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10 UNITED STATES DISTRICT COURT
 11 CENTRAL DISTRICT OF CALIFORNIA

12 TOBY BROCK, individually and on
13 behalf of all others similarly situated,

14 Plaintiff,

15 vs.

16 GNC HOLDINGS, INC., and DOES 1
17 through 10, inclusive,

18 Defendants.

Case No.

CLASS ACTION COMPLAINT

1. VIOLATION OF CALIFORNIA CONSUMERS LEGAL REMEDIES ACT, CIVIL CODE SECTION 1750, *et seq.*
2. VIOLATION OF CALIFORNIA FALSE ADVERTISING LAW, BUSINESS & PROFESSIONS CODE SECTION 17500, *et seq.*
3. VIOLATION OF CALIFORNIA UNFAIR COMPETITION LAW, BUSINESS & PROFESSIONS CODE SECTION 17200, *et seq.*

DEMAND FOR JURY TRIAL

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25 Plaintiff Toby Brock, individually and on behalf of all others similarly situated,
 26 (“Plaintiff”) brings this class action complaint against GNC Holdings, Inc.,
 27 (“Defendant” or “GNC”) and Does 1 through 10, inclusive (collectively referred to
 28 herein as “Defendants”) and alleges as follows:

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1 **SUMMARY OF THE ACTION**

2 1. GNC’s Vitamin E Skin Oil (the “Product”) is not Vitamin E oil: It is
3 mostly a vegetable oil used for cooking called Safflower oil masquerading as
4 Vitamin E oil. Safflower oil does not deliver the cosmetic benefits of Vitamin E oil.
5 GNC’s false and deceptive Vitamin E skin oil label misleads and shortchanges
6 consumers and creates a competitive advantage over other competitors, large and
7 small, who play by the rules. Reasonable consumers do not expect mostly safflower
8 oil in a Product labeled and advertised as Vitamin E skin oil. A true and correct
9 representation of the Product’s front label is set forth below.



25 2. Some of GNC’s competitors manufacture and sell vitamin E oil products
26 similar to the Product, but accurately label them as a “blend.” For example, Trader
27 Joe’s sells a Vitamin E oil product comprised mostly of soybean oil and labels it as
28 “Vitamin E Oil Blend.” Defendant could easily modify its label to truthfully label it

1 as a blend and dispel consumer confusion but refuses to do so. A true and correct
2 representation of the Trader Joe's product is set forth below.



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17 **PARTIES**

18 3. Plaintiff is, and at all times relevant hereto was, a citizen of California
19 residing in the county of Los Angeles. Plaintiff purchased the Product at a GNC in
20 Los Angeles, California in Summer 2019 for approximately \$12. In making her
21 purchase, Plaintiff relied upon Defendant's labeling and advertising claims,
22 including "Vitamin E Skin Oil" prominently labeled in large capital lettering front
23 and center on the front of the bottle. This claim was prepared and approved by
24 Defendants and their agents and disseminated statewide and nationwide, as well as
25 designed to encourage consumers to purchase the Product. If Plaintiff had known
26 that the Product was in fact primarily comprised of safflower oil rather than
27 Vitamin E oil, she would not have purchased the Product. Plaintiff would purchase
28 the Product again in the future if she could be sure that the Product was primarily or

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1 exclusively Vitamin E oil or if GNC dispelled any confusion that the Product does
2 not contain primarily or exclusively Vitamin E oil on its labeling, packaging, and
3 advertising of the Product.

4 4. GNC is a corporation headquartered in Pittsburgh, Pennsylvania. GNC
5 maintains its principal business office at 300 6th Avenue, Pittsburgh, Pennsylvania
6 15222. GNC directly and through its agents, has substantial contacts with and
7 receives substantial benefits and income from and through the State of California.
8 GNC is the one of the owners, manufacturers, and distributors of the Product, and is
9 one of the companies that created and/or authorized the false, misleading, and
10 deceptive packaging for the Product.

