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ENDORSED
FILED
Superior Court of California
County of San Francisco

AUG 18 2014

CLERK OF THE COURT
BY: VICTORIA GONZALEZ
Deputy Clerk

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF SAN FRANCISCO

11 ENVIRONMENTAL RESEARCH
12 CENTER, INC.,

13 Plaintiff,

14 v.

15 NATURE'S ANSWER, INC.; BIO-
16 BOTANICA, INC.; D-D CHEMCO., INC.;
17 6S, INC. dba ALL STAR HEALTH;
18 LUCKY VITAMIN COMPANY;
19 VITACOST.COM, INC.; VITAMIN
20 SHOPPE INDUSTRIES, INC.; VITAMIN
21 SHOPPE, INC.; and DOES 1-50, inclusive,

22 Defendants.

Case No.

CGC-14-541224

**COMPLAINT FOR INJUNCTIVE
RELIEF AND CIVIL PENALTIES**

[Health & Safety Code §25249.5, et seq.]

23 Plaintiff Environmental Research Center, Inc. brings this action in the interests of the
24 general public and, on information and belief, hereby alleges:

25 **INTRODUCTION**

26 1. This action seeks to remedy Defendants' continuing failure to warn consumers in
27 California that they are being exposed to lead, a substance known to the State of California¹ to
28 cause cancer, birth defects and other reproductive harm.

2. Defendants have manufactured, packaged, distributed, marketed, sold and/or have
otherwise been involved in the chain of commerce of, and continue to manufacture, package,

¹ All statutory and regulatory references herein are to California law, unless otherwise specified.

1 distribute, market, sell, and/or otherwise continue to be involved in the chain of commerce of one
2 or more of the ingestible products identified in Exhibit A attached hereto (hereinafter referred to
3 as "THE PRODUCTS"), which contain the chemical lead and which have been and continue to
4 be offered for sale, sold and/or otherwise provided for use and/or handling to individuals in
5 California.

6 3. The use and/or handling of each of THE PRODUCTS causes exposures to lead at
7 levels requiring a "clear and reasonable warning" under California's Safe Drinking Water and
8 Toxic Enforcement Act of 1986, Health & Safety Code ("H&S Code") §25249.5, *et. seq.* (also
9 known as "Proposition 65"). Defendants have failed to provide the health hazard warnings
10 required by Proposition 65.

11 4. Defendants' continued manufacturing, packaging, distributing, marketing and/or
12 sales of THE PRODUCTS without the required health hazard warnings, causes individuals to be
13 involuntarily and unwittingly exposed to levels of lead that violate Proposition 65.

14 5. Plaintiff seeks injunctive relief enjoining Defendants from the continued
15 manufacturing, packaging, distributing, marketing and/or selling of THE PRODUCTS for sale or
16 use in California without first providing clear and reasonable warnings, within the meaning of
17 Proposition 65, regarding the risks of cancer, birth defects and other reproductive harm posed by
18 exposure to lead through the use and/or handling of THE PRODUCTS. Plaintiff seeks an
19 injunctive order compelling Defendants to bring their business practices into compliance with
20 Proposition 65 by providing clear and reasonable warnings to each individual who may be
21 exposed to lead from the use and/or handling of THE PRODUCTS.

22 6. In addition to injunctive relief, Plaintiff seeks an assessment of civil penalties to
23 remedy Defendants' failure to provide clear and reasonable warnings regarding exposures to the
24 lead.

25 **JURISDICTION AND VENUE**

26 7. This Court has jurisdiction over this action pursuant to California Constitution
27 Article VI, Section 10, which grants the Superior Court "original jurisdiction in all causes except
28 those given by statute to other trial courts." The statute under which this action is brought does
not specify any other basis for jurisdiction.

8. This Court has jurisdiction over Defendants because, based on information and

1 belief, Defendants are businesses having sufficient minimum contacts with California, or
2 otherwise intentionally availing themselves of the California market through the marketing,
3 distribution and/or sale of THE PRODUCTS in the State of California to render the exercise of
4 jurisdiction over them by the California courts consistent with traditional notions of fair play and
5 substantial justice.

6 9. This Court is the proper venue for this action because the Defendants have
7 violated California law in the County of San Francisco. Furthermore, this Court is the proper
8 venue under Code of Civil Procedure §395.5 and H&S Code §25249.7(a), which provides that
9 any person who violates or threatens to violate H&S Code §§25249.5 or 25249.6 may be
10 enjoined in any court of competent jurisdiction.

