:

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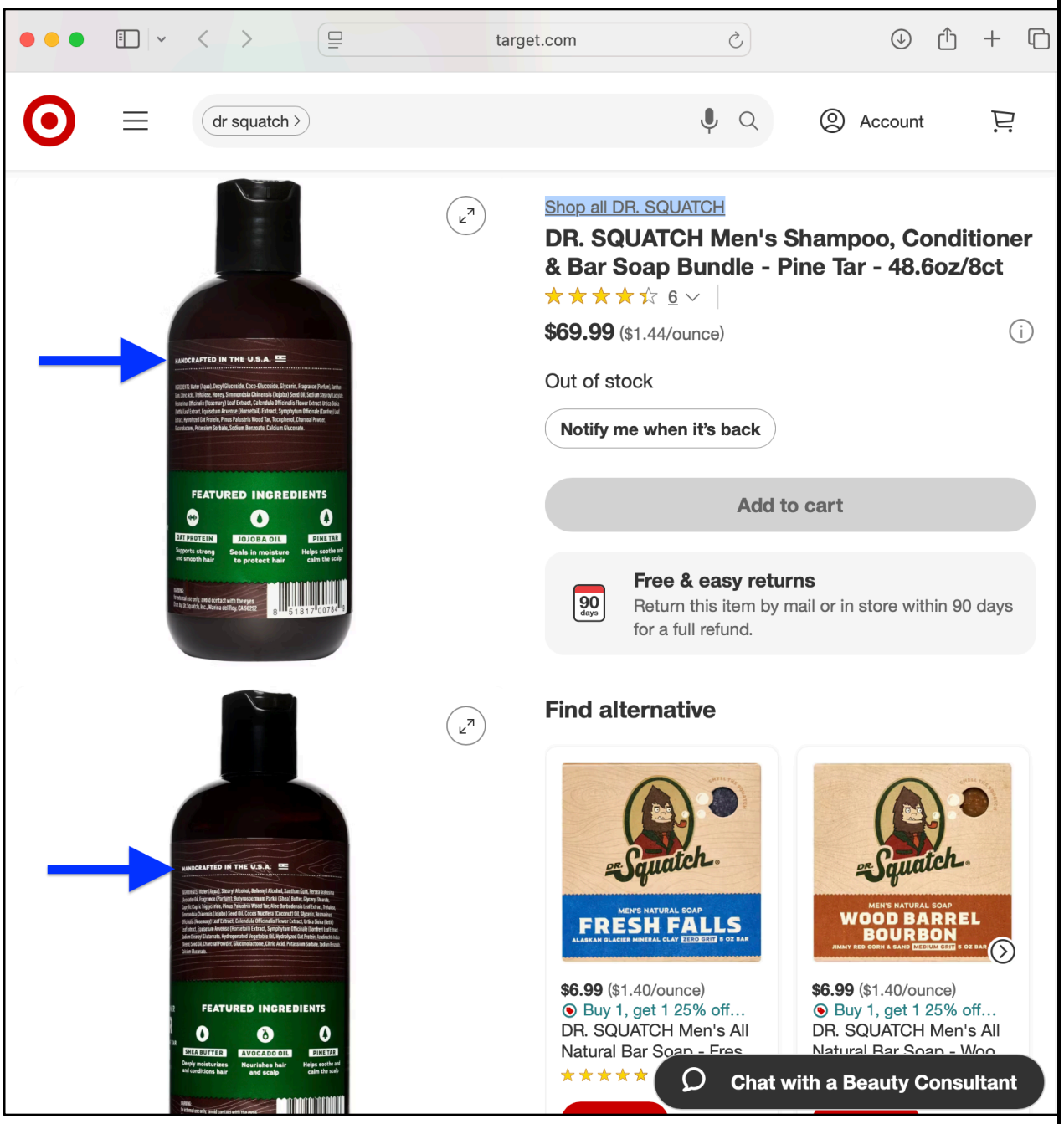




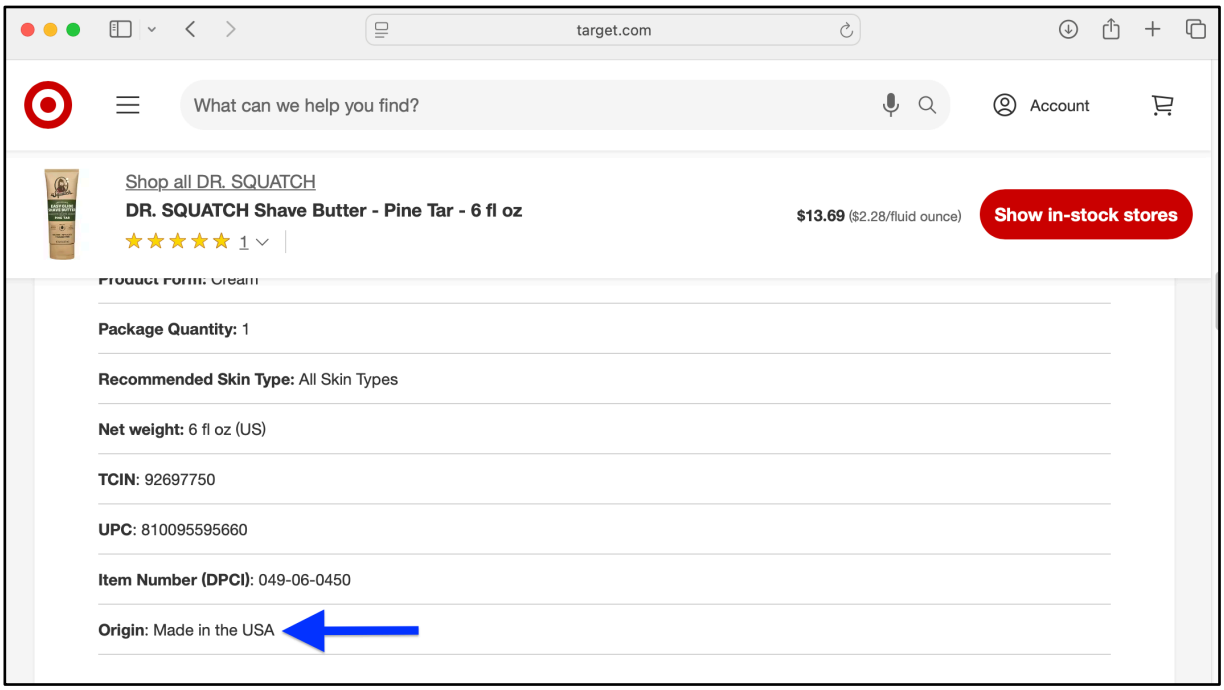
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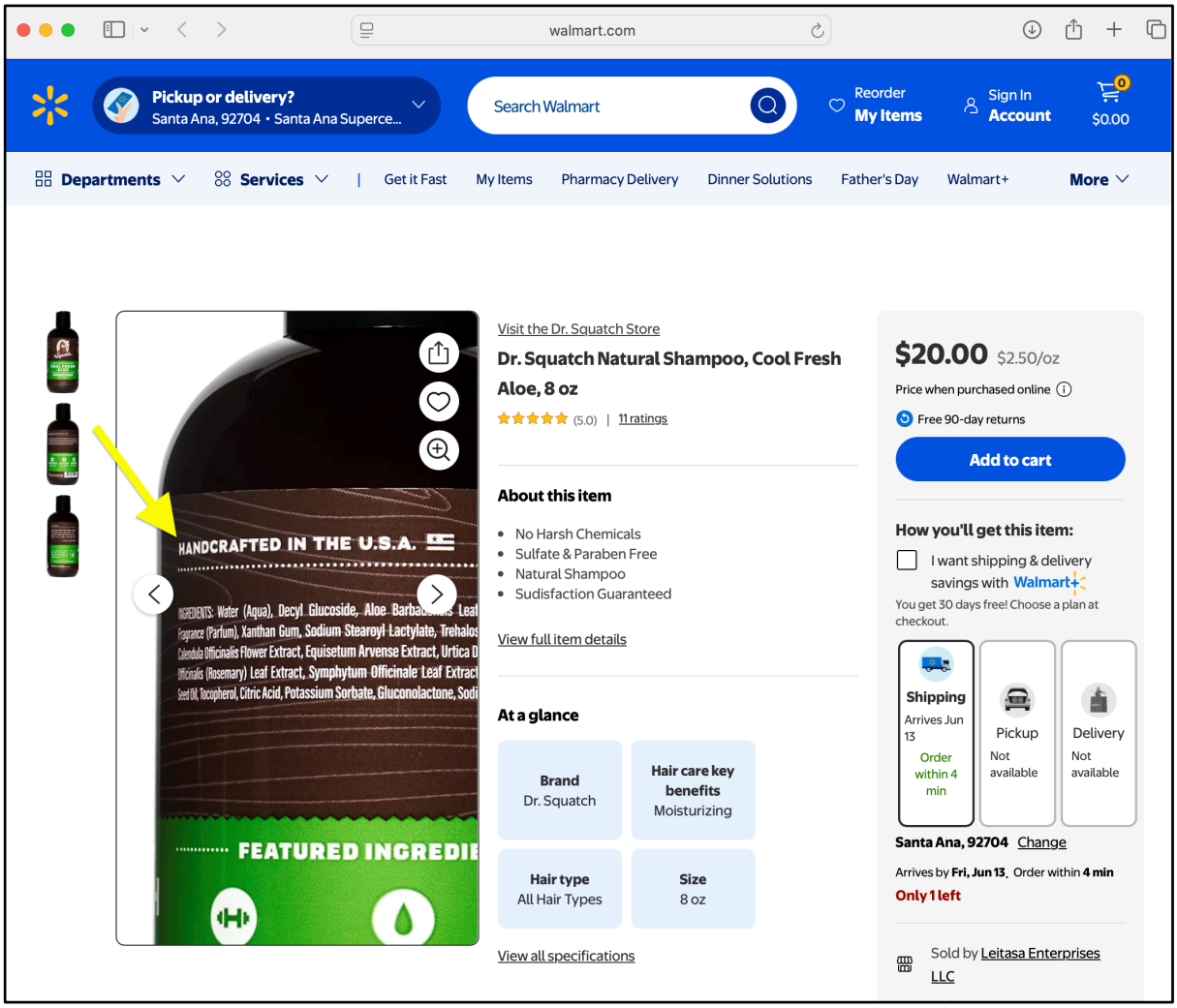


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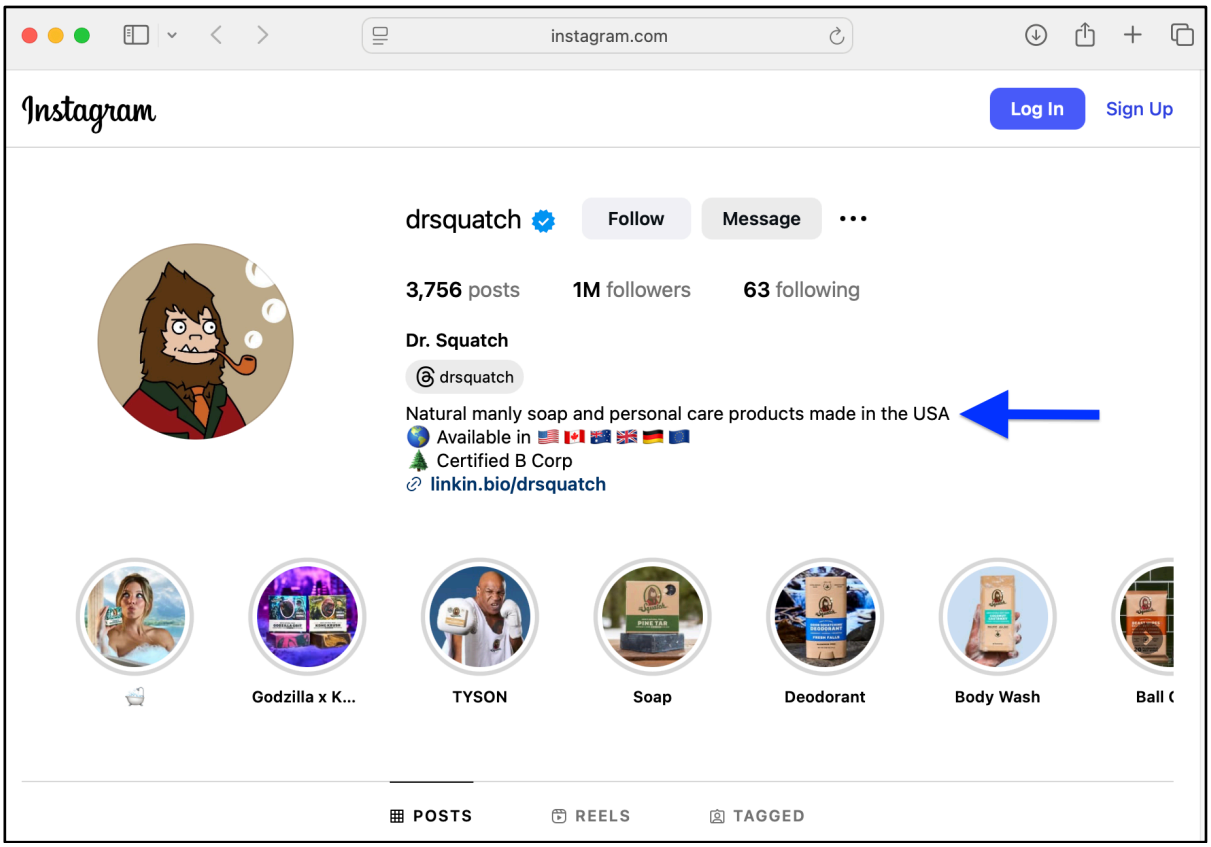


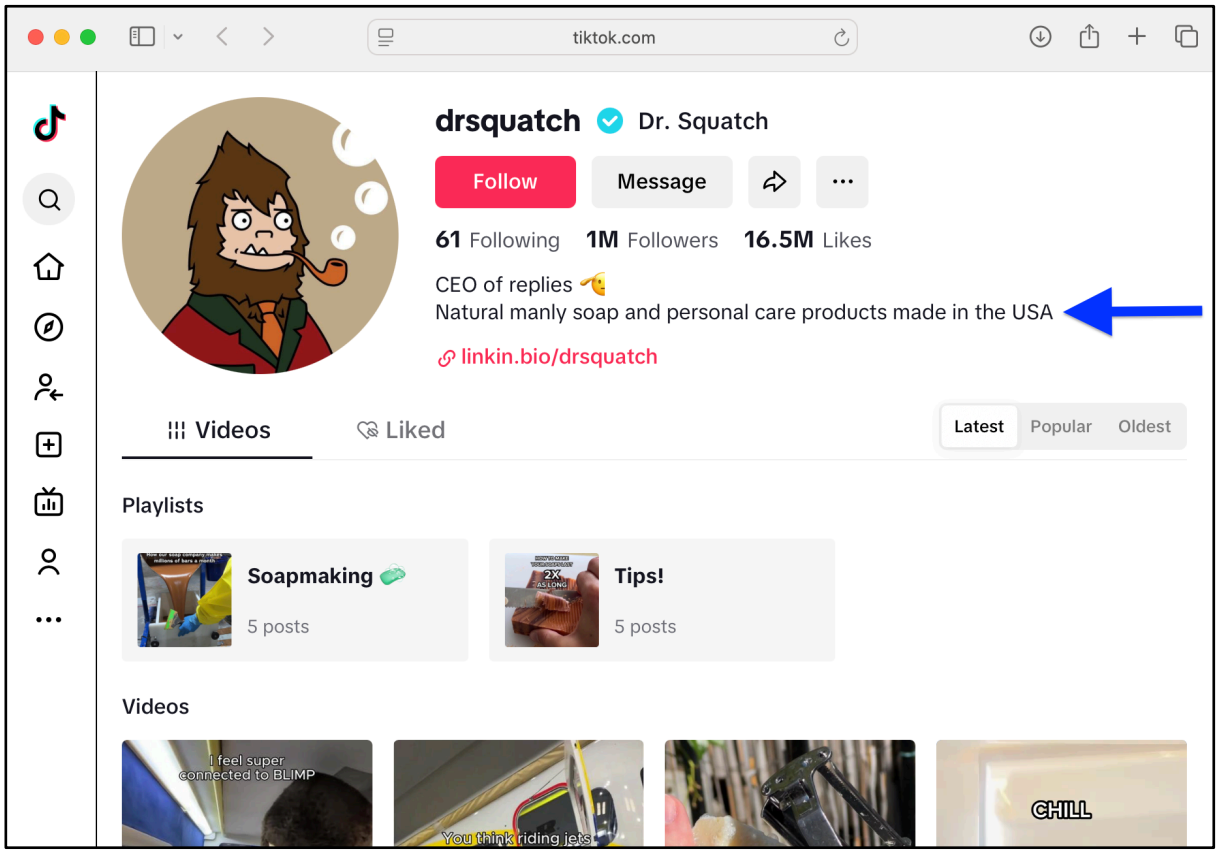
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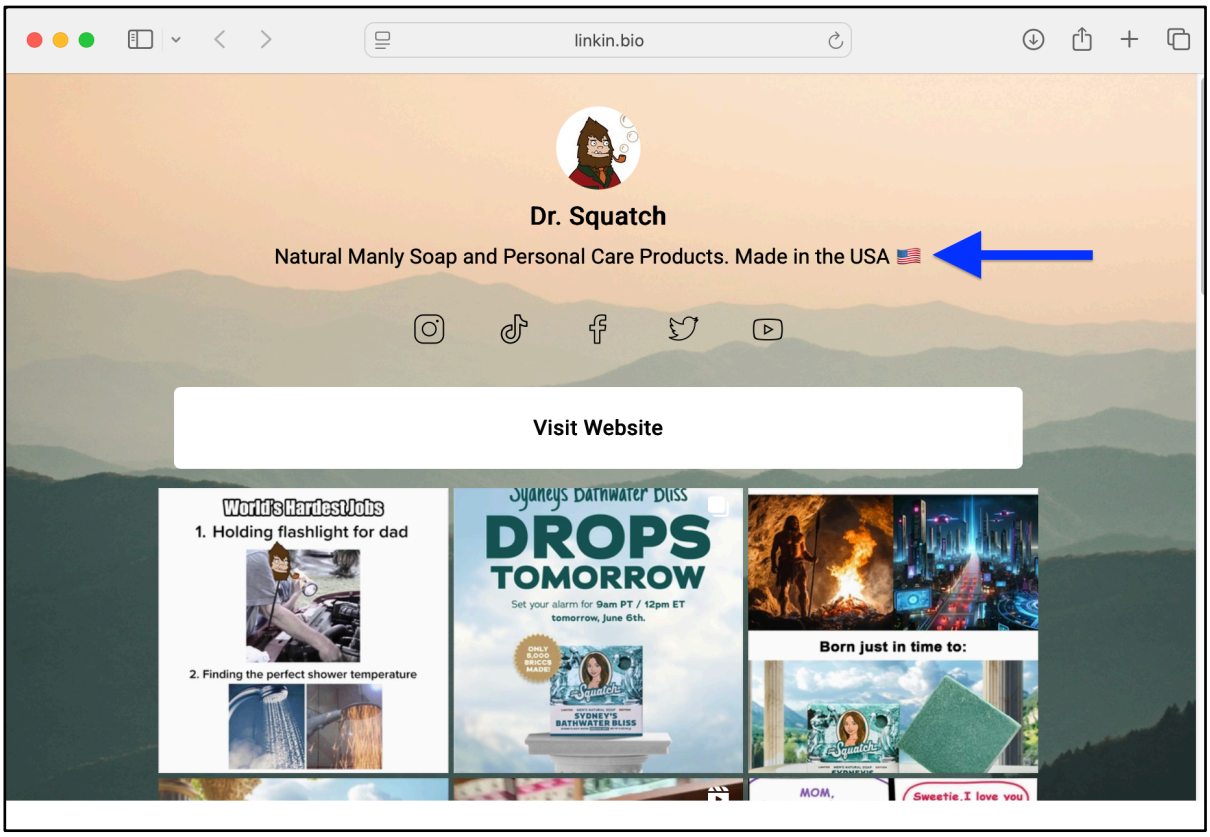


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59. Defendants' unqualified U.S. origin representations were prominently and consistently displayed on either the top or bottom panel of the Class Products' packaging and include virtually identical language and iconography.

60. As a result of the "Made in USA" representations on the Class Products packaging and in their advertising, online retailers have further propagated this misrepresentation through their websites' product pictures and descriptions, in addition to having sold the Class Products with unqualified "Made in USA" (or similar) misrepresentations on their shelves, where applicable.[16]

61. As a result of the unqualified U.S. origin claims on the Class Products' packaging and marketing, consumers have been misled for years, leading to both initial and repeat purchases of products they believed were made in the United States with ingredients and components sourced from the United States.

[16] For illustrative examples of Defendants' "Made in USA" (or similar) claims appearing on Amazon.com, Target.com and Walmart.com sales pages, *see* ¶ 58, above.