11 5. The true names and capacities, whether individual, corporate, associate,
12 or otherwise of certain manufacturers, distributors, and/or their alter egos sued herein
13 as DOES 1 through 10 inclusive are presently unknown to Plaintiff who therefore
14 sues these individuals and/or entities by fictitious names. Plaintiff will seek leave of
15 this Court to amend the Complaint to show their true names and capacities when the
16 same have been ascertained. Plaintiff is informed and believes and based thereon
17 alleges that DOES 1 through 10 were authorized to do and did business in Los
18 Angeles County. Plaintiff is further informed and believes and based thereon alleges
19 that DOES 1 through 10 were and/or are, in some manner or way, responsible for
20 and liable to Plaintiff for the events, happenings, and unlawful and deceptive conduct
21 hereinafter set forth below.

22 **JURISDICTION AND VENUE**

23 6. This Court has subject matter jurisdiction of this action pursuant to 28
24 U.S.C. Section 1332 of the Class Action Fairness Act of 2005 because: (i) there are
25 100 or more class members, (ii) there is an aggregate amount in controversy
26 exceeding \$5,000,000, exclusive of interest and costs, and (iii) there is minimal
27 diversity because at least one Plaintiff and Defendant are citizens of different
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1 states. This Court has supplemental jurisdiction over any state law claims pursuant
2 to 28 U.S.C. Section 1367.

3 7. Pursuant to 28 U.S.C. Section 1391, this Court is the proper venue for
4 this action because a substantial part of the events, omissions, and acts giving rise
5 to the claims herein occurred in this District: Plaintiff is a citizen of California who
6 resides in this District; Defendant made the challenged false representations to
7 Plaintiff in this District; Plaintiff purchased the Product in this District; and
8 Plaintiff used the Product within this District. Moreover, Defendant receives
9 substantial compensation from sales in this District, and Defendant made numerous
10 misrepresentations which had a substantial effect in this District involving its
11 labeling and advertising representations.

12 8. Defendant is subject to personal jurisdiction in California based upon
13 sufficient minimum contacts which exist between Defendant and California.
14 Defendant is authorized to do and is doing business in California.

15 **FACTUAL ALLEGATIONS**

16 9. Defendants prominently display “Vitamin E Skin Oil” front and center on
17 each bottle of the Product. The “Vitamin E” label claim is written in the largest font,
18 in capital lettering, on the front of each and every bottle. Safflower oil is starkly
19 omitted from the front label of the packaging despite being the primary oil.
20 Defendant tellingly does not label the Product “Safflower skin oil.”

21 10. The net impression of Defendant’s labeling and advertising is that the
22 Product is made exclusively or primarily of vitamin E oil. In actuality and
23 unbeknownst to consumers, the Product is comprised primarily of safflower oil.

24 11. “Vitamin E” is the collective name for a group of fat-soluble compounds
25 with distinctive antioxidant activities.¹ Vitamin E, also known as “D-Alpha-

26
27 ¹ U.S. DEP’T OF HEALTH AND HUMAN SERVICES, THE NAT’L INSTITUTES OF HEALTH
28 OFFICE OF DIETARY SUPPLEMENTS, *Vitamin E*,
<https://ods.od.nih.gov/factsheets/VitaminE-HealthProfessional/#en1> (Nov. 3, 2016)
(citing Maurice E. Shils et al., MODERN NUTRITION IN HEALTH AND DISEASE 396-411
(10th ed. 2006)).

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1 Tocopherol,” is the most important lipid soluble antioxidant.² The National Institutes
2 of Health Office of Dietary Supplements explains that Vitamin E is an antioxidant
3 that helps protect cells from damage caused by free radicals, a reactive oxygen
4 species formed when the body converts food to energy.³ Additionally, damaged cells
5 caused by radicals may contribute to cardiovascular disease and cancer.⁴ People can
6 be exposed to free radicals from environmental exposures such as pollution and
7 ultraviolet radiation.⁵ Moreover, Vitamin E oil blocks the free radicals from the
8 human body which also play a major role in the aging process. Vitamin E oil is a
9 powerful fat soluble antioxidant that can help rejuvenate human skin and overall
10 health. Safflower oil does not possess the same qualities as Vitamin E oil.

11 12. Plaintiff and other consumers purchased the Product to obtain the
12 benefits and qualities of Vitamin E, not of other oils like safflower oil.

13 13. Plaintiff and the Class made their purchasing decisions in reliance upon
14 Defendants’ advertised claims that that Product was exclusively or primarily Vitamin
15 E skin oil.

16 14. Plaintiff purchased GNC Vitamin E skin oil from a GNC in Los Angeles
17 in Summer 2019. Plaintiff paid approximately \$12.00 for the Product.

18 15. Plaintiff reasonably and detrimentally relied upon the Product’s front
19 label indicating that the Product was exclusively or primarily “Vitamin E” skin oil.

20 16. Plaintiff would not have purchased the Product had she known the
21 Product was primarily safflower skin oil. Plaintiff would purchase the Product again
22 in the future if she could be sure that the Product was primarily or exclusively
23 Vitamin E oil or if GNC dispelled any confusion that the Product does not contain
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25 ² See Lester Packer et al., Molecular Mechanisms of Protective Effects of Vitamin E
26 in Atherosclerosis, THE JOURNAL OF NUTRITION (April 16, 2000)
<http://jn.nutrition.org/content/131/2/369S.full.pdf>.

27 ³ *Supra* U.S. DEP’T OF HEALTH AND HUMAN SERVICES.

28 ⁴ *Supra* U.S. DEP’T OF HEALTH AND HUMAN SERVICES (citing Hans Verhagen et al.,
The State of Antioxidant Affairs, NUTRITION TODAY, November/December 2006, Vol.
41, Issue 6 at 244-50).

⁵ *Supra* U.S. DEP’T OF HEALTH AND HUMAN SERVICES.

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1 primarily or exclusively Vitamin E oil on its labeling, packaging, and advertising of
2 the Product.

3 17. Defendants’ conduct threatens California consumers by using deceptive
4 and misleading labels. Defendants’ conduct also threatens other companies, large
5 and small, who “play by the rules.” Defendants’ conduct stifles competition and has
6 a negative impact on the marketplace, and reduces consumer choice.

7 18. There is no practical reason for the false or misleading labeling and
8 advertising of the Product, other than to mislead consumers as to the actual
9 ingredients of the Product being purchased by consumers while simultaneously
10 providing Defendants with a financial windfall as a result of money saved from
11 lower supply costs.

12 19. Plaintiff makes the allegations herein upon personal knowledge as to
13 herself and her own acts and experiences, and as to all other matters, upon
14 information and belief, including investigation conducted by her attorneys.

15 **CLASS ALLEGATIONS**

16 20. Plaintiff brings this action on her own behalf and on behalf of all other
17 persons similarly situated. The Class which Plaintiff seeks to represent comprises:

18 All persons who purchased the Product in the United States or,
19 alternatively, the State of California, for personal use and not for
20 resale during the time period of four years prior to the filing of the
complaint through the present.

21 Said definition may be further defined or amended by additional pleadings,
22 evidentiary hearings, a class certification hearing, and orders of this Court.

23 21. There is a well-defined community of interest in the questions of law
24 and fact involved affecting the parties to be represented. The questions of law and
25 fact common to the Class predominate over questions which may affect individual
26 Class members. Common questions of law and fact include, but are not limited to,
27 the following:

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- 1 a. Whether Defendants' conduct constitutes an unfair method of
2 competition, or unfair or deceptive act or practice, in violation of Civil Code section
3 1750, *et seq.*;
- 4 b. Whether Defendants used deceptive representations in connection
5 with the sale of the Product in violation of Civil Code section 1750, *et seq.*;
- 6 c. Whether Defendants represented the Product has characteristics or
7 quantities that it does not have in violation of Civil Code section 1750, *et seq.*;
- 8 d. Whether Defendants advertised the Product with intent not to sell it
9 as advertised in violation of Civil Code section 1750, *et seq.*;
- 10 e. Whether Defendants' labeling and advertising of the Product is
11 untrue or misleading in violation of Business and Professions Code section 17500, *et*
12 *seq.*;
- 13 f. Whether Defendants knew or by the exercise of reasonable care
14 should have known their labeling and advertising was and is untrue or misleading in
15 violation of Business and Professions Code section 17500, *et seq.*;
- 16 g. Whether Defendants' conduct is an unfair business practice within
17 the meaning of Business and Professions Code section 17200, *et seq.*;
- 18 h. Whether Defendants' conduct is a fraudulent business practice
19 within the meaning of Business and Professions Code section 17200, *et seq.*;
- 20 i. Whether Defendants' conduct is an unlawful business practice
21 within the meaning of Business and Professions Code section 17200, *et seq.*;
- 22 j. Whether Plaintiff and the Class paid more money for the Product
23 than they actually received; and
- 24 k. How much money Plaintiff and the Class paid for the Product than
25 they actually received.

26 22. Plaintiff's claims are typical of the claims of the Class, and Plaintiff will
27 fairly and adequately represent and protect the interests of the Class. Plaintiff has
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1 retained competent and experienced counsel in class action and other complex
2 litigation.

3 23. Plaintiff and the Class have suffered injury in fact and have lost money as
4 a result of Defendants' false representations and material omissions. Plaintiff
5 purchased the Product under the false belief that the Product contained exclusively or
6 primarily Vitamin E skin oil. Plaintiff relied upon Defendants' packaging and would
7 not have purchased the Product if she had known that the Product did not comprise
8 exclusively or primarily of Vitamin E skin oil as advertised, and that the Product was
9 actually comprised primarily of Safflower oil.

10 24. A class action is superior to other available methods for fair and efficient
11 adjudication of this controversy. The expense and burden of individual litigation
12 would make it impracticable or impossible for the Class to prosecute their claims
13 individually.

14 25. The trial and litigation of Plaintiff's claims are manageable. Individual
15 litigation of the legal and factual issues raised by Defendants' conduct would
16 increase delay and expense to all parties and the court system. The class action
17 device presents far fewer management difficulties and provides the benefits of a
18 single, uniform adjudication, economies of scale, and comprehensive supervision by
19 a single court.

20 26. Defendants have acted on grounds generally applicable to the entire
21 Class, thereby making final injunctive relief and/or corresponding declaratory relief
22 appropriate with respect to the Class as a whole. The prosecution of separate actions
23 by individual Class members would create the risk of inconsistent or varying
24 adjudications with respect to individual Class members that would establish
25 incompatible standards of conduct for Defendant.

26 27. Absent a class action, Defendants will likely retain the benefits of their
27 wrongdoing. Because of the small size of the individual Class members' claims,
28 few, if any, Class members could afford to seek legal redress for the wrongs

1 complained of herein. Absent a representative action, the Class will continue to
2 suffer losses and Defendants will be allowed to continue these violations of law and
3 to retain the proceeds of their ill-gotten gains.

4 **COUNT ONE**

5 **Violation of California Consumers Legal Remedies Act,**

6 **California Civil Code Section 1750, *et seq.***

7 **(By Plaintiff against all Defendants)**

8 28. Plaintiff repeats and realleges all allegations of the previous paragraphs,
9 and incorporates the same as if set forth herein at length.

10 29. Plaintiff brings this cause of action pursuant to Civil Code section 1750,
11 *et seq.*, the Consumers Legal Remedies Act (“CLRA”), on her own behalf and on
12 behalf of all other persons similarly situated. Plaintiff seeks to represent a Class
13 consisting of “All persons who purchased the Product in the United States or,
14 alternatively, the State of California, for personal use and not for resale during the
15 time period of four years prior to the filing of the complaint through the present.”
16 Excluded from the Class are Defendants’ officers, directors, and employees, and
17 any individual who received remuneration from Defendants in connection with that
18 individual’s use or endorsement of the Product.

19 30. The Class consists of thousands of persons, the joinder of whom is
20 impracticable.

21 31. There are questions of law and fact common to the Class, which
22 questions are substantially similar and predominate over questions affecting the
23 individual Class members, as set forth herein.

24 32. The CLRA prohibits certain “unfair methods of competition and unfair
25 or deceptive acts or practices” in connection with a sale of goods.

26 33. The practices described herein, specifically Defendants’ packaging,
27 advertising, and sale of the Product, were intended to result and did result in the sale
28 of the Product to the consuming public and violated and continue to violate the

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1 CLRA by (1) using deceptive representations in connection with the Product; and
2 (2) advertising and packaging the Product with intent not to sell them as advertised.

3 34. Defendants fraudulently deceived Plaintiff and the Class by
4 misrepresenting the Product as having characteristics which it does not have, e.g.,
5 advertising the Product in such a way to represent it as containing primarily or
6 exclusively Vitamin E skin oil when it contains primarily Safflower oil. In doing so,
7 Defendants misrepresented and concealed material facts from Plaintiff and the
8 Class. Said misrepresentations and concealment were done with the intention of
9 deceiving Plaintiff and the Class and depriving them of their legal rights and
10 money.

11 35. Defendants fraudulently deceived Plaintiff and the Class by labeling and
12 advertising the Product with intent not to sell as advertised. Specifically,
13 Defendants intentionally labeled and misrepresented the Product as being primarily
14 or exclusively Vitamin E skin oil, and deliberately omitted any mention of
15 Safflower oil despite that the Product consists primarily of Safflower oil. In doing
16 so, Defendants intentionally misrepresented and concealed material facts from
17 Plaintiff and the Class. Said misrepresentations and concealment were done with the
18 intention of deceiving Plaintiff and the Class and depriving them of their legal
19 rights and money.

20 36. Defendants knew or should have known, through the exercise of
21 reasonable care, that the Product's labeling and advertising were misleading.

22 37. Defendants' actions as described herein were done with conscious
23 disregard of Plaintiff's rights, and Defendants were wanton and malicious in their
24 concealment of the same.

25 38. Defendants' labeling and advertising of the Product was a material factor
26 in Plaintiff's and the Class's decisions to purchase the Product. Based on
27 Defendant's labeling and advertising of the Product, Plaintiff and the Class
28 reasonably believed that they were purchasing a bottle that contained exclusively or

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1 primarily Vitamin E skin oil instead of the Product containing primarily Safflower
2 oil. Had they known the truth of the matter, Plaintiff and the Class would not have
3 purchased the Product.

4 39. Plaintiff and the Class have suffered injury in fact and have lost money
5 as a result of Defendants’ unfair, unlawful, and fraudulent conduct. Specifically,
6 Plaintiff paid for a bottle of oil that was different from what she was reasonably
7 expecting to receive when she decided to make her purchase. Plaintiff would not
8 have purchased the Product had she known the Product contained primarily
9 Safflower oil.

10 40. Defendants’ false and misleading labeling and advertising should be
11 enjoined due to its false, misleading, and/or deceptive nature.

12 41. By letter dated June 17, 2019, Plaintiff advised Defendants of their false
13 and misleading claims pursuant to California Civil Code Section 1782(a).

14 42. Pursuant to Section 1780(a) of the Act, Plaintiff seeks injunctive relief
15 in the form of an order enjoining the above-described wrongful acts and practices of
16 Defendant, including, but not limited to, an order enjoining Defendant from
17 continuing to make the label and advertising claims challenged herein.

18 43. Plaintiff shall be irreparably harmed if such an order is not granted.

19 **COUNT TWO**

20 **Violation of California False Advertising Law,**
21 **Business & Professions Code Section 17500, et seq.**

22 **(By Plaintiff against all Defendants)**

23 44. Plaintiff repeats and realleges the allegations set forth in the preceding
24 paragraphs, and incorporates the same as if set forth herein at length.

25 45. Plaintiff brings this cause of action pursuant to Business and Professions
26 Code section 17500, et seq., on her own behalf and on behalf of all other persons
27 similarly situated. Plaintiff seeks to represent a Class consisting of “All persons
28 who purchased the Product in the United States or, alternatively, the State of

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1 California, for personal use and not for resale during the time period of four years
2 prior to the filing of the complaint through the present.” Excluded from the Class
3 are Defendants’ officers, directors, and employees, and any individual who received
4 remuneration from Defendants in connection with that individual’s use or
5 endorsement of the Product.

6 46. California’s False Advertising Law, California Business and Professions
7 Code section 17500, *et seq.*, makes it “unlawful for any person to make or
8 disseminate or cause to be made or disseminated before the public in this state, in
9 any advertising device or in any other manner or means whatever, including over
10 the Internet, any statement, concerning personal property or services, professional
11 or otherwise, or performance or disposition thereof, which is untrue or misleading
12 and which is known, or which by the exercise of reasonable care should be known,
13 to be untrue or misleading.”

14 47. Defendants knowingly spread misleading claims regarding the Product
15 as a means to mislead the public about the amount of said ingredient in the Product.

16 48. Defendants controlled the labeling, packaging, production and
17 advertising of the Product. They knew or should have known, through the exercise
18 of reasonable care that their representations and omissions about the ingredients of
19 the Product was untrue, deceptive and misleading.

20 49. Defendants’ action of displaying misleading claims and omissions about
21 the ingredients of the Product in prominent type face on each Product front label is
22 likely to deceive the general public.

