## UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

**COMMISSIONERS:** Lina M. Khan, Chair

Rebecca Kelly Slaughter Christine S. Wilson Alvaro M. Bedoya

In the Matter of

THE BOUNTIFUL COMPANY, a corporation.

**DOCKET NO. C-4791** 

## **COMPLAINT**

The Federal Trade Commission, having reason to believe that The Bountiful Company, a corporation ("Respondent"), 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 The Bountiful Company is a New York corporation with its principal office or place of business at 90 Orville Drive, Bohemia, New York 11716.
- 2. Respondent has manufactured, advertised, labeled, offered for sale, sold, and distributed vitamins, minerals, herbal and other specialty supplements to consumers, including Nature's Bounty and Sundown brand products. These products are "foods" and/or "drugs," within the meaning of Sections 12 and 15 of the Federal Trade Commission Act.
- 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.

## **Course of Conduct**

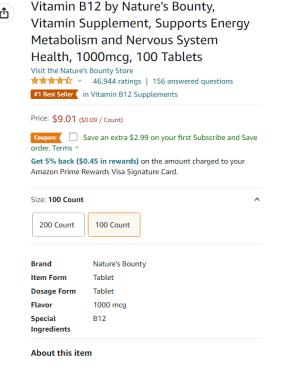
- 4. Respondent is a vendor to Amazon.com, Inc. ("Amazon"). Respondent sells well over a thousand different products to Amazon which in turn sells those products on the Amazon.com website ("Amazon.com").
- 5. Amazon allows its vendors and third-party sellers to create or submit requests to create "variation" relationships between products sold on Amazon.com that are substantially similar. Such products may differ only in narrow, specific ways such as color, size, quantity, or flavor that do not alter the core essence of the item. According to Amazon, substantially different products should not share a variation relationship.

6. Products that have a variation relationship share the same product detail page. Each product in the variation relationship will appear as an alternative choice on the product detail page and when a shopper selects a different product in the variation relationship, the content of the product detail page, such as the pictured product, the product description, or the price, may change. The variation relationship enables buyers to compare and choose among product attributes (such as color, size, quantity, or flavor) from a single product detail page, thereby facilitating customer choice and ease of shopping. An example would be the same shirt that comes in multiple colors and different sizes. An Amazon.com page explaining variation relationships, gives the following example:

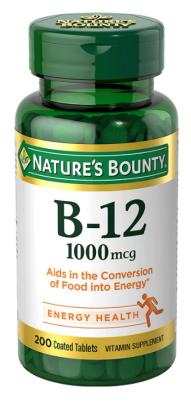


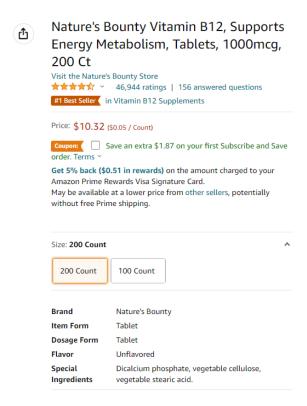
Another example would be the same dietary supplement that is sold in 100 count bottles:





and in 200 count bottles:





- 7. The product detail page of products that are in a variation relationship displays the total number of ratings and reviews and the average star rating for all of the products in the variation relationship. (See, e.g., Paragraph 6). All the products in a variation relationship also share any "#1 Best Seller" or "Amazon's Choice" badges. (See, e.g., Paragraph 6). The product detail page of products that are in a variation relationship shows the ratings and reviews of all the products in the variation relationship
- 8. In an August 2020 email, Bountiful's Director Ecommerce, Customer Development (the "Ecommerce Customer Development Director") explained that earlier in that year when products "launched during Covid when [the Amazon] Vine [program for promoting new products] was down" and Amazon's "born to run [program for launching new products] was down," Bountiful "got creative." Bountiful "created variations with some of our [new products] to try and ramp them faster as they were NOT selling and we wanted to give them a little boost in R[atings]&R[eviews] to gain visibility and allow them to also borrow the 'amazon choice' badge and best seller badge which worked."
- 9. During 2020 and 2021, Respondent submitted requests to Amazon to create numerous variation relationships involving Respondent's products with different formulations, including the examples described below.
- 10. In March 2020, Respondent began selling two new products to Amazon for sale on Amazon.com: Nature's Bounty Stress Comfort Mood Booster Gummies (which was available in two sizes) and Nature's Bounty Stress Comfort Peace of Mind Stress Relief Gummies (which was available in two sizes). The Mood Booster Gummies and Peace of Mind Stress Relief

Gummies had different formulations. Respondent requested that Amazon combine those new products in a variation relationship with three of Respondent's established products, Nature's Bounty Anxiety & Stress Relief Ashwagandha KSM-66 tablets, Nature's Bounty Botanical Sleep tablets, and Nature's Bounty Valerian Root capsules, each of which had different formulations from each other and from the Stress Comfort products.

- 11. In August 2020, the Ecommerce Customer Development Director explained in an email that the approximately 1,000 ratings and 4.5-star average rating that the new Stress Comfort products then appeared to have on Amazon.com were because of the variation relationship, that the Stress Comfort "ratings and reviews ... [we]re low roughly 26 and only 3.2 stars," that "[u]nfortunately people d[id] not love the [Stress Comfort] product[s]," and that sales "spiked the second we variated the pages and they continue to grow." A presentation attached to that email said that the variation had earned an Amazon's Choice badge. That would have been based on the established products.
- 12. Later in 2020, Respondent began selling a new Nature's Bounty Zinc Gummies product to Amazon for sale on Amazon.com. In August 2020, before the launch of the Zinc Gummies product, the Ecommerce Customer Development Director, wrote in an email:

[m]oving forward we are going to launch skus with variations that make sense: i.e. Zinc gummy with zinc tablet – gives the strongest opportunity to win from day 1 – gives relevancy, page 1 view, ... increased Conversation, and sales. We are seeing success with this strategy ....

Respondent requested that Amazon create a variation relationship including Zinc Gummies, and two of Respondent's established products, Nature's Bounty Calcium Magnesium & Zinc caplets and Nature's Bounty Zinc 50 mg caplets. The products had different formulations, including different amounts of the main ingredient or additional ingredients. The Zinc caplets were Amazon.com's "#1 Best Seller in Zinc Mineral Supplements."

- 13. In November 2020, the Ecommerce Customer Development Director explained in an email that her strategy of variating new products with "top sellers" allowed the new products "to essentially 'borrow' the best-selling flags, ratings, and reviews, and first page placement" of the top sellers, that she was "using this strategy with all of our launches," and that the strategy was "extremely successful" for the "Zinc gummy."
- 14. In November 2020, Respondent began selling a new product, Nature's Bounty Immune 24 Hour+ softgels, to Amazon for sale on Amazon.com. On November 15, 2020, Respondent requested that Amazon create a variation relationship between that product and one of Respondent's established products, Nature's Bounty Vitamin C 500 mg tablets. The products had different formulations. At the time of the Immune 24+ product launch, it appeared that the product had 11,516 ratings and a 4.5-star rating because of the Vitamin C product ratings. (*See* Exhibit A). It also displayed a "#1 Best Seller" badge.
- 15. In or around early-August 2021, the Nature's Bounty Immune 24 Hour+ softgels and Nature's Bounty Vitamin C 500 mg tablets products were in a variation relationship. At that

time, they had 40,165 ratings, what appeared to be a 5-star average rating, and an Amazon's Choice badge. (*See* Exhibit B).

- 16. On August 16, 2021, Respondent requested that the variation relationship between Nature's Bounty Immune 24 Hour+ softgels and Nature's Bounty Vitamin C 500 mg tablets be terminated.
- 17. Later in August 2021, the Nature's Bounty Immune 24 Hour+ softgels product was no longer in a variation relationship with the Nature's Bounty Vitamin C 500 mg tablets. At that time, the Nature's Bounty Immune 24 Hour+ softgels product had 2,751 ratings, what appeared to be a 4.5-star average rating, and no Amazon's Choice badge. (*See* Exhibit C).
- 18. In March 2021, Respondent began selling a new product, Nature's Bounty Stress Comfort Fast Acting Calm chewable tablets, to Amazon for sale on Amazon.com. Respondent requested that Amazon create a variation relationship between that product and one of Respondent's established products, Nature's Bounty Anxiety & Stress Relief Ashwagandha KSM-66 tablets. The products had different formulations. As of January 26, 2022, the products together had 5,164 ratings. (See Exhibit D). All of the "Top reviews" and most of the 270 reviews for the products were for the Anxiety & Stress Relief product. Two days later, after the variation relationship ended, the Stress Comfort product only had 219 ratings and 10 reviews. (See Exhibit E).
- 19. In March 2021, Respondent began selling two new products, Nature's Bounty Brain Superfood capsules and Nature's Bounty Brain Focus chewable tablets, to Amazon for sale on Amazon.com. Respondent requested that Amazon create a variation relationship between those products and an established product, Nature's Bounty Ginkgo Biloba 120mg capsules. The products had different formulations.
- 20. In March 2021, Respondent began selling a new product, Nature's Bounty Elderberry Sambucus Herbal 630 mg softgels, to Amazon for sale on Amazon.com. Respondent requested that Amazon create a variation relationship between that product and an established product, Nature's Bounty Elderberry Gummies. The products had different formulations.
- 21. In March 2021, Respondent began selling a new product, Sundown Kids Vitamin C Gummies, to Amazon for sale on Amazon.com. Respondent requested that Amazon create a variation relationship between that product and an established product, Sundown Kids Disney and Pixar Toy Story 4 Multivitamin Gummies. The products had different formulations. As of May 26, 2022, the products together had 7,546 ratings and 344 reviews, of which only 1,143 ratings and 38 reviews were for the Sundown Kids Vitamin C Gummies. (See Exhibit F).
- 22. In March 2021, Respondent began selling a new product, Nature's Bounty Apple Cider Vinegar Gummies, to Amazon for sale on Amazon.com. Respondent requested that Amazon create a variation relationship between that product and an established product, Nature's Bounty Apple Cider Vinegar 480 mg tablets. The products had different formulations, including different amounts of the main ingredient or additional ingredients. As of May 18, 2022, the

products together had 14,196 ratings and 420 reviews, of which only 1,121 ratings and 60 reviews were for the Apple Cider Vinegar Gummies product. (*See* Exhibit G).

## Count I False Claims

- 23. In numerous instances in connection with the advertising, promotion, offering for sale, or sale of its products sold on Amazon.com, Respondent has represented, directly or indirectly, expressly or by implication that:
  - A. The apparent reviewers of certain of its products sold on Amazon.com had used and endorsed the products.
  - B. Certain of its products sold on Amazon.com had received the numbers of customer ratings appearing on their Amazon.com product pages.
  - C. Certain of its products sold on Amazon.com had obtained the average star ratings displayed on their Amazon.com product pages.
  - D. Certain of its products sold on Amazon.com were number one best sellers.
  - E. Certain of its products sold on Amazon.com had earned an Amazon's Choice badge.
- 24. In fact, in numerous instances in which Respondent has made the representations set forth in Paragraph 23, Respondent improperly requested that Amazon combine or variate Respondent's newer or weaker selling products sold on Amazon.com with Respondent's different or longer or better selling products sold on Amazon.com, and therefore:
  - A. The apparent reviewers of certain of its products sold on Amazon.com were not actual users or endorsers of the products, but instead had used and endorsed a different product.
  - B. Certain of its products sold on Amazon.com received significantly fewer customer ratings than appeared to be the case from their Amazon.com product pages.
  - C. Certain of its products sold on Amazon.com obtained significantly lower average star ratings than appeared to be the case from their Amazon.com product pages.
  - D. Certain of its products sold on Amazon.com identified on Amazon.com as number one best sellers were not number one best sellers.
  - E. Certain of its products sold on Amazon.com that appeared to have earned an Amazon's Choice badge had not earned an Amazon's Choice badge.

Therefore, the representations set forth in Paragraph 23 are false or misleading.

## **Violations of Sections 5 and 12**

25. The acts and practices of Respondent as alleged in this complaint constitute unfair or deceptive acts or practices, and the making of false advertisements, in or affecting commerce in violation of Sections 5(a) and 12 of the Federal Trade Commission Act.

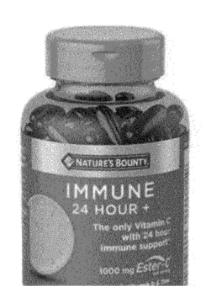
THEREFORE, the Federal Trade Commission this 28th day of March, 2023, has issued this Complaint against Respondent.

By the Commission.

April J. Tabor Secretary

SEAL:





## Nature's Bounty Immune 24 Hour +, 24 Hour Immune Support from Ester C, 100 Rapid Release Softgels, 100 Count

Visit the Nature's Boardy Store 素素素素 11,516 ratings ( 64 arouvered questions ( 11 Vitansin C Supplements

Price: \$20,53 staze / count & FREE Shipping on orders over \$25,00 shipped by Amazon, Details.

Get 560 all asstantly: Pay \$0.00 upon approval for the Amezon Rescrift Visi Card. No crowst fire.

Returnable until Jan 31, 2021 -

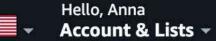
51ste: 1000mg, 100CT



- The only Vitamini C with 24-hour Immune Support: Nature's Bounty Immune 24-hour Cantains 1000ing of Exter-C, the only clinically studied Vitamini C with 24-hour Immune Support. Exter-C lasts up to 2a longer than regular Vitamini C.
  Plus Vitamin D Zinc, with elderberry and Echinocesi Immune 24.
- Plus Vitamin D Zinc, with elderberry and Echinocea: immune 24 flour Provides Vitamin D, Vitamin A and zinc for extra immune

Exhibit A – beginning of product detail page for Nature's Bounty Immune 24 Hour+ softgels from approximately November 19, 2020 (before the product was even in stock). The alternative product was Nature's Bounty Vitamin C 500 mg tablets.

Q







Update

**Health & Personal Care** 

prime

Household Supplies Vitamins & Diet Supplements

O Brooklyn 11215

All nature's bounty immune 24 hour

Baby & Child Care Health Care Sports Nutrition Sexual Wellness

= All Buy Again Best Sellers Prime Video Browsing History Voutdoor Recreation Sports & Fitness Amazon Business Vorceries Livestreams Coupons Automotive Pet Supplies

Medical Supplies & Equipment FSA Eligible Items Sales & Special Offers Subscribe & Save

Shop low prices for school

amazon pharmacy

Your medication, delivered

Learn more

Health & Wellness



Back to results















Roll over image to zoom in

Exhibit B – beginning of product detail page for Nature's Bounty Immune 24 Hour+ softgels from approximately August 2021. The alternative product was Nature's Bounty Vitamin C 500 mg tablets.



Visit the Nature's Bounty Store

**★★★★** 40,165 ratings | 110 answered questions

Amazon's Choice

for "nature's bounty immune 24 hour"

Price: \$15.40 (\$0.15 / Count) \rightarrow prime FREE One-Day

Get 5% back (\$0.77 in rewards) on the amount charged to your Amazon Prime Rewards Visa Signature Card.

May be available at a lower price from other sellers, potentially without free Prime shipping.

Style: 1000mg, 100CT





**Primary Supplement** 

Vitamin A

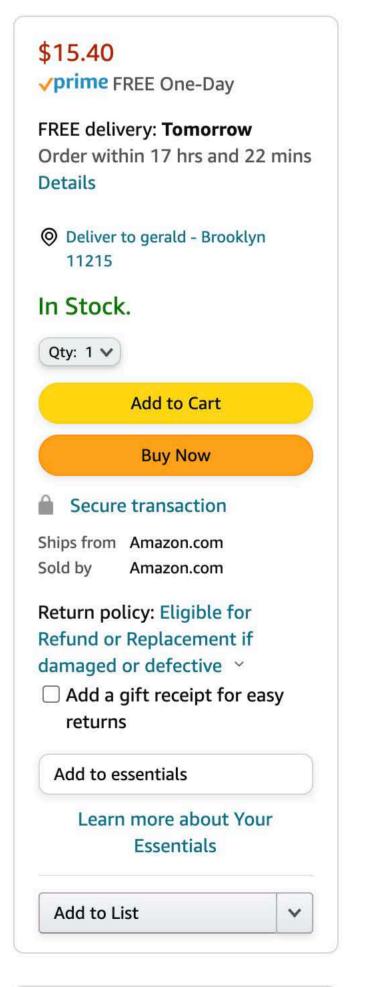
Type

**Brand** Nature's Bounty

Softgels Item Form Adult Age Range (Description) Diet Type Gluten Free

## About this item

- THE ONLY VITAMIN C WITH 24-HOUR IMMUNE SUPPORT: Nature's Bounty Immune 24 Hour plus contains 1000mg of Ester-C, the only clinically studied Vitamin C with 24-hour immune support. Ester-C lasts up to 2x longer than regular Vitamin C
- PLUS VITAMIN D & ZINC, WITH ELDERBERRY AND ECHINACEA: Immune 24 Hour plus provides Vitamin D, Vitamin A and Zinc for extra immune plus antioxidant support. Also contains Elderberry and Echinacea, plus 9 essential nutrients to help keep you healthy
- SUPPORTS UPPER RESPIRATORY HEALTH: Highly bioavailable Ester-C can increase Vitamin C levels in the body, which is important for white blood cell function, contributing to the health of the upper respiratory tract



NON-GMO FORMULA: Nature's Bounty Immune 24 Hour plus is Non-GMO and contains No artificial





# Consider these alternative items



Vitamin C by Nature's Bounty for Immune Support. Vitamin C is a Leading Immune Support Vitamin, 500mg, 250 Tablets

★★★★★ 38,011

\$8<sup>23</sup>(\$0.03/Count)



Nature's Bounty Vitamin C, 1000mg, 100 Caplets (Pack of 3)

★★★★☆ 11

\$26<sup>90</sup>(\$0.09/Count)



Vitamin C by Nature's Bounty for immune support. Vitamin C is a leading immune support vitamin, 1000mg, 100 Caplets

★★★★ 8,983

\$8<sup>60</sup>(\$0.09/Count)

Health & Household > Vitamins & Dietary Supplements > Vitamins > Vitamin C













Exhibit C – beginning of product detail page for Nature's Bounty *Immune 24 Hour+* softgels captured in August 2021 after Exhibit B was captured. There is no alternative product.



Roll over image to zoom in

# Nature's Bounty Immune 24 Hour +, 24 Hour Immune Support From Ester C, 100 Rapid Release Softgels, 100 Count

Visit the Nature's Bounty Store

\*\*\* 2,751 ratings | 25 answered questions

**Primary** Vitamin A **Supplement Type** 

**Brand Nature's Bounty** 

Adult

**Item Form** Softgels

Age Range (Description)

**Diet Type** Gluten Free

## About this item

- THE ONLY VITAMIN C WITH 24-HOUR IMMUNE SUPPORT: Nature's Bounty Immune 24 Hour plus contains 1000mg of Ester-C, the only clinically studied Vitamin C with 24-hour immune support. Ester-C lasts up to 2x longer than regular Vitamin C
- PLUS VITAMIN D & ZINC, WITH ELDERBERRY AND ECHINACEA: Immune 24 Hour plus provides Vitamin D, Vitamin A and Zinc for extra immune plus antioxidant support. Also contains Elderberry and Echinacea, plus 9 essential nutrients to help keep you healthy
- SUPPORTS UPPER RESPIRATORY HEALTH: Highly bioavailable Ester-C can increase Vitamin C levels in the body, which is important for white blood cell function, contributing to the health of the upper respiratory tract
- NON-GMO FORMULA: Nature's Bounty Immune 24 Hour plus is Non-GMO and contains No artificial flavor or artificial sweeteners, no sugar, no starch, no milk, no lactose, no soy, no gluten, no wheat, no yeast, no fish, sodium free
- RAPID RELEASE SOFTGELS: For adults, Take 2 softgels daily, preferably with a

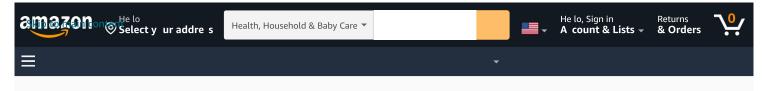






1,307

Sponsored

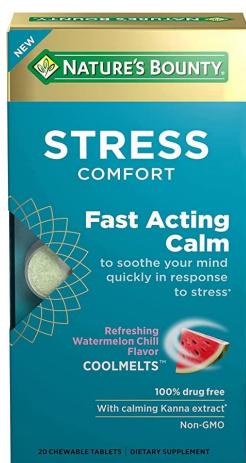


Health & Household Vitamins, Minerals & Supplements > Blended Vitamin & Mineral Supplements F

Sponsored

One-time purchase: \$9.96 (\$0.50 / Count) F





Roll over image toFoom in

Exhibit D.1. - first screen of product detail page for 20 count Nature's Bounty Stress Comfort Fast Acting Calm chewable tablets. Alternative product is 50 count bottle of Nature's Bounty Anxiety & Stress Relief Ashwagandha KSM-66 tablets. From January 26, 2022.

Nature's Bounty Stress Comfort Fast Acting Calm, Chewable Tablets for Occasional Stress Flavor, Watermelon Chill, 20 Count

Visit the Nature's Bounty Store F

★★★☆ ✓ 5,164 ratings

| 24 answered questions

List Price: \$12.99 Details

Price: \$9.96 (\$0.50 / Count) Get F
Fast, Free Shipping with F
Amazon Prime

You Save: \$3.03 (23%)

0

Si e: 20 unt (Pack f 1

20 unt (Pack f 1 \$9.96 (\$0.50 / Count

50 Count (Pac of 1) \$9.74 (\$0.19 / Count)

- One 20 count bottle of Nature's Bounty Stress Comfort Fast Acting Calm Chewable Tablets
- Watermelon chill flavored herbal supplements dissolve quickly and provide a cooling sensation
- Stress management supplement is F 100% drug free, non-GMO, and suitable for vegetarians
- Includes Zembrin (2) Kanna, a fast acting plant extract with a long history of traditional use for occasional stress management (1)
- Adults should chew one tablet per day when needed; allow tablet to dissolve before swallowing

Compare with similar items

Subscribe & Save:
5% 15%
\$9.46 (\$0.47 / Count)
First delivery on Feb 1
Ships from: Amazon.com
Sold by: Amazon.com

Add to List F

## C stomer reviews



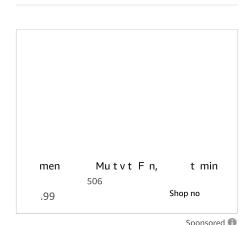


Exhibit D.2. - beginning of review section of the product detail page for 20 count Nature's Bounty Stress Comfort Fast Acting Calm chewable tablets unfiltered. The "top" reviews are for the 50 count bottle of Nature's Bounty Anxiety & Stress Relief Ashwagandha KSM-66 tablets. From January 26, 2022.

## Reviews with images





See all customer images F

Top re iews

## Top Feviews from the United States F



\*\*\*\*\* Reduced my anxiety and made me feel relaxed (but not impaired) F

Reviewed in the United States on June 30, 2019

Size: 50 Count (Pack of 1)

A friend told me about ashwagandha for anxiety. I was skeptical but decided to try it. I was looking for an alternative to Xanax since it causes drowsiness and I never want to take it because I always have responsibilities and I cannot be drowsy!

I have mild anxiety that mostly comes from stress: trying to get from work to pick up kids to their after school activities and worrying about running late, or the kids fighting me every step of the way or mild social anxiety... My experience so far while taking the ashwagandha is that I feel relaxed and calm. I take 1 pill in the morning and 1 at night. It does not impair me, and I will continue taking it since it seems to work for me.

Websites boast all kinds of benefits from ashwagandha including increased stamina, weight loss, lowering cortisol, increasing fertility, reducing inflammation and even treating arthritis, F diabetes, cancer, hypothyroidism, lupus, and other diseases. It sounds like a cure-all. I don't know if it does any of those things, however I do believe that stress causes or (at least <a href="xxacerbates:xxace

457 people found this helpful

Helpf l

Report abuse



Jacque L.

## ★★★★★ This Really Works!

Reviewed in the United States on November 16, 2019

Size: 50 Count (Pack of 1) | Verified Purchase

My anxiety and stress consists of ruminating thoughts that leave me feeling depressed and sometimes angry over nothing. I think a lot about what-if situations that are never likely to happen. I didn't want to have to find a primary doctor just to get a referral to a psychiatrist to get medication. In my city that would take YEARS to do! I started researching natural ways to help with anxiety, and found this! I started out by talking 1 tablet just to see what happened: within 10 minutes I felt a calm sensation come over me. And those ruminating thoughts were almost gone! Within two hours I could feel it wearing off, because those thoughts returned. So I took a second one and it helped. Now I take 2 tablets in the morning F and feel great! Sometimes three to four hours later I take two more depending on my stress. F I also take two before bed and I sleep like a baby! I just ordered another bottle! Just for reference, there is no known toxicity and I read reviews of people taking up to 800mg throughout the day. The most I've taken is 500mg in a day and I have no side effects. This stuff is worth it! F

304 people found this helpful

Helpf l

Report abuse F



Karen G

★★☆☆☆ Worked but too many side effects
Reviewed in the United States on September 17, 2019 F

Vater lone h...

Size: 50 Count (Pack of 1) | Verified Purchase

The product did make me much calmer, however I was having horrible headaches that started the day after taking the products and about two days in would get dizzy and F lightheaded every time I stood up which has never been a problem before. Also strange F sensation up the left size of the back of my neck. But since it made me calmer I tried to see if the side effects would lessen. I had my son start taking it since he battles with anxiety and stress. He took it one day and said it made him calmer but was having the same strange sensation in the same spot. I stopped taking it two days ago and the headaches, dizziness F and lightheadedness when standing all subsided. It is a shame because I liked feeling calmer but the side effects made me unable to take it. So half the bottle I guess will go in the trash. F

193 people found this helpful



Report abuse

#### Tduubs76

## ★☆☆☆☆ If diagnosed might not work as intended.

Reviewed in the United States on January 12, 2020

Size: 50 Count (Pack of 1) | Verified Purchase

To start off by no means is this a knock on the company that makes this supplement. Packaging was nice, delivered on time.

But, I was diagnosed with mild anxiety disorder due to trauma that I endured in the past. I only want to say if you were diagnosed with this particular type of illness, this supplement might not work the way you are anticipating.

I am sure that if you had mild anxiety due to stress and just overall life issues that are in the moment this supplement could most definitely be beneficial. In my case it was not. F

93 people found this helpful



Report abuse

#### Michael perez

#### ★★★★★ Good Company

Reviewed in the United States on July 22, 2019

Size: 50 Count (Pack of 1) | Verified Purchase

Definitely Works I have a very stressful job and this product keeps me in a good positive balance. Thank you! Definitely will be buying more soon. F

98 people found this helpful

Hel ful

Report abuse

## Elaine T Ruiz

#### \*\*\*\*\* Excellent Supplement foe Sleep. and Mood disorder Help

Reviewed in the United States on September 15, 2019

Size: 50 Count (Pack of 1) | Verified Purchase

I tried this supplement and it is excellent. It helped me with both anxiety and sleep. It is one of the few all in one supplements that is effective. Most all in one has a propriety blend and there usually is not enough milligrams to help.

I have two sleep disorders so it is hard for me to sleep. This supplement combined with a few others gives me five hours of uninterrupted restful sleep. F

I also use GABA, Tyrosine, Tryptophan, Melatonin, Kava Kava, Lemon Balm, Passion Flower, to help with sleep.

The only drawback for me is the smell. I.do not use Valerian Root for sleep because of it atrocious smell and taste. I still use Ashwagandgha and tTeanine for sleep but purchase them individually. If you can.handle the smell. it is an excellent product.

84 people found this helpful

Hel ful

Report abuse

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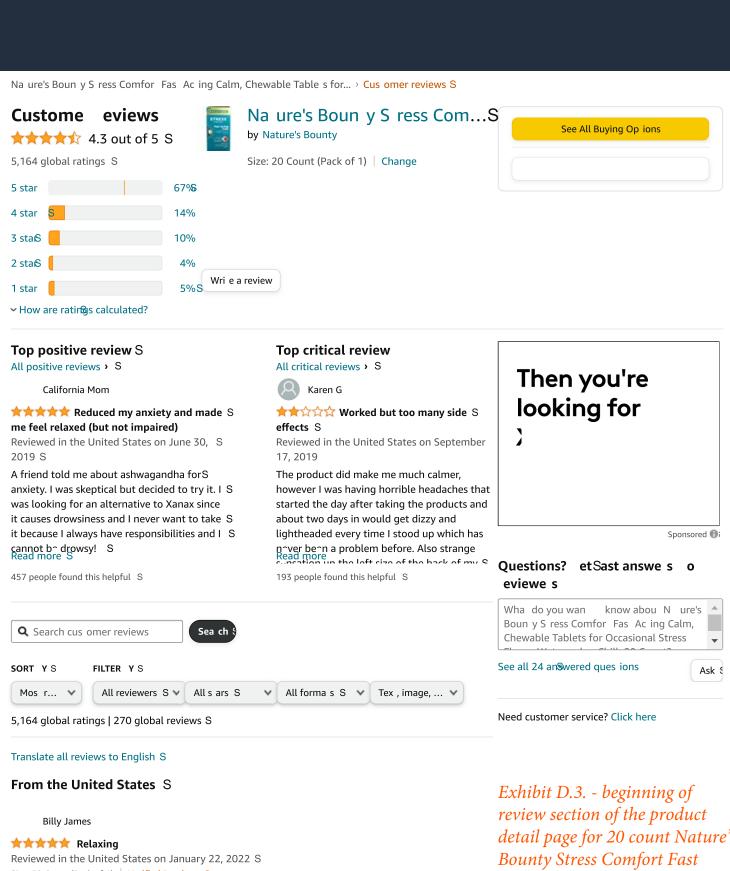
mazing Formulas Melatonin Strawberry ...F

19.99

Shop now F

Sponsored ①

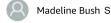
**Disclaimer**: While we work to ensure that product information is correct, on occasion manufacturers may alter their ingredient lists. Actual product packaging and materials may contain more and/oFdifferent information than that shown on our Web site. We recommend that you do not solely rely F on the information presented and that you always read labels, warnings, and directions before using or consuming a product. For additional information about a product, please contact the manufacturer. Content on this site is for reference purposes and is not intended to substitute for advice given by a physician, pharmacist, or other licensed health-care professional. You should not use this information as self-diagnosis or for treating a health problem or disease. Contact your health-care provider immediately if you suspect that you have a medical problem. Information and statements regarding dietary supplements have not been evaluated by the Food and Drug Administration and are not intended to diagnose, treat, cure, or prevent any disease or health condition. Amazon.com assumes no liability for inaccuracies or misstatements about products.



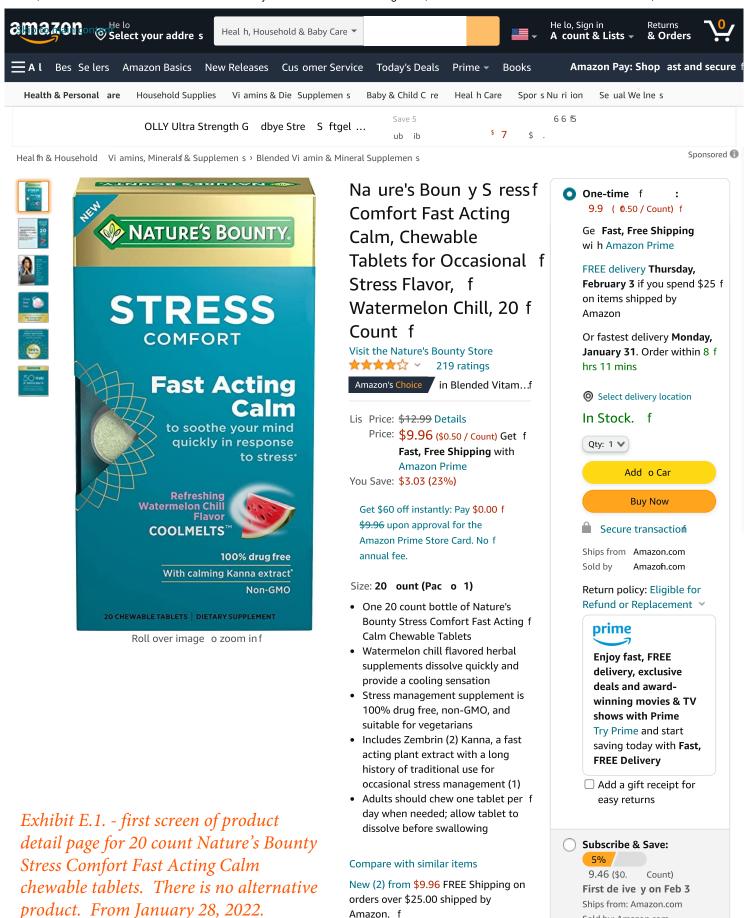
Size: 50 Count (Pack of 1) Verified Purchase S

Great product! I will purchase again. I feel very relaxed with it! S

Helpful Report abuse



detail page for 20 count Nature's Acting Calm chewable tablets filtered to show all ratings and reviews. From January 26, 2022.



Add o Lis

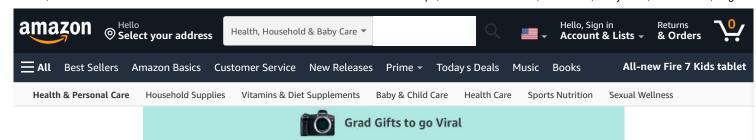
Sold by: Amazon.com

January 28, 2022.

Reviewed in the United States on November 12, 2021 B

Size: 20 Count (Pack of 1) | Verified Purchase B

Feels good B



Health & Household > Vitamins, Minerals & Supplements > Vitamins > Multivitamins



Roll over image to zoom in

Exhibit F.1. - first screen of product detail page of 90 count bottle of Sundown Kids Vitamin C Gummies. Alternative product is 180 count bottle of Sundown Kids Disney and Pixar Toy Story 4 Multivitamin Gummies.

Sundown Kids Vitamin
C Gummies with
Rosehips, Citrus
Bioflavonoids, NonGMO, Dairy-Free,
Gluten-Free,
Vegetarian, 90 Count
Visit the Sundown Kids Store
7,546 ratings
18 answered questions
Amazon's Choice in Multivitamins ...

Price: \$7.12 (\$0.08 / Count)

Get \$50 off instantly: Pay \$0.00 \$7.49 upon approval for the Amazon Rewards Visa Card. No annual fee.

Size: 90 Count

90 Count

180 Count

Brand Sundown Kids
Item Form Gummy
Dosage Gummy
Form

Flavor Orange
Primary Multivitamins
Supplement

Туре

## About this item

- SUPPORTS IMMUNE AND GENERAL HEALTH — Vitamin C supports your little one's immune system; also maintains strong bones, teeth, joints, gums, and heart health
- ANTIOXIDANT BLEND Our unique blend of Vitamin C, rosehips and citrus bioflavonoids contain powerful antioxidant properties; may help fight against free radicals

One-time purchase: \$7.49 (\$0.08 / Count) FREE delivery: Wednesday, June 1 on orders over \$25.00 shipped by Amazon. Ships from: Amazon.com Sold by: Amazon.com Subscribe & Save: **5%** 15% \$7.12 (\$0.08 / Count) Save 5% now and up to 15% on repeat deliveries. No fees Cancel anytime Learn more Get it Wednesday, Jun 1 In Stock. Qty: 1 🗸 Deliver every: 2 months (Most common) 🗸 Set Up Now Ships from and sold by Amazon.com

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Have one to sell?