11 PARTIES

12 10. Plaintiff ENVIRONMENTAL RESEARCH CENTER, INC. ("ERC") is a non-
13 profit corporation organized under California's Non-Profit Benefit Corporation Law. ERC is
14 dedicated to, among other causes, reducing the use and misuse of hazardous and toxic
15 substances, consumer protection, worker safety and corporate responsibility.

16 11. ERC is a "Person" within the meaning of H&S Code §25118 and H&S Code
17 §25249.11(a), and brings this enforcement action "in the public interest" pursuant to H&S Code
18 §25249.7(d).

19 12. Defendants NATURE'S ANSWER, INC.; BIO-BOTANICA, INC.; D-D
20 CHEMCO., INC.; 6S, INC. dba ALL STAR HEALTH; LUCKY VITAMIN COMPANY;
21 VITACOST.COM, INC.; VITAMIN SHOPPE INDUSTRIES, INC.; VITAMIN SHOPPE, INC.
22 are corporations, and each is a "Person" within the meaning of H&S Code §25249.11(a).
23 Defendants NATURE'S ANSWER, INC.; BIO-BOTANICA, INC.; D-D CHEMCO., INC.; 6S,
24 INC. dba ALL STAR HEALTH; LUCKY VITAMIN COMPANY; VITACOST.COM, INC.;
25 VITAMIN SHOPPE INDUSTRIES, INC.; VITAMIN SHOPPE, INC. have manufactured,
26 packaged, distributed, marketed, sold and/or has otherwise been involved in the chain of
27 commerce of, and continue to manufacture, package, distribute, market, sell, and/or otherwise
28 continues to be involved in the chain of commerce of one or more of THE PRODUCTS for sale
or use in California. Defendants NATURE'S ANSWER, INC.; BIO-BOTANICA, INC.; D-D
CHEMCO., INC.; 6S, INC. dba ALL STAR HEALTH; LUCKY VITAMIN COMPANY;
VITACOST.COM, INC.; VITAMIN SHOPPE INDUSTRIES, INC.; VITAMIN SHOPPE, INC.,

1 at all times relevant to this action, have had 10 or more employees and is a "Person in the course
2 of doing business" pursuant to H&S Code §25249.11(b).

3 13. Defendants DOES 1-50 are named herein under fictitious names, as their true
4 names and capacities are unknown to Plaintiff. ERC is informed and believes, and thereon
5 alleges, that each of said Does has manufactured, packaged, distributed, marketed, sold and/or
6 has otherwise been involved in the chain of commerce of, and continues to manufacture,
7 package, distribute, market, sell, and/or otherwise continues to be involved in the chain of
8 commerce of THE PRODUCTS for sale or use in California, and/or is responsible, in some
9 actionable manner, for the events and happenings referred to herein, either through its conduct or
10 through the conduct of its agents, servants or employees, or in some other manner, causing the
11 harms alleged herein. Plaintiff will seek leave to amend this Complaint to set forth the true
12 names and capacities of Does when ascertained.

12 STATUTORY BACKGROUND

13 14. The People of the State of California have declared in Proposition 65 their right
14 "[t]o be informed about exposures to chemicals that cause cancer, birth defects, or other
15 reproductive harm." (Section 1(b) of Initiative Measure, Proposition 65).

16 15. To effect this goal, Proposition 65 requires that individuals be provided with a
17 "clear and reasonable warning" before being exposed to substances listed by the State of
18 California as causing cancer or reproductive toxicity. H&S Code §25249.6 states, in pertinent
19 part:

20 No person in the course of doing business shall knowingly and intentionally
21 expose any individual to a chemical known to the state to cause cancer or
22 reproductive toxicity without first giving clear and reasonable warning to
23 such individual....

23 16. Proposition 65 provides that any person who "violates or threatens to violate" the
24 statute "may be enjoined in any court of competent jurisdiction." (H&S Code §25249.7(a).)
25 "Threaten to violate" is defined to mean creating "a condition in which there is a substantial
26 probability that a violation will occur." (H&S Code §25249.11(e).) Violators are liable for civil
27 penalties of up to \$2,500 per day for each violation of Proposition 65. (H&S Code §25249.7(b).)

27 FACTUAL BACKGROUND

28 17. On February 27, 1987, the State of California officially listed the chemical lead as

1 a chemical known to cause developmental and reproductive toxicity. Lead became subject to the
2 warning requirement one year later and was therefore subject to the “clear and reasonable”
3 warning requirements of Proposition 65 beginning on February 27, 1988. (27 California Code of
4 Regulations (“CCR”) §25000, *et seq.*; H&S Code §25249.5, *et seq.*)

5 18. On October 1, 1992, the State of California officially listed the chemical lead as a
6 chemical known to cause cancer. Lead became subject to the warning requirement one year later
7 and was therefore subject to the “clear and reasonable” warning requirements of Proposition 65
8 beginning on October 1, 1993. (27 CCR §25000, *et seq.*; H&S Code §25249.5, *et seq.*)

9 19. Plaintiff is informed and believes, and based on such information and belief,
10 alleges THE PRODUCTS have been marketed, distributed and/or sold to individuals in
11 California without the requisite clear and reasonable warnings before, on, and after May 9, 2009.
12 THE PRODUCTS continue to be marketed, distributed and sold in California without the
13 requisite warning information.

14 20. As a proximate result of acts by Defendants, as persons in the course of doing
15 business within the meaning of H&S Code §25249.11(b), individuals throughout the State of
16 California, including in the County of San Francisco, have been exposed to lead without clear
17 and reasonable warnings. The individuals subject to exposures to lead include normal and
18 foreseeable users of THE PRODUCTS, as well as all other persons exposed to THE
19 PRODUCTS.

20 21. At all times relevant to this action, Defendants have knowingly and intentionally
21 exposed the users and/or handlers of THE PRODUCTS to lead without first giving clear and
22 reasonable warnings to such individuals.

23 22. Individuals using or handling THE PRODUCTS are exposed to lead in excess of
24 the “maximum allowable daily” and “no significant risk” levels determined by the State of
25 California, as applicable.

26 23. At all times relevant to this action, Defendants have, in the course of doing
27 business, failed to provide individuals using and/or handling THE PRODUCTS with clear and
28 reasonable warnings that THE PRODUCTS exposes individuals to lead.

29 24. THE PRODUCTS continue to be marketed, distributed, and/or sold in California
30 without the requisite clear and reasonable warnings.

1 **FIRST CAUSE OF ACTION**

2 **(Injunctive Relief for Violations of Health and Safety Code §25249.5, et seq. concerning**
3 **THE PRODUCTS, which are identified in Plaintiff's February 14, 2014 and May 23, 2014**
4 **60-Day Notices of Violations)**

5 25. Plaintiff realleges and incorporates by reference Paragraphs 1 through 24,
6 inclusive, as if specifically set forth herein.

7 26. On February 14, 2014, Plaintiff sent a 60-Day Notice of Proposition 65 violations
8 to the requisite public enforcement agencies and to Defendant NATURE'S ANSWER, INC.
9 ("February 14, 2014 Notice of Violations"). On May 23, 2014, Plaintiff sent separate 60-Day
10 Notices of Proposition 65 violations to the requisite public enforcement agencies and to
11 Defendants NATURE'S ANSWER, INC.; BIO-BOTANICA, INC.; D-D CHEMCO., INC.; 6S,
12 INC. dba ALL STAR HEALTH; LUCKY VITAMIN COMPANY; VITACOST.COM, INC.;
13 VITAMIN SHOPPE INDUSTRIES, INC.; VITAMIN SHOPPE, INC. ("May 23, 2014 Notices
14 of Violations"). THE PRODUCTS were identified in the Notices of Violations as containing
15 lead exceeding allowable levels. The Notices of Violations were issued pursuant to, and in
16 compliance with, the requirements of H&S Code §25249.7(d) and the statute's implementing
17 regulations regarding the notice of violations to be given to certain public enforcement agencies
18 and to the violator. The Notices of Violations were issued as follows:

- 18 a. The February 14, 2014 Notice of Violations was provided by Certified
19 Mail, along with a Certificate of Merit by the attorney for the noticing
20 party stating that there is a reasonable and meritorious cause for this
21 action, to Defendant NATURE'S ANSWER, INC. and the California
22 Attorney General; and the separate May 23, 2014 Notices of Violations
23 were provided by Certified Mail, along with a Certificate of Merit by the
24 attorney for the noticing party stating that there is a reasonable and
25 meritorious cause for this action, to Defendants NATURE'S ANSWER,
26 INC.; BIO-BOTANICA, INC.; D-D CHEMCO., INC.; 6S, INC. dba ALL
27 STAR HEALTH; LUCKY VITAMIN COMPANY; VITACOST.COM,
28 INC.; VITAMIN SHOPPE INDUSTRIES, INC.; VITAMIN SHOPPE,
INC., respectively, and to the California Attorney General. The requisite
county district attorneys and city attorneys were provided copies by First

1 Class Mail of the Notices of Violations and Certificates of Merit.

2 b. Defendants NATURE'S ANSWER, INC.; BIO-BOTANICA, INC.; D-D
3 CHEMCO., INC.; 6S, INC. dba ALL STAR HEALTH; LUCKY
4 VITAMIN COMPANY; VITACOST.COM, INC.; VITAMIN SHOPPE
5 INDUSTRIES, INC.; VITAMIN SHOPPE, INC. were provided, with each
6 of the respective Notices of Violations, a copy of a document entitled
7 "The Safe Drinking Water and Toxic Enforcement Act of 1986
8 (Proposition 65): A Summary," which is also known as Appendix A to
9 Title 27 of CCR §25903.

10 c. The California Attorney General was provided, with the Notices of
11 Violations, additional factual information sufficient to establish a
12 basis for the certificates, including the identity of the persons consulted
13 with and relied on by the certifier, and the facts, studies, or other data
14 reviewed by those persons, pursuant to H&S Code §§25249.7(d)(1) and
15 25249.7(h)(2).

16 27. The appropriate public enforcement agencies have failed to commence and
17 diligently prosecute a cause of action under H&S Code §25249.5, *et seq.* against Defendants
18 based on the allegations herein.

19 28. By committing the acts alleged in this Complaint, Defendants at all times relevant
20 to this action, and continuing through the present, have violated and continue to violate H&S
21 Code §25249.6 by, in the course of doing business, knowingly and intentionally exposing
22 individuals who use or handle THE PRODUCTS to the chemical lead at levels exceeding
23 allowable exposure levels without Defendants first giving clear and reasonable warnings to such
24 individuals pursuant to H&S Code §§25249.6 and 25249.11(f). Each of the Defendants has
25 manufactured, packaged, distributed, marketed, sold and/or has otherwise been involved in the
26 chain of commerce of, and continues to manufacture, package, distribute, market, sell, and/or
27 otherwise continues to be involved in the chain of commerce of one or more of THE
28 PRODUCTS, which have been, are, and will be used and/or handled by individuals in California,
without Defendants providing clear and reasonable warnings, within the meaning of Proposition
65, regarding the risks of cancer, birth defects and other reproductive harm posed by exposure to
lead through the use and/or handling of THE PRODUCTS. Furthermore, Defendants have

1 threatened to violate H&S Code §25249.6 by THE PRODUCTS being marketed, offered for
2 sale, sold and/or otherwise provided for use and/or handling to individuals in California.

3 29. By the above-described acts, Defendants have violated H&S Code §25249.6 and
4 are therefore subject to an injunction ordering Defendants to stop violating Proposition 65, and to
5 provide required warnings to consumers and other individuals who will purchase, use and/or
6 handle THE PRODUCTS.

7 30. An action for injunctive relief under Proposition 65 is specifically authorized by
8 Health & Safety Code §25249.7(a).

9 31. Continuing commission by Defendants of the acts alleged above will irreparably
10 harm the citizens of the State of California, for which harm they have no plain, speedy, or
adequate remedy at law.

11 Wherefore, plaintiff prays judgment against Defendants, as set forth hereafter.

12 **SECOND CAUSE OF ACTION**

13 **(Civil Penalties for Violations of Health and Safety Code §25249.5, et seq. concerning THE**
14 **PRODUCTS, which are identified in Plaintiff's February 14, 2014 and May 23, 2014 60-**
15 **Day Notices of Violations)**

16 32. Plaintiff realleges and incorporates by reference Paragraphs 1 through 31,
inclusive, as if specifically set forth herein.

17 33. On February 14, 2014, Plaintiff sent a 60-Day Notice of Proposition 65 violations
18 to the requisite public enforcement agencies and to Defendant NATURE'S ANSWER, INC.
19 ("February 14, 2014 Notice of Violations"). On May 23, 2014, Plaintiff sent separate 60-Day
20 Notices of Proposition 65 violations to the requisite public enforcement agencies and to
21 Defendants NATURE'S ANSWER, INC.; BIO-BOTANICA, INC.; D-D CHEMCO., INC.; 6S,
22 INC. dba ALL STAR HEALTH; LUCKY VITAMIN COMPANY; VITACOST.COM, INC.;
23 VITAMIN SHOPPE INDUSTRIES, INC.; VITAMIN SHOPPE, INC. ("May 23, 2014 Notices
24 of Violations"). THE PRODUCTS were identified in the Notices of Violations as containing
25 lead exceeding allowable levels. The Notices of Violations were issued pursuant to, and in
26 compliance with, the requirements of H&S Code §25249.7(d) and the statute's implementing
27 regulations regarding the notice of violations to be given to certain public enforcement agencies
and to the violator. The Notices of Violations were issued as follows:

28 a. The February 14, 2014 Notice of Violations was provided by Certified

1 Mail, along with a Certificate of Merit by the attorney for the noticing
2 party stating that there is a reasonable and meritorious cause for this
3 action, to Defendant NATURE'S ANSWER, INC. and the California
4 Attorney General; and the separate May 23, 2014 Notices of Violations
5 were provided by Certified Mail, along with a Certificate of Merit by the
6 attorney for the noticing party stating that there is a reasonable and
7 meritorious cause for this action, to Defendants NATURE'S ANSWER,
8 INC.; BIO-BOTANICA, INC.; D-D CHEMCO., INC.; 6S, INC. dba ALL
9 STAR HEALTH; LUCKY VITAMIN COMPANY; VITACOST.COM,
10 INC.; VITAMIN SHOPPE INDUSTRIES, INC.; VITAMIN SHOPPE,
11 INC., respectively, and to the California Attorney General. The requisite
12 county district attorneys and city attorneys were provided copies by First
13 Class Mail of the Notices of Violations and Certificates of Merit.

14 b. Defendants NATURE'S ANSWER, INC.; BIO-BOTANICA, INC.; D-D
15 CHEMCO., INC.; 6S, INC. dba ALL STAR HEALTH; LUCKY
16 VITAMIN COMPANY; VITACOST.COM, INC.; VITAMIN SHOPPE
17 INDUSTRIES, INC.; VITAMIN SHOPPE, INC. were provided, with each
18 of the respective Notices of Violations, a copy of a document entitled
19 "The Safe Drinking Water and Toxic Enforcement Act of 1986
20 (Proposition 65): A Summary," which is also known as Appendix A to
21 Title 27 of CCR §25903.

22 c. The California Attorney General was provided, with the Notices of
23 Violations, additional factual information sufficient to establish a
24 basis for the certificates, including the identity of the persons consulted
25 with and relied on by the certifier, and the facts, studies, or other data
26 reviewed by those persons, pursuant to H&S Code §§25249.7(d)(1) and
27 25249.7(h)(2).

28 34. The appropriate public enforcement agencies have failed to commence and
diligently prosecute a cause of action under H&S Code §25249.5, *et seq.* against Defendants
based on the allegations herein.

35. By committing the acts alleged in this Complaint, Defendants at all times relevant

1 to this action, and continuing through the present, have violated and continue to violate H&S
2 Code §25249.6 by, in the course of doing business, knowingly and intentionally exposing
3 individuals who use or handle THE PRODUCTS to the chemical lead at levels exceeding
4 allowable exposure levels without Defendants first giving clear and reasonable warnings to such
5 individuals pursuant to H&S Code §§25249.6 and 25249.11(f). Each of the Defendants has
6 manufactured, packaged, distributed, marketed, sold and/or has otherwise been involved in the
7 chain of commerce of, and continues to manufacture, package, distribute, market, sell, and/or
8 otherwise continues to be involved in the chain of commerce of one or more of THE
9 PRODUCTS, which have been, are, and will be used and/or handled by individuals in California,
10 without Defendants providing clear and reasonable warnings, within the meaning of Proposition
11 65, regarding the risks of cancer, birth defects and other reproductive harm posed by exposure to
12 lead through the use and/or handling of THE PRODUCTS. Furthermore, Defendants have
13 threatened to violate H&S Code §25249.6 by THE PRODUCTS being marketed, offered for
14 sale, sold and/or otherwise provided for use and/or handling to individuals in California.

15 36. By the above-described acts, Defendants are liable, pursuant to H&S Code
16 §25249.7(b), for a civil penalty of \$2,500 per day for each violation of H&S Code §25249.6
17 relating to THE PRODUCTS.

18 Wherefore, plaintiff prays judgment against Defendants, as set forth hereafter.

19 THE NEED FOR INJUNCTIVE RELIEF

20 37. Plaintiff realleges and incorporates by this reference Paragraphs 1 through 36, as
21 if set forth below.

22 38. By committing the acts alleged in this Complaint, Defendants have caused
23 irreparable harm for which there is no plain, speedy or adequate remedy at law. In the absence
24 of equitable relief, Defendants will continue to create a substantial risk of irreparable injury by
25 continuing to cause consumers to be involuntarily and unwittingly exposed to lead through the
26 use and/or handling of THE PRODUCTS.

27 PRAYER FOR RELIEF

28 Wherefore, Plaintiff prays for the following relief:

A. A preliminary and permanent injunction enjoining Defendants, their agents,

1 employees, assigns and all persons acting in concert or participating with Defendants, from
2 manufacturing, packaging, distributing, marketing and/or selling THE PRODUCTS for sale or
3 use in California without first providing clear and reasonable warnings, within the meaning of
4 Proposition 65, that the users and/or handlers of THE PRODUCTS are exposed to the lead.

5 B. An assessment of civil penalties pursuant to Health & Safety Code §25249.7(b),
6 against Defendants in the amount of \$2,500 per day for each violation of Proposition 65;

7 C. An award to Plaintiff of its reasonable attorney fees pursuant to California Code
8 of Civil Procedure §1021.5 or the substantial benefit theory or any other relevant basis;

9 D. An award of costs of suit herein; and

10 E. Such other and further relief as may be just and proper.

11 Dated: August 18, 2014

LAW OFFICE OF PHILIP T. EMMONS

12
13 By: 

14 Philip T. Emmons

15 Attorney for Plaintiff

16 Environmental Research Center, Inc.

2
3 **EXHIBIT A TO COMPLAINT**

- 4 1. Nature's Answer Inc. Tru Cleanse Fiber Chia Plus
5 2. Nature's Answer Inc. Gotu Kola Herb
6 3. Nature's Answer Inc. Gotu Kola Herb Extract
7 4. Nature's Answer Inc. Nettle Leaf
8 5. Nature's Answer Inc. Butcher's Broom Root
9 6. Nature's Answer Inc. Dandelion Root
10 7. Nature's Answer Inc. Di-Jest Herbal Blend
11 8. Nature's Answer Inc. Alfalfa Leaf Single Herb
12 9. Nature's Answer Inc. Dong Quai Root Single Herb
13 10. Nature's Answer Inc. Tense-Ease Herbal Blend
14 11. Nature's Answer Inc. Horsetail Grass Single Herb
15 12. Nature's Answer Inc. Bladderwrack Thallus Single Herb
16 13. Nature's Answer Inc. Ginger Rhizome Single Herb
17 14. Nature's Answer Advance Botanical Fingerprint Technology Black Walnut
18 15. Nature's Answer Inc. Reishi Mushroom Extract Standardization
19 16. Nature's Answer Inc. Broncitone Herbal Blend
20 17. Nature's Answer Inc. Echinacea Herb & Root & Goldenseal Root Herbal Blend
21 18. Nature's Answer Inc. Advanced Botanical Fingerprint Technology Bacopa 500mg
22 19. Nature's Answer Advanced Botanical Fingerprint Technology Female Complex 800mg
23 Blend
24 20. Nature's Answer Inc. Hyssop Herb Single Herb
25 21. Nature's Answer Inc. Echinacea Herb Single Herb
26 22. Nature's Answer Inc. Red Clover Tops Single Herb
27 23. Nature's Answer Inc. Advanced Botanical Fingerprint Technology Reishi 1000 mg
28 24. Nature's Answer Inc. Advanced Botanical Fingerprint Technology Slippery Elm 1050 mg
29 25. Nature's Answer Inc. Burdock Root Single Herb
30 26. Nature's Answer Inc. Valerian Root Single Herb
31 27. Nature's Answer Inc. Butcher's Broom Root Single Herb
32 28. Nature's Answer Inc. Detox Formula Herbal Blend
33 29. Nature's Answer Inc. Bladdex Herbal Blend
34 30. Nature's Answer Inc. Echinacea with Astragalus Herbal Blend
35 31. Nature's Answer Inc. Advanced Botanical Fingerprint Technology Damiana 800 mg
36 32. Nature's Answer Inc. Greens Today Raw Superfood
37 33. Nature's Answer Inc. Greens Today Vegan Formula
38 34. Nature's Answer Inc. Greens Today Green Power Formula Cellular Energy
39 35. Nature's Answer Inc. Greens Today Men's Formula
40 36. Nature's Answer Inc. Greens Today Original
41 37. Nature's Answer Inc. Greens Today Original Formula
42 38. Nature's Answer Inc. Liver Support Herbal Blend
43 39. Nature's Answer Greens Today Joint Formula French Vanilla Flavor