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10 *Attorneys for Plaintiff and the Proposed Class*

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

13 BRIA HARRIS, individually and on behalf of all
14 others similarly situated,

15 Plaintiffs,

16 v.

17 PRESTIGE CONSUMER HEALTHCARE,
18 INC.; C. B. FLEET COMPANY,
19 INCORPORATED, and DOES 1 through 10,
20 inclusive,

21 Defendants.

Case No. **26STCV14114**

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 BRIA HARRIS (“Plaintiff”), individually and on behalf of all other similarly
2 situated purchasers (the “Class” and “Class Members”), brings this class action lawsuit against
3 Defendants PRESTIGE CONSUMER HEALTHCARE, INC. and C. B. FLEET COMPANY,
4 INCORPORATED (“Defendants”), and alleges as follows:

5 **I. NATURE OF THE ACTION**

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

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

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

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

26 5. Accordingly, Plaintiff brings this action on behalf of herself and all others similarly
27 situated to seek relief under California’s Consumers Legal Remedies Act, Cal. Civ. Code § 1750,
28

1 et seq.; Unfair Competition Law, Cal. Bus. & Prof. Code § 17200, et seq.; and False Advertising
2 Law, Cal. Bus. & Prof. Code § 17500, et seq.

3 **II. THE PRODUCTS AT ISSUE**

4 6. The products at issue consist of the following items, identified by the product names
5 appearing on the front labels of each product and grouped according to the product categories
6 designated by Defendant:

7 **Cleansing Washes**

- 8 (1) Perimenopause Cooling Wash
9 (2) Ultimate Odor Protection Daily Refreshing Wash
10 (3) Ultimate Odor Protection Shea Butter Wash
11 (4) Simply Sensitive Daily Cleansing Wash
12 (5) Blissful Escape Daily Refreshing Wash
13 (6) Golden Glamour Daily Refreshing Wash
14 (7) Fragrance Free Daily Cleansing Wash
15 (8) Island Splash Daily Refreshing Wash
16 (9) Delicate Blossom Daily Refreshing Wash
17 (10) Aloe Love Daily Gentle Wash
18 (11) Sheer Floral Daily Refreshing Wash
19 (12) Amber Nights Daily Refreshing Wash
20 (13) Essential Botanicals with Argan Oil Extracts Daily Gentle Wash
21 (14) Essential Botanicals with Coconut and Aloe Extracts Daily Gentle Wash

22 **Cleansing Cloths**

- 23 (15) Ultimate Odor Protection Daily Refreshing Wipes
24 (16) Blissful Escape Daily Refreshing Cloths
25 (17) Sheer Floral Daily Refreshing Cloths
26 (18) Island Splash Daily Refreshing Cloths
27 (19) Simply Sensitive Daily Gentle Cloths
28 (20) Aloe Love Daily Gentle Cloths

1 (21) Fragrance Free Daily Gentle Cloths

2 (22) Amber Nights Daily Refreshing Cloths

3 **Freshening Sprays**

4 (23) Ultimate Odor Protection Daily Intimate Body Spray

5 (24) Blissful Escape Daily Intimate Body Spray

6 (25) Ultra Daily Intimate Body Spray

7 (26) Sheer Floral Daily Intimate Body Spray

8 (27) Island Splash Daily Intimate Body Spray

9 (28) Tahitian Sunset Daily Intimate Body Spray

10 (29) Baby Powder Daily Gentle Intimate Body Spray

11 (30) Amber Nights Daily Intimate Body Spray

12 **Whole Body Deodorant**

13 (31) Whole Body Deodorant Cream – Fresh Scent

14 (32) Whole Body Deodorant Cream – Simply Sensitive

15 (33) Whole Body Deodorant Cream – Blissful Escape

16 (The foregoing products are collectively referred to as the “Wash,
17 Cloth, Spray and Deodorant Products”).

18 **Douches**

19 (34) Complete Clean Odor Reduction Douche

20 (35) Extra Cleansing Vinegar & Water Douche

21 (36) Clean & Fresh Island Splash Douche

22 (The foregoing products are collectively referred to as the Douche
23 Products)(The “Wash, Cloth, Spray and Deodorant Products” and the
24 “Douche Products” are hereinafter referred to collectively as the
25 “Products”).

26 7. The Products are offered for sale through various channels, including directly on the
27 “Summer’s Eve” brand website, and through third party retail outlets and internet websites.