Sell on Amazon

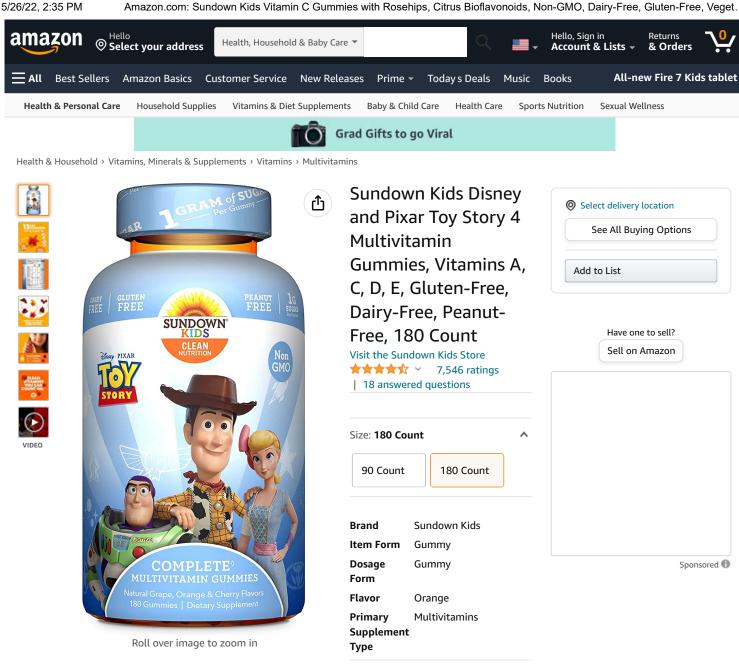


Exhibit F.2. - first screen of product detail page of 180 count bottle of Sundown Kids Disney and Pixar Toy Story 4 Multivitamin Gummies. Alternative product is 90 count bottle of Sundown Kids Vitamin C Gummies.

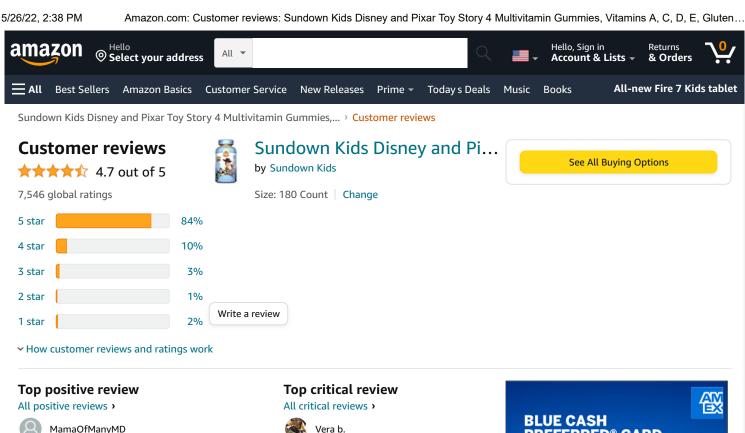
## About this item

- SUPPORT YOUR CHILD'S IMMUNE HEALTH — A complete(4) daily multivitamin provides your toddler, child or teen with nutritional support for healthy growth and development(3); maintains healthy eyes, bones, teeth, heart and immune health(3)
- 13 KEY NUTRIENTS(4) Vitamin A (eyes, skin, immune support), Vitamin C (immune support), Vitamin D & K (bone & immune health), Vitamin E (antioxidant), B6 & B12 (energy support), folate, iodine (thyroid support), zinc (immune support) and more(3)
- CLEAN(1) KIDS MULTIVITAMIN (1)Clean defined as all products Non-GMO(2), and free of gluten,

r reeviews: Sun own Kis itan CiGu

5/26/22, 2:0

reaching out to his doctor about the situation. V





## \*\*\*\*\* My kids favorite vitamins!

Reviewed in the United States on February 13, 2020

As a mom of 5 little ones I have tried tons of different vitamins with them but these are by far their favorite! They like the flavor the best. Some vitamins they won't even eat but they like these. I think it's a great amount for the money and bonus that they love the cute character bottles!

14 people found this helpful



★☆☆☆☆ Can possibly give your child a headache.

Reviewed in the United States on November 28. 2020

I have had pretty good results with sundown products in the past. However I got these for my son who is 5 and just started virtual school with kindergarten. I gave him the recommended dose 2 a day and twice he complained about a headache. Perfectly healthy child so I stopped it and he decent

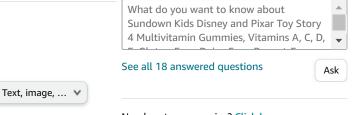
12 people found this helpful

All formats



Sponsored

## **Ouestions? Get fast answers from** reviewers



Need customer service? Click here

#### From the United States

7,546 total ratings, 344 with reviews

Search customer reviews

FILTER BY

All reviewers



SORT BY

Top rev... ∨

★☆☆☆☆ Can possibly give your child a headache.

Reviewed in the United States on November 28, 2020

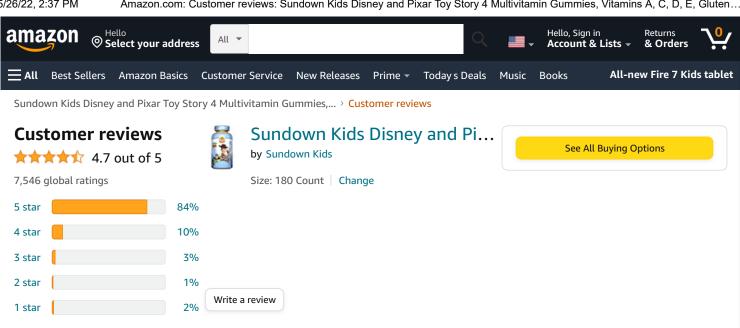
Size: 180 Count | Verified Purchase

I have had pretty good results with sundown products in the past. However I got these for my son who is 5 and just started virtual school with kindergarten. I gave him the recommended dose 2 a day and twice he complained about a headache. Perfectly healthy child, so I stopped it and he doesn't complain about them anymore. Maybe it didn't agree with him I'm not sure but I will definitely be reaching out to his doctor about the situation.

Search

All stars

Exhibit F.4. - beginning of review section of the product detail page for the 180 count bottle of Sundown Kids Disney and Pixar Toy Story 4 Multivitamin Gummies filtered to show all ratings and reviews.



## Top positive review

All positive reviews >



## \*\*\*\*\* My kids favorite vitamins!

How customer reviews and ratings work

Reviewed in the United States on February 13, 2020

As a mom of 5 little ones I have tried tons of different vitamins with them but these are by far their favorite! They like the flavor the best. Some vitamins they won't even eat but they like these. I think it's a great amount for the money and bonus that they love the cute character bottles!

14 people found this helpful

## Top critical review

All critical reviews >



★☆☆☆☆ Can possibly give your child a

headache.

Reviewed in the United States on November 28. 2020

I have had pretty good results with sundown products in the past. However I got these for my son who is 5 and just started virtual school with kindergarten. I gave him the recommended dose 2 a day and twice he complained about a headache. Perfectly hoalthy child so I stanged it and he decent

12 people found this helpful



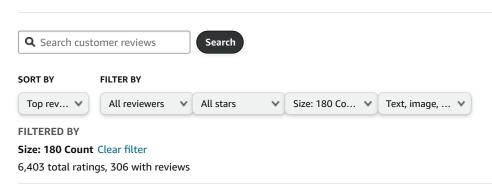
Sponsored

## **Ouestions? Get fast answers from** reviewers



Need customer service? Click here

Exhibit F.6. - beginning of review section of the product detail page for the 180 count bottle of Sundown Kids Disney and Pixar Toy Story 4 Multivitamin Gummies filtered to show ratings and reviews for just the 180 count bottle of Sundown Kids Disney and Pixar Toy Story 4 Multivitamin Gummies.



#### From the United States



## \*\*\*\*\*\*\* Can possibly give your child a headache.

Reviewed in the United States on November 28, 2020

Size: 180 Count | Verified Purchase

I have had pretty good results with sundown products in the past. However I got these for my son who is 5 and just started virtual school with kindergarten. I gave him the recommended dose 2 a day and twice he complained about a headache. Perfectly healthy child, so I stopped it and he doesn't complain about them anymore. Maybe it didn't agree with him I'm not sure but I will definitely be reaching out to his doctor about the situation.

Question: Does this product contain tree nuts??

Answer: The Toy Story 4 Gummies (B80928) c

The Toy Story 4 Gummies (B80928) contains a highly refined coconut oil and the allergenic protein

has been removed.

By Customer Care MANUFACTURER on September 9, 2019

Question: What is the source of the gelatin?

Answer: The gelatin in the Sundown Kids Toy Story 4 Complete Multivitamin Gummies (B80928) is sourced

from porcine (pig).

By A manufacturer MANUFACTURER on June 10, 2020

Question:

votes

votes

votes

m: What happens if my child doesn't like the gummy product? Can I receive a refund?

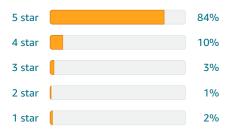
Answer: Not sure need to contact seller
By silvia zepeda on March 15, 2021

See more answered questions (14)

## **Customer reviews**

## **★★★★** 4.7 out of 5

7,546 global ratings



How customer reviews and ratings work

## By feature

Easy to swallow

Value for money

Ingredient quality

✓ See more

## **Review this product**

Share your thoughts with other customers

Write a customer review

Exhibit F.7. - first few pages of the unfiltered review section of the product detail page for the 90 count bottle of Sundown Kids Vitamin C Gummies.

## Reviews with images



See all customer images

#### Read reviews that mention



## Top reviews from the United States



Vera b.

## ★☆☆☆☆ Can possibly give your child a headache.

Reviewed in the United States on November 28, 2020

Size: 180 Count | Verified Purchase

I have had pretty good results with sundown products in the past. However I got these for my son who is 5 and just started virtual school with kindergarten. I gave him the recommended dose 2 a day and twice he complained about a headache. Perfectly healthy child, so I stopped it and he doesn't complain about them anymore. Maybe it didn't agree with him I'm not sure but I will definitely be reaching out to his doctor about the situation.



12 people found this helpful

Helpful Report abuse



MamaOfManyMD



Sponsored 📵

## ★★★★★ My kids favorite vitamins!

Reviewed in the United States on February 13, 2020

Size: 180 Count | Verified Purchase

As a mom of 5 little ones I have tried tons of different vitamins with them but these are by far their favorite! They like the flavor the best. Some vitamins they won't even eat but they like these. I think it's a great amount for the money and bonus that they love the cute character bottles!

14 people found this helpful

Helpful

Report abuse



## ★★★★★ My picky children think they're fruit snacks!

Reviewed in the United States on January 17, 2021

Size: 180 Count | Verified Purchase

These are a hit in our house! I have three kids, two of them are extremely fussy. I've tried many different brands of vitamins for them and they throw up with every single one because they don't like the flavor. I gave them each two vitamins yesterday and they thought they were eating fruit snacks ③. I tried them as well and they really do taste like a fruit snack and do not leave a awful aftertaste like many other vitamins. No gagging, no throwing up!

Unlike many of the other reviews here, my vitamins arrived fine. They were not bundled together or melted.

8 people found this helpful

Helpful

Report abuse



Craig R.

