

EXHIBIT A

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Attorneys for Plaintiff and the Proposed Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

SHALON MOON, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

LUME DEODORANT, LLC and DOES 1
through 10, inclusive,

Defendants.

Case No. **26STCV10405**

CLASS ACTION COMPLAINT

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

1 Plaintiff SHALON MOON (“Plaintiff”), individually and on behalf of all other similarly
2 situated purchasers (the “Class” and “Class Members”), brings this class action lawsuit against
3 LUME DEODORANT, LLC (“Defendant”), and alleges as follows:

4 **I. NATURE OF THE ACTION**

5 1. Plaintiff brings this consumer protection action against Defendant for its false,
6 misleading, and deceptive marketing and sale of intimate care products, which are branded, labeled,
7 and advertised for use on women’s genital area.

8 2. The challenged marketing conveys the net impression that Defendant’s Products are
9 specialized solutions for maintaining cleanliness, freshness, and odor control in women’s “private”
10 “intimate” genital area. In doing so, Defendant markets its Products as addressing a special hygiene
11 issue that does not exist, promotes the Products’ use in a manner contrary to medical consensus, and
12 omits that such use may pose health risks.

13 3. In reality, women’s genital area maintains health through natural processes and
14 routine hygiene is generally sufficient to maintain cleanliness of the genital area. Medical consensus
15 recognizes that no specialized cleansing products are needed for such purposes and advises against
16 their use.

17 4. By making and reinforcing the challenged marketing while omitting material facts,
18 Defendant has induced consumers, including Plaintiff, to purchase the Products and to pay a price
19 premium for products they reasonably believed were beneficial and appropriate for use on the
20 genital area. Plaintiff and other consumers would not have purchased the Products, or would have
21 paid less for them, had they known the omitted material facts, including that such products are not
22 necessary or recommended for maintaining intimate hygiene and may not be appropriate for all
23 uses. As a result, Defendant’s conduct has caused economic injury to Plaintiff and the proposed
24 Class and has conferred upon Defendant an unfair competitive advantage.

25 5. Accordingly, Plaintiff brings this action on behalf of herself and all others similarly
26 situated to seek relief under California’s Consumers Legal Remedies Act, Cal. Civ. Code § 1750,
27 et seq.; Unfair Competition Law, Cal. Bus. & Prof. Code § 17200, et seq.; and False Advertising
28 Law, Cal. Bus. & Prof. Code § 17500, et seq.

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II. THE PRODUCTS AT ISSUE

6. The products at issue are the following products as identified by product name on the front label of each product:

- (1) Lume Whole Body Deodorant Smooth Solid Stick: (Scents - Vanilla Bliss, Minted Cucumber, Soft Powder, Toasted Coconut, Clean Tangerine, Peony Rose, Lavender Sage, Fresh Alpine, Unscented)
- (2) Lume Whole Body Deodorant Invisible Spray: (Scents - Vanilla Bliss, Soft Powder, Clean Tangerine, Lavender Sage, Unscented)
- (3) Lume Whole Body Deodorant Invisible Cream Tube: (Scents - Vanilla Bliss, Minted Cucumber, Soft Powder, Toasted Coconut, Clean Tangerine, Peony Rose, Lavender Sage, Unscented, Fresh Alpine)
- (4) Lume Whole Body Deodorant Invisible Cream Stick: (Scents - Vanilla Bliss, Minted Cucumber, Soft Powder, Toasted Coconut, Clean Tangerine, Peony Rose, Lavender Sage, Fresh Alpine, Unscented)
- (5) Lume Acidified Body Wash: (Scents - Toasted Coconut, Clean Tangerine, Peony Rose, Lavender Sage, Unscented)
- (6) Lume Acidified Body Cream: (Scents - Clean Tangerine, Lavender Sage, Unscented)
- (7) Lume Acidified Deodorant Wipes: (Scents - Soft Powder, Cool Cucumber)

(hereinafter referred to collectively as the “Products”).

7. The Products are offered for sale through various channels, including directly on Lume’s website, and through third party retail outlets and internet websites.

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III. THE CHALLENGED MARKETING AND ADVERTISING

A. Defendant’s Representations

8. During the Class Period—defined herein as the four (4) years preceding the filing of this Complaint—Defendant, through an extensive, uniform, and nationwide marketing campaign, marketed the Products using the following specific statements and representations:

(1) Product Positioning

- (1) “Welcome to Lume. We created a smarter deodorant that stops odor before it starts and keeps you fresh all day—from your underarms to your most intimate areas and everywhere in between.”
- (2) “For Pits, Privates & Beyond”
- (3) “upgrade your hygiene routine”
- (4) “DOCTOR DEVELOPED”
- (5) “OB/GYN developed”
- (6) “After seeing countless women misdiagnosed for odor concerns, doctor Shannon Klingman set out to find a better solution. When big brands said “no one needs this”, she built Lume from the ground up to prove them wrong.”
- (7) “Dr. Shannon Klingman saw how body odor - whatever the source - was undermining people's confidence. For nearly ten years she worked to find a solution for ALL body odor.”
- (8) “Lume Deodorant for pits privates and beyond truly is the first Whole Body deodorant and it's safe to use ANYWHERE you have odor but wish you didn't. Whether it's your pits, skin, folds, belly button, feet, or privates. Lume can safely be used wherever you want to opt out of body odor.”
- (9) “Removes odor better than soap”
- (10) “traditional soap makes odor bloom”
- (11) “We made a better deodorant for underarms, privates & beyond”
- (12) “Odor Control”
- (13) “Outrageously Effective Odor Control”

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- (14) “Stop Odor Before It Starts”
- (15) “Blocks odor before it starts.”
- (16) “...remove body odors and control odor for 24 hours.”
- (17) “Clinically proven to control odor for 24 hours”
- (18) “Clinically proven 72 hour odor control”
- (19) “Ideal to refresh before or after intimacy”

(2) Safety / Intimate Area-Friendly Claims/Application Instructions

- (1) “Whole Body Application”
- (2) “Gentle enough for everywhere.”
- (3) “Privates”
- (4) Our deodorants are rigorously tested for Whole Body use—tough enough for underarms, yet gentle enough for intimate areas.”
- (5) “Apply Anywhere You Want To Control Odor – Think pits, underboobs, belly buttons, tummy folds, butt cracks, thigh creases, **vulvas...**”
- (6) “Rub into dry skin anywhere you have odor”
- (7) “... use fingertips to swipe the dispensed cream to apply to privates”
- (8) “Ideal to refresh before or after intimacy”

(3) Defendant reinforces the necessity and health-related nature of the Products by marketing the Products as “OB/GYN Developed” “Doctor Developed” “Doctor developed for pits, privates & beyond” “gynecologist developed for pits, privates & beyond” “Clinically Proven”, thereby implying medical or hygienic credibility and endorsement and elevating the Products beyond ordinary cosmetic cleansing. (hereafter collectively referred to as “the Challenged Representations”).

9. The Challenged Representations are uniform, standardized, and directed to all consumers in California.

10. The Challenged Representations are set forth in Exhibit 1 attached hereto.

11. Through the Challenged Representations and their repeated use across Defendant’s website, product pages, and product labels, Defendant conveys the net impression that its Products

1 are scientifically advanced, doctor-developed solutions for maintaining cleanliness, freshness, and
2 odor control in women’s genital area more effectively than ordinary hygiene methods such as soap.

3 **B. Medical Consensus Recognizes that Feminine Hygiene Products Are Not Beneficial**
4 **and Potentially Harmful.**

5 12. Contrary to the Challenged Representations, medical authorities advise against
6 purchasing and using feminine washes and sprays and products that claim to reduce odor and clean
7 the genital area. As one authority states, “[t]hese products were essentially created to prey on
8 people’s insecurities regarding their bodily odors. In truth, these products are both unnecessary and
9 harmful.” <https://www.healthline.com/health/how-to-clean-your-vagina>.

10 13. The “genital area”, also referred to as the “vulvovaginal area”, refers collectively to
11 both the external and internal female genital structures—specifically:

- 12 (1) Vulva (external): the outer genital structures, including the labia (majora and
- 13 minora), clitoris, and the openings of the urethra and vagina
- 14 (2) Vagina (internal): the muscular canal that extends from the vaginal opening inward.
- 15 *Id.*

16 14. Clinical experts recognize that cultural and marketing pressures have led consumers
17 to believe that the vulva and vagina are dirty areas that must be scrupulously cleaned and kept dry
18 and fragrant, when in fact “nature knows best” how to protect the vagina and vulva and keep them
19 clean and healthy. *Elizabeth G. Stewart & Ione Bissonnette, General Vulvar Care, Vulvovaginal*
20 *Disorders: A Pathway to Diagnosis and Treatment* (Harvard Vanguard Med. Assocs.),
21 <https://vulvovaginaldisorders.org/handouts/GeneralVulvarCare.pdf>

22 15. Medical authorities consistently recognize that the vagina is a self-cleaning organ that
23 does not require cleansing with soaps, washes, or similar products. *Id.* The vagina maintains its
24 own health through a natural balance of bacteria and other microorganisms. *Id.* A complex colony
25 of good bacteria and other microbes helps keep the vagina healthy. *Id.*

26 16. The vulva also does not require specialized cleansing products. *Id.* Medical guidance
27 provides that the vulva may be cleaned with warm water and does not require soaps, including those
28 marketed specifically for feminine hygiene. *Id.*

1 17. The vagina and vulva naturally produce fluids that are important for overall health.
2 *Id.* A healthy vagina has a natural odor and attempts to eliminate this odor through washing are
3 unnecessary and may be harmful. *Id.*

4 18. Research consistently shows that external cleansing products are associated with
5 increased health risks. The Office on Women’s Health identifies risks including vaginal irritation
6 and dryness, bacterial vaginosis, pelvic inflammatory disease, sexually transmitted infections
7 (including HIV), and adverse pregnancy outcomes such as infertility, ectopic pregnancy, preterm
8 birth, recurrent vulvovaginal candidiasis, and infertility. *Id.*; *Elizabeth G. Stewart & Ione*
9 *Bissonnette, General Vulvar Care, Vulvovaginal Disorders: A Pathway to Diagnosis and*
10 *Treatment* (Harvard Vanguard Med. Assocs.),
11 <https://vulvovaginaldisorders.org/handouts/GeneralVulvarCare.pdf>.

12 19. Because of the anatomical proximity of the vulva to the vagina, products applied
13 externally may enter the vaginal canal and cause irritation, disruption of the vaginal environment
14 and or implicate increased health risks. [https://www.medicalnewstoday.com/articles/how-to-clean-](https://www.medicalnewstoday.com/articles/how-to-clean-your-vagina)
15 [your-vagina](https://www.medicalnewstoday.com/articles/how-to-clean-your-vagina).

16 20. Consistent with the foregoing, healthcare experts advise against the use of soaps,
17 bubble baths, shower gels, body scrubs, deodorants, wet wipes, baby wipes, douches, feminine
18 wipes and similar cleansing products in the vagina and vulva areas. *Id.*

19 21. If a person is experiencing an unpleasant vaginal odor, they should see a doctor. *Id.*
20 These are among the first signs of an infection, which will require treatment.
21 <https://www.medicalnewstoday.com/articles/how-to-clean-your-vagina>.

22 **C. Omission of Material Qualifying Information**

23 22. Plaintiff and other consumers were not provided with information regarding the risks
24 of using the Products on the vaginal or vulva areas of the human body and therefore lacked
25 information material to their purchasing and use decisions.

26 23. A significant portion of reasonable consumers do not understand the anatomical
27 distinction between the “vulva” and the “vagina” and do not understand that the term “vulva” refers
28 exclusively to external female genitalia. Given that many consumers do not understand the

1 anatomical meaning of “vulva,” labeling a product for use on the “vulva” without clear additional
2 guidance is likely to mislead reasonable consumers into believing the product is appropriate for
3 internal vaginal use.

4 24. Defendant fails to disclose that:

- 5 (1) the Products are not intended for use in internal vaginal area and may not be
6 appropriate for all intimate uses;
- 7 (2) routine hygiene is generally sufficient to maintain cleanliness of external intimate
8 areas, without the need for deodorizing products;
- 9 (3) the vagina is self-cleaning and does not require deodorizing or cleansing products;
- 10 (4) the use of deodorants or similar products on intimate areas may disrupt the natural
11 microbiome or normal physiological processes and may not be appropriate for all
12 consumers; and
- 13 (5) the use of the Products on the intimate areas may implicate health risks set forth herein
14 in paragraph 18.

15 25. Defendant’s marketing and labeling, including its website pages, packaging, and
16 product instructions as set forth in Exhibit 1, should and could have disclosed these material facts,
17 including clear and prominent limitations or warnings regarding use on intimate areas but failed to
18 do so. To the extent Defendant relies on a disclaimer such as “for external use only,” that disclaimer
19 is vague and insufficient. The term “external use” is ambiguous for consumers in the context of
20 female anatomy, particularly where Defendant simultaneously instructs consumers to apply the
21 Products to intimate areas, including but not limited to the vulva. The disclaimer fails to define the
22 relevant anatomical boundaries or to disclose that such use is unnecessary or may disrupt natural
23 physiological processes and therefore does not cure the misleading net impression created by
24 Defendant’s marketing. At a minimum, Defendant should have included prominent disclosures such
25 as:

- 26 (1) “For external use only. Not intended for internal vaginal use.”
- 27 (2) “For external use only. Not intended for internal vaginal use. Avoid contact with the
28 vaginal opening. Discontinue use if irritation occurs.”

1 (3) “For external use only. Not for vaginal (internal) use. Products applied to the vulva
2 may enter the vaginal canal due to anatomical proximity. Internal exposure may
3 disrupt the natural vaginal balance and may result in irritation, infection (including
4 bacterial vaginosis and pelvic inflammatory disease), increased susceptibility to
5 sexually transmitted infections, and potential reproductive complications.”

6 (4) “Normal vaginal odor is normal and does not require deodorizing products.”

7 (5) “Consult a medical provider for unusual odor or symptoms.”

8 26. Defendant’s omission and non-disclosure of these material facts (hereafter
9 “Omissions”) is unlawful for multiple reasons:

10 (1) **Contrary to Representations Made**

11 Defendant’s Omission are contrary to, and renders misleading, its affirmative
12 Challenged Representations that the Products are suitable and more beneficial for
13 use across the “whole body”, on “privates,” “intimate areas,” and on the “vulva”.
14 These representations create the impression that such use is safe, necessary, and
15 beneficial for the entire vulvovaginal area, which is misleading in the absence of
16 disclosure of the above material facts.

17 (2) **Omission of Facts Defendant Was Obligated to Disclose**

18 (1) **Exclusive Knowledge**

19 Defendant possessed exclusive knowledge of material facts not known or
20 reasonably accessible to Plaintiff and consumers, including the intended use
21 parameters of the Products, the limitations of their safety for intimate use,
22 and the lack of necessity of such products for maintaining intimate hygiene.
23 Plaintiff and reasonable consumers lack specialized medical or scientific
24 knowledge regarding intimate anatomy and microbiome health and cannot
25 independently ascertain these facts. Consumers therefore reasonably rely on
26 Defendant to provide accurate, complete, and non-misleading information
27 regarding the Products’ safety and appropriate uses.
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1 (2) **Partial Representations That Are Misleading**

2 Defendant made partial representations—such as promoting “whole body”
3 and “intimate area” use, emphasizing safety, and describing the Products as
4 “gentle” and “clinically proven”—that are misleading because they omit
5 material facts regarding the limitations, risks, and lack of necessity of such
6 use.

7 (3) **Material Safety and Health Implications**

8 The omitted information concerns health, safety, and bodily function—matters
9 that a reasonable consumer would consider important in deciding whether to
10 purchase and use a product marketed for intimate areas of the body.

11 **D. Reasonable Consumer Interpretation**

12 27. Through the Challenged Representations—prominently disseminated across
13 Defendant’s website, product pages, labeling, and marketing materials—and the omission of
14 material information, Defendant conveys the net impression that its Products are necessary,
15 appropriate, and beneficial for maintaining cleanliness, freshness, and odor control in women’s
16 intimate areas. This unified message suggests that ordinary hygiene is inadequate and that
17 consumers should use Defendant’s specialized Products to achieve proper cleanliness and long-
18 lasting odor control.

19 28. In reality, and contrary to the Net Impression conveyed, medical consensus recognizes
20 that routine hygiene is generally sufficient to maintain cleanliness of the female genital area.
21 Defendant also fails to disclose that the Products are not necessary for such purposes and may not
22 be appropriate for all intimate uses, including that they are not intended for internal vaginal use.