1 (10) “Not all products are created equal. Summer’s Eve® offers a variety of
2 products to control odor and meet every woman’s needs.”

3 (11) “Unlike ordinary bar soap and some body washes, all Summer’s Eve®
4 Cleansing Washes are specially designed and extensively clinically tested on
5 the vulva (which is the external vaginal area) to make sure they align with
6 women’s natural pH range of the vulva.”

7 (12) “A lot of women think the vaginal area is self-cleaning, which is only partly
8 true....The vagina itself is self-cleaning, but the vulva (the external vaginal
9 area) is exposed to bacteria daily and should be cleansed only with products
10 specially formulated for this sensitive area.”

11 (2) Product Category Marketing

12 **Cleansing Washes**

13 (1) “Removes odor”

14 (2) “Gynecologist tested”

15 (3) “Clinically tested”

16 (4) “Safe for sensitive skin”

17 (5) “Apply to your intimate area”

18 (6) “Odor Protection”

19 (7) “Cleanses away odor and discharge”

20 (8) “All day odor protection, anytime, anywhere”

21 (9) “Intimate Care, Elevated”

22 (10) “Odor reducing”

23 (11) “Say goodbye to odor, say hello to all day freshness”

24 (12) “Specially formulated for your feminine area”

25 (13) “Remove odor causing bacteria”

26 (14) “Ordinary soap tends to have a high pH (basic) which may throw off the
27 external vaginal pH balance and result in irritation. Fortunately, all Summer’s
28

1 Eve washes and cloths are pH balanced to your intimate skin for a gentle, non-
2 irritating cleansing experience”

3 (15) “A refreshing, cleansing experience for your intimate area”

4 (16) “Vaginal odor stops here”

5 (17) “Gentle enough to use everyday”

6 (18) “Safe and gentle for everyday use”

7 (19) “Gently cleanse away odor causing bacteria in your most intimate areas”

8 (20) “...variety of products to control odor and every woman’s needs”

9 **Cleansing Cloths**

10 (21) “Removes odor”

11 (22) “Cleanses away odor and discharge without irritating sensitive skin”

12 (23) “All day odor protection, anytime, anywhere”

13 (24) “Specially formulated for your feminine area”

14 (25) “Gentle for everyday use”

15 (26) “Gynecologist & Clinically Tested”

16 (27) “Refreshing, cleansing experience for your intimate area”

17 (28) “Vaginal odor stops here”

18 (29) “Remove odor causing bacteria”

19 (30) “Unfold cloth and gently wipe from front to back”

20 (31) “Gentle intimate care, elevated”

21 (32) “For sensitive skin”

22 (33) “Odor control safe for your sensitive skin”

23 **Freshening Sprays**

24 (34) “Removes odor”

25 (35) “Gynecologist Tested”

26 (36) “For Sensitive Skin”

27 (37) “All day odor protection, anytime, anywhere”

28 (38) “Specially formulated for your feminine area”

- 1 (39) "Neutralizes odor"
- 2 (40) "Remove odor causing bacteria"
- 3 (41) "Gentle enough to use everyday"
- 4 (42) "Vaginal odor stops here"
- 5 (43) "Clinically tested"
- 6 (44) "Intimate care, elevated"
- 7 (45) "Use daily, or as a quick refresher"
- 8 (46) "Spray intimate area, panties and feminine liners. Repeat as needed to feel
- 9 shower-fresh all day"
- 10 (47) "For extra freshness, spray panties and feminine liners"

11 **Whole Body Deodorant**

- 12 (48) "Gynecologist and Dermatologist tested"
- 13 (49) "Safe for intimate skin"
- 14 (50) "Strong enough for full body"
- 15 (51) "All day odor control"
- 16 (52) "Whole Body Deodorant"
- 17 (53) "Neutralizes odor"
- 18 (54) "Intimate area, pits, and beyond"
- 19 (55) "Apply to areas where you want to control odor"
- 20 (56) "Ph balanced for your intimate area"

21 **Douches**

- 22 (57) "Gynecologist tested to be gentle, safe, and non-irritating"
- 23 (58) "Odor reducing douche"
- 24 (59) "Leave you feeling fresh and clean"
- 25 (60) "Tested for gentleness to make sure you're getting the proper attention you so
- 26 rightly deserve without irritation"
- 27 (61) "Feel fresh & clean"
- 28

1 (62) “Gently insert nozzle into your vagina, no more than 3 inches, and slowly
2 squeeze bottle. Do not close the vaginal opening; douching solution should
3 flow freely out of vagina”

4 9. Defendants reinforce the necessity and health-related nature of the Products
5 by marketing the Products as “Gynecologist tested,” “clinically tested,” and “Dermatologist
6 tested,” thereby implying medical or hygienic credibility and endorsement and elevating the
7 Products beyond ordinary cosmetic cleansing (hereafter collectively referred to as “the Challenged
8 Representations”).

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

11 11. The Challenged Representations are set forth in Exhibit 1, attached hereto. Exhibit 1
12 reflects Defendant’s general overarching brand marketing and provides representative examples of
13 its marketing, packaging, and labeling for each product category.

14 12. Through the Challenged Representations and their repeated use across Defendants’
15 website, product pages, and product labels, Defendants convey the net impression that their Products
16 are scientifically advanced, doctor-developed solutions for maintaining cleanliness, freshness, and
17 odor control in women’s genital area more effectively than ordinary hygiene methods such as soap.

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

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

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

- 27 (1) Vulva (external): the outer genital structures, including the labia (majora and
28 minora), clitoris, and the openings of the urethra and vagina

1 (2) Vagina (internal): the muscular canal that extends from the vaginal opening inward.

2 *Id.*

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

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

13 17. Medical authorities uniformly advise against the use of vaginal douche products due
14 to their harmful effects on normal vaginal health. The vagina is a self-regulating organ which
15 includes maintaining a natural balance of flora and pH; introducing douche solutions disrupts this
16 balance by eliminating beneficial bacteria and altering acidity levels. As a result, douching is
17 associated with an increased risk of bacterial vaginosis, yeast infections, and pelvic inflammatory
18 disease. Leading organizations, including the American College of Obstetricians and Gynecologists,
19 specifically recommend that individuals avoid douching because it provides no medical benefit and
20 may instead exacerbate or mask underlying conditions.

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

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

27 20. Research consistently shows that external cleansing products are associated with
28 increased health risks. The Office on Women’s Health identifies risks including vaginal irritation

1 and dryness, bacterial vaginosis, pelvic inflammatory disease, sexually transmitted infections
2 (including HIV), and adverse pregnancy outcomes such as infertility, ectopic pregnancy, preterm
3 birth, recurrent vulvovaginal candidiasis, and infertility. *Id.*; Elizabeth G. Stewart & Ione
4 Bissonnette, *General Vulvar Care, Vulvovaginal Disorders: A Pathway to Diagnosis and*
5 *Treatment* (Harvard Vanguard Med. Assocs.),
6 <https://vulvovaginaldisorders.org/handouts/GeneralVulvarCare.pdf>.

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

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

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

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

18 24. Plaintiff and other consumers were not provided with information regarding the risks
19 of using the Wash, Cloth, Spray and Deodorant Products on the vaginal or vulva areas of the human
20 body and therefore lacked information material to their purchasing and use decisions.

21 25. A significant portion of reasonable consumers do not understand the anatomical
22 distinction between the “vulva” and the “vagina” and do not understand that the term “vulva” refers
23 exclusively to external female genitalia. Given that many consumers do not understand the
24 anatomical meaning of “vulva,” labeling a product for use on the “vulva” without clear additional
25 guidance is likely to mislead reasonable consumers into believing the Wash, Cloth, Spray and
26 Deodorant Products are appropriate for internal vaginal use.

27 26. Defendants fail to disclose that:
28

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

12 27. Defendants' marketing and labeling, including their website pages, packaging, and
13 product instructions as set forth in Exhibit 1, should and could have disclosed these material facts,
14 including clear and prominent limitations or warnings regarding use on intimate areas but failed to
15 do so. Defendants fail to define the relevant anatomical boundaries or to disclose that such use is
16 unnecessary or may disrupt natural physiological processes and therefore does not cure the
17 misleading net impression created by Defendants' marketing.