## ★★☆☆☆ Beware gummies in transit

Reviewed in the United States on September 16, 2019

Size: 180 Count | Verified Purchase

All stuck together. Hard to get individual vitamin out of the container. Appears these got very hot  ${\bf n}$ 

11 people found this helpful

Helpful

Report abuse



Elle

## ★★★★★ Store these in a place kids can't access! Taste just like fruit gummies.

Reviewed in the United States on May 12, 2022

Size: 180 Count | Verified Purchase

While some may purchase gummies for the shapes or characters on the box, we've tried a myriad of gummies and Sundown Kids - specifically the Orange, Cherry, and Grape flavor package - is our favorite. The texture is most similar to gummy bears or fruit gummies (compared to other vitamins we've tried) and they are NOT sugar/crystal coated. I'm so glad that Amazon has them - and check the other varieties of these vitamins, because you might get a better price with a different character variety (but double check the flavors - I think the Frozen vitamins are different!).

We have a coconut allergy in our home, and many, many, MANY gummy vitamins contain coconut oil as an ingredient. I love that these gummy vitamins are safe for us to use, and that they taste good enough for my kids to love taking them. However, store in a safe and inaccessible place... because they're so good, your kids might try to eat more than recommended. Treat these like medicine and don't let your kids access them!

Helpful

Report abuse



kentmj55

★★☆☆☆ Melted

Reviewed in the United States on July 13, 2020

Size: 180 Count | Verified Purchase

I should have known better than to order these to Florida during the summer. They arrived completely melted. The characters are not able to be distinguished. They are able to be pulled apart and still edible. Disappointing. The other vitamins that I ordered came in a cooler and were in much better shape.



5 people found this helpful

Helpful

Report abuse



LaDonna

#### **★★★★★** Great taste

Reviewed in the United States on May 22, 2020

Size: 180 Count | Verified Purchase

My kids always get this brand and love the taste. We have tried a few other brands and the kids didn't care for them. We haven't ran across and clumps inside the containers yet. Always a great product.

6 people found this helpful

Helpful

Report abuse



Amber

## ★★★★★ Very soft, taste like candy

Reviewed in the United States on January 14, 2022

Size: 180 Count | Verified Purchase

As far as gummies go they are soft and easy to chew, while maintaining a great flavor. Probably the best tasting vitamins I've ever had, they are also easy on the stomach. (I have to take childrens vitamins because adult ones make me vomit terrible). The kids love them too so they are the ones that remind me to give them every day, other brands I've bought end up having at least one flavor that just isn't good, these ones are all good and orange gets tackled the most instead of being left behind. The price isn't bad either.

One person found this helpful

Helpful

Report abuse

See all reviews >

#### **Products related to this item**

Page 1 of 179

Sponsored





disease. (4) Our Complete multivitamin contains 13 key nutrients, including certain essential A, C, D, E & select B vitamins, to supplement a range of common nutrient gaps that may not be addressed by diet alone.

Statements regarding dietary supplements have not been evaluated by the FDA and are not intended to diagnose, treat, cure, or prevent any disease or health condition.

## More from frequently bought brands

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One A Day Men's Multivitamin, Supplement with Vitamin A, Vitamin C,...

\$14.97 \( \text{prime} \)



Nature's Bounty Kids Multi Jelly Beans, Supports Healthy Growth and... \*\*\*\*\*\*\* 313 \$13.28 \(\rightarrow\)prime



Focus Factor Kids Extra
Strength Daily Chewable
for Brain Health
Support, 120 Count...

\*\*\*\*\*\* 6,924
\$24.99 \( \)prime



Kids Formula & Fiber
Daily Gummy
Multivitamin: Fiber for
Digestive Health,...

14,967
\$21.52 \( \text{prime} \)



SmartyPants Women's Formula Gummy Vitamins: Gluten Free, Multivitamin, CoQ10,... 65,435
#1 Best Seller
\$26.93 \( \text{prime} \)

Centrum Kids' Organic Multigummies, Kids Multivitamin Gummies, Organic Multivitamin for Kids with Essential Nutrients for Immune Support, Muscle Function, and Brain Health - 90 Count

★★★★☆ 732

\$15.00

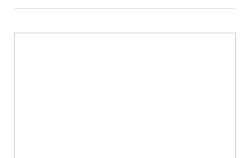
Shop now

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## **Customer Questions & Answers**

See questions and answers

**Reviews with images** 



949

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Shop now

Exhibit F.8. - first few pages of the unfiltered review section of the product detail page for the 180 count bottle of Sundown Kids Disney and Pixar Toy Story 4 Multivitamin Gummies.









See all customer images

#### Read reviews that mention

toy story year old stuck together gummy vitamins

value for money great value good value corn syrup nail polish

polish remover taste like ice pack daughter loves alien head

## Top reviews from the United States



## ★☆☆☆☆ Can possibly give your child a headache.

Reviewed in the United States on November 28, 2020

Size: 180 Count | Verified Purchase

I have had pretty good results with sundown products in the past. However I got these for my son who is 5 and just started virtual school with kindergarten. I gave him the recommended dose 2 a day and twice he complained about a headache. Perfectly healthy child, so I stopped it and he doesn't complain about them anymore. Maybe it didn't agree with him I'm not sure but I will definitely be reaching out to his doctor about the situation.

#### 12 people found this helpful

Helpful Report abuse

## MamaOfManyMD

## ★★★★★ My kids favorite vitamins!

Reviewed in the United States on February 13, 2020

Size: 180 Count | Verified Purchase

As a mom of 5 little ones I have tried tons of different vitamins with them but these are by far their favorite! They like the flavor the best. Some vitamins they won't even eat but they like these. I think it's a great amount for the money and bonus that they love the cute character bottles!

14 people found this helpful

Helpful Report abuse

## Candra

#### \*\*\*\*\* My picky children think they're fruit snacks!

Reviewed in the United States on January 17, 2021

Size: 180 Count | Verified Purchase

These are a hit in our house! I have three kids, two of them are extremely fussy. I've tried many different brands of vitamins for them and they throw up with every single one because they don't like the flavor. I gave them each two vitamins yesterday and they thought they were eating fruit snacks ③. I tried them as well and they really do taste like a fruit snack and do not leave a awful aftertaste like many other vitamins. No gagging, no throwing up!

Unlike many of the other reviews here, my vitamins arrived fine. They were not bundled together or melted.

8 people found this helpful

Helpful Report abuse

Craig R.

## **★★☆☆☆** Beware gummies in transit

Reviewed in the United States on September 16, 2019

Size: 180 Count | Verified Purchase

All stuck together. Hard to get individual vitamin out of the container. Appears these got very hot n

11 people found this helpful

Helpful Report abuse

Elle

## \*\*\*\*\* Store these in a place kids can't access! Taste just like fruit gummies.

Reviewed in the United States on May 12, 2022

Size: 180 Count | Verified Purchase

While some may purchase gummies for the shapes or characters on the box, we've tried a myriad of gummies and Sundown Kids - specifically the Orange, Cherry, and Grape flavor package - is our favorite. The texture is most similar to gummy bears or fruit gummies (compared to other vitamins we've tried) and they are NOT sugar/crystal coated. I'm so glad that Amazon has them - and check the other varieties of these vitamins, because you might get a better price with a different character variety (but double check the flavors - I think the Frozen vitamins are different!).

We have a coconut allergy in our home, and many, many, MANY gummy vitamins contain coconut oil as an ingredient. I love that these gummy vitamins are safe for us to use, and that they taste good enough for my kids to love taking them. However, store in a safe and inaccessible place... because they're so good, your kids might try to eat more than recommended. Treat these like medicine and don't let your kids access them!

Helpful Rep

Report abuse



#### **★★☆☆☆ Melted**

Reviewed in the United States on July 13, 2020

Size: 180 Count | Verified Purchase

I should have known better than to order these to Florida during the summer. They arrived completely melted. The characters are not able to be distinguished. They are able to be pulled apart and still edible. Disappointing. The other vitamins that I ordered came in a cooler and were in much better shape.

5 people found this helpful

Helpful Report abuse

LaDonna

#### \*\*\*\*\* Great taste

Reviewed in the United States on May 22, 2020

Size: 180 Count | Verified Purchase

My kids always get this brand and love the taste. We have tried a few other brands and the kids didn't care for them. We haven't ran across and clumps inside the containers yet. Always a great product.



#### **Products related to this item**

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HYLAND'S Naturals Kids Organic Elderberry Plus Gummies, Organic Black Elderberry wi...

**★★★★** 929 \$12.78 **√prime** 

Extra 25% off when you subscribe



Flintstones Gummies
Kids Vitamins, Gummy
Multivitamin for Kids
and Toddlers with Vi...
7,157

\$12.29 \( \sqrt{prime} \)

Extra 25% off when you subscribe



Flintstones SuperBeans, Kids Multivitamin with Immunity Support with Vitamins A, D,...

**★★★★** 949 \$10.99 **√prime** 

Extra 25% off when you subscribe



Kids Formula & Fiber
Daily Gummy
Multivitamin: Fiber for
Digestive Health,...

★★★★ 14,967

\$21.52 **yrime** 



Focus Factor Kids Extra Strength Daily Chewable for Brain Health Support, 120 Count...

**★★★☆☆** 6,924 **\$24.99 √prime** 

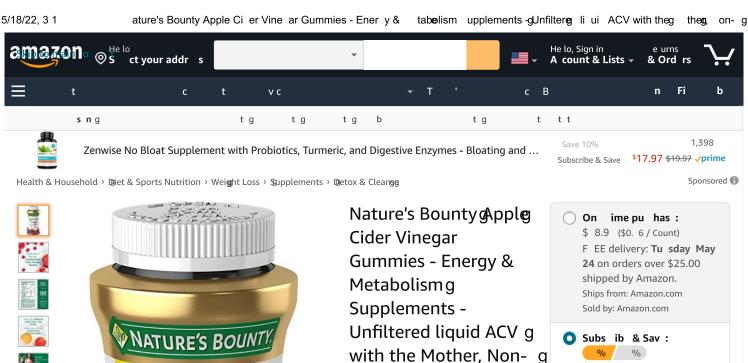
Extra 5% off when you subscribe

3,116 Add to Cart

Disclaimer: While we work to ensure that product information is correct, on occasion manufacturers may alter their ingredient lists. Actual product packaging and materials may contain more and/or different information than that shown on our Web site. We recommend that you do not solely rely on the information presented and that you always read labels, warnings, and directions before using or consuming a product. For additional information about a product, please contact the manufacturer. Content on this site is for reference purposes and is not intended to substitute for advice given by a physician, pharmacist, or other licensed health-care professional. You should not use this information as self-diagnosis or for treating a health problem or disease. Contact your health-care provider immediately if you suspect that you have a medical problem. Information and statements regarding dietary supplements have not been evaluated by the Food and Drug Administration and are not intended to diagnose, treat, cure, or prevent any disease or health condition. Amazon.com assumes no liability for inaccuracies or misstatements about products.

## Recommended based on your shopping trends

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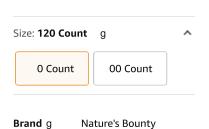


oll ovegimage togoom in g

GMO, Vegetarian, Vitamin B12, Beet Root, Pomegranate (500 Mg, 120 Count) g Visit the Nature's Bounty Store ★★★★★ < 14,196 ratings</p> | 57 answered questions Price: \$17.97 (\$0.15 / Count) Get \$50goff instantly: Pay \$0.00 g

\$18.92 upon approval for the Amazon Rewards Visa Card. No annual fee.

Available at a lower price from other sellers that may not offer free rime shipping.