23 29. Defendant further omits that the use of deodorizing or cleansing products on intimate
24 areas may disrupt the natural vaginal microbiome and normal physiological processes, creating
25 potential risks rather than providing the promised benefits.

26 30. Reasonable consumers, including members of the general consuming public and
27 targeted consumers, lack specialized knowledge of female anatomy and are not expected to
28 understand these medical principles. Accordingly, they reasonably rely on Defendant to provide

1 complete and non-misleading information regarding the Products’ necessity, safety, and appropriate
2 use.

3 31. As a result of the Challenged Representations and Omissions, a significant portion of
4 reasonable consumers would be misled into believing that Defendant’s Products are necessary to
5 achieve proper hygiene and odor control in intimate areas. The Challenged Representations and
6 Omissions are therefore false, misleading, and deceptive, and thus unlawful.

7 **E. Materiality**

8 32. The Challenged Representations and Omissions are material.

9 33. The Challenged Representations and Omissions are material to reasonable consumers
10 because claims regarding health, hygiene, safety, and appropriate use are important to a significant
11 portion of purchasers of products marketed for use on intimate areas.

12 34. A significant portion of reasonable consumers actively seek out, and are willing to
13 pay a premium for, products marketed as safe, effective, and specifically designed for intimate
14 hygiene. As a result, Defendant’s representations—and its failure to disclose material limitations,
15 risks, and the lack of necessity for such use—are material factors in consumers’ purchasing
16 decisions.

17 35. In particular, reasonable consumers would consider it important that: (a) the Products
18 are not intended for internal vaginal use; (b) may not be appropriate for all genital uses; (c) routine
19 hygiene is generally sufficient to maintain cleanliness of women’s “intimate” genital area without
20 deodorizing products; and (d) use of such products may disrupt the natural vaginal microbiome or
21 normal physiological processes or implicate other health risks. Defendant’s failure to disclose these
22 facts is material.

23 36. Through its false, misleading, and deceptive packaging, labeling, and marketing—and
24 by omitting material information—Defendant sought to capitalize on consumers’ concerns
25 regarding hygiene of the female genital area and thereby gained an unfair competitive advantage
26 over other market participants.

1 37. Defendant’s marketing and advertising campaign enabled it to sell the Products to
2 thousands of consumers throughout California. The Products are sold at prices ranging from
3 approximately \$8.00 to \$30.00 per unit.

4 38. In reliance on the Challenged Representations and Omissions, Plaintiff and other
5 California consumers purchased Products they otherwise would not have purchased, or paid more
6 for the Products than they otherwise would have paid. Had they known the omitted material facts,
7 they would not have purchased the Products or would have paid less.

8 39. For the foregoing reasons, Defendant’s Challenged Representations and Omissions
9 are false and misleading, and are likely to deceive reasonable consumers.

10 40. Accordingly, Defendant has engaged in conduct that violates California Business and
11 Professions Code sections 17200 and 17500, as well as the Consumers Legal Remedies Act, Civil
12 Code section 1750, et seq., including section 1770(a)(5) and (a)(7).

13 **IV. SUMMARY OF NOTICE OF VIOLATIONS OF LAW**

14 41. On January 29, 2026, Defendant was served by Plaintiff with written notices pursuant
15 to Civil Code section 1750, et seq., which set forth Plaintiff’s contentions. Plaintiff’s letter was sent
16 via certified mail with electronic return receipt to Defendant who acknowledged receipt. Defendant
17 rejected Plaintiff’s attempts to address the concerns stated herein and instead has allowed the
18 Products to continue to be sold with full knowledge of the alleged claims.

19 42. Wherefore, unless and until enjoined by order of this Court, the false, misleading, and
20 deceptive marketing and advertising of the Products by Defendant (i.e., the Challenged
21 Representations and Omissions) will continue and cause great and irreparable injury to Plaintiff, the
22 Members of the Class, and other California consumers.

23 43. Therefore, Plaintiff brings this action challenging Defendant’s claims relating to the
24 Products on behalf of herself and all others similarly situated under Civil Code section 17500, et
25 seq., Business and Professions Code sections 17200, et seq. and Civil Code section 1770,
26 subdivisions (a)(5) and (a)(7).

27 44. Wherefore, Plaintiff seeks an order in equity compelling Defendant to discontinue the
28 conduct alleged herein.

1 45. Plaintiff further seeks an order in equity compelling restitution of the monetary
2 amounts by which Plaintiff and the Class did not receive the value of the Products they paid for and
3 by which Defendant has been unjustly enriched.

4 46. Plaintiff further seeks actual and punitive damages, pre- and post-judgment interest,
5 attorney's fees, and costs.

6 **V. THE PARTIES**

7 **A. Defendant**

8 47. Defendant Lume Deodorant, LLC is the owner and distributor of the Products and is
9 the company that created and/or authorized the false, misleading, and deceptive advertisements and
10 labeling for the Products alleged herein.

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

20 **B. Plaintiff**

21 49. Plaintiff Shalon Moon, and at all times relevant hereto was, a citizen of the state of
22 California.

23 50. Plaintiff purchased the Lume Cool Cucumber Acidified Deodorant Wipes.

24 51. Plaintiff purchased the Lume Cool Cucumber Acidified Deodorant Wipes multiple
25 times, with the most recent purchase being in December 2024. To the best of Plaintiff's recollection,
26 Plaintiff purchased the Lume Cool Cucumber Acidified Deodorant Wipes product in-store at
27 Walmart and Walgreens retail locations.

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1 substantial benefits and income from and through the State of California, and committed the
2 wrongful acts alleged herein within the State of California.

3 57. By marketing, advertising, selling, and distributing the Products at issue to consumers
4 throughout California, Defendant Lume Deodorant, LLC purposefully availed itself of the privilege
5 of conducting activities within California and invoked the benefits and protections of California
6 law.

7 58. The injuries suffered by Plaintiff and the Class occurred in California, and arise out
8 of Defendant Lume Deodorant, LLC's contacts with California. Accordingly, the exercise of
9 jurisdiction over Defendant Lume Deodorant, LLC is proper and comports with traditional notions
10 of fair play and substantial justice.

11 VII. VENUE

12 59. Venue is proper in this District because Defendant is doing business in Los Angeles
13 County.

14 VIII. CLASS ALLEGATIONS

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

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18 All natural persons who were citizens of the State of California at the time of
19 purchase and who purchased the Products in the State of California while physically
20 located in California or for delivery to a California address, during the four (4) years
preceding the filing of this action through the present (Referred to herein as "the
Class" or "Class Members").

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

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24 61. Numerosity: although the exact number of Class Members is uncertain and can only
25 be ascertained through appropriate discovery, the number is great enough such that joinder is
26 impracticable.

27 62. Adequacy: Plaintiff is an adequate representative of the Class because Plaintiff's
28 interests are the same as the Class in that Plaintiff and the Class Members were subjected to the

1 same representations by Defendant as set forth herein; Plaintiff intends to prosecute this action
2 vigorously and completely on behalf of herself and the Class Members; Plaintiff has retained
3 competent counsel experienced in prosecuting class actions; and Plaintiff's interests do not conflict
4 with the interests of the Members of the Class. Based thereon, the interests of the Class Members
5 will be fairly and adequately protected by Plaintiff and Plaintiff's counsel.

6 63. Commonality and Predominance of Common Issues: Defendant has acted on grounds
7 common and applicable to the entire Class and therefore, numerous questions of law and fact are
8 common to Plaintiff and the Class Members that predominate over any question affecting only
9 individual Class Members thereby making relief appropriate with respect to the Class as a whole.
10 Common and predominate factual and legal issues include but are not limited to:

- 11 a. Common facts include but are not limited to:
- 12 i. Each of the Products are each respectively packaged and labeled the same over
13 the proposed class period. Therefore, Plaintiff and the Class Members were
14 exposed to the same packaging and labeling.
 - 15 ii. The Products manufactured, marketed, advertised, and sold by Defendant
16 during the Class Period, including the Product purchased by Plaintiff, are
17 substantially similar and bear the same Challenged Representations and
18 Omissions alleged herein.
- 19 b. Common issues of law include but are not limited to:
- 20 i. Whether the Challenged Representations and Omissions by Defendant, as
21 alleged herein, were and are material to Plaintiff and the Class Members.
 - 22 ii. Whether the Challenged Representations and Omissions by Defendant, as
23 alleged herein, were and are false, deceptive and/or misleading in violation of
24 Business and Professions Code sections 17200, et seq. and 17500, et seq. and
25 California Civil Code 1750, et. seq.
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1 64. Accordingly, the determination of Defendant’s liability under each of the causes of
2 action presents legal issues that are common to Plaintiff and the class as a whole.