18 28. **At a minimum, Defendants should have included prominent disclosures for the**
19 **Wash, Cloth, Spray and Deodorant Products such as:**

- 20 (1) "For external use only. Not intended for internal vaginal use."
- 21 (2) "For external use only. Not intended for internal vaginal use. Avoid contact with the
- 22 vaginal opening. Discontinue use if irritation occurs."
- 23 (3) "For external use only. Not for vaginal (internal) use. Products applied to the vulva
- 24 may enter the vaginal canal due to anatomical proximity. Internal exposure may
- 25 disrupt the natural vaginal balance and may result in irritation, infection (including
- 26 bacterial vaginosis and pelvic inflammatory disease), increased susceptibility to
- 27 sexually transmitted infections, and potential reproductive complications."
- 28 (4) "Normal vaginal odor is normal and does not require deodorizing products."

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

2 29. Plaintiff and other consumers were not provided with information regarding the risks
3 of using the Douche Products and therefore lacked information material to their purchasing and use
4 decisions.

5 30. A significant portion of reasonable consumers lack knowledge regarding the risks
6 associated with the Douche Products. In the absence of clear and adequate disclosures, Defendants’
7 omissions are likely to deceive reasonable consumers acting reasonably under the circumstances
8 into believing that the Products are safe, beneficial, and appropriate for routine use.

9 31. Defendants currently provide the following information on the Douche Products
10 packaging and website pages:

11 (1) An association has been reported between douching and pelvic inflammatory disease
12 (PID), ectopic pregnancy, and infertility. It is not currently known whether douching
13 is causally related to these conditions, but women should be aware of this association.

14 Douching should not be used for self-treatment if you have symptoms of PID or STD.

15 (2) Symptoms of pelvic inflammatory disease (PID) include lower abdominal pain, fever,
16 chills, nausea, vomiting, and/or a pus-like yellow cervical discharge.

17 (3) Symptoms of sexually transmitted diseases (STDs) include vaginal discharge of an
18 unusual amount, color, or odor; painful and/or frequent urination; and genital sores or
19 ulcers.

20 (4) If you have symptoms of PID or an STD, do not use any douche product and see a
21 doctor right away.

22 32. The foregoing disclosures are inadequate. They are limited to narrow, conditional
23 warnings applicable only in the presence of symptoms of PID or STDs, and therefore fail to address
24 the ordinary, intended use of the Douche Products. The disclosures employ hedged language—
25 stating merely that an “association has been reported” and that causation is “not currently known”—
26 which minimizes the significance of the relationship between douching and adverse health outcomes
27 and fails to convey the seriousness of the risks. Critically, the disclosures do not inform consumers
28 that douching is unnecessary, is generally discouraged by medical professionals, or that routine use

1 itself may be harmful. By focusing on extreme conditions and symptomatic users, the disclosures
2 imply that the Douche Products are otherwise safe and suitable for regular use, thereby reinforcing,
3 rather than correcting, Defendants’ misleading marketing. Moreover, the disclosures omit the
4 material fact that the vagina is self-cleaning and does not require douching, depriving consumers of
5 information necessary to evaluate the Products’ purported benefits. As a result, the overall net
6 impression remains that the Douche Products are beneficial and appropriate for everyday hygiene,
7 rendering the disclosures inadequate to prevent deception.

8 33. **At a minimum, Defendants should have included prominent disclosures for the**
9 **Douche Products, such as:**

10 **IMPORTANT HEALTH INFORMATION:**

11 This product is **not necessary for routine vaginal hygiene**. The vagina is naturally self-
12 cleaning and does not require douching for cleanliness or odor control.

13 **Routine or frequent use is not recommended by medical professionals** and may disrupt
14 natural balance and increase the risk of infections.

15 **Use of vaginal douching products should only occur if specifically directed by a**
16 **healthcare provider**. If you have symptoms such as unusual discharge, odor, or irritation,
17 consult a healthcare professional instead of self-treating.

18 34. Defendants’ omissions and non-disclosure of these material facts (hereafter
19 “Omissions”) are unlawful for multiple reasons:

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

21 Defendants’ Omissions are contrary to, and render misleading, its affirmative
22 Challenged Representations that the Products are suitable and more beneficial for
23 use across the “whole body,” “intimate areas,” and on the “vulva.” These
24 representations create the impression that such use is safe, necessary, and beneficial
25 for the entire vulvovaginal area, which is misleading in the absence of disclosure of
26 the above material facts.