Item Form Gummy g Product Energy Management g **Benefits** Flavor g Apple g Dosage Form Gummy g Item Weight 0.84 Pounds g

\$ 7.9 (\$0.15 / Count) Save % now and up to % on repeat deliveries. · No fees · Cancel anytime Learn more Get it Tuesday, May 24 In Stock. Qty: 1 🗸 Deliver every: mon Set Up Now Ships from and sold by Amazon.com

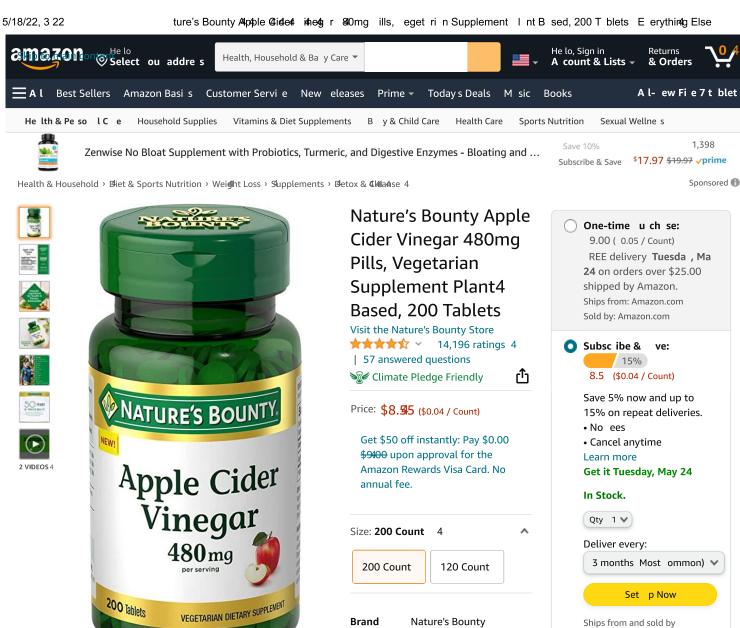
Add to List

New (4) from \$17.09 FREE Shipping on orders over \$25.00 shipped by Amazon.



Exhibit G.1. - first screen of product detail page for 120 count bottle of Nature's Bounty Apple Cider Vinegar Gummies. Alternative product is 200 count bottle of Nature's Bounty Apple Cider Vinegar 480 mg tablets.

Sell on Ama on



oll over image to zoom in

Exhibit G.2 - first screen of product detail page for 200 count bottle of Nature's Bounty Apple Cider Vinegar 480 mg tablets. *Alternative product is 120 count bottle of* Nature's Bounty Apple Cider Vinegar Gummies.

# About this item

Item Form

Product

**Benefits** 

Flavor

Specific **Uses For** 

**Product** 

See more

**Tablet** 

Apple

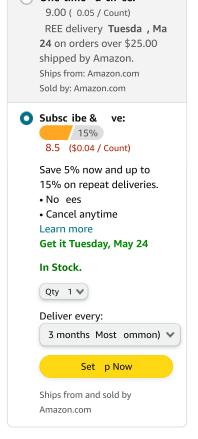
Vinegar 4

Metabolism, Energy

and Metabolism 4

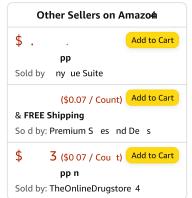
Supports Energy Levels 4

- EASY WAY TO TAKE APPLE CIDER VINEGAR: Want to take apple cider vinegar without the strong sour taste? With Nature's Bounty Apple Cider Vinegar tablets, you'll get 480 mg of apple cider vinegar per serving—no more grimacing through an ACV drink
- A POPULAR INGREDIENT: Nature's Bounty Apple Cider Vinegar is provides the popular ingredient 4 that is perfect for health and fitness enthusiasts



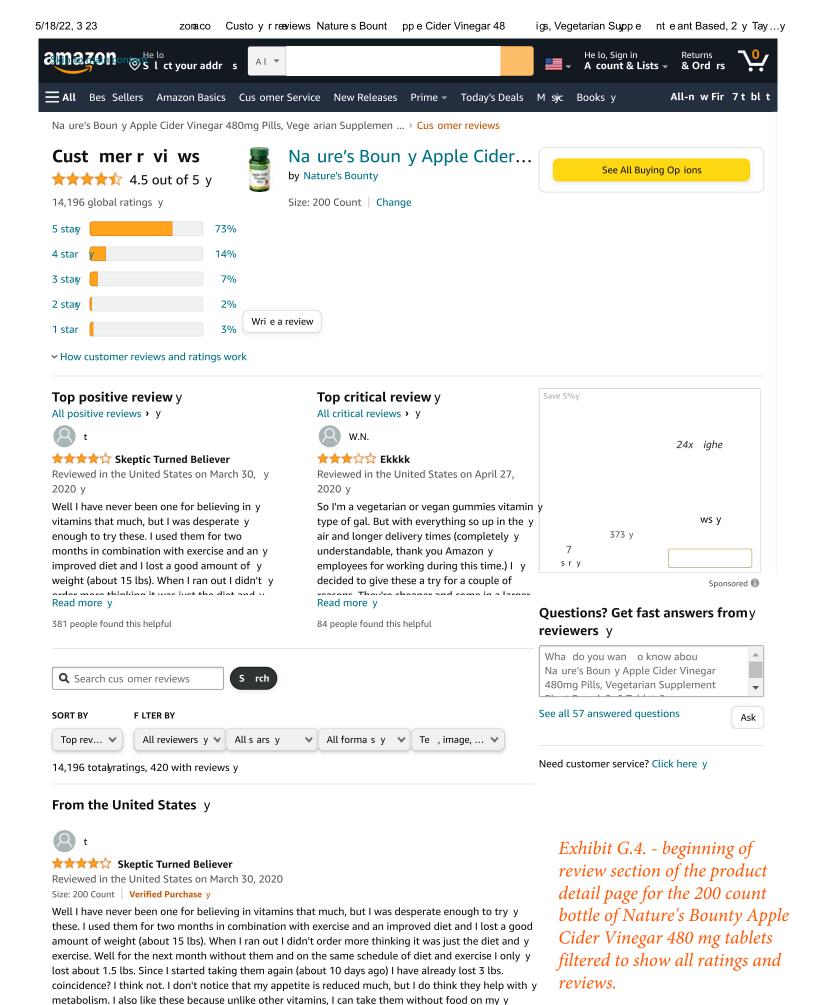


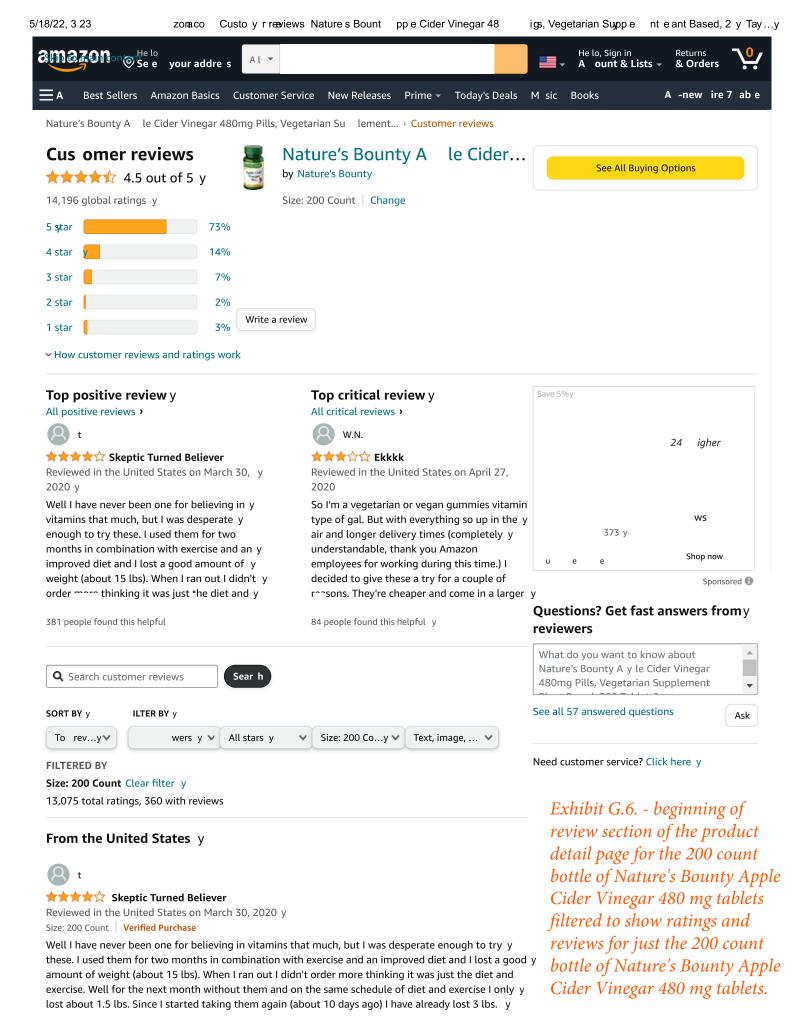
Add to List



htt s //www.amazon.com/ atures- ounty- B le-Vinegar-Gummies/ roduct-reviews/ 8YS85WG7/ref=cm\_cr\_ar \_d\_viewo t\_fmt?ie= TF8 reviewer...B 1/6 B

coincidence? I think not. I don't notice that my appetite is reduced much, but I do think they help with B metabolism. I also like these because unlike other vitamins, I can take them without food on my B





theon, on-Sponsored @

# **Customer questions & answers**

Q Have a question? Search for answers

votes g

Question: Answer: g What it is the Mother mean?

In ACV particularly, "the mother" is a complex structure of beneficial acids that seem to have health benefits. Unrefined vinegars have a murky appearance and typically still contain the mother culture. Clear and pasteurized vinegars typically do not contain the mother culture and don't carry the same benefits.

By Ashley on February 18, 2021

→ See more answers (2)

votes g

Ouestion: Answer: g does this have the mother? g

Thank you for your interest in Nature's Bounty products! The Apple Cider Vinegar does not contain

By Customer Care MANUFACTURER on July 17, 2018

See more answers (1)

3 votes g Question:

1 tablet is equivalent to how many tsp. of ACV?

Answer: g

500 mg is equivalent to two liquid teaspoons (10 ml). The serving size is 2 tablets for 480mg, so each pill is roughly equal to 1 liquid teaspoon of ACV

By Elizabeth P on May 14, 2020

✓ See more answers (2)

lack2 votes Question:

Are these tablets chewable??

Answer: g

The Apple Cider Vinegar 480mg (Prod No.78570) are not chewable tablets.

By A manufacturer MANUFACTURER on July 8, 2020

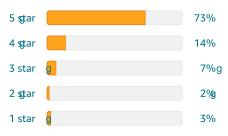
See more answers (10)

See more answered questions (53)g

#### **Customer reviews**



14,196 global ratings



 ➤ How customer reviews and ratings work

#### **By feature** g



## Review this product g

### Reviews with images









See all customer images

#### Read reviews that mention

pple cider cider vinegar weight lo s nature b unty liquid formg started taking acid reflux hard to swa low blood pre sure lost 23 lbs highly recommend waste of money lose weight

Top reviews



Exhibit G.7. - first few pages of the unfiltered review section of Top reviews from the United States gthe product detail page for the 120 count bottle of Nature's Bounty Apple Cider Vinegar Gummies.

Share your thoughts with other customers



Reviewed in the United States on March 30, 2020

Size: 200 Count | Verified Purchase

Well I have never been one for believing in vitamins that much, but I was desperate enough to try these. I used them for two months in combination with exercise and an improved diet g and I lost a good amount of weight (about 15 lbs). When I ran out I didn't order more thinking it was just the diet and exercise. Well for the next month without them and on the g same schedule of diet and exercise I only lost about 1.5 lbs. Since I started taking them again (about 10 days ago) I have already lost 3 lbs. coincidence? I think not. I don't notice that my appetite is reduced much, but I do think they help with metabolism. I also like these because unlike other vitamins, I can take them without food on my stomach. usually i get sick if I take an vitamins without any food on board. this is nice so that I can take them in the morning before I get hungry for anything.