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62. Despite the prominent and unqualified claim that the Class Products were "Made in USA," they have been made with foreign ingredients, a fact that was not properly disclosed on the label, as the MUSA Rule and New York law require.

63. For example, the Men's Natural Soap products purchased by Plaintiff contain palm oil, coconut oil, olive oil, and shea butter, all of which are sourced from outside the United States.[17] These ingredients are not incidental additives. Rather, they are foundational components of Dr. Squatch's formulations and are essential to the products' composition, performance, and consumer appeal. Palm oil, coconut oil, and olive oil are, in that order, the *first three ingredients* listed in Dr. Squatch's Natural Soap products, including the Products purchased by Plaintiff. Shea butter likewise appears near the top of the ingredient list. The prominence of these foreign ingredients within the formulation underscores their importance and demonstrates that they contribute materially to the functionality, marketability, and overall value of the products.

64. The concentration and prominence of these alleged foreign ingredients throughout Dr. Squatch's formulations demonstrate that foreign content is a significant component of the Class Products. These ingredients collectively contribute to the Class Products' consumer appeal and overall value, and they cannot plausibly be characterized as *de minimis* or incidental. In any event, the foreign content in the Products and the Class Products is too substantial for those products to satisfy the MUSA Rule's requirement that "all or virtually all" ingredients or components be domestically made and sourced. 16 C.F.R. § 323.2(c).

65. Because the sourcing of numerous other chemically processed ingredients in the formulation cannot be determined through publicly available information and is solely within Defendants' possession, the full extent of the Class Products' foreign

[17] The factual basis and supporting authorities concerning the foreign sourcing of the ingredients identified herein are set forth in **Exhibit A**.

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content can only be established through discovery.

66. Notwithstanding, based on publicly available information, Defendant is believed to use RSPO-certified palm oil in its Men's Natural Soap products.[18] However, according to the RSPO's website, there are no RSPO-certified growers within the United States.[19] Therefore, Defendants' Men's Natural Soap products cannot possibly be "Made in USA" because they use RSPO-certified palm oil.

67. The functional ingredients that provide the characteristics consumers actually purchase the products to obtain, including palm oil, coconut oil, olive oil, and shea butter assume correspondingly greater importance in the finished products. Given the material contribution of these foreign ingredients to the Class Products' performance and consumer appeal, it is implausible that the Class Products satisfy the MUSA Rule's requirement that "all or virtually all" ingredients or components be made and sourced in the United States. 16 C.F.R. § 323.2(c).

68. The foreign ingredients and components identified herein are not incidental additives or trace constituents. Rather, they help provide the very attributes Dr. Squatch promotes to consumers, including each of the Class Products' signature scents and moisturizing capabilities.

69. Despite the numerous foreign ingredients contained in the Class Products, Defendants have prominently, uniformly, and without qualification represented these products as "Made in USA" on their packaging and throughout their marketing.

70. Defendants' failure to disclose the use of foreign ingredients and components results in unqualified U.S.-origin claims that are unlawful, false, misleading, and

[18] https://www.drsquatch.com/pages/clean-for-all-mankind (last accessed Oct. 14, 2026) ("We use sustainable RSPO-certified palm oil . . ..").

[19] https://rspo.org/search-members/certified-growers/ (last accessed Oct. 14, 2026) (no results for United States RSPO-certified growers).

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likely to deceive reasonable consumers.

71. There is no federal or state law, rule, or regulation that requires products such as the Class Products to bear a "Made in USA," or any similar U.S. origin representation. Defendants' decision to include unqualified U.S. origin claims on the Class Products' packaging and in their marketing materials was therefore *voluntary* and driven solely by marketing, branding, and product-positioning considerations, rather than by any legal or regulatory obligation.

72. Had Plaintiff and other consumers similarly situated been made aware that the Class Products contained ingredients, including key ingredients, sourced from outside of the United States, they would have preferred to pay less for the Class Products.

73. Consumers are accustomed to seeing U.S. origin claims that are expressly qualified when products are made using foreign ingredients, such as representations stating "Made in the USA using global ingredients" or similar disclosures. In this marketplace context, Defendants' use of unqualified "Made in USA" representations conveyed to reasonable consumers that the Class Products and their ingredients were wholly or substantially of domestic origin. By omitting any qualifying disclosure despite the presence of key foreign-sourced ingredients and components, Defendants created a misleading net impression that deceived Plaintiff and other consumers into believing the Class Products met a higher domestic-origin standard than they in fact did.

74. Non-exhaustive examples of Defendants' competitors and other consumer products using properly qualified U.S. origin claims are shown below:

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75. Specifically, Defendants' conduct violated the MUSA Rule because they made unqualified U.S.-origin claims, such as "Made in USA," when, in fact, not "all or virtually all" ingredients and components are sourced domestically, as required by 16 C.F.R. § 323.2.

76. When considered collectively, the foreign-sourced ingredients and components described herein contribute materially to the functionality, performance, consumer appeal, marketability, and overall value of the Class Products.

77. The origin of other ingredients and components used by Defendants in the Class Products cannot be definitively traced through publicly available information - and since this information is exclusively known to Defendants at this time - Plaintiff cannot fully allege the extent of Defendants' unqualified "Made in USA" violations. These important facts are within the exclusive knowledge, control, and possession of Defendants, their contract manufacturers and agents, and cannot be fully ascertained or alleged without the benefit of discovery.

78. Defendants' willful disregard for the laws discussed herein for financial gain is well established by the aforementioned, non-exhaustive examples.

79. There is no reliable, competent, or commercially available laboratory testing

method capable of determining the country of origin of ingredients from finished consumer products. Origin determinations depend on supply-chain documentation, sourcing records, and manufacturer-controlled Certificates of Analysis ("COA") and supplier disclosures, all of which are exclusively within Defendants' possession. Plaintiff therefore cannot obtain this information through testing, and the truth or falsity of Defendants' sourcing representations can only be verified through discovery of Defendants' and their agents' records.

80. Defendants possess superior knowledge of the true facts, which were not disclosed, thereby tolling the applicable statute of limitations.

81. The precise proportions of the ingredients and components in the Class Products are known only to Defendants and their agents. Plaintiff cannot reasonably determine or estimate those proportions without discovery. FDA regulations generally require ingredients to be listed in descending order of predominance.[20] The placement of the foreign ingredients identified above near the beginning of the Class Products' ingredient lists supports the inference that they are among the predominant ingredients in those formulations.

82. The identities of Defendants' suppliers, contract manufacturers, and other entities involved in the sourcing and production of the Class Products are likewise not publicly available and are presently unknown to Plaintiff. These facts, along with other material information regarding ingredient origin, composition, and valuation, can be readily obtained from Defendants through discovery.

83. Most consumers have limited awareness that products, along with their ingredients and components, labeled or marketed as made in the United States may, in fact, contain ingredients or components sourced, grown, or manufactured in foreign countries. This is a material factor in many purchasing decisions, as consumers believe they are buying superior goods while supporting American companies and jobs. Consumer disclosure regarding the true origin of products and

[20] *See* 21 C.F.R. § 701.3(a), (f)

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their ingredients is therefore a central rationale underlying federal and state "Made in the USA" laws, including the MUSA Rule.

84. Ordinary consumers are not experts in consumer product formulations, nor are they expected to possess specialized knowledge concerning the nature or origin of product ingredients. Consumers reasonably rely on manufacturers to accurately represent their products, particularly when presented with unqualified "Made in USA" representations on labeling or in marketing materials. There is no reason for consumers to question such representations or to suspect that a manufacturer would deliberately misstate the contents, composition, or characteristics of its products.

85. On information and belief, Defendants either charged a premium for the Class Products compared to their competitors or gained a competitive advantage by having the Class Products chosen over others based on false, unqualified "Made in USA" claims. Federal rules and state laws are designed to protect consumers from such false representations and predatory conduct.

FACTS SPECIFIC TO PLAINTIFF THEO COUDERC

86. Mr. Couderc has purchased several units of the Class Products, including in person at retailers like Target and from Dr. Squatch's website.

87. For example, on April 3, 2023, after visiting Dr. Squatch's website at www.drsquatch.com (the "Website"), Mr. Couderc purchased The Ultimate Squatch Starter Set Bundle, which included Defendants' Pine Tar, Birchwood Breeze, Wood Barrel Bourbon, and Fresh Falls Men's Natural Soaps; Soap Saver; and Pine Tar and Fresh Falls Deodorants after reviewing the marketing information for those products. This bundle cost Mr. Couderc a total of $52.92, inclusive of taxes and shipping.

88. The individual products' labeling and packaging (with the exception of the Soap Saver and the Deodorant products) in the bundle included unqualified "Handcrafted in the U.S.A." statements, located to the left of an American flag on the top panel of the products' packaging.

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89. On July 19, 2024, Mr. Couderc visited the Website where he reviewed information and marketing materials about Dr. Squatch's products and decided to purchase Defendants' Fight Scrub 3-Pack Bundle, Freedom Fresh – Exclusive Edition 3-Pack Bundle, and Nautical Nonsense 3-Pack Bundle for a total of $51.00, inclusive of taxes and shipping. In making the purchase, Mr. Couderc understood that the products were represented as being domestically made, including their ingredients and components.

90. Each unit of the Fight Scrub Men's Natural Soap received by Mr. Couderc included the unqualified language "Handcrafted in the U.S.A.," located to the left of the American flag on the bottom panel of the product's packaging, above and to the right of the product's barcode. The Nautical Nonsense version of the same soap included the language "Handcrafted in the U.S.A." (without qualification) to the left of the American flag on the bottom panel of the product's packaging, above and to the right of the product's barcode.

91. On September 17, 2024, Mr. Couderc visited the Website, reviewed information and marketing materials about Dr. Squatch's products, and decided to purchase Defendants' Game of Thrones Collection bundle, The Star Wars 4-Pack II bundle, and Adamantium Scrub 3-Pack bundle for a total of $63.53, including taxes and shipping. In making the purchase, Mr. Couderc understood that the products were represented as being domestically made, including their ingredients and components.

92. The Game of Thrones Collection soap products, specifically, Viserion's Freeze, Thousand Sword Scrub, and Dragon's Blaze Men's Natural Soaps, included the unqualified "Handcrafted in the U.S.A." language, located to the left of the American flag on the bottom panel of those products' packaging.

93. On October 4, 2024, Mr. Couderc visited the Website, reviewed information and marketing materials about Dr. Squatch's products, and decided to purchase Defendants' Gold Moss, Grapefruit IPA, Cold Brew Cleanse, Deep Sea Goats Milk,

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and Flamin' Hot Bricc individual Men's Natural Soap as well as the Fearsome Fall 3-Pack Bundle, which included Count Sudsula, Drunk'n Pumpkin, and Headless Rinse Men's Natural Soap bars. Altogether, these products cost Plaintiff $49.68, inclusive of taxes and shipping. In making the purchase, Mr. Couderc understood that the products were represented as being domestically made, including their ingredients and components.

94. The Gold Moss, Grapefruit IPA, Cold Brew Cleanse, Deep Sea Goats Milk, and Fearsome Fall 3-Pack Bundle Plaintiff purchased on October 4, 2024, included the language "Handcrafted in the U.S.A," located to the left of an American flag on the top panel of the products' packaging. This representation was unqualified, and made no disclosure of *any* foreign ingredients or components used in Dr. Squatch's products, and upon information and belief was repeated in more than one place on the Website.

95. Non-exhaustive images of the unqualified U.S. origin representation made on the Website are reproduced below.

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help.drsquatch.com

Where are Dr. Squatch personal care products made?

All of our formulated products are manufactured in the United States. Click here to watch a video on our soap-making process!



How did we do?

Help Shop Info

help.drsquatch.com

- Is your soap antibacterial?
- Where are Dr. Squatch personal care products made?

All of our formulated products are manufactured in the United States. Click here to watch a video on our soap-making process! Click for more

- Which bars are best for exfoliating?
- What is the shelf life for a bar of soap?
- Can children and teenagers use Dr. Squatch soap?
- Do Dr. Squatch products contain gluten?
- Are your bars hypoallergenic?
- How is Dr. Squatch soap different from commercial soaps?

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96. In addition to having purchased the Class Products on Defendants' Website, Mr. Couderc purchased the Class Products in person at a physical retail store.

97. For example, on January 28, 2025, Plaintiff visited a Target located at 340 Towne Drive, Fayetteville, New York, 13066-1371 ("Towne Drive Target"). While visiting the Health and Beauty section of that Target, Mr. Couderc noticed the Birchwood Breeze Men's Natural Soap on display, which Birchwood Breeze product said "Handcrafted in the U.S.A.," located to the left of the American flag on the top panel of the product's packaging. Mr. Couderc ultimately purchased the product for a total of $5.59, excluding taxes.

98. Plaintiff's reliance on Dr. Squatch's representations was reasonable under the circumstances. Ordinary consumers are not experts in consumer product formulations, nor are they expected to possess specialized knowledge regarding the nature or origin of product ingredients. Consumers reasonably trust that manufacturers will accurately represent their products, particularly when claims such as "Made in USA" are prominently displayed on product labeling and/or in marketing materials. There is no reason for consumers to doubt these representations or to suspect that a manufacturer would deliberately misstate the characteristics of its products.

99. For example, when consumers encounter express representations in a product's labeling, advertising, or marketing, they reasonably expect the product to possess the represented characteristics. A reasonable consumer would not expect that the product is materially inconsistent with those representations.

100. Similarly, Plaintiff's reliance on Defendants' unqualified "Made in USA" representations was reasonable. Consumers are accustomed to encountering clear qualifying disclosures, such as "Made in the USA *with globally sourced ingredients*," (emphasis added) when products marketed with U.S.-origin claims contain foreign-sourced ingredients or components. Accordingly, when consumers encounter an unqualified "Made in USA" claim, or a substantially similar

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representation, they reasonably understand it to mean that the product and its ingredients or components are wholly or substantially of domestic origin.

101. Defendants were under no legal obligation in the United States to label or market the Class Products as being of U.S. origin. However, once such representations are made, they are subject to strict regulatory standards. Defendants' use of "Made in USA" claims for the Class Products served no regulatory or compliance purpose. Rather, it was employed solely as a marketing device to enhance the Class Products' appeal to consumers such as Plaintiff.

102. Defendants' representations regarding the Class Products were unlawful, unfair, deceptive, and misleading, in that the Class Products were made with and/or contain ingredients or components that were sourced, grown, or manufactured outside the United States.

103. Accordingly, Defendants were not and are not entitled to lawfully make unqualified "Made in USA" claims that they made on and regarding the Products and the Class Products.

104. Defendants' representations were important to Plaintiff's decision to continuing purchasing the Products.

105. Plaintiff relied on the labeling, marketing, and/or advertising prepared and approved by Defendants and their agents, as disseminated through the Class Products' packaging and marketing containing the misrepresentations alleged herein.

106. Plaintiff was harmed because Defendants took Plaintiff's money due to their unlawful, false, unfair, and deceptive misrepresentations on the Class Products, including the Products purchased by Plaintiff.

107. Plaintiff and other similarly situated consumers were deceived by Defendants' unlawful actions.

108. Plaintiff believed, at the time of purchase, that the Products were of superior quality and that he was supporting American jobs, the American economy, the

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environment, and ethical working conditions by purchasing a product made with domestically sourced ingredients, rather than ingredients sourced, grown, or made outside the United States.

109. Ingredients and components grown or manufactured in the United States are subject to strict regulatory requirements, including, but not limited to, agricultural, environmental, labor, safety, ethical, and quality standards.

110. Foreign-sourced, grown, or manufactured ingredients and components are not subject to the same regulatory oversight, manufacturing standards, environmental protections, or quality-control requirements applicable in the United States, and may therefore present increased risks to consumers, the environment, and the domestic economy. These concerns are particularly significant for products intended for direct human application, including haircare, skincare, and other personal care products.

111. Foreign-sourced, grown, or manufactured ingredients and components are generally of lower quality and less reliable than their U.S. origin counterparts.

112. As of 2026, Dr. Squatch's website included a self-authored article from 2014 entitled "Soap Made in USA: Why It's Worth It," which echoed many of the concerns associated with ingredients and components sourced abroad for products sold domestically, including the loss of American jobs and the negative impact on our environment.[21]

113. Defendants have misrepresented the domestic origin of their products, which are alleged to contain foreign ingredients and components, despite apparently having shared many of the same concerns articulated in this Complaint.

114. False, unqualified, unfair and deceptive representations that products are "Made in USA" reduce overall customer satisfaction compared to if such products were genuinely made in the United States using ingredients and components

[21] https://www.drsquatch.com/blogs/blog/soap-made-in-usa-worth-it (last accessed July 13, 2026). This article has since been removed from Defendant's website.

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sourced, grown, or made domestically.

115. The Class Products, including the Products purchased by Plaintiff, contain foreign ingredients and are not worth the purchase price paid by Plaintiff and putative Class members.

116. The precise amount of damages will be proven at the time of trial.

117. Plaintiff and Class members suffered injury in fact and lost money or property as a direct result of Defendants' false, unlawful, unfair, and deceptive representations, including unqualified "Made in USA" claims despite the presence of foreign-sourced ingredients and components in the products.

118. Defendants' false, unlawful, unfair, and deceptive advertising of the Class Products presents an ongoing threat to consumers, as this conduct continues to this day through Defendants' direct actions or omissions, and/or through the conduct of its agents.

CLASS ALLEGATIONS

119. Plaintiff brings this action on behalf of himself and all other similarly situated individuals.

120. Plaintiff is a member of and seeks to represent a New York Class, pursuant to Fed. R. Civ. P. 23(b)(3), defined as:

> All persons in New York who purchased one or more of the Class Products, between May 5, 2021, and May 5, 2025 that were marketed or represented as "Made in USA," or any synonymous representation on the product or in its marketing materials, but which contain and/or are made with ingredients or components not grown or manufactured in the United States.

121. The New York Class shall be referred to herein as the "Class."

122. Excluded from the Class are Defendants' officers, directors, and employees; any entity in which Defendants have a controlling interest; and the affiliates, legal representatives, attorneys, successors, heirs, and assigns of Defendants; and persons

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who purchased the Class Products for resale. Further excluded from the Class are members of the judiciary to whom this case is assigned.

123. Plaintiff reserves the right to modify the proposed Class definition, including but not limited to expanding the Class to protect additional individuals, including in other states, and to assert additional sub-classes as warranted by additional investigation.

124. Numerosity: Members of the Class are so numerous that joinder of all of them is impracticable. While the exact number of Class members is unknown to Plaintiff at this time, based on information and belief, the Class consists of thousands of individuals within New York.

125. Commonality: There are questions of law and fact common to the Class, which predominate over any questions affecting only individual members of the Class. These common questions of law and fact include, without limitation:

- The nature, scope, and operations of Defendants' wrongful practices;
- Whether the Class Products are or have been made with foreign ingredients or components;
- Whether the Class Products are or have been represented as being of domestic origin without clear and adequate qualification;
- Whether Defendants intentionally misrepresented or omitted the fact that the Class Products, including the Products purchased by Plaintiff and other Class members, were misbranded and thus sold unlawfully in New York;
- Whether Defendants knew or should have known that their business practices were unfair and/or unlawful;
- Whether Defendants' conduct violated the DPA;
- Whether Defendants' conduct violated the FAL;
- Whether Defendants were unjustly enriched;

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- Whether Defendants breached express warranties to Plaintiff and members of the Class;
- Whether Defendants intentionally misrepresented their products; and
- Whether Plaintiff and Class members suffered monetary damages as a result of Defendants' conduct and, if so, the appropriate amount of damages.

126. Typicality: Plaintiff's claims are typical of those of the Class. Plaintiff and all Class members have been harmed by Defendants' wrongful practices. Plaintiff's claims arise from the same course of conduct that gave rise to the claims of the Class and are based on the same legal theories. Specifically, Plaintiff purchased one or more of the Class Products that were labeled, represented and/or advertised as being "Made in USA" or a similar representation, without clear and adequate qualification of the foreign ingredients or components contained therein.

127. Adequacy of Representation: Plaintiff will fairly and adequately represent and protect the interests of Class members. Plaintiff's counsel is competent and experienced in litigating consumer class actions. Plaintiff has retained counsel experienced in consumer protection law, including complex class action litigation involving unfair business practices. Plaintiff has no adverse or antagonistic interests to those of the Class and will fairly and adequately protect the interests of the Class. Plaintiff's attorneys are aware of no interests adverse or antagonistic to those of Plaintiff and the proposed Class.

128. Predominance: Defendants have engaged in a common course of conduct toward Plaintiff and Class members, in that Plaintiff and Class members were induced to purchase the Class Products. The common issues arising from Defendants' conduct set out above affecting Class members predominate over any individual issues. Adjudication of these common issues in a single action has important and desirable advantages of judicial economy.

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129. Superiority: A class action is superior to other available methods for the fair and efficient adjudication of the controversy. Class treatment of common questions of law and fact is superior to multiple individual actions or piecemeal litigation. Absent a class action, most members of the Class would likely find that the cost of litigating their individual claims is prohibitively high and would therefore have no effective remedy. The prosecution of separate actions by individual Class members would create a risk of inconsistent or varying adjudications with respect to individual Class members, which would establish incompatible standards of conduct for Defendants. In contrast, the conduct of this action as a class action presents far fewer management difficulties, conserves judicial resources and the parties' resources, and protects the rights of each Class member.

130. Unless the Class is certified, Defendants will retain monies received as a result of their unlawful, unfair and deceptive conduct alleged herein.

131. Defendants have acted on grounds that apply generally to the Class, so that Class certification is appropriate.

CAUSES OF ACTION

FIRST CAUSE OF ACTION
Violations of New York's Deceptive Practices Act ("DPA")
(N.Y. Gen. Bus. Law §§ 349, *et seq.*)

132. Plaintiff re-alleges and incorporates by reference all preceding paragraphs of this Complaint as though fully set forth herein, and further alleges as follows:

133. The DPA states that "[d]eceptive acts or practices in the conduct of any business, trade, or commerce or in the furnishing of any service in this state are hereby declared unlawful." N.Y. Gen. Bus. Law § 349(a).

134. The DPA further states that "any person who has been injured by reason of any violation of this section may bring . . . an action to recover his actual damages or fifty dollars, whichever greater . . .[, t]he court may in its discretion, increase the award of damages to an amount not to exceed three times the actual damages up to

one thousand dollars, if the court finds defendant willfully or knowingly violated this section[, and that t]he court may award reasonable attorney's fees to a prevailing plaintiff." *Id.* at § 349(h).

135. The DPA "seeks to ensure an honest market place where trust, and not deception, prevails . . .." *Goshen v. Mut. Life Ins. Co.*, 98 N.Y.2d 314, 324 (2002) (internal quotation marks omitted).

136. Defendants engaged in deceptive acts and practices in violation of the DPA by misleading Plaintiff and the Class to believe that its Class Products were made domestically, without qualification.

137. Plaintiff and the Class are consumers, as that term is used in the context of the DPA. Defendants' products are consumer-oriented as they are sold to consumers, such as Plaintiff and Class members, for daily personal care purposes.

138. Defendants' conduct has been materially misleading because said conduct is not only likely to mislead a reasonable consumer acting reasonably under the circumstances, but Defendants have misled Plaintiff and the Class, as is alleged herein.

139. Plaintiff purchased the Class Products online and in-store with the belief that he was purchasing items that were domestically made based on Defendants' representations on Dr. Squatch's website and on the Class Products' top and bottom packaging labels (while purchasing Class Products in store) stating that they were "Handcrafted in the U.S.A.," "Crafted in the U.S.A.," and/or another unqualified "Made in USA" claim.

140. Defendants' conduct was knowing and willful because they were in the unique position of knowing the foreign origin of the Class Products' ingredients and components, yet they continued to represent those products as being made in the United States, without clear and adequate qualification of the foreign ingredients and components contained therein.

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141. As a direct and proximate result of Defendants' aforementioned conduct, Plaintiff and the Class have been damaged in an amount to be determined at trial.

SECOND CAUSE OF ACTION
Violations of New York's False Advertising Law ("FAL")
(N.Y. Gen. Bus. Law §§ 350, *et seq.*)

142. Plaintiff re-alleges and incorporates by reference all preceding paragraphs of this Complaint as though fully set forth herein, and further alleges as follows:

143. New York's False Advertising Law ("FAL"), N.Y. Gen. Bus. Law §§ 350, *et seq.*, states that "[f]alse advertising in the conduct of any business, trade or commerce or in the furnishing of any service in this state is hereby declared unlawful."

144. The FAL defines "false advertising" as "advertising, including labeling, of a commodity, or of the kind, character, terms of conditions of any employment opportunity if such advertising is misleading in a material respect." *Id.* at § 350-a.

145. Furthermore, "[i]n determining whether any advertising is misleading, there shall be taken into account (among other things) not only representations made by statement, word, design, device, sound or any combination thereof, but also the extent to which the advertising fails to reveal facts material in the light of such representations with respect to the commodity or employment to which the advertising relates under the conditions prescribed in said advertisement, or under such conditions as are customary or usual." *Id.*

146. Defendants' material misrepresentations and omissions, as alleged herein, violate the FAL. Defendants knew or should have known that these misrepresentations and omissions were false, unlawful, unfair, deceptive, and misleading. This includes, but is not limited to, the representations that the Class Products are "Made in USA" despite containing foreign-grown, sourced, or manufactured ingredients and components.

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147. Defendants' conduct was knowing and willful because they were in the unique position of knowing the foreign origin of the Class Products' ingredients and components, yet they continued to represent those products as being made in the USA, without clear and adequate qualification of the foreign ingredients and components contained therein.

148. Plaintiff and the Class suffered tangible, concrete injuries as a result of Defendants' actions, as set forth herein, because they purchased the Class Products in reliance on Defendants' misrepresentations.

149. As a result, Plaintiff and the Class are entitled to the remedies enumerated in N.Y. Gen. Bus. Law § 350-e, which states that "[a]ny person who has been injured by reason of any violation of [the FAL] may bring . . . an action to recover his or her actual damages or five hundred dollars, whichever is greater . . .. The court may, in its discretion, increase the award of damages to an amount not to exceed three times the actual damages, up to ten thousand dollars, if the court finds that the defendant willfully or knowingly violated [the FAL]. The court may award reasonable attorney's fees to a prevailing plaintiff."

THIRD CAUSE OF ACTION
Breach of Express Warranty

150. Plaintiff re-alleges and incorporates by reference all preceding paragraphs of this Complaint as though fully set forth herein, and further alleges as follows:

151. Under New York law, the elements for a breach of express warranty claim are a material representation expressly made about the product by the defendant, reliance on the truthfulness of the representation by the plaintiff, the product failing to live up to the representation, and resulting damage to the plaintiff.

152. Defendants represented to Plaintiff and similarly situated consumers, through their labeling, advertising, and marketing, that the Class Products are "Made in USA" without any qualification or disclosure of the inclusion of foreign ingredients and components.

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153. Defendants' representations regarding the unqualified domestic origin of the Class Products constitute affirmations of fact.

154. Defendants' explicit claims that the Class Products are "Made in USA," without qualification, directly pertain to the composition of the products. These representations form a fundamental part of the bargain between Defendants and purchasers, influencing consumer purchasing decisions and expectations.

155. Defendants' statements—prominently featured on the labeling and marketing of the Class Products—constitute express warranties regarding the composition and origin of the products and their ingredients.

156. Relying on these express warranties, Plaintiff and Class members purchased the Class Products, believing these warranties.

157. Defendants breached their express warranties by falsely representing that the Class Products were "Made in USA," without qualification, when, in reality, they contained foreign-sourced ingredients.

158. As a result of Defendants' breach, Plaintiff and Class members suffered harm and are entitled to recover either the full purchase price of the Class Products or the difference between their actual value and the value they would have held if Defendants' representations regarding the Class Products had been accurate, truthful, and lawful.

159. Plaintiff and Class members did not receive the benefit of their bargain and sustained additional injuries, as alleged herein.

160. Had Plaintiff and Class members known the true nature and origin of the ingredients of the Class Products, they would have paid less for those products.

161. Defendants' misrepresentations were a substantial factor in causing Plaintiff and the Class economic harm.

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FOURTH CAUSE OF ACTION
Unjust Enrichment

162. Plaintiff pleads this unjust enrichment cause of action in the alternative to contract-based claims.

163. Plaintiff re-alleges and incorporates by reference all preceding paragraphs of this Complaint as though fully set forth herein, and further alleges as follows:

164. Under New York law, the elements of unjust enrichment are the defendant's enrichment at the expense of the plaintiff and that it is against equity and good conscience to permit the defendant to retain what is sought to be recovered.

165. Defendants were enriched at the expense of Plaintiff and the Class when Plaintiff and members of the Class purchased the Class Products, which Defendants misrepresented as to their origin.

166. Plaintiff and Class members allege that Defendants owe them money for the unjust conduct described herein that resulted in the wrongful acquisition of funds.

167. An undue advantage was taken of Plaintiff's and the Class's lack of knowledge of the deception, resulting in money being extracted to which Defendants had no legal right.

168. Defendants are therefore indebted to Plaintiff and the Class in a specific sum—the amount of money each paid for the Class Products, which Defendants should not retain in equity and good conscience.

169. Defendants are therefore liable to Plaintiff and the Class for the amount of unjust enrichment.

170. Defendants' retention of any benefit, whether directly or indirectly collected from Plaintiff and the Class, violates principles of justice, equity, and good conscience.

171. As a result, Defendants have been and continue to be unjustly enriched.

172. Plaintiff and the Class are entitled to recover from Defendants all amounts that Defendants have wrongfully and improperly obtained, and Defendants should

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be required to disgorge to Plaintiff and the Class the benefits they have unjustly received.

173. Defendants accepted and retained such benefits with knowledge that Plaintiff's and the Class's rights were being violated for financial gain. Defendants have been unjustly enriched by retaining the revenues and profits obtained from Plaintiff and the Class, and such retention under these circumstances is both unjust and inequitable.

174. As a direct and proximate result of Defendants' unlawful practices and the retention of monies paid by Plaintiff and the Class, Plaintiff and the Class have suffered concrete harm and injury.

175. Defendants' retention of the non-gratuitous benefits conferred upon it by Plaintiff and the Class would be unjust and inequitable.

176. Plaintiff and the Class are entitled to seek disgorgement and restitution of wrongful profits, revenue, and benefits conferred upon Defendants, in a manner to be determined by this Court.

FIFTH CAUSE OF ACTION
Intentional Misrepresentation

177. Plaintiff re-alleges and incorporates by reference all preceding paragraphs of this Complaint as though fully set forth herein, and further alleges as follows:

178. Under New York law, the elements of an intentional misrepresentation claim are a material misrepresentation of fact, knowledge of its falsity, an intent to induce reliance, justifiable reliance by the plaintiff, and damages.

179. Defendants knowingly and intentionally represented to the public, including Plaintiff and the Class, through their marketing, advertising, labeling, and other means, that the Class Products are "Made in USA" without any qualification of foreign ingredients and components contained therein. The representation was unfair, deceptive, false and misleading because the Class Products contain multiple ingredients and components that are sourced from outside the United States.

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180. The "Made in USA" representation was material to Plaintiff and putative Class members because they saw it as a bonus to their decision to purchase the Class Products, and they would have paid less for the Class Products had they known the truth behind Defendants' "Made in USA" claims.

181. Defendants knew their representations were false because they maintain full control over the formulation and manufacturing of the Class Products.

182. Defendants acted intentionally by willfully and purposefully disseminating misrepresentations about the Class Products through labeling, online and offline marketing, advertising, and social media.

183. Indeed, Defendants intended to induce Plaintiff's and Class members' reliance on the "Made in USA" representation because, on information and belief, they wanted to gain a competitive advantage for their Class Products compared to competitors' products in the marketplace.

184. However, as described above, Defendants' representations regarding the Class Products are false, unlawful, unfair, deceptive and/or misleading.

185. Defendants knew that their "Made in USA" representation regarding the Class Products were false, unlawful, unfair, deceptive, and/or misleading, yet they continued to make such representations over a period of years.

186. Defendants further knew that their agents, and retailers were marketing the Class Products in a false or misleading manner, as Defendants designed, manufactured, and affixed the product labeling to the Class Products before supplying them to retailers. Additionally, Defendants provided their agents, and retailers with marketing materials that contained their false and misleading representations, thereby perpetuating the deception.

187. Plaintiff and the putative Class members saw, believed, and relied on Defendants' misrepresentations when deciding to purchase the Class Products. Indeed, Plaintiff and Class members reasonably relied on the express representations on the Class Products in making their purchases as there was

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nothing in Defendants' labeling, packaging, and marketing materials remotely suggesting that their Class Products contained foreign ingredients or components.

188. As a direct and proximate result of Defendants' intentional misrepresentations described above, Plaintiff and the putative Class suffered damages in an amount to be determined at trial.

189. By engaging in the acts described above, Plaintiff and the putative Class are entitled to recover exemplary or punitive damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for relief and judgment against Defendants, and each of them, as follows, seeking equitable relief in the alternative to legal relief:

- Certification of this action as a class action;
- Appointment of Plaintiff as Class Representative;
- Appointment of Plaintiff's attorneys as Class Counsel;
- That Defendants' wrongful conduct alleged herein be adjudged and decreed to violate the consumer protection statutes asserted herein;
- An Order requiring Defendants to disgorge all monies, revenues, and profits obtained by means of any wrongful act or practice;
- An Order requiring the imposition of a constructive trust and/or disgorgement of Defendants' ill-gotten gains, compelling Defendants to pay restitution to Plaintiff and all members of the Class, and to restore to Plaintiff and Class members all funds acquired through any act or practice declared by this Court to be unlawful, fraudulent, unfair, or deceptive; in violation of laws, statutes, or regulations; or constituting unfair competition, along with pre- and post-judgment interest thereon;
- For pre and post-judgment interest on all amounts awarded;
- For an order of restitution and all other forms of equitable monetary relief, as pleaded;
- Actual and statutory damages under the DPA and FAL;

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- General and compensatory damages in an amount to be determined at trial;
- That Plaintiff and each of the other members of the Class recover their costs of suit, including reasonable attorneys' fees and expenses pursuant to, *inter alia*, the DPA and FAL; and
- That Plaintiff and members of the Class be granted any other relief the Court may deem just and proper.

DEMAND FOR TRIAL BY JURY

190. Plaintiff, individually and on behalf of all others similarly situated, hereby demands a jury trial on all claims so triable.

Dated: November 12, 2026

Respectfully submitted,

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Telephone: (800) 400-6808
Facsimile: (800) 520-5523

EXHIBIT A

CLASS PRODUCTS

All products sold during the Class Period that have since been discontinued or renamed, and are therefore not specifically identified herein, are nonetheless subject to this Complaint and are included in the Class Products.

Men's Natural Bar Soap

1. Alpine Sage Men's Natural Bar Soap
2. Bay Rum Men's Natural Bar Soap
3. Birchwood Breeze Men's Natural Bar Soap
4. Coastal Mist Men's Natural Bar Soap
5. Coconut Castaway Men's Natural Bar Soap
6. Cool Fresh Aloe Men's Natural Bar Soap
7. Deep Sea Goat's Milk Men's Natural Bar Soap
8. Fresh Falls Men's Natural Bar Soap
9. Grapefruit IPA Men's Natural Bar Soap
10. Lumberjack Lodge Men's Natural Bar Soap
11. Maverick Musk Men's Natural Bar Soap
12. Mountain Meadow Men's Natural Bar Soap
13. Oceanside Orchard Men's Natural Bar Soap
14. Pine Tar Men's Natural Bar Soap
15. Rainforest Rapids Men's Natural Bar Soap
16. Sandalwood Summit Men's Natural Bar Soap
17. Sierra Storm Men's Natural Bar Soap
18. Summer Citrus Men's Natural Bar Soap
19. Wood Barrel Bourbon Men's Natural Bar Soap
20. Gold Moss Men's Natural Bar Soap
21. Cold Brew Cleanse Men's Natural Bar Soap

Total Moisture Bar Soap

22. Total Moisture Green Tea Butter
23. Total Moisture Mango Butter
24. Total Moisture Shea Butter

Limited-Edition, Seasonal, and Collaboration Bar Soap

25. Blue Flame Fresh Men's Natural Bar Soap
26. Blue Ribbon Breeze Men's Natural Bar Soap
27. Drunk'n Pumpkin Men's Natural Bar Soap
28. Flannel Forest Men's Natural Bar Soap
29. Freedom Fresh Men's Natural Bar Soap
30. Friday Night Men's Natural Bar Soap

31. Gameday Fresh Men's Natural Bar Soap
32. Glow in the Dark Bricc
33. Golden Glory Men's Natural Bar Soap
34. Grand Canyon Grit Men's Natural Bar Soap
35. I'll Be Bricc Men's Natural Bar Soap
36. Mango Tango Men's Natural Bar Soap
37. Mysterio Magic Men's Natural Bar Soap
38. Ninny Scrubbins Men's Natural Bar Soap
39. Psycho Suds Men's Natural Bar Soap
40. Spiked Cider Men's Natural Bar Soap
41. Stone Cold Stunner Men's Natural Bar Soap
42. Straw Hat Bricc
43. The Chosen One Men's Natural Bar Soap
44. Three Sword Surge Men's Natural Bar Soap
45. Yellowstone Rush Men's Natural Bar Soap
46. You Know Who Men's Natural Bar Soap
47. Fight Scrub Men's Natural Bar Soap
48. Nautical Nonsense Men's Natural Bar Soap
49. Viserion's Freeze Men's Natural Bar Soap
50. Thousand Sword Scrub Men's Natural Bar Soap
51. Dragon's Blaze Men's Natural Bar Soap
52. Count Sudsula Men's Natural Bar Soap
53. Headless Rinse Men's Natural Bar Soap

Body Wash

54. Birchwood Breeze Body Wash
55. Coastal Mist Body Wash
56. Coconut Castaway Body Wash
57. Fresh Falls Body Wash
58. Lumberjack Lodge Body Wash
59. Maverick Musk Body Wash
60. Mountain Meadow Body Wash
61. Oceanside Orchard Body Wash
62. Pine Tar Body Wash
63. Rainforest Rapids Body Wash
64. Sandalwood Summit Body Wash
65. Sierra Storm Body Wash
66. Summer Citrus Body Wash
67. Wood Barrel Bourbon Body Wash

Exfoliating Body Wash

68. Pine Tar Exfoliating Body Wash
69. Wood Barrel Bourbon Exfoliating Body Wash

Hand Soap

70. Hand Soap, in every scent

Deodorant

71. Alpine Sage Deodorant
72. Birchwood Breeze Deodorant
73. Blue Flame Fresh Deodorant
74. Coastal Mist Deodorant
75. Coconut Castaway Deodorant
76. Cool Fresh Aloe Deodorant
77. Drunk'n Pumpkin Deodorant
78. Freedom Fresh 250th Anniversary Deodorant
79. Fresh Falls Deodorant
80. Gameday Fresh Deodorant
81. Lumberjack Lodge Deodorant
82. Maverick Musk Deodorant
83. Mountain Meadow Deodorant
84. Pine Tar Deodorant
85. Rainforest Rapids Deodorant
86. Sandalwood Summit Deodorant
87. Sierra Storm Deodorant
88. Sonic Speed Deodorant
89. Stone Cold Stunner Deodorant
90. Straw Hat Sticc
91. Summer Citrus Deodorant
92. Wood Barrel Bourbon Deodorant

Invisible Glide Deodorant

93. Birchwood Breeze Invisible Glide Deodorant
94. Coastal Mist Invisible Glide Deodorant
95. Coconut Castaway Invisible Glide Deodorant
96. Fresh Falls Invisible Glide Deodorant
97. Lumberjack Lodge Invisible Glide Deodorant
98. Mountain Meadow Invisible Glide Deodorant
99. Oceanside Orchard Invisible Glide Deodorant
100. Pine Tar Invisible Glide Deodorant
101. Rainforest Rapids Invisible Glide Deodorant
102. Sandalwood Summit Invisible Glide Deodorant
103. Sierra Storm Invisible Glide Deodorant
104. Summer Citrus Invisible Glide Deodorant
105. Wood Barrel Bourbon Invisible Glide Deodorant

Spray Deodorant

106. Birchwood Breeze Spray Deodorant
107. Coastal Mist Spray Deodorant
108. Coconut Castaway Spray Deodorant
109. Fresh Falls Spray Deodorant
110. Mountain Meadow Spray Deodorant
111. Pine Tar Spray Deodorant
112. Rainforest Rapids Spray Deodorant
113. Sandalwood Summit Spray Deodorant
114. Sierra Storm Spray Deodorant
115. Wood Barrel Bourbon Spray Deodorant

Precision Deo

116. Rainforest Rapids Precision Deo
117. Unscented Precision Deo
118. Wood Barrel Bourbon Precision Deo

Body Wipes

119. Wood Barrel Bourbon Wipes

Shampoo

120. Coconut Castaway Shampoo
121. Cool Fresh Aloe Shampoo
122. Fresh Falls Shampoo
123. Pine Tar Shampoo
124. Summer Citrus Shampoo
125. Wood Barrel Bourbon Shampoo

Full & Thick Shampoo

126. Coconut Castaway Full & Thick Shampoo
127. Cool Fresh Aloe Full & Thick Shampoo
128. Fresh Falls Full & Thick Shampoo

Conditioner

129. Coconut Castaway Conditioner
130. Cool Fresh Aloe Conditioner
131. Fresh Falls Conditioner
132. Pine Tar Conditioner
133. Summer Citrus Conditioner

134. Wood Barrel Bourbon Conditioner

Cologne

135. Castaway Cove Cologne
136. Fireside Bourbon Cologne
137. Glacial Falls Cologne
138. Midnight Birch Cologne
139. Rainforest Mist Cologne
140. Woodland Pine Cologne

Conditioning Beard Oil & Cologne

141. Castaway Cove Beard Oil & Cologne
142. Conditioning Beard Oil & Cologne Fireside Bourbon
143. Conditioning Beard Oil & Cologne Glacial Falls
144. Conditioning Beard Oil & Cologne Woodland Pine

Lotion

145. Coconut Castaway Lotion
146. Cool Fresh Aloe Lotion
147. Fresh Falls Lotion
148. Pine Tar Lotion
149. Wood Barrel Bourbon Lotion

Dry Lotion

150. Rainforest Rapids Dry Lotion
151. Unscented Dry Lotion

Face Wash

152. Birchwood Breeze Refreshing Face Wash
153. Coconut Castaway Refreshing Face Wash
154. Rainforest Rapids Refreshing Face Wash
155. Cool Fresh Aloe Exfoliating Face Wash
156. Fresh Falls Exfoliating Face Wash
157. Pine Tar Exfoliating Face Wash

Lip Balm

158. Hot Choccy Lip Balm
159. Salted Caramel Lip Balm
160. Spiked Cider Lip Balm
161. Lip Balm, in every flavor

Spray Sunscreen

162. Amber Solstice Spray Sunscreen
163. Coconut Castaway Spray Sunscreen

Easy Glide Shave Butter

164. Easy Glide Shave Butter Coconut Castaway
165. Easy Glide Shave Butter Fresh Falls
166. Easy Glide Shave Butter Pine Tar
167. Easy Glide Shave Butter Wood Barrel Bourbon

Soothing Post Shave

168. Soothing Post Shave Coconut Castaway
169. Soothing Post Shave Fresh Falls
170. Soothing Post Shave Pine Tar
171. Soothing Post Shave Wood Barrel Bourbon

Toothpaste

172. Citrus Mint Whitening Toothpaste
173. Soothing Spearmint - Night
174. Spearmint Whitening Toothpaste

Lil Squatch

175. Lil Squatch products, in every scent

CLASS PRODUCTS CATEGORIES AND ILLUSTRATIVE INGREDIENTS

This list of the categories of Defendants' Class Products and their corresponding ingredients identifies: (1) definitively foreign ingredients in **bold**; and (2) likely foreign ingredients in *italics*. The absence of bold or italicized emphasis does not constitute a concession that an ingredient is of domestic origin.

On information and belief, Class Products within each category share a common base formulation and differ principally in fragrance, colorants, exfoliants, and other scent-specific additives. Accordingly, for each category below, the ingredients of a representative Class Product are set out as illustrative of the ingredients of the Class Products in that category, together with the online source from which the ingredient information was obtained. In most instances, ingredient information was obtained directly from Defendant's website. Where Defendant's website does not display an ingredient list for the representative product, ingredients were identified through other publicly available sources, which are cited accordingly.

For brevity, supporting references for each ingredient appear only upon its first mention in the list.[1]

Men's Natural Bar Soap

Representative Class Product: Pine Tar Bar Soap

Saponified Oils of (Sustainable Palm, Coconut, *Olive***)**[2], Naturally Derived Fragrance, **Shea Butter**[3], Pine Tar, Pine Essential Oil, Oatmeal, Sand, Activated Charcoal, Kaolin Clay, Sea Salt

https://www.drsquatch.com/products/pine-tar

Body Wash

Representative Class Product: Rainforest Rapids Body Wash

Water (Aqua), **Potassium Cocoate**[4], Glycerin, Naturally Derived Fragrance, Xanthan Gum, Potassium Oleate, Saccharide Isomerate, Citric Acid, Ethylhexylglycerin, **Hydroxypropyl Guar Hydroxypropyltrimonium Chloride**[5], Trisodium Dicarboxymethyl Alaninate

https://www.drsquatch.com/products/14-oz-rainforest-rapids-body-wash

Deodorant

Representative Class Product: Coastal Mist Deodorant

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[1] All websites cited in Exhibit A were last accessed on November 5, 2026.

[2] Both palm oil and coconut oil are foreign sourced and olive oil is likely foreign. *See* https://www.fao.org/faostat/en/#data/QCL/visualize (Select Item: Palm oil. According to the Food and Agriculture Organization of the United Nations, palm oil is not produced commercially in the United States.); https://www.fao.org/faostat/en/#data/QCL/visualize (Select Item: Coconut oil. According to the Food and Agriculture Organization of the United Nations, coconut oil is not produced in commercial quantities in the United States.); *See* https://www.fao.org/faostat/en/#data/QCL/visualize (Select Item: Olive oil. According to the Food and Agriculture Organization of the United Nations, the United States does not rank among the top ten global producers of olive oil. Although some olive oil is produced domestically, the ingredient at issue is likely of foreign origin given that leading producers, including Spain, Italy, Greece, Türkiye, Morocco, and Portugal, dominate global production and consistently rank within the top ten worldwide.).

[3] *See* Colleen C. Naughton, Peter N. Lovett & James R. Mihelcic, Land Suitability Modeling of Shea (Vitellaria paradoxa) Distribution Across Sub-Saharan Africa, 58 APPLIED GEOGRAPHY 217 (2015) ("The ecological zone of shea trees (Vitellaria paradoxa, syn. Butyrospermum paradoxum or parkii) is stated to cover a 500–750 km wide area stretching 6000 km from Senegal/Guinea to South Sudan and Uganda in 21 countries…").

[4] Derivative of coconut oil. *See* n.7.

[5] This ingredient is a derivative of guar gum, a crop that is not sourced from or cultivated in the United States. *See* https://www.mordorintelligence.com/industry-reports/guar-market ("Asia-Pacific leads the world in guar production, with India at the forefront. India and Pakistan account for over 95% of global guar gum production.").

Caprylic/Capric Triglyceride[6], Manihot Esculenta (Arrowroot) Powder, Stearyl Alcohol, Magnesium Hydroxide, Beeswax (Cera Alba), **Butyrospermum Parkii (Shea) Butter**, **Cocos Nucifera (Coconut) Oil**[7], Triethyl Citrate, Naturally Derived Fragrance, Simmondsia Chinensis (Jojoba) Seed Oil, Jojoba Esters, Charcoal Powder, Tocopherol, Lactobacillus Ferment, Maltodextrin

https://www.drsquatch.com/products/coastal-mist-deodorant

Shampoo

Representative Class Product: Wood Barrel Bourbon Shampoo

Water (Aqua), Decyl Glucoside, **Coco-Glucoside**[8], Glycerin, Naturally Derived Fragrance, Xanthan Gum, Gluconolactone, Sodium Stearoyl Lactylate, Trehalose, Honey, **Pogostemon Cablin (Patchouli) Leaf Oil**[9], Citrus Aurantium Dulcis (Orange) Peel Oil, Sodium Benzoate, Potassium Sorbate, Hydrolyzed Oat Protein, *Calendula Officinalis Flower Extract*[10], Equisetum Arvense (Horsetail) Extract, *Rosmarinus Officinalis (Rosemary) Leaf Extract*[11], Symphytum Officinale (Comfrey) Leaf Extract, Urtica Dioica (Nettle) Leaf Extract, Simmondsia Chinensis (Jojoba) Seed Oil, Tocopherol, Citric Acid

https://www.drsquatch.com/products/wood-barrel-bourbon-shampoo

Conditioner

Representative Class Product: Wood Barrel Bourbon Conditioner

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[6] Derivative of coconut oil. *See* https://www.skincarelab.org/ingredient/caprylic-capric-triglyceride/ ("Caprylic/Capric Triglyceride is a gentle, non-greasy emollient derived from coconut oil …"); *see also* n. 7.

[7] See https://www.fao.org/faostat/en/#data/QCL/visualize (Select Item: Coconut oil. According to the Food and Agriculture Organization of the United Nations, coconut oil is not produced in commercial quantities in the United States.).

[8] Derivative of coconut oil. *See* https://www.skincarelab.org/ingredient/coco-glucoside/ ("Coco-Glucoside is a mild, plant-derived surfactant made from coconut oil…"); *see also* n.7.

[9] *See* https://powo.science.kew.org/taxon/urn:lsid:ipni.org:names:454827-1 (The distribution map shows that the species is not present in the United States. The species' native and current range is limited to foreign regions. Accordingly, any ingredient derived from this species is necessarily of foreign origin.).

[10] While calendula may be cultivated in the United States, the U.S. is recognized as the largest importer of calendula. *See* https://www.volza.com/p/calendula-officinalis/import/import-in-united-states/ ("United States imports most of its Calendula Officinalis from Egypt, India, and Spain… United States leads the world in Calendula Officinalis imports…").

[11] While rosemary can be cultivated worldwide, the primary producers of the herb are Morocco, Tunisia, and Spain. Because the ingredients at issue consist of extracts and essential oils, rather than the fresh or dried herbs commonly found in the United States, it is likely that these ingredients are of foreign origin, as extraction processes are typically more cost-effective overseas. See https://www.cbi.eu/market-information/spices-herbs/rosemary ("Morocco, Tunisia (mainly for essential oils), and Spain are the main producing countries of this herb.").

Water (Aqua), Stearyl Alcohol, Behenyl Alcohol, Xanthan Gum, Naturally Derived Fragrance, **Butyrospermum Parkii (Shea) Butter**, **Caprylic/Capric Triglyceride**, Glyceryl Stearate, Hydrogenated Vegetable Oil, *Persea Gratissima (Avocado) Oil*[12], Gluconolactone, Trehalose, Sodium Stearoyl Glutamate, Simmondsia Chinensis (Jojoba) Seed Oil, **Pogostemon Cablin (Patchouli) Leaf Oil**, Citrus Aurantium Dulcis (Orange) Peel Oil, Sodium Benzoate, Potassium Sorbate, Glycerin, **Cocos Nucifera (Coconut) Oil**, Hydrolyzed Oat Protein, *Aloe Barbadensis (Aloe Vera) Leaf Juice*[13], *Calendula Officinalis Flower Extract*, Equisetum Arvense (Horsetail) Extract, *Rosmarinus Officinalis (Rosemary) Leaf Extract*, Symphytum Officinale (Comfrey) Leaf Extract, Urtica Dioica (Nettle) Leaf Extract, **Azadirachta Indica (Neem) Seed Oil**,[14] Citric Acid

https://www.drsquatch.com/products/wood-barrel-bourbon-conditioner

Conditioning Beard Oil & Cologne

Representative Class Product: Conditioning Beard Oil & Cologne Fireside Bourbon

Prunus Amygdalus Dulcis (Sweet Almond) Oil, Simmondsia Chinensis (Jojoba) Seed Oil, **Argania Spinosa (Argan) Kernel Oil**[15], **Ricinus Communis (Castor) Seed Oil**[16], Naturally Derived Fragrance

https://giantfoodstores.com/groceries/health-beauty/shaving-hair-removal/beard-care/dr-squatch-natural-fireside-bourbon-conditioning-beard-oil-cologne-1-oz-pkg.html

Lotion

Representative Class Product: Pine Tar Lotion

Water (Aqua), **Caprylic/Capric Triglyceride**, Propanediol, **Butyrospermum Parkii (Shea) Butter**, Cetyl Alcohol, Glyceryl Caprylate, Cetearyl Alcohol, **Cocos Nucifera (Coconut) Oil**, Polyglyceryl-3 Methylglucose Distearate, Microcrystalline Cellulose, Naturally Derived

[12] *See* https://edis.ifas.ufl.edu/publication/FE1150 ("...since the early 1990s, the total supply of avocados in the United States has been increasingly dependent on imports, reaching a dependence share of 90% during the last decade.").

[13] While aloe is cultivated in the United States, the U.S. is not among the world's leading producers, and is recognized as the largest importer of aloe. *See* https://smallfarmers.trade/sites/default/files/2020-05/REPORT%20Aloe%20EN.pdf ("The main importers of this product are the USA with 15% of the global imports…").

[14] *See* https://powo.science.kew.org/taxon/1213180-2 (Map reflecting extensive distribution throughout Asia and Africa with no distribution in the United States).

[15] *See* https://powo.science.kew.org/taxon/urn:lsid:ipni.org:names:789863-1 (Distribution map showing that Sideroxylon spinosum (synonymous with Argania spinosa) is found exclusively in Algeria, Mauritania, Morocco, Western Sahara, Spain, Tunisia, and the Canary Islands.).

[16] *See* https://www.fao.org/faostat/en/#data/QCL/visualize (Select Item: Castor oil seeds. According to the Food and Agriculture Organization of the United Nations, castor oil is not produced commercially in the United States.).

Fragrance, Potassium Cetyl Phosphate, Xanthan Gum, Glyceryl Undecylenate, Cellulose Gum, Tocopherol, Butylene Glycol, Charcoal Powder, Beta-Glucan

https://www.drsquatch.com/products/pine-tar-lotion-1

Face Wash

Representative Class Product: Pine Tar Exfoliating Face Wash

Water, Sodium Laurylglucosides Hydroxypropylsulfonate, Glycerin, **Sodium Cocoyl Glutamate**,[17] Cetearyl Alcohol, Oryza Sativa (Rice) Powder, Stearyl Stearate, **Cocoyl Methyl Glucamide**,[18] **Coffea Robusta Seed Powder**,[19] Xanthan Gum, Microcrystalline Cellulose, Cetyl Palmitate, Sodium Citrate, Sodium Chloride, Gluconolactone, Charcoal Powder, **Acacia Senegal Gum**,[20] Citric Acid, Fragrance, Sodium Gluconate, Sodium Benzoate, Cetearyl Glucoside, Cellulose Gum, **Euphorbia Cerifera (Candelilla) Wax**[21], *Aloe Barbadensis Leaf Juice*, Jojoba Esters, Sorbic Acid, Calcium Gluconate, **Carica Papaya (Papaya) Fruit Extract**,[22] Glucose

https://www.heb.com/product-detail/dr-squatch-men-s-natural-face-wash-pine-tar/10442013

Easy Glide Shave Butter

Representative Class Product: Easy Glide Shave Butter Pine Tar

Water (Aqua), **Coco-Glucoside**, Sodium Decylglucosides Hydroxypropylsulfonate, Myristic Acid, Glycerin, Stearic Acid, **Sodium Cocoyl Glutamate**, Propanediol, Naturally Derived Fragrance, **Butyrospermum Parkii (Shea) Butter**, **Astrocaryum Murumuru Seed Butter**,[23]

[17] Derivative of coconut oil. *See* n.7.

[18] *Id*.

[19] *See* https://www.fao.org/faostat/en/#data/QCL/visualize (Select Item: Coffee, green. According to the Food and Agriculture Organization of the United Nations, the United States does not rank among the top ten global producers of coffee.).

[20] *See* https://powo.science.kew.org/taxon/urn:lsid:ipni.org:names:518304-1 (Distribution map showing that Senegalia senegal (synonymous with Acacia Senegal) is found exclusively in Africa and Asia.).

[21] While some Candelilla grows naturally in the Trans-Pecos region of Texas, almost all commercial cultivation occurs in Mexico. *See* https://candelilla.org/en/candelilla/#candelilla-plant ("The Candelilla plant is found nearly exclusively in a semi-desert region of Mexico, situated in the geographic zone known as 'The Chihuahuan Desert'").

[22] *See* https://www.fao.org/faostat/en/#data/QCL/visualize (Select Item: Papayas. According to the Food and Agriculture Organization of the United Nations, India is the world's leading producer of papaya, followed by Brazil and Mexico. The United States does not rank among the top ten global producers. Because the ingredient at issue is an extract rather than a fresh papaya commonly available in the United States, it is almost certainly of foreign origin, as extraction is typically less expensive overseas, particularly in countries such as India.).

[23] *See* https://powo.science.kew.org/taxon/urn:lsid:ipni.org:names:664335-1 (Distribution map showing that Astrocaryum Murumuru is found exclusively in South America.).

Macadamia Ternifolia Seed Oil,[24] Microcrystalline Cellulose, Saccharide Isomerate, Citric Acid, Cetearyl Alcohol, Cetyl Stearate, Ethylhexylglycerin, Titanium Dioxide, Sodium Benzoate, **Acacia Senegal Gum**, Cetyl Alcohol, Glycol Distearate, Xanthan Gum, Potassium Sorbate, Palmitic Acid, Cellulose Gum, Tetrasodium Glutamate Diacetate, Lauric Acid, Arachidic Acid

https://www.heb.com/product-detail/dr-squatch-men-s-natural-easy-glide-shave-butter-pine-tar/14845513

Soothing Post Shave

Representative Class Product: Soothing Post Shave Pine Tar

Water (Aqua), Propanediol, C13-15 Alkane, Cetearyl Alcohol, Selaginella Lepidophylla (Ressurection Plant) Extract, Sodium Citrate, Silica, Gluconolactone, Cetyl Palmitate, Sodium Stearoyl Glutamate, **Butyrospermum Parkii (Shea) Butter**, Glycerin, Xanthan Gum, Carrageenan, Citric Acid, Sodium Benzoate, Sodium Gluconate, Naturally Derived Fragrance, Bisabolol, Potassium Hydroxide, Hydrolyzed Jojoba Esters, Lactobacillus Ferment, Calcium Gluconate, **Tasmannia Lanceolata (Mountain Pepper) Fruit/Leaf Extract**,[25] Hordeum Distichon (Barley) Extract, Zingiber Officinale (Ginger) Root Extract

https://www.heb.com/product-detail/dr-squatch-men-s-natural-soothing-post-shave-lotion-pine-tar/14844013

The foregoing categories are illustrative and do not limit the Class Products. Ingredient information for Class Products in categories not separately identified above, including Total Moisture Bar Soap, Cologne, Exfoliating Body Wash, Hand Soap, Invisible Glide Deodorant, Spray Deodorant, Precision Deo, Body Wipes, Full & Thick Shampoo, Dry Lotion, Lip Balm, Spray Sunscreen, Toothpaste, and Lil Squatch products, and for discontinued, renamed, limited-edition, and reformulated Class Products, is in the possession, custody, and control of Defendant.

[24] *See* https://powo.science.kew.org/taxon/urn:lsid:ipni.org:names:705199-1 (Distribution map showing that Macadamia Ternifolia is found exclusively in Australia.).

[25] *See* https://powo.science.kew.org/taxon/urn%3Alsid%3Aipni.org%3Anames%3A555234-1 (Distribution map showing that Tasmannia Lanceolata is found exclusively in Australia.).

JS 44 (Rev. 10/20)

CIVIL COVER SHEET

5:26-cv-2332

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

I. (a) PLAINTIFFS

Theo Couderc

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

(c) Attorneys *(Firm Name, Address, and Telephone Number)*
(see attachment)

DEFENDANTS

Dr. Squatch, LLC; Yeti Intermediate Holdings II, LLC; Summit Master Company, LLC; and Conopco, Inc.

County of Residence of First Listed Defendant Los Angeles
(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)*

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

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

(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	☒ 1	☐ 1	Incorporated *or* Principal Place of Business In This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated *and* Principal Place of Business In Another State	☐ 5	☒ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

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

Click here for: Nature of Suit Code Descriptions.

CONTRACT
- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)
- ☐ 153 Recovery of Overpayment of Veteran's Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

TORTS

PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury - Medical Malpractice

PERSONAL INJURY
- ☐ 365 Personal Injury - Product Liability
- ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

CIVIL RIGHTS
- ☐ 440 Other Civil Rights
- ☐ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/ Accommodations
- ☐ 445 Amer. w/Disabilities - Employment
- ☐ 446 Amer. w/Disabilities - Other
- ☐ 448 Education

PRISONER PETITIONS

Habeas Corpus:
- ☐ 463 Alien Detainee
- ☐ 510 Motions to Vacate Sentence
- ☐ 530 General
- ☐ 535 Death Penalty

Other:
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee - Conditions of Confinement

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

LABOR
- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Management Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Employee Retirement Income Security Act

IMMIGRATION
- ☐ 462 Naturalization Application
- ☐ 465 Other Immigration Actions

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

PROPERTY RIGHTS
- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 835 Patent - Abbreviated New Drug Application
- ☐ 840 Trademark
- ☐ 880 Defend Trade Secrets Act of 2016

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS
- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS—Third Party 26 USC 7609

OTHER STATUTES
- ☐ 375 False Claims Act
- ☐ 376 Qui Tam (31 USC 3729(a))
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 480 Consumer Credit (15 USC 1681 or 1692)
- ☐ 485 Telephone Consumer Protection Act
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/ Exchange
- ☒ 890 Other Statutory Actions
- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Information Act
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State 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 *(specify)* ☐ 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)***:
N.Y. GEN. BUS. LAW § 349 and N.Y. GEN. BUS. LAW § 350

Brief description of cause:
Deceptive practices and false advertising based on alleged country-of-origin misrepresentations

VII. REQUESTED IN COMPLAINT:

☒ CHECK IF THIS IS A **CLASS ACTION** UNDER RULE 23, F.R.Cv.P.

DEMAND $

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

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE _____ DOCKET NUMBER _____

DATE
November 12, 2026

SIGNATURE OF ATTORNEY OF RECORD
/s/ Abbas Kazerounian

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT $405 APPLYING IFP _____ JUDGE BKS MAG. JUDGE CBF

ANYNDC-7851376

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