27 **(2) Omission of Facts Defendants Were Obligated to Disclose**

28 **(1) Exclusive Knowledge**

1 Defendants possessed exclusive knowledge of material facts not known or
2 reasonably accessible to Plaintiff and consumers, including the intended use
3 parameters of the Products, the limitations of their safety for intimate use,
4 and the lack of necessity of such products for maintaining intimate hygiene.
5 Plaintiff and reasonable consumers lack specialized medical or scientific
6 knowledge regarding intimate anatomy and microbiome health and cannot
7 independently ascertain these facts. Consumers therefore reasonably rely on
8 Defendant to provide accurate, complete, and non-misleading information
9 regarding the Products' safety and appropriate uses.

10 **(2) Partial Representations That Are Misleading**

11 Defendants made partial representations—such as promoting “whole body”
12 and “intimate area” use, emphasizing safety, and describing the Products as
13 “gentle” and “clinically tested”—that are misleading because they omit
14 material facts regarding the limitations, risks, and lack of necessity of such
15 use.

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

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

20 **D. Reasonable Consumer Interpretation**

21 35. Through the Challenged Representations—prominently disseminated across
22 Defendants' website, product pages, labeling, and marketing materials—and the omission of
23 material information, Defendants convey the net impression that their Products are necessary,
24 appropriate, and beneficial for maintaining cleanliness, freshness, and odor control in women's
25 intimate areas. This unified message suggests that ordinary hygiene is inadequate and that
26 consumers should use Defendants specialized Products to achieve proper cleanliness and long-
27 lasting odor control.

1 36. In reality, and contrary to the Net Impression conveyed, medical consensus recognizes
2 that routine hygiene is generally sufficient to maintain cleanliness of the female genital area.
3 Defendants also fail to disclose that the Products are not necessary for such purposes and may not
4 be appropriate for all intimate uses, including that they are not intended for internal vaginal use.

5 37. Defendants further omit that the use of deodorizing or cleansing products on intimate
6 areas may disrupt the natural vaginal microbiome and normal physiological processes, creating
7 potential risks rather than providing the promised benefits.

8 38. Reasonable consumers, including members of the general consuming public and
9 targeted consumers, lack specialized knowledge of female anatomy and are not expected to
10 understand these medical principles. Accordingly, they reasonably rely on Defendants to provide
11 complete and non-misleading information regarding the Products' necessity, safety, and appropriate
12 use.

13 39. As a result of the Challenged Representations and Omissions, a significant portion of
14 reasonable consumers would be misled into believing that Defendants' Products are necessary to
15 achieve proper hygiene and odor control in intimate areas. The Challenged Representations and
16 Omissions are therefore false, misleading, and deceptive, and thus unlawful.

17 **E. Materiality**

18 40. The Challenged Representations and Omissions are material.

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

22 42. A significant portion of reasonable consumers actively seek out, and are willing to
23 pay a premium for, products marketed as safe, effective, and specifically designed for intimate
24 hygiene. As a result, Defendants' representations—and their failure to disclose material limitations,
25 risks, and the lack of necessity for such use—are material factors in consumers' purchasing
26 decisions.

27 43. In particular, reasonable consumers would consider it important that: (a) the Products
28 are not intended for internal vaginal use; (b) may not be appropriate for all genital uses; (c) routine

1 hygiene is generally sufficient to maintain cleanliness of women’s “intimate” genital area without
2 deodorizing products; and (d) use of such products may disrupt the natural vaginal microbiome or
3 normal physiological processes or implicate other health risks. Defendants’ failure to disclose these
4 facts is material.

5 44. Through their false, misleading, and deceptive packaging, labeling, and marketing—
6 and by omitting material information—Defendants sought to capitalize on consumers’ concerns
7 regarding hygiene of the female genital area and thereby gained an unfair competitive advantage
8 over other market participants.

9 45. Defendants’ marketing and advertising campaign enabled it to sell the Products to
10 thousands of consumers throughout California. The Products are sold at prices ranging from
11 approximately \$1.94 to \$7.48 per unit.

12 46. In reliance on the Challenged Representations and Omissions, Plaintiff and other
13 California consumers purchased Products they otherwise would not have purchased, or paid more
14 for the Products than they otherwise would have paid. Had they known the omitted material facts,
15 they would not have purchased the Products or would have paid less.

16 47. For the foregoing reasons, Defendants’ Challenged Representations and Omissions
17 are false and misleading, and are likely to deceive reasonable consumers.

18 48. Accordingly, Defendants have engaged in conduct that violates California Business
19 and Professions Code sections 17200 and 17500, as well as the Consumers Legal Remedies Act,
20 Civil Code section 1750, et seq., including section 1770(a)(5) and (a)(7).

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

22 49. On January 13, 2026, Defendant, Prestige Consumer Healthcare Inc was served by
23 Plaintiff with written notices pursuant to Civil Code section 1750, et seq., which set forth Plaintiff’s
24 contentions. Plaintiff’s letter was sent via certified mail with electronic return receipt to Defendant,
25 Prestige Consumer Healthcare Inc. This notice was forwarded to Defendant C. B. Fleet Company,
26 Incorporated who acknowledged receipt. Defendants rejected Plaintiff’s attempts to address the
27 concerns stated herein and instead have allowed the Products to continue to be sold with full
28 knowledge of the alleged claims.

1 their alter egos sued herein as DOES 1 through 10 inclusive are presently unknown to Plaintiff who
2 therefore sue this Defendant by fictitious names. Plaintiff will seek leave of this Court to amend
3 the Complaint to show their true names and capacities when the same have been ascertained.
4 Plaintiff is informed and believes and based thereon alleges that DOES 1 through 10 were authorized
5 to do and did business in Los Angeles, California.

6 **B. Plaintiff**

7 58. Plaintiff Bria Harris, and at all times relevant hereto was, a citizen of the state of
8 California.

9 59. Plaintiff purchased the Summer's Eve Island Splash Daily Refreshing Wash.

10 60. Plaintiff purchased the Summer's Eve Island Splash Daily Refreshing Wash multiple
11 times, with the most recent purchase being in September 2025. To the best of Plaintiff's recollection,
12 Plaintiff purchased the Summer's Eve Island Splash Daily Refreshing Wash product in-store at
13 Walmart retail locations.

14 61. Prior to and at the time of each purchase, Plaintiff considered the Challenged
15 Representations and Omissions. Plaintiff reasonably relied on the Challenged Representations and
16 Omissions in deciding to purchase the Products, and she would not have purchased the Products if
17 the true facts had been known. As a direct result of Defendants' Challenged Representations,
18 Plaintiff suffered and continues to suffer economic injuries.

19 62. Plaintiff would like to purchase the Products in the future. However, Plaintiff will be
20 unable to rely on the Products' packaging, labels, or advertising in the future, and so will not
21 purchase the Products although she would like to. Plaintiff understands that the truth and/or accuracy
22 of the Challenged Representations and Omissions as represented by Defendants could change over
23 time and Plaintiff might purchase the Products, despite the fact they were once marred by false
24 and/or misleading marketing, as she may reasonably assume, incorrectly, that the Products'
25 capability to perform the represented claims changed. However, as long as Defendants continue to
26 manufacture the Products but promote the Products with the Challenged Representations and
27 Omissions, Plaintiff (and other consumers) will be unable to make informed decisions about
28 whether to purchase the Products, and will be unable to evaluate the differences between the

1 Products and competitors' products. Plaintiff and other consumers are therefore further likely to be
2 repeatedly misled by Defendants' conduct, unless and until Defendants are enjoined from
3 continuing to engage, use, or employ the practice of falsely marketing and advertising for sale of
4 the Products.

5 **VI. JURISDICTION**

6 63. This Court has subject-matter jurisdiction over this action because the claims arise
7 under California law and no federal question is presented.

8 64. This Court has personal jurisdiction over Plaintiff because Plaintiff is a citizen of
9 California and submits to the Court's jurisdiction.

10 65. This Court has personal jurisdiction over Defendant Prestige Consumer Healthcare,
11 Inc. Defendant Prestige Consumer Healthcare, Inc. is a corporation formed in Delaware. Defendant
12 Prestige Consumer Healthcare, Inc. is not registered with the California Secretary of State.
13 Defendant Prestige Consumer Healthcare, Inc. is existing under the laws of the State of California.
14 Defendant Prestige Consumer Healthcare, Inc. conducts substantial, continuous, and systematic
15 business within California and has substantial contacts with and receives substantial benefits and
16 income from and through the State of California, and committed the wrongful acts alleged herein
17 within the State of California.

18 66. This Court has personal jurisdiction over Defendant C.B. Fleet Company,
19 Incorporated. Defendant C.B. Fleet Company, Incorporated is a corporation formed in Virginia.
20 Defendant C.B. Fleet Company, Incorporated is not registered with the California Secretary of State.
21 Defendant C.B. Fleet Company, Incorporated is existing under the laws of the State of California.
22 Defendant C.B. Fleet Company, Incorporated conducts substantial, continuous, and systematic
23 business within California and has substantial contacts with and receives substantial benefits and
24 income from and through the State of California, and committed the wrongful acts alleged herein
25 within the State of California.