3 65. Typicality: Plaintiff’s claims are co-extensive with those of the Class Members as
4 Plaintiff and the Class Members’ injuries and claims arise from the same course of conduct by
5 Defendant as alleged herein.

6 66. The Class is identifiable and ascertainable. Plaintiff has precisely defined the Class
7 based on objective criteria whereby Class Members would be able to know whether they are a
8 member of the prospective Class, specifically, “[A]ll natural persons who were citizens of the State
9 of California at the time of purchase and who purchased the Products in the State of California,
10 including purchases made while physically located in California or for delivery to a California
11 address, during the four (4) years preceding the filing of this action through the present.”

12 67. Notice can be provided to such purchasers using techniques and a form of notice
13 customarily used in class actions, including direct notice by email to the Class Members from
14 Defendant’s and third-party retailers’ records, internet publication, radio, newspapers, magazines,
15 and other social media platforms such as YouTube, Instagram, TikTok, and Facebook.

16 68. Superiority: A class action is superior to other available methods for the fair and
17 efficient adjudication of this controversy. Plaintiff and Class Members have all suffered and will
18 continue to suffer harm and damages as a result of Defendant’s unlawful and wrongful conduct.
19 The expense and burden of individual litigation would make it impracticable and impossible for
20 proposed Class Members to afford to seek legal redress for the wrongs complained of herein and
21 prosecute their claims individually. Therefore, absent a class or representative action, the Class
22 Members will continue to suffer losses and Defendant will be allowed to continue these violations
23 of law and to retain the proceeds of its wrongdoing. Class treatment of common questions of law
24 and fact would also be a superior method to multiple individual actions or piecemeal litigation in
25 that class treatment will conserve the resources of the courts and the litigants and will promote
26 consistency and efficiency of adjudication. Finally, trial on a representative and class basis would
27 be manageable. Liability may be determined by facts and law common to the Class Representative
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1 and the Class Members and monetary damages or restitution may be determined by proven and
2 approved methods on a class wide basis.

3 **IX. CAUSES OF ACTION**

4 **FIRST CAUSE OF ACTION**

5 **VIOLATION OF BUSINESS & PROFESSIONS CODE SECTION 17500, et seq.**

6 **(False and Misleading Advertising)**

7 69. Plaintiff repeats and realleges the allegations set forth in the preceding paragraphs and
8 incorporates the same as if set forth herein.

9 70. This cause of action is brought pursuant to Business and Professions Code section
10 17500, et seq., on behalf of Plaintiff and the Class.

11 71. As alleged in the preceding paragraphs, the Challenged Representations and
12 Omissions detailed herein constitute unfair, unlawful, and fraudulent business practices within the
13 meaning of Business and Professions Code section 17500, et seq.

14 72. Defendant intended the Challenged Representations and Omissions as detailed herein.

15 73. Defendant publicly disseminated and advertised the Challenged Representations and
16 Omissions set forth herein which Defendant knew, or should have known in the exercise of
17 reasonable care, was untrue or misleading via advertising mediums that include but are not limited
18 to, the Products' labeling and website, as set forth herein.

19 74. The Challenged Representations and Omissions were material to Plaintiff and the
20 Members of the Class and played a substantial part, and were a substantial factor, in influencing
21 Plaintiff's and other California consumers decisions to purchase the Products.

22 75. Plaintiff and the Members of the Class relied on Defendant's false, deceptive, and
23 misleading representations and would not have purchased the Products if not for the false, deceptive,
24 and misleading representations and marketing of the Challenged Representations and Omissions by
25 Defendant set forth herein.

26 76. Plaintiff and the Members of the Class have suffered injury in fact and have lost
27 money or property as a result of Defendant's false, deceptive, and misleading representations and
28 marketing of the Challenged Representations and Omissions set forth herein.

1 77. The Products as purchased by Plaintiff and the Members of the Class were and are
2 unsatisfactory and worth less than the amount paid for them.

3 78. All of Defendant’s conduct alleged herein occurs and continues to occur in
4 Defendant’s business.

5 79. Wherefore, Plaintiff, the Members of the Class, and other California consumers have,
6 among other things, no adequate remedy at law for the injuries that are currently being suffered and
7 that will be suffered in the future in that, unless and until enjoined by order of this Court, the
8 Challenged Representations and Omissions will continue and cause great and irreparable injury to
9 Plaintiff, the Members of the Class, and other California consumers.

10 80. Therefore, pursuant to Business and Professions Code section 17535, Plaintiff seeks
11 an order in equity from this Court enjoining Defendant from engaging in the above-described
12 wrongful acts and practices, including, but not limited to, an order enjoining Defendant from
13 continuing to disseminate and/or including the Challenged Representations and Omissions detailed
14 herein in the marketing, advertising, website pages, packaging, and labeling of the Products.

15 81. In addition, Plaintiff seeks an order awarding Plaintiff and the Members of the Class
16 restitution of the monetary amounts by which Plaintiff and the Members of the Class did not receive
17 the value of the Products they paid for and by which Defendant was unjustly enriched.

18 **SECOND CAUSE OF ACTION**

19 **VIOLATION OF CALIFORNIA BUSINESS & PROFESSIONS CODE § 17200, et seq.**
20 **(Unlawful, Unfair, and Fraudulent Business Acts or Practices and Unfair, Deceptive, Untrue**
21 **or Misleading Advertising)**

22 82. Plaintiff repeats and realleges the allegations set forth above and incorporates the
23 same as if set forth herein at length.

24 83. Plaintiff brings this cause of action pursuant to Business and Professions Code section
25 17200, et seq., on her own behalf and on behalf of all other persons similarly situated.

26 84. The UCL prohibits “any unlawful, unfair... or fraudulent business act or practice.”
27 (Bus. & Prof. Code, § 17200, et seq.) Defendant’s Challenged Representations as set forth herein
28 violates each of these provisions.

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A. “Unfair” Prong

85. Under California’s Unfair Competition Law (Bus. & Prof. Code, § 17200, et seq.), a challenged activity is “unfair” when “any injury it causes outweighs any benefits provided to consumers and the injury is one that the consumers themselves could not reasonably avoid.” (*Camacho v. Auto Club of Southern California* (2006) 142 Cal.App.4th 1394, 1403.)

86. Defendant’s Challenged Representations in the marketing, advertising, packaging, and labeling of the Products are false.

87. Defendant’s Challenged Representations falsely advertising the status of the Products caused injuries Plaintiff and the Members of the Class, who did not receive what they were promised.

88. Defendant’s Challenged Representations stifles competition in the marketplace.

89. Consumers cannot avoid any of the injuries caused by Defendant’s false and misleading advertising of the Products.

90. Defendant’s conduct of marketing, advertising, packaging, and labeling the Products with the Challenged Representations and Omissions detailed herein results in financial harm to consumers. Thus, the utility of Defendant’s conduct is vastly outweighed by the gravity of its harm.

91. Defendant’s marketing, advertising, packaging, and labeling of the Products with the Challenged Representations and Omissions detailed herein is false, deceptive, misleading, and unreasonable, and constitutes unfair conduct.

92. Defendant knew or should have known of its unfair conduct.

93. As alleged in the preceding paragraphs, the Challenged Representations and Omissions by Defendant detailed above constitute an unfair business practice within the meaning of Business and Professions Code section 17200, et seq.

94. There were reasonably available alternatives to further Defendant’s business interests other than the conduct described herein. Defendant could have marketed, advertised, packaged, and labeled the Product without making the Challenged Representations and Omissions detailed herein.

1 95. All of the conduct alleged herein occurs and continues to occur in Defendant’s
2 business. Defendant’s wrongful conduct is part of a pattern or generalized course of conduct
3 repeated on thousands of occasions daily.

4 **B. “Fraudulent” Prong**

5 96. Defendant’s marketing, advertising, packaging, and labeling of the Products with the
6 Challenged Representations and Omissions detailed herein is likely to deceive members of the
7 public.

8 97. Defendant’s advertising and labeling of the Products with the Challenged
9 Representations and Omissions detailed herein are false, deceptive, misleading, and unreasonable,
10 and constitutes fraudulent conduct.

11 98. Defendant knew or should have known of its fraudulent conduct.

12 99. As alleged in the preceding paragraphs, the material Challenged Representations by
13 Defendant detailed above constitute a fraudulent business practice in violation of Business and
14 Professions Code section 17200, et seq.

15 100. There were reasonably available alternatives to further Defendant’s business interests
16 other than the conduct described herein. Defendant could have marketed, advertised, packaged and
17 labeled the Products without making the Challenged Representations and Omissions detailed herein.

18 101. All of the conduct alleged herein occurs and continues to occur in Defendant’s
19 business. Defendant’s wrongful conduct is part of a pattern or generalized course of conduct
20 repeated on thousands of occasions daily.

21 102. Plaintiff and the Class have suffered injury in fact and have lost money as a result of
22 Defendant’s fraudulent conduct. Plaintiff and the Class paid an unwarranted premium for the
23 Products. Plaintiff and the Class purchased the Products under the false belief of the Challenged
24 Representations and Omissions set forth herein. Plaintiff and the Class relied upon Defendant’s
25 Challenged Representations set forth herein. Plaintiff and the Class reasonably relied on these
26 Challenged Representations in deciding to purchase the Products and would not have purchased the
27 Products if the true facts had been known. Plaintiff and the Class would not have purchased the
28

1 Products had they not been misled by the false and misleading advertising containing the Challenged
2 Representations and Omissions detailed herein.

3 **C. “Unlawful” Prong**

4 103. As alleged in the preceding paragraphs, Defendants’ business practices, described
5 herein, violated and continue to violate the “unlawful” prong of Business and Professions Code
6 section 17200, et seq., by violating Civil Code sections 1573, 1709, 1710, 1711, and 1750 et seq.,
7 and Business and Professions Code sections 17500, et. seq.

8 104. Defendant knew that the claims that they made and continue to make about the
9 Products with the Challenged Representations and Omissions are false and misleading.

10 105. Defendant’s false, deceptive, and misleading representations through the Challenged
11 Representations and Omissions played a substantial part, and was a substantial factor, in influencing
12 Plaintiff’s and the Members of the Class’s decisions to purchase the Products.

13 106. Plaintiff and the Class have suffered injury in fact and have lost money or property as
14 a result of the Challenged Representations and Omissions.

15 107. The Products as purchased by the Plaintiff and the Class were and are unsatisfactory
16 and worth less than the amounts paid for.

17 108. All of the conduct alleged herein occurs and continues to occur in Defendant’s
18 business.

19 109. All of the conduct alleged herein occurred and continues to occur in Defendant’s
20 business. Defendant’s wrongful conduct is part of a pattern or generalized course of conduct
21 repeated on thousands of occasions daily.

22 110. Wherefore, Plaintiff and the Members of the Class, and other California consumers
23 have, among other things, no adequate remedy at law for the injuries that are currently being suffered
24 and that will be suffered in the future in that, unless and until enjoined by order of this Court, the
25 Challenged Representations and Omissions by Defendant will continue and cause great and
26 irreparable injury to Plaintiff, the Members of the Class, and other California consumers.

27 111. Therefore, pursuant to Business and Professions Code section 17203, Plaintiff seeks
28 an order in equity from this Court enjoining Defendant from engaging in the above-described

1 wrongful acts and practices, including, but not limited to, an order enjoining Defendant from
2 continuing to disseminate and/or including the Challenged Representations and Omissions detailed
3 herein in the marketing, advertising, website pages, packaging, and labeling of the Products.

4 112. In addition, Plaintiff seeks an order awarding Plaintiff and the Members of the Class
5 restitution of the monetary amounts by which Plaintiff and the Members of the Class did not receive
6 the value of the Products they paid for, and by which Defendant was unjustly enriched.

7 **THIRD CAUSE OF ACTION**

8 **VIOLATION OF CALIFORNIA CIVIL CODE § 1750, et seq.**

9 **(Consumer Legal Remedies Act)**

10 113. Plaintiff repeats and realleges the allegations set forth in the preceding paragraphs and
11 incorporates the same as if set forth herein.

12 114. This cause of action is brought pursuant to Civil Code section 1750, et seq., the
13 Consumers Legal Remedies Act, on behalf of Plaintiff and a Class pursuant to Civil Code section
14 1781 consisting of the Class defined above.

15 115. The Class consists of thousands of persons, the joinder of whom is impracticable.

16 116. There are questions of law and fact common to the Class, which questions are
17 substantially similar and predominate over questions affecting the individual members, including
18 but not limited to:

- 19 a. Common facts include but are not limited to:
 - 20 i. Each of the Products are each respectively packaged and labeled the same over
21 the proposed class period. Therefore, Plaintiff and the Class Members were
22 exposed to the same packaging and labeling.
 - 23 ii. The Products manufactured, marketed, advertised, and sold by Defendant
24 during the Class Period, including the Product purchased by Plaintiff, are
25 substantially similar and bear the same Challenged Representations and
26 Omissions alleged herein.

27 \\\

28 \\\

1 b. Common issues of law include but are not limited to:

2 i. Whether the Challenged Representations and Omissions by Defendant, as
3 alleged herein, were and are material to Plaintiff and the Class Members.

4 ii. Whether the Challenged Representations and Omissions by Defendant, as
5 alleged herein, were and are false, deceptive and/or misleading in violation of
6 Business and Professions Code sections 17200, et seq. and 17500, et seq. and
7 California Civil Code 1750, et. seq.

8 117. Accordingly, the determination of Defendant's liability under each of the causes of
9 action presents legal issues that are common to Plaintiff and the class as a whole.

10 118. As set forth in detail herein, Defendant publicly disseminated the Challenged
11 Representations and Omissions.

12 119. The policies, acts, and practices described herein were intended to result in the sale of
13 the Products to the consuming public and violated and continue to violate Civil Code section 1770,
14 subdivision (a)(5) of the Act by making representations that the Products have characteristics and
15 benefits which they do not have as represented, and violate Civil Code section 1770, subdivision
16 (a)(7) by representing that the Products are of a particular standard, quality, grade and style when
17 they are of another.

18 120. In doing so, Defendant intentionally misrepresented material facts.

19 121. Defendant's Challenged Representations about the Products led Plaintiff and the
20 Members of the Class to believe that the Products have characteristics, ingredients, and benefits
21 which they do not have and are of a particular standard, quality, grade, and style when they are of
22 another.

23 122. Defendant knew that the Challenged Representations and Omissions concerning the
24 Products' purported attributes and qualities were false and/or misleading and material to the Plaintiff
25 and the Class Members' purchase decisions.

26 123. Defendant's actions as described hereinabove were done with a conscious disregard
27 of Plaintiff's, the Class Members' and other California consumers' rights.

28

1 124. Defendant’s Challenged Representations were material to Plaintiff and the Class
2 Members and played a substantial part, and were a substantial factor, in influencing Plaintiff’s and
3 the Class Members’ decisions to purchase the Products.

4 125. Plaintiff and the Class Members relied on Defendant’s Challenged Representations
5 and would not have purchased the Products if not for the Challenged Representations and Omissions
6 by Defendant set forth herein.

7 126. Plaintiff and the Class Members have suffered injury in fact and have lost money or
8 property as a result of Defendant’s false, deceptive, and misleading Challenged Representations set
9 forth herein.

10 127. The Products as purchased by Plaintiff and the Class Members were and are
11 unsatisfactory and worth less than the amount paid for them.

12 128. On January 29, 2026, Defendant was served by Plaintiff with written pre lawsuit
13 notice pursuant to Civil Code section 1750, et seq., which set forth Plaintiff’s contentions.
14 Plaintiff’s letter was sent via certified mail with electronic return receipt to Defendant who
15 acknowledged receipt. Defendant rejected Plaintiff’s attempts to address the concerns stated herein
16 and instead has allowed the Products to continue to be sold with full knowledge of the alleged
17 claims.

18 129. All of Defendant’s conduct alleged herein occurs and continues to occur in
19 Defendant’s business.

20 130. Wherefore, Plaintiff, the Members of the Class, and other California consumers have,
21 among other things, no adequate remedy at law for the injuries that are currently being suffered and
22 that will be suffered in the future in that, unless and until enjoined by order of this Court, the
23 Challenged Representations and Omissions by Defendant will continue and cause great and
24 irreparable injury to Plaintiff, the Members of the Class and other California consumers.

25 131. Therefore, pursuant to Civil Code section 1780, subdivision (a)(2), Plaintiff seeks an
26 order in equity from this Court enjoining Defendant from engaging in the above-described wrongful
27 acts and practices, including, but not limited to, an order enjoining Defendant from continuing to
28

1 disseminate and/or including the Challenged Representations and Omissions detailed herein in the
2 marketing, advertising, website pages, packaging, and labeling of the Products.

3 132. In addition, Plaintiff seeks an order awarding Plaintiff and the Class Members
4 restitution of the monetary amounts by which Plaintiff and the Class Members did not receive the
5 value of the Products they paid for and by which Defendant was unjustly enriched and/or damages.

6
7 **X. PRAYER FOR RELIEF**

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

10 **FIRST AND SECOND CAUSES OF ACTION**

- 11 1. An order enjoining Defendant from pursuing the practices complained of herein;
12 2. An order certifying that the action may be maintained as a Class Action;
13 3. For an award of restitution in an amount according to proof at trial;
14 4. For an award of attorney fees pursuant to Civil Code section 1021.5.

15 **THIRD CAUSE OF ACTION**

- 16 1. An order enjoining Defendant from pursuing the practices complained of pursuant
17 to Civil Code section 1780, subdivision (a)(2);
18 2. An order certifying that the action may be maintained as a Class Action pursuant to
19 Civil Code section 1781;
20 3. For an award of restitution in an amount according to proof at trial pursuant to Civil
21 Code section 1780, subdivision (a)(3);
22 4. For an award of damages.
23 5. For an award of punitive damages pursuant to Civil Code section 1780, subdivision
24 (a)(4);
25 6. For an award of costs of this suit pursuant to Civil Code section 1780 (e);
26 7. For an award of attorney's fees pursuant to Civil Code sections 1780 (e) and/or
27 1021.5.
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FURTHER RELIEF

Plaintiff further seeks punitive damages pursuant to Civil Code section 3294, pre- and post-judgment interest and such other and further relief as the Court may deem appropriate.

JURY TRIAL DEMANDED

Plaintiff demands a jury trial on all triable issues.

DATED: April 1, 2026

STEVENS, L.C.

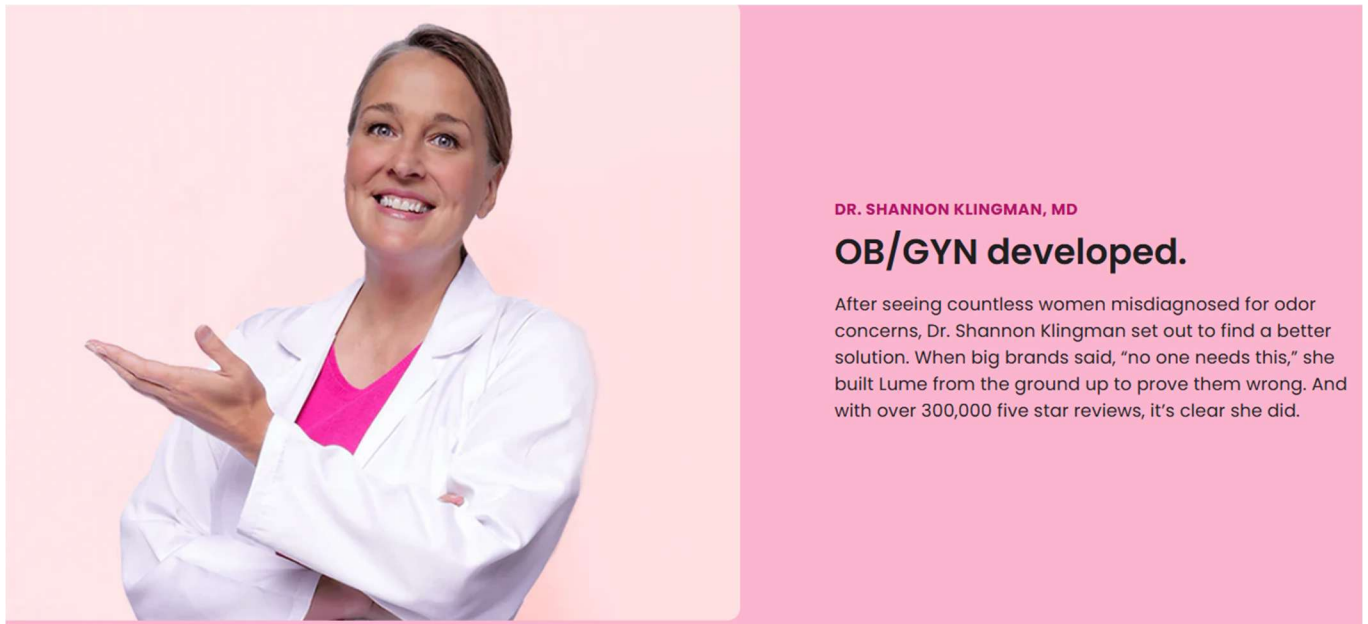
By: //s//Paul D. Stevens
Paul D. Stevens
Attorneys for Plaintiff and the
Class

EXHIBIT 1

Exhibit 1

Website:

1.



DR. SHANNON KLINGMAN, MD

OB/GYN developed.

After seeing countless women misdiagnosed for odor concerns, Dr. Shannon Klingman set out to find a better solution. When big brands said, “no one needs this,” she built Lume from the ground up to prove them wrong. And with over 300,000 five star reviews, it’s clear she did.

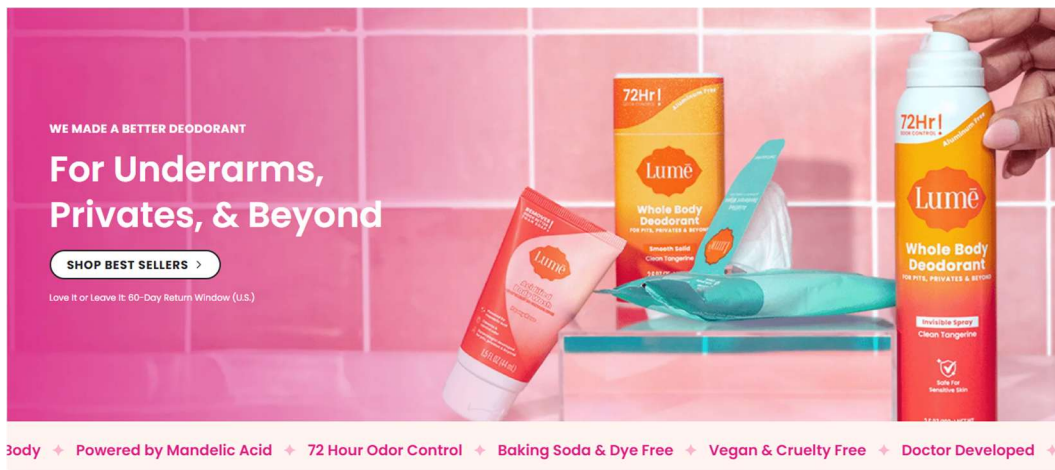
- Doctor Shannon Klingman, MD
- OB/GYN developed
- After seeing countless women misdiagnosed for odor concerns, doctor Shannon Klingman set out to find a better solution.
- When big brands said “no one needs this”, she built Lume from the ground up to prove them wrong.
- <https://lumedeorant.com/the-lume-difference>

1.

Upgrade Your Hygiene Routine

- <https://lumedodorant.com/>

2.



- We Made A Better Deodorant
- For Underarms, Privates & Beyond
- <https://lumedodorant.com/>

3.

WHOLE BODY DEODORANT™

Strong enough for underarms. Gentle enough for everywhere.

Designed with skin safety in mind, our low pH formula supports your skin's acid mantle and keeps skin happy in its naturally acidic state. Our deodorants are rigorously tested for Whole Body use—tough enough for underarms, yet gentle enough for intimate areas.

Skin Loving

- ✓ No Parabens
- ✓ No Phthalates
- ✓ No Dyes
- ✓ No Baking Soda
- ✓ Cruelty-free
- ✓ Vegan







- Gentle enough for everywhere.
- Gentle enough for intimate areas.

4.

THE LUME DIFFERENCE

Outrageously Effective Odor Control

Welcome to Lume. We created a smarter deodorant that stops odor before it starts and keeps you fresh all day—from your underarms to your most intimate areas and everywhere in between.

-  Stops Odor Before It Starts
-  Powered by Mandelic Acid
-  Whole Body Application
-  OB/GYN Developed
-  Clinically Proven
-  Skin Loving

- Outrageously Effective Odor Control
- Welcome to Lume. We created a smarter deodorant that stops odor before it starts and keeps you fresh all day—from your underarms to your most intimate areas and everywhere in between.
- Stop Odor Before It Starts
- OB/GYN Developed
- Whole Body Application
- <https://lumedeodorant.com/the-lume-difference>

5.

Outrageously Effective.

- <https://lumedeodorant.com/>

6.



lumedeodorant  ...

Lume Deodorant

1,843 posts 200K followers 266 following

Health/beauty

- For 🍌 Pits 🍌 Privates & Beyond
- Proven 72 Hour Odor Control
- 300,000+ 5 Star ⭐ Reviews
- Baking Soda Free
- Vegan & Cruelty Free 🐾

try.lumedeodorant.com/organic-instagram-bio/?utm_source=Insta...

📍 lumedeodorant

- For Pits, Privates & Beyond
- <https://www.instagram.com/lumedeodorant>

Product: Lume Acidified Deodorant Wipes (Scent: Cool Cucumber)

A. Product Label

FRONT OF PRODUCT



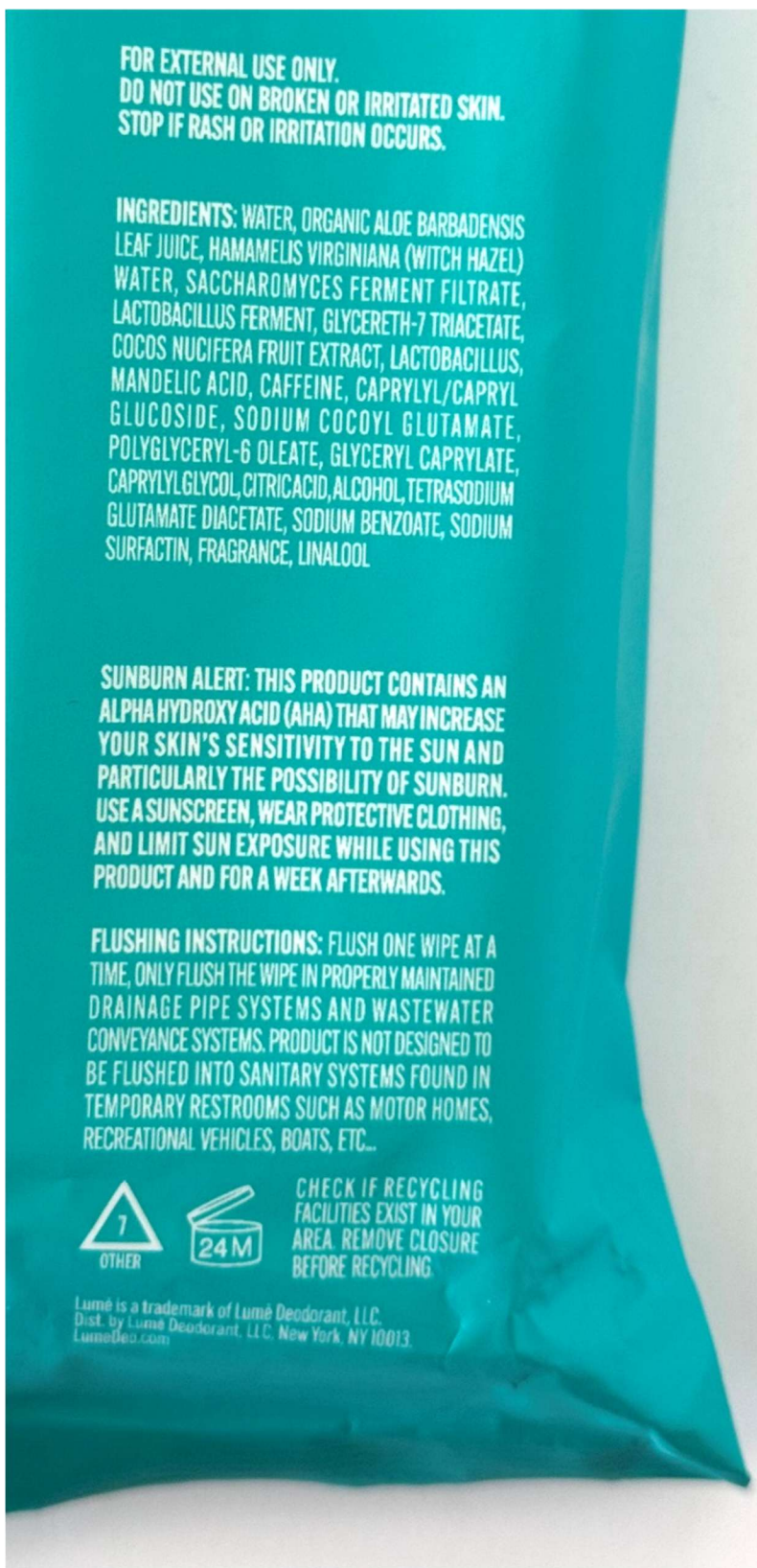
- Gynecologist developed
- For pits, privates & beyond

BACK OF PRODUCT



- Lume Acidified Deodorant Wipes remove body odors and control odor for 24 hours.
- Ideal for your purse, gym bag, or to refresh before or after intimacy.

BACK OF PRODUCT



B. Website

1.



- For pits, privates & beyond
- PH optimized to control odor
- <https://lumedeodorant.com/products/cool-cucumber-deodorant-wipes-15-count>

2.

Outrageously Effective Acidified Deodorant Wipes

- Clinically proven to control odor for 24 hours
 - Formulated without aluminum, baking soda, or parabens
 - Doctor developed for pits, privates & beyond
-
- Doctor developed for pits privates and beyond
 - Clinically proven to control odor for 24 hours
 - <https://lumedeodorant.com/products/cool-cucumber-deodorant-wipes-15-count>

3.

ACIDIFIED SKIN SMELLS BETTER

The power to knock out odor is just a wipe away with Lume Acidified Deodorant Wipes. Whether you want a quick touch up in between showers or extra protection for special moments, Lume's acidified formula controls odor for 24 hours so you're ready for whatever comes next.

- The power to knockout odor is just a wipe away with Lume Acidified Deodorant wipes. Whether you want a quick touch up in between showers or extra protection for special moments.
- <https://lumedeodorant.com/products/cool-cucumber-deodorant-wipes-15-count>

Product: Lumē Acidified Body Wash (Scent: Clean Tangerine)

A. Product Label

FRONT OF PRODUCT



- REMOVES ODOR BETTER THAN SOAP
- pH optimized to control odor
- Gynecologist developed for pits, privates & beyond

BACK OF PRODUCT



- Life can leave you feeling less than fresh - especially in odor prone areas.
- Traditional soap gets you clean, but it Raises the pH of your skin - helping odor bloom more quickly.
- Lume's body wash puts more power in your shower with an acidified formula that knocks out existing odor while priming your skin to control new odor.
- For outrageously effective odor control, follow with any Lume Whole Body Deodorant.

B. Website

1.



- REMOVES ODOR BETTER THAN SOAP
- pH optimized to control odor
- Cleanse and control odor
- Gynecologist developed for pits, privates and beyond
- <https://lumedeodorant.com/products/clean-tangerine-acidified-body-wash>

2.



- Removes odor better than traditional soap
- pH optimized to control odor
- Cleanse and control odor
- Gynecologist developed for pits, privates and beyond
- <https://lumedeodorant.com/products/clean-tangerine-acidified-body-wash>

3.

Outrageously Effective Acidified Body Wash

- Powered by Acidified Technology
 - Clinically proven to remove odor better than traditional soap
 - Clinically proven to control odor for 24 hours
 - Clinically proven to visually even skin tone and decrease the appearance of hyperpigmentation
 - Formulated without SLS, SLES, parabens, or phthalates
 - Gynecologist developed for pits, privates & beyond
 - Contains over 40 quarter sized uses
-
- Gynecologist developed for pits, privates and beyond
 - <https://lumedeodorant.com/products/clean-tangerine-acidified-body-wash>

4.

ACIDIFIED SKIN LOOKS, FEELS, AND SMELLS BETTER!

Life can leave you feeling less than fresh—especially in odor prone areas. Traditional soap gets you clean, but it raises the pH of your skin—helping odor bloom more quickly. Lume's body wash puts more power in your shower with an acidified formula that removes existing odor better than soap, and primes your skin to control new odor for 24 hours.

For outrageously effective odor control, follow with any Lume Whole Body Deodorant.

- Life can leave you feeling less than fresh - especially in odor prone areas.
- Traditional soap gets you clean, but it Raises the pH of your skin - helping odor bloom more quickly.
- Lume's body wash puts more power in your shower with an acidified formula that knocks out existing odor while priming your skin to control new odor.
- For outrageously effective odor control, follow with any Lume Whole Body Deodorant.
- <https://lumedeodorant.com/products/clean-tangerine-acidified-body-wash>

5.

WHAT'S ACIDIFIED BODY WASH?

- ✓ Powered by Acidified Technology
- ✓ Creates a low pH environment that helps skin smell better longer
- ✓ Deep cleans odors that traditional soaps can't
- ✓ Clinically proven to control odor for 24 hours
- ✓ Clinically proven to visually even skin tone and decrease the appearance of hyperpigmentation

- <https://lumedeodorant.com/products/clean-tangerine-acidified-body-wash>

Product: Lume Whole Body Deodorant Smooth Solid Stick (Scent: Lavender Sage)

A. Product Label

FRONT OF PRODUCT

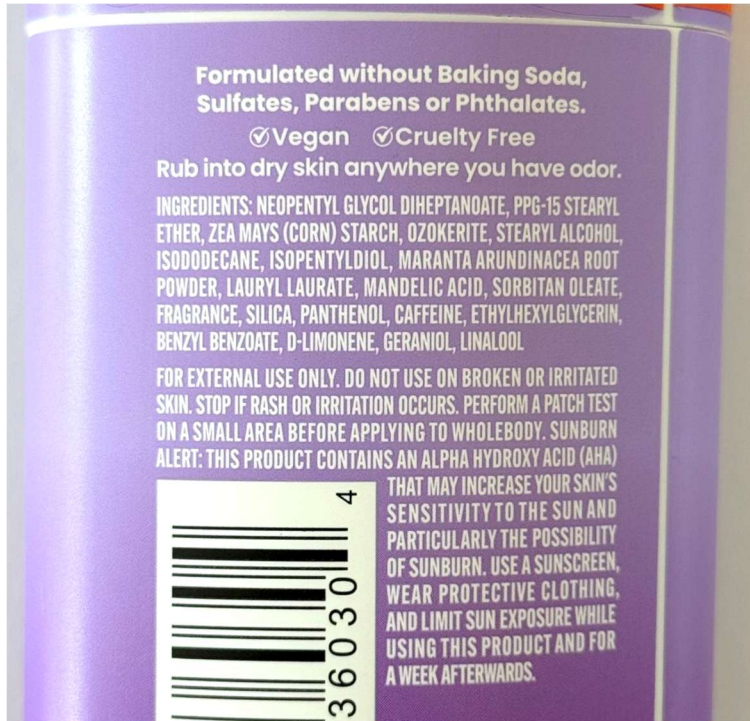


BACK OF PRODUCT



- Whole Body Deodorant
- FOR PITS, PRIVATES & BEYOND

BACK OF PRODUCT



- Rub into dry skin anywhere you have odor

B. Website

1.



- Whole Body Deodorant
- FOR PITS, PRIVATES & BEYOND
- <https://lumedeodorant.com/products/lavender-sage-cream-deodorant-stick>

2.



- Whole Body Deodorant
- Privates
- <https://lumedeodorant.com/products/lavender-sage-cream-deodorant-stick>

3.

Smell Better Everywhere™


Science Based & pH Optimized To Control Odor

- ✦ **Outrageously Effective**

Lume Deodorant is clinically proven to control odor for 72 hours.
- ✦ **Blocks Odor Before It Starts**


Rather than neutralizing or covering up odor after it forms, Lume Deodorant blocks odor.
- ✦ **Apply Anywhere You Want To Control Odor**

Think pits, underboobs, belly buttons, tummy folds, butt cracks, thigh creases, vulvas, balls, and feet!



- Apply Anywhere You Want To Control Odor. Think pits, underboobs, belly buttons, tummy folds, butt cracks, thigh creases, **vulvas**, balls and feet!
- <https://lumedeodorant.com/products/lavender-sage-cream-deodorant-stick>

4.



WHOLE BODY DEODORANT

True lavender with a hint of clary sage.

We go beyond quality odor control by sourcing premium fragrances that adhere to clean beauty standards and possess a minimal risk of allergens.

Lume's Invisible Cream Stick dispenser can be used directly on underarms or use fingertips to swipe the dispensed cream to apply to privates or anywhere else you have odor but wish you didn't. Our water-based formula won't stain your clothes and leaves no residue behind.

Using a trace amount, the Invisible Cream Stick will offer 110 underarm applications (two armpits) or 220 "anywhere else" uses. A little goes a long way.

- Lume's invisible Cream Stick dispenser can be used directly on under arms or use fingertips to swipe the dispensed cream **to apply to privates** or anywhere else you have odor but wish you didn't.
- <https://lumedeodorant.com/products/lavender-sage-cream-deodorant-stick>

5.

DOCTOR DEVELOPED

Dr. Shannon Klingman saw how body odor - whatever the source - was undermining people's confidence. For nearly 10 years, she worked to find a solution for **ALL** body odor.

Lume Deodorant for Pits, Privates and Beyond truly is the first Whole Body deodorant, and it's safe to use **ANYWHERE** you have odor but wish you didn't. Whether it's your pits, skinfolds, belly buttons, feet, or privates, Lume can safely be used wherever you want to opt out of body odor.

- DOCTOR DEVELOPED
- Dr. Shannon Klingman saw how body odor - whatever the source - was undermining people's confidence. For nearly ten years she worked fine solution for **ALL** body odor
- Lume Deodorant for pits privates and beyond truly is the first Whole Body deodorant and it's safe to use **ANYWHERE** you have odor but wish you didn't whether it's your pits, skin folds, belly buttons, feet, or privates, Lume can safely be used wherever you want to opt out of body odor.
- <https://lumedeodorant.com/products/lavender-sage-cream-deodorant-stick>

Product: Lume Whole Body Deodorant Invisible Spray (Scent: Vanilla Bliss)

A. Website

1.



- Whole Body Deodorant
- FOR PITS, PRIVATES & BEYOND
- <https://lumedodorant.com/products/vanilla-bliss-spray-deodorant>

2.

- ✦ **Outrageously Effective**
Lume Deodorant is clinically proven to control odor for 72 hours.
- ✦ **Blocks Odor Before It Starts**
Rather than neutralizing or covering up odor after it forms, Lume Deodorant blocks odor.
- ✦ **Apply Anywhere You Want To Control Odor**
Think pits, underboobs, belly buttons, tummy folds, butt cracks, thigh creases, vulvas, balls, and feet!

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- <https://lumedeorant.com/products/vanilla-bliss-spray-deodorant>

3.

WHOLE BODY DEODORANT

Vanilla bean and tonka intertwine with sandalwood for a deliciously cozy scent.

We go beyond quality odor control by sourcing premium fragrances that adhere to clean beauty standards and possess a minimal risk of allergens.

Lume's Invisible Spray goes anywhere you have odor but wish you didn't. Our environmentally friendly spray makes application from any angle ideal for reaching all the nooks and crannies. Our low alcohol formula is safe for even the most sensitive skin.

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4.

DOCTOR DEVELOPED

Dr. Shannon Klingman saw how body odor - whatever the source - was undermining people's confidence. For nearly 10 years, she worked to find a solution for **ALL** body odor.

Lume Deodorant for Pits, Privates and Beyond truly is the first Whole Body deodorant, and it's safe to use **ANYWHERE** you have odor but wish you didn't. Whether it's your pits, skinfolds, belly buttons, feet, or privates, Lume can safely be used wherever you want to opt out of body odor.

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