381 people found this helpful



#### ★★★★★ No more heartburn!

Reviewed in the United States on July 26, 2019

Size: 200 Count | Verified Purchase

I was able to stop taking daily omeprazole which I'd been on for 13 years. It really helps my g reflux and heart burn.

303 people found this helpful





#### ★★★★★ Great for anyone with GI issues

Reviewed in the United States on December 7, 2019 g

Size: 200 Count | Verified Purchase

I don't take this for weight loss.

I use this to help cut down on gallbladder attacks, kidney stones, and things like that. I take one a day after my largest meal (usually dinner) and it's been months. With large holiday meals, nights out, takeout at work, and everything else in between- there's been no more sharp resonating painful attacks or spasms.

I'd recommend this to anyone with similar dietary issues, because this has been a godsend. g

235 people found this helpful



#### **★★★★★** great supplement to suppress appetite **g**

Reviewed in the United States on April 12, 2019

Size: 200 Count | Verified Purchase

smells and tastes gross but it's the best weight loss vitamin i've ever taken. i can feel it working well because my appetite is quelled immediately after taking, and i have to drink a lot of water and pee a lot after taking. it works i've been losing weight because it's helped me eat less. g

266 people found this helpful





#### ★★★☆☆ Ekkkk

Reviewed in the United States on April 27, 2020

Size: 200 Gount | Verified Purchase

So I'm a vegetarian or vegan gummies vitamin type of gal. But with everything so up in the air and longer delivery times (completely understandable, thank you Amazon employees for working during this time.) I decided to give these a try for a couple of reasons. They're

cheaper and come in a larger quantity.

They aren't as hard to swallow as most vitamins I've tried in my life time. They're a decent size. I don't take gummies because I'm a fan of gummy candy. I'm not. I don't like the texture, but I loathe swallowing pills more. I have to be on the verge of dying to take Tylenol. So I'm not the best judge on ease of swallowing. They're a little larger than I would like though. I can take these with a grimace and a lot of water. I still gag and ick a bit. It's manageable, but I dread vitamin time now.

When you open the bottle, you're clubbed in the nostrils with vinegar. It's understandable. Եսեւմեր օրենա vinegar, I don't know if you' l be able to get past the sme l. It's a lot stronger

84 people found this helpful

Help ul

Report abuse



Voice of Reason

#### **★★★★★** Blown away!

Reviewed in the United States on August 8, 2020

Size: 200 Count | Verified Purchase

I purchased these as a weight loss supplement. I've lost 10 lbs in 1 month. However, I fast from 4 pm to 7 am (15 hrs) sometimes snacking a trail mix but that's about it. Initially I didn't believe it but one morning I stepped on the scale and was completely shocked. g Shocked because I had tried these pills before with no success (another brand). Then again I wasn't fasting but still just not eating heavy after 4 pm but still eating. Fasting not only helps you lose weight without exercising (although I highly recommend it for even better results) but it helps the body heal tremendously. Studies have shown fasting is very helpful in restoring normal body functions.

60 people found this helpful

Help ul

Report abuse g



Epic Horizon

#### **★★★★★** Fast weight loss

Reviewed in the United States on December 30, 2020

Size: 200 Count | Verified Purchase

I started taking two of these in the morning and two before bed. In 8 weeks, I've lost 12 pounds and my stomach is back to flat!! I have also been exercising and eating healthy, but I've never gotten such amazing results with diet and exercise alone. I also feel cleaner, if that makes sense. I will continue to take these.

53 people found this helpful

Help ul

Report abuse



Amazon Customer

# ★★☆☆ Has the acv smell

Reviewed in the United States on February 26, 2020 g

Size: 200 Count | Verified Purchase

If you don't swallow immediately you CAN taste ACV but compared to drinking the real thing then this is a breeze. Smells like just what it says it is, acv. I can't really say I'm noticing a difference in appetite or weightloss. I do like that it won't damage my teeth the way actual acv does. But I do think I will opt for the real deal when these pills are finished. I suspect they will have more of an impact on appetite and weight loss.

56 people found this helpful

Help ul

Report abuse

See all reviews g

Sponsored Ag



Goli® Apple Cider Vinegar Gummy Vitamins (1 Pack, 60 Count, Gelatin-Free,... **★★★★☆** 337,018 \$18.98 \rime



ature's Bounty Apple Ci er Vine ar Gummies - Ener y &

Vitalitown Apple Cider Vinegar Gummies with The Mother, Weight Countrol, Detox & Cle... q **★★★★** 16 \$12.97 \( \text{prime} \) Save 20% with coupon



(2-Pack) Apple Cider Vinegar Gummies by ProTKFU - Immunity & Detox with The Mother,... **★★★★☆** 849 \$20.99 \rime Save 10% with coupon



Apple Cider Vinegar Gummies by Plantarr, **ACV Gummies with** Folate, Vitamin B12,... **★★★★** 16 \$8.97 **prime** 

Save 5% with coupon



Apple Cider Gummies wit Mother: High 1500 mg - St \*\*\*\* \$16.95 **/p**i

FRESH

Natural Healthcare Supplements



Premium Apple Cider Vinegar Capsules Max 1740mg wit... **★★★★** 9,680 \$15.21 \$16.90 **√prime** Shop now

Sponsored

Disclaimer: While we work to ensure that product information is correct, on occasion manufacturers may alter their ingredient lists. Actual product packaging and materials may contain more and/or different information than that shown on our Web site. We recommend that you do not solely rely on the information presented and that you always read labels, warnings, and directions before using or consuming a product. For additional information about a product, please contact the manufacturer. Content on this site is for reference purposes and is not intended to substitute for advice given by a physician, pharmacist, or other licensed health-care professional. You should not use this information as self-diagnosis or for treating a health problem or disease. Contact your health-care provider immediately if you suspect that you have a medical problem. Information and statements regarding g dietary supplements have not been evaluated by the Food and Drug Administration and are not intended to diagnose, treat, cure, or prevent any disease or health condition. Amazon.com assumes no liability for inaccuracies or misstatements about products.

# Recommended based on your shopping trends

Sponsored g

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Onnit Alpha Brain **Premium Nootropic** Brain Supplement, 90 Count, for Men & Women - Caffeine-Free

**★★★★** 18,423 \$79.95 **vprime** 



Thorne Research -Phosphatidyl Choline - g Phospholipid Complex for Ced Membrane Support - 60 Gelcaps g

**★★★★** 418 \$29.00 yprime



Onnit Alpha Brain **Premium Nootropic** Brain Supplement, 30g Count, for Men & Women - Caffeine-Free g

**★★★★** 17,833 \$34.95 **vprime** 



Focus Factor Brain and Vision Supplement, 120 g Count - Eye Vitamin, Mineral Supplement & Complete Multivitamin

**★★★☆☆** 2,427 \$36.37 /prime



Page 1 of 3 g

Strength Brain Su Memory and Foci \*\*\*

\$39.99

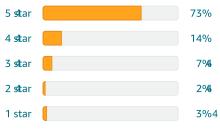
Page 1 of 3 g

# Amazon devices for you

#### **Customer rev ews**

## ★★★★★ 4.5 out of 5

14,196 global ratings



How customer reviews and ratings work

#### By feature 4



#### Review this product 4

Share your thoughts with other customers 4

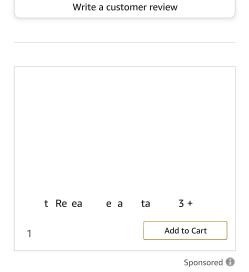


Exhibit G.8. - first few pages of the unfiltered review section of the product detail page for the 200 count bottle of Nature's Bounty Apple Cider Vinegar 480 mg tablets.

#### Reviews with ima es







#### Read reviews that mention



#### Top reviews from the United States



### **★★★★☆** Skeptic Turned Believer

Reviewed in the United States on March 30, 2020 4

Size: 200 Count | Verified Purchase

Well I have never been one for believing in vitamins that much, but I was desperate enough to try these. I used them for two months in combination with exercise and an improved diet 4 and I lost a good amount of weight (about 15 lbs). When I ran out I didn't order more thinking it was just the diet and exercise. Well for the next month without them and on the same schedule of diet and exercise I only lost about 1.5 lbs. Since I started taking them4 again (about 10 days ago) I have already lost 3 lbs. coincidence? I think not. I don't notice that my appetite is reduced much, but I do think they help with metabolism. I also like these because unlike other vitamins, I can take them without food on my stomach. usually I get sick if I take an vitamins without any food on board. this is nice so that I can take them in the morning before I get hungry for anything.

381 people found this helpful

Helpful | Report abuse 4

### **★★★★★** No more heartburn!

Reviewed in the United States on July 26, 2019

Size: 200 Count | Verified Purchase

I was able to stop taking daily omeprazole which I'd been on for 13 years. It really helps my 4 reflux and heart burn.

303 people found this helpful

Helpful Report abuse



#### ★★★★★ Great for anyone with GI issues

Reviewed in the United States on December 7, 2019

Size: 200 Count | Verified Purchase

I don't take this for weight loss.

I use this to help cut down on gallbladder attacks, kidney stones, and things like that. I take one a day after my largest meal (usually dinner) and it's been months. With large holiday meals, nights out, takeout at work, and everything else in between- there's been no more sharp resonating painful attacks or spasms.

I'd recommend this to anyone with similar dietary issues, because this has been a godsend. 4

235 people found this helpful



smells and tastes gross but it's the best weight loss vitamin i've ever taken. i can feel it working well because my appetite is quelled immediately after taking, and i have to drink a lot of water and pee a lot after taking. it works i've been losing weight because it's helped me eat less. 4

266 people found this helpful

Helpf l Report abuse 4



W.N.

#### **★★★☆☆** Ekkkk

Reviewed in the United States on April 27, 2020

Size: 200 Count | Verified Purchase

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84 people found this helpful

Helpf l Report abuse



Voice of Reason

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60 people found this helpful

Helpf l Report abuse



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Helpful

Report abuse 4



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56 people found this helpful

Helpful

Report abuse 4

See all reviews &

#### Deals on related products 4



Sponsored A

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Nutrivein Resveratrol 1450mg - Antioxidant Supplement 120 4 Capsules – Supports... ★★★☆ 2,706 4

\$15.29 4

List: \$17.99 (15% off)



Sponsored A

Qunol Ultra CoQ10 100mg, 3x Better 4 Absorption, Patented 4 Water and Fat Soluble... \$\dagger\$\dagger\$\dagger\$\dagger\$45,967 4

Limited time deal

\$23.99

List: <del>\$59.99</del> (60% off)



Sponsored 🚹

Probiotics 60 Billion CFU
- Ptobiotics for Women,
Probiotics for Men and 4
Adults, Na... 4

**★★★★** 100,755

Limited time deal

\$16.95 4

List: <del>\$21.99</del> (23% off)



Sponsored 🕦

NutriFlair Premium4
Berberine HCL 1200mg,
120 Capsules - Plus Pure 4
True Ceylon Cinna...

★★★★★ 3,287 4

Limited time deal

\$17.84 4

List: \$20.99 (14% off)



Page 1 of 2 4

Sponsored 🕦

MASON NAT Mcg Tablets, Supplemen⁴, and Strength ★★★☆

Limited tim

\$10.79

List: <del>\$13.82</del> (2:4



Natural Healthcare Supplements 4



Premium Apple Cider Vinegar Capsules Max 1740mg wit...4

★★★★ 9,680 \$15.21 \$16.90 ∨ prime

Shop now

Sponsored 📵

Disclaimer: While we work to ensure that product information is correct, on occasion manufacturers may alter their ingredient lists. Actual product packaging and materials may contain more and/or different information than that shown on our Web site. We recommend that you do not solely rely on the information presented and that you always read labels, warnings, and directions before using or consuming a product. For additional information about a product, please contact the manufacturer. Content on this site is for reference purposes and is not intended to substitute for advice given by a physician, pharmacist, or other licensed health-care professional. You should not use this information as self-diagnosis or for treating a health problem or disease. Contact your health-care provider immediately if you suspect that you have a medical problem. Information and statements regarding dietary supplements have not been evaluated by the Food and Drug Administration and are not intended to diagnose, treat, cure, or prevent any disease or health condition. Amazon.com assumes no liability for inaccuracies or misstatements about products.

# Recommended based on your shopping trends 4

Page 1 of 3

# UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Lina M. Khan, Chair

Rebecca Kelly Slaughter Christine S. Wilson Alvaro M. Bedoya

In the Matter of

THE BOUNTIFUL COMPANY, a corporation.

**DECISION AND ORDER** 

**DOCKET NO. C-4791** 

#### **DECISION**

The Federal Trade Commission ("Commission") initiated an investigation of certain acts and practices of the Respondent named in the caption. The Commission's Bureau of Consumer Protection ("BCP") prepared and furnished to Respondent a draft Complaint. BCP proposed to present the draft Complaint to the Commission for its consideration. If issued by the Commission, the draft Complaint would charge the Respondent with violations of the Federal Trade Commission Act.

Respondent and BCP thereafter executed an Agreement Containing Consent Order ("Consent Agreement"). The Consent Agreement includes: 1) statements by Respondent that it neither admit nor deny any of the allegations in the Complaint, except as specifically stated in this Decision and Order, and that only for purposes of this action, it admits the facts necessary to establish jurisdiction; and 2) waivers and other provisions as required by the Commission's Rules.

The Commission considered the matter and determined that it had reason to believe that Respondent has violated the Federal Trade Commission Act, and that a Complaint should issue stating its charges in that respect. The Commission accepted the executed Consent Agreement and placed it on the public record for a period of 30 days for the receipt and consideration of public comments. The Commission duly considered any comments received from interested persons pursuant to Section 2.34 of its Rules, 16 C.F.R. § 2.34. Now, in further conformity with the procedure prescribed in Rule 2.34, the Commission issues its Complaint, makes the following Findings, and issues the following Order:

#### **Findings**

1. The Respondent is The Bountiful Company, a New York corporation with its principal office or place of business at 90 Orville Drive, Bohemia, New York 11716.

2. The Commission has jurisdiction over the subject matter of this proceeding and over the Respondent, and the proceeding is in the public interest.

#### **ORDER**

#### **Definitions**

For purposes of this Order, the following definition applies:

"Respondent" means The Bountiful Company, a New York corporation, and its successors and assigns.

#### **Provisions**

#### I. Prohibited Misrepresentations

IT IS ORDERED that Respondent, and Respondent's officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, in connection with the advertising, promotion, offering for sale, or sale of any of Respondent's products or services must not make any misrepresentation, expressly or by implication, about or through ratings, reviews, badges, or endorsements of the product or service, including any misrepresentation:

- A. that a reviewer or other person reviewed, endorsed, or used the product or service;
- B. about the number of ratings or reviews the product or service has received;
- C. about the average star rating of the product or service;
- D. about the product or service being a best seller; or
- E. about the product or service having earned an Amazon's Choice badge or designation.

### **II. Prohibited Practices**

IT IS FURTHER ORDERED that Respondent, and Respondent's officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, in connection with the advertising, promotion, offering for sale, or sale of any of Respondent's products or services must not:

A. create or request the creation of variation or other relationships between different products sold on Amazon.com or any other online shopping platform or website; or

B. otherwise procure, suppress, boost, organize, selectively publish, up-vote, down-vote, or edit consumer reviews or ratings of products or services,

in any manner that distorts or otherwise misrepresents what consumers think of such products or services.

## III. Monetary Relief

#### **IT IS FURTHER ORDERED** that:

- A. Respondent must pay to the Commission \$600,000 as monetary relief.
- B. Such payment must be made within 8 days of the effective date of this Order by electronic fund transfer in accordance with instructions provided by a representative of the Commission.

## IV. Additional Monetary Provisions

#### IT IS FURTHER ORDERED that:

- A. Respondent relinquishes dominion and all legal and equitable right, title, and interest in all assets transferred pursuant to this Order and may not seek the return of any assets.
- B. The facts alleged in the Complaint will be taken as true, without further proof, in any subsequent civil litigation by or on behalf of the Commission to enforce its rights to any payment pursuant to this Order, such as a nondischargeability complaint in any bankruptcy case.
- C. The facts alleged in the Complaint establish all elements necessary to sustain an action by or on behalf of the Commission pursuant to Section 523(a)(2)(A) of the Bankruptcy Code, 11 U.S.C. § 523(a)(2)(A), and this Order will have collateral estoppel effect for such purposes.
- D. All money paid to the Commission pursuant to this Order may be deposited into a fund administered by the Commission or its designee to be used for relief, including consumer redress and any attendant expenses for the administration of any redress fund. If a representative of the Commission decides that direct redress to consumers is wholly or partially impracticable or money remains after redress is completed, the Commission may apply any remaining money for such other relief (including consumer information remedies) as it determines to be reasonably related to Respondent's practices alleged in the Complaint. Any money not used is to be deposited to the U.S. Treasury. Respondent has no right to challenge any activities pursuant to this Provision.
- E. In the event of default on any obligation to make payment under this Order, interest, computed as if pursuant to 28 U.S.C. § 1961(a), shall accrue from the date of default to the date of payment. In the event such default continues for 10 days beyond the date that

payment is due, the entire amount will immediately become due and payable.

- F. Each day of nonpayment is a violation through continuing failure to obey or neglect to obey a final order of the Commission and thus will be deemed a separate offense and violation for which a civil penalty shall accrue.
- G. Respondent acknowledges that its Taxpayer Identification Number (Employer Identification Number), which Respondent has previously submitted to the Commission, may be used for collecting and reporting on any delinquent amount arising out of this Order, in accordance with 31 U.S.C. § 7701.

# V. Acknowledgments of the Order

**IT IS FURTHER ORDERED** that Respondent obtain acknowledgments of receipt of this Order:

- A. Respondent, within 10 days after the effective date of this Order, must submit to the Commission an acknowledgment of receipt of this Order sworn under penalty of perjury.
- B. For 10 years after the issuance date of this Order, Respondent must deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers and members; (2) all employees having managerial responsibilities for conduct related to the subject matter of the Order and all agents and representatives having managerial responsibilities for conduct related to the subject matter of the Order; and (3) any business entity resulting from any change in structure as set forth in the Provision titled Compliance Reports and Notices. Delivery must occur within 10 days after the effective date of this Order for current personnel. For all others, delivery must occur before they assume their responsibilities.
- C. From each individual or entity to which Respondent delivered a copy of this Order, Respondent must obtain, within 30 days, a signed and dated acknowledgment of receipt of this Order.

# VI. Compliance Reports and Notices

**IT IS FURTHER ORDERED** that Respondent make timely submissions to the Commission:

- A. One year after the issuance date of this Order, Respondent must submit a compliance report, sworn under penalty of perjury, in which Respondent must:
  - 1. Identify the primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Commission may use to communicate with Respondent;
  - 2. Identify all of Respondent's businesses that could violate the Order by all of their

names, telephone numbers, and physical, postal, email, and Internet addresses;

- 3. Describe the activities of each business that could violate the Order, including the goods and services offered, the means of advertising, marketing, and sales;
- 4. Describe in detail whether and how the Respondent is in compliance with each Provision of this Order, including a discussion of all of the changes the Respondent made to comply with the Order; and
- 5. Provide a copy of each Acknowledgment of the Order obtained pursuant to this Order, unless previously submitted to the Commission.
- B. For 10 years after the issuance date of this Order, Respondent must submit a compliance notice, sworn under penalty of perjury, within 14 days of any change in the following:
  - 1. Any designated point of contact; or
  - 2. The structure of Respondent or any entity that Respondent has any ownership interest in or controls directly or indirectly that may affect compliance obligations arising under this Order, including: creation, merger, sale, or dissolution of the entity or any subsidiary, parent, or affiliate that engages in any acts or practices subject to this Order.
- C. Respondent must submit notice of the filing of any bankruptcy petition, insolvency proceeding, or similar proceeding by or against Respondent within 14 days of its filing.
- D. Any submission to the Commission required by this Order to be sworn under penalty of perjury must be true and accurate and comply with 28 U.S.C. § 1746, such as by concluding: "I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on: \_\_\_\_\_" and supplying the date, signatory's full name, title (if applicable), and signature.
- E. Unless otherwise directed by a Commission representative in writing, all submissions to the Commission pursuant to this Order must be emailed to DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to: Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The subject line must begin: In re *The Bountiful Company*.

#### VII. Recordkeeping

IT IS FURTHER ORDERED that Respondent must create certain records for 10 years after the issuance date of the Order, and retain each such record for 5 years, unless otherwise specified below. Specifically, Respondent must create and retain the following records:

A. Accounting records showing the revenues from all goods or services sold;

- B. Personnel records showing, for each person providing services in relation to any aspect of the Order, whether as an employee or otherwise, that person's: name; addresses; telephone numbers; job title or position; dates of service; and (if applicable) the reason for termination;
- C. Copies or records of all consumer or other complaints relating to the ratings, reviews, badges, or endorsements of any product or service, whether received directly or indirectly, such as through a third party, and any response;
- D. All records relating to the creation or termination of any variation relationship between Respondent's different products sold on Amazon.com, to the extent that the creation or termination of such variation relationship was initiated or requested by Respondent;
- E. For each of Respondent's products sold on Amazon.com in any variation relationship initiated or requested by Respondent, copies of its Amazon.com product page taken: (1) within 7 days before Respondent initiates or requests the creation or termination of the relationship, and (2) after the relationship has been created or terminated, but no later than 30 days after Respondent initiates or requests the creation or termination of the relationship;
- F. All records relating to Respondent's suppressing, boosting, organizing, selectively publishing, up-voting, or down-voting any product reviews; and
- G. All records necessary to demonstrate full compliance with each provision of this Order, including all submissions to the Commission.

#### VIII. Compliance Monitoring

**IT IS FURTHER ORDERED** that, for the purpose of monitoring Respondent's compliance with this Order:

- A. Within 14 days of receipt of a written request from a representative of the Commission, Respondent must: submit additional compliance reports or other requested information, which must be sworn under penalty of perjury, and produce records for inspection and copying.
- B. For matters concerning this Order, representatives of the Commission are authorized to communicate directly with Respondent. Respondent must permit representatives of the Commission to interview anyone affiliated with Respondent who has agreed to such an interview. The interviewee may have counsel present.
- C. The Commission may use all other lawful means, including posing through its representatives as consumers, suppliers, or other individuals or entities, to Respondent or any individual or entity affiliated with Respondent, without the necessity of identification

or prior notice. Nothing in this Order limits the Commission's lawful use of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1.

#### **IX. Order Effective Dates**

IT IS FURTHER ORDERED that this Order is final and effective upon the date of its publication on the Commission's website (ftc.gov) as a final order. This Order will terminate 20 years from the date of its issuance (which date may be stated at the end of this Order, near the Commission's seal), or 20 years from the most recent date that the United States or the Commission files a complaint (with or without an accompanying settlement) in federal court alleging any violation of this Order, whichever comes later; *provided, however*, that the filing of such a complaint will not affect the duration of:

- A. Any Provision in this Order that terminates in less than 20 years;
- B. This Order if such complaint is filed after the Order has terminated pursuant to this Provision.

Provided, further, that if such complaint is dismissed or a federal court rules that Respondent did not violate any provision of the Order, and the dismissal or ruling is either not appealed or upheld on appeal, then the Order will terminate according to this Provision as though the complaint had never been filed, except that the Order will not terminate between the date such complaint is filed and the later of the deadline for appealing such dismissal or ruling and the date such dismissal or ruling is upheld on appeal.

By the Commission.

April J. Tabor Secretary

SEAL:

ISSUED: March 28, 2023