23 50. Defendants’ actions in violation of Section 17500 were false and
24 misleading such that the general public is and was likely to be deceived.

25 51. Pursuant to Business and Professions Code section 17535, Plaintiff and
26 the Class seek an order of this Court enjoining Defendants from continuing to
27 engage, use, or employ their practice of falsely advertising that the Product is
28 simply “Vitamin E skin oil” and deliberately omitting that the Product contains

1 primarily Safflower oil.

2 52. Plaintiff and the Class have suffered injury in fact and have lost money
3 as a result of Defendants’ false representations. Plaintiff purchased the Product in
4 reliance upon the claims and omissions by Defendants that the Product is primarily
5 or exclusively Vitamin E skin oil as represented by Defendants’ labeling and
6 advertising. Plaintiff would not have purchased the Product if she had known that
7 the claims and advertising as described herein were false and misleading.

8 **COUNT THREE**

9 **Violation of California Unfair Competition Law,**
10 **Business & Professions Code Section 17200, *et seq.***
11 **(By Plaintiff against all Defendants)**

12 53. Plaintiff repeats and realleges the allegations set forth above, and
13 incorporate the same as if set forth herein at length.

14 54. Plaintiff brings this cause of action pursuant to Business and Professions
15 Code section 17200, *et seq.*, on her own behalf and on behalf of all other persons
16 similarly situated. Plaintiff seeks to represent a Class consisting of “All persons
17 who purchased the Product in the United States or, alternatively, the State of
18 California, for personal use and not for resale during the time period of four years
19 prior to the filing of the complaint through the present.” Excluded from the Class
20 are Defendants’ officers, directors, and employees, and any individual who received
21 remuneration from Defendants in connection with that individual’s use or
22 endorsement of the Product.

23 55. In the advertising of the Product, Defendants make false and misleading
24 statements regarding the ingredients of the Product, as alleged in the preceding
25 paragraphs.

26 56. Defendants’ advertising claims and omissions about the Product, as
27 alleged in the preceding paragraphs, are false, deceptive, misleading and
28 unreasonable.

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1 57. Defendants are aware that the claims (and omissions) they make about
2 the Product are false, deceptive, misleading and unreasonable.

3 58. As alleged in the preceding paragraphs, the misrepresentations by
4 Defendants of the material facts detailed above constitutes an unfair and fraudulent
5 business practice within the meaning of California Business & Professions Code
6 Section 17200.

7 59. In addition, Defendants' use of various forms of advertising media to
8 advertise, call attention to, or give publicity to the sale of goods or merchandise that
9 are not as represented in any manner constitutes unfair competition, unfair,
10 deceptive, untrue or misleading advertising, and an unlawful business practice
11 within the meaning of Business & Professions Code Sections 17200 and 17531,
12 which advertisements have deceived and are likely to deceive the consuming public,
13 in violation of Business & Professions Code section 17500.

14 60. There were reasonably available alternatives to further Defendants'
15 legitimate business interests, other than the conduct described herein.

16 61. All of the conduct alleged herein occurs and continues to occur in
17 Defendants' business. Defendants' wrongful conduct is part of a pattern or
18 generalized course of conduct repeated on thousands of occasions daily.

19 62. Pursuant to Business & Professions Code Sections 17203 and 17535,
20 Plaintiff and the members of the Class seek an order of this Court enjoining
21 Defendants from continuing to engage, use, or employ their practice of advertising
22 the sale and use of the Product.

23 63. Plaintiff and the Class have suffered injury in fact and have lost money
24 as a result of Defendants' false representations. Indeed, Plaintiff purchased the
25 Product in reliance of the claims by Defendants that the Product was capable of the
26 representations made in Defendants' packaging and advertising. Plaintiff would not
27 have purchased the Product if she had known that the claims and advertising as
28 described herein were false.

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PRAYER FOR RELIEF

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated, prays for judgment and relief on all Causes of Action as follows:

- A. An order enjoining GNC from continuing to label and advertise the Product as challenged herein;
- B. Reasonable attorneys’ fees; and
- C. Costs of this suit.

JURY TRIAL DEMANDED

Plaintiff demands a jury trial on all triable issues.

DATED: January 24, 2020

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/s/ Ryan J. Clarkson
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 Shireen M. Clarkson, Esq.
 Matthew T. Theriault, Esq.
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