

**UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION**

**COMMISSIONERS:**       **Edith Ramirez, Chairwoman  
Maureen K. Ohlhausen  
Terrell McSweeney**

**In the Matter of**

**ABS CONSUMER PRODUCTS, LLC, a limited  
liability company, d/b/a EDEN  
BODYWORKS**

**DOCKET NO.**

**COMPLAINT**

The Federal Trade Commission, having reason to believe that ABS Consumer Products, LLC, a limited liability company, has violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent ABS Consumer Products, LLC, also doing business as EDEN BodyWorks, is a limited liability company with its principal office or place of business at 3634 Park Avenue, Memphis, Tennessee 38111.
2. Respondent has advertised, labeled, offered for sale, sold, and distributed products to consumers, including Coconut Shea All Natural Curl Defining Cream, Coconut Shea All Natural Leave In Conditioner, Coconut Shea Styling Elixir, Jojoba Monoi Moisturizing Shampoo, and Jojoba Monoi Revitalizing Conditioner.
3. The acts and practices of Respondent alleged in this complaint have been in or affecting commerce, as “commerce” is defined in Section 4 of the Federal Trade Commission Act.
4. Respondent advertises the above products on the Internet. They retail for \$8.47 to \$8.99.
5. Respondent has disseminated or has caused to be disseminated advertisements for Coconut Shea All Natural Curl Defining Cream, Coconut Shea All Natural Leave In Conditioner, Coconut Shea Styling Elixir, Jojoba Monoi Moisturizing Shampoo, and Jojoba Monoi Revitalizing Conditioner, including but not necessarily limited to the attached Exhibits A-C. These materials contain the following statements:

## **Coconut Shea All Natural Curl Defining Cream**

Discover EDEN for yourself. EDEN BodyWorks Coconut Shea All Natural Curl Defining Cream is a humidity-resistant formulation designed to refine and separate curls and waves.

(Exhibit A, Internet webpages [www.walmart.com/ip/EDEN-BodyWorks-Coconut-Shea-All-Natural-Curl-Defining-Cream](http://www.walmart.com/ip/EDEN-BodyWorks-Coconut-Shea-All-Natural-Curl-Defining-Cream) (April and May 2015))

## **Coconut Shea All Natural Leave In Conditioner**

Discover EDEN for yourself. EDEN BodyWorks Shea All Natural Leave In Conditioner is a daily conditioning treatment formulated with one of nature's best moisturizers, coconut oil, to penetrate and revitalize tresses. It's blended with shea butter to seal in moisture.

(Exhibit B, Internet webpage [www.walmart.com/ip/EDEN-BodyWorks-Coconut-Shea-All-Natural-Leave-In-Conditioner](http://www.walmart.com/ip/EDEN-BodyWorks-Coconut-Shea-All-Natural-Leave-In-Conditioner) (May 2015))

## **Coconut Shea All Natural Styling Elixir**

## **Jjoba Monoi All Natural Shampoo**

## **Jjoba Monoi All Natural Conditioner**

(Exhibit C, product labels displayed on Internet webpages at [www.edenbodyworks.com](http://www.edenbodyworks.com) (May 2015))

## **Count I False Claim**

6. In connection with the advertising, labeling, promotion, offering for sale, or sale of Coconut Shea All Natural Curl Defining Cream, Coconut Shea All Natural Leave In Conditioner, Coconut Shea Styling Elixir, Jjoba Monoi Moisturizing Shampoo, and Jjoba Monoi Revitalizing Conditioner, Respondent has represented, directly or indirectly, expressly or by implication, including through the name of the first two products, that these products are "all natural."

7. In fact, the above products are not “all natural” because they contain at least one synthetic ingredient. Coconut Shea All Natural Curl Defining Cream contains the synthetic ingredient Polyquaternium-7. Coconut Shea All Natural Leave In Conditioner contains the synthetic ingredients Polyquaternium-7 and Polyquaternium-37. Coconut Shea Styling Elixir contains the synthetic ingredients Polyquaternium-37, Polyquaternium-11, Phenoxyethanol, and Caprylyl Glycol. Jojoba Monoi Moisturizing Shampoo and Jojoba Monoi Revitalizing Conditioner contain the synthetic ingredients Phenoxyethanol and Caprylyl Glycol. Therefore, the “all natural” representation set forth in Paragraph 6 is false or misleading.

### **Violations of Section 5**

8. The acts and practices of Respondent as alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this \_\_\_\_\_ day of \_\_\_\_\_, 2016, has issued this Complaint against Respondent.

By the Commission.

Donald S. Clark  
Secretary

SEAL: