

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

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

**In the Matter of**

**TRANS-INDIA PRODUCTS, INC., a corporation,  
d/b/a/ SHIKAI.**

DOCKET NO.

**COMPLAINT**

The Federal Trade Commission, having reason to believe that Trans-India Products, Inc., 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 Trans-India Products, Inc., doing business as ShiKai, is a California corporation with its principal office or place of business at 3330-A Coffey Lane, Santa Rosa, California 95404, and a mailing address of Box 2866, Santa Rosa, California 95405.
2. Respondent has advertised, labeled, offered for sale, sold, and distributed products to consumers, including “All Natural Hand and Body Lotion” and “All Natural Moisturizing Shower Gel.”
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 \$6.39 to \$6.59.
5. Respondent has disseminated or has caused to be disseminated advertisements for its Hand and Body Lotion and Moisturizing Shower Gel, including but not necessarily limited to the attached Exhibits A-C.
  - A. The packaging for the Hand and Body Lotion states that it is an “All Natural Hand and Body Lotion.”

Exhibit A, Internet webpage [www.walgreens.com/store/c/shikai-all-natural-hand-and-body-lotion-starfruit](http://www.walgreens.com/store/c/shikai-all-natural-hand-and-body-lotion-starfruit) (August 2015).

- B. Respondent's catalogue states that the Hand and Body Lotion contains:  
wonderful rich ingredients: lots of aloe vera, wheatgerm & apricot oils, shea butter, and borage oil too. And they're all natural.

Exhibit B, Internet webpage [www.shikai.com/home/catalogue.pdf](http://www.shikai.com/home/catalogue.pdf) at p. 10 (August 2015).

- C. The packaging for the Moisturizing Shower Gel states that it is an "All Natural Moisturizing Shower Gel."

Exhibit C, Internet webpage [www.vitacost.com/shikai-all-natural-moisturizing-showerhand-and-body-lotion-coconut-12-fl-oz](http://www.vitacost.com/shikai-all-natural-moisturizing-showerhand-and-body-lotion-coconut-12-fl-oz) (August 2015); Exhibit D, Internet webpage [www.shikai.com/home/catalogue.pdf](http://www.shikai.com/home/catalogue.pdf) at p. 11 (August 2015).

**Count I**  
**False Claim**

6. In connection with the advertising, labeling, promotion, offering for sale, or sale of its All Natural Hand and Body Lotion and All Natural Moisturizing Shower Gel, Respondent has represented, directly or indirectly, expressly or by implication, that these products are "all natural."

7. In fact, All Natural Hand and Body Lotion and All Natural Moisturizing Shower Gel are not "all natural" because they contain or contained at least one synthetic ingredient. The All Natural Hand and Body Lotion contains or contained the synthetic ingredients Dimethicone, Ethylhexyl Glycerin, and Phenoxyethanol. The All Natural Moisturizing Shower Gel contains or contained the synthetic ingredients Ethylhexyl Glycerin and Phenoxyethanol. Therefore, the "all natural" representations set forth in Paragraph 6 are false or misleading.

**Violations of Section 5(a)**

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: