



DR. BRONNER'S
MAGIC
"ALL-ONE!"™

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

ALL ONE GOD FAITH, INC. d/b/a
DR. BRONNER'S MAGIC SOAPS,
a California corporation
Plaintiff,
vs.
THE HAIN CELESTIAL GROUP, INC.
a Delaware corporation;
KISS MY FACE CORPORATION, a
New York corporation;
LEVLAD, INC., a California corporation;
ESTEE LAUDER, INC., a
Delaware corporation; FLORES,
BOTANICAL, Inc., a New York
corporation;
JUICE BEAUTY, INC., a
Delaware corporation;
STELLA MCCARTNEY,
a California corporation;
AMERICA, INC., a
Delaware corporation;
JOVANNI COSMETICS, INC.,
COSWAY COMPANY, INC.,
COUNTRY LIFE, LLC, a New
York limited liability
company; ORGANIC AND
TRY STANDARDS, INC., a
Nevada corporation;
FRANCH COOPERATION, a
Delaware corporation;
BERT, INC., a
California corporation;
CASE NO. _____
COMPLAINT FOR
INJUNCTIVE RELIEF
AGAINST UNFAIR
AND UNLAWFUL
BUSINESS ACTS AND
PRACTICES AND
DECEPTIVE AND
FALSE ADVERTISING

Reasonable Consumer Expectations for Organic Body Care

The lawsuit against companies fraudulently using the word “organic” on their labels is based in part on extensive focus groups that measured what a reasonable consumer would expect from organic products. Here is a summary of those consumer expectations as outlined in our lawsuit:



Reasonable consumers of organic skin, body and hair care products in California expect and believe that such products labeled as “Organic,” “Organics,” “100% Organic Active Ingredients” and/or “Made with Organic Ingredients” will:



1 Not contain any petrochemicals or petrochemical compounds whatsoever in the ingredients and thus will be entirely free of any petrochemical contaminants that could pose any concern, such as amidoamine in cocamidopropyl betaine and 1,4-dioxane in ethoxylated surfactants.



2 Not contain any petrochemical preservatives



3 Not contain cleansing or moisturizing agents derived from conventionally-produced agricultural material that may have been grown using synthetic fertilizers, pesticides or herbicides.



4 Not be so labeled based merely on the inclusion of water in which botanical material has been soaked or steamed; rather such consumers expect that products so labeled will include main ingredients, such as cleansing and moisturizing agents, that are derived from organic material and are free of any petrochemical compounds.

In addition, reasonable consumers of organic skin, body and hair care products in California believe that the terms “Organic” and “Organics” (in the plural) mean the same thing and that personal care products labeled as “Organics” will have the same characteristics as those labeled as “Organic.”