26 67. By marketing, advertising, selling, and distributing the Products at issue to consumers
27 throughout California, Defendants purposefully availed themselves of the privilege of conducting
28 activities within California and invoked the benefits and protections of California law.

1 same representations by Defendants 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 73. Commonality and Predominance of Common Issues: Defendants have acted on
7 grounds common and applicable to the entire Class and therefore, numerous questions of law and
8 fact are common to Plaintiff and the Class Members that predominate over any question affecting
9 only individual Class Members thereby making relief appropriate with respect to the Class as a
10 whole. 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 Defendants
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 Defendants, as
21 alleged herein, were and are material to Plaintiff and the Class Members.
- 22 ii. Whether the Challenged Representations and Omissions by Defendants, 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.

26 74. Accordingly, the determination of Defendants' liability under each of the causes of
27 action presents legal issues that are common to Plaintiff and the class as a whole.
28

1 **FIRST CAUSE OF ACTION**

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

3 **(False and Misleading Advertising)**

4 79. Plaintiff repeats and realleges the allegations set forth in the preceding paragraphs and
5 incorporates the same as if set forth herein.

6 80. This cause of action is brought pursuant to Business and Professions Code section
7 17500, et seq., on behalf of Plaintiff and the Class.

8 81. As alleged in the preceding paragraphs, the Challenged Representations and
9 Omissions detailed herein constitute unfair, unlawful, and fraudulent business practices within the
10 meaning of Business and Professions Code section 17500, et seq.

11 82. Defendants intended the Challenged Representations and Omissions as detailed
12 herein.

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

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

20 85. Plaintiff and the Members of the Class relied on Defendants' false, deceptive, and
21 misleading representations and would not have purchased the Products if not for the false, deceptive,
22 and misleading representations and marketing of the Challenged Representations and Omissions by
23 Defendants set forth herein.

24 86. Plaintiff and the Members of the Class have suffered injury in fact and have lost
25 money or property as a result of Defendants' false, deceptive, and misleading representations and
26 marketing of the Challenged Representations and Omissions set forth herein.

27 87. The Products as purchased by Plaintiff and the Members of the Class were and are
28 unsatisfactory and worth less than the amount paid for them.

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

5 96. Defendants’ Challenged Representations in the marketing, advertising, packaging,
6 and labeling of the Products are false.

7 97. Defendants’ Challenged Representations falsely advertising the status of the Products
8 caused injuries Plaintiff and the Members of the Class, who did not receive what they were
9 promised.

10 98. Defendants’ Challenged Representations stifle competition in the marketplace.

11 99. Consumers cannot avoid any of the injuries caused by Defendants’ false and
12 misleading advertising of the Products.

13 100. Defendants’ conduct of marketing, advertising, packaging, and labeling the Products
14 with the Challenged Representations and Omissions detailed herein results in financial harm to
15 consumers. Thus, the utility of Defendants’ conduct is vastly outweighed by the gravity of their
16 harm.

17 101. Defendants’ marketing, advertising, packaging, and labeling of the Products with the
18 Challenged Representations and Omissions detailed herein is false, deceptive, misleading, and
19 unreasonable, and constitutes unfair conduct.

20 102. Defendants knew or should have known of their unfair conduct.

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

24 104. There were reasonably available alternatives to further Defendants’ business interests
25 other than the conduct described herein. Defendants could have marketed, advertised, packaged,
26 and labeled the Product without making the Challenged Representations and Omissions detailed
27 herein.

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**

4 113. 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.

8 114. Defendants 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.

10 115. Defendants’ 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.

13 116. 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.

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

17 118. All of the conduct alleged herein occurs and continues to occur in Defendants’
18 business.

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

22 120. 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 Defendants will continue and cause great and
26 irreparable injury to Plaintiff, the Members of the Class, and other California consumers.

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

1 wrongful acts and practices, including, but not limited to, an order enjoining Defendants 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.

4 122. 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 Defendants was unjustly enriched.

7 **THIRD CAUSE OF ACTION**

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

9 **(Consumer Legal Remedies Act)**

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

12 124. 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.

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

16 126. 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 Defendants
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 b. Common issues of law include but are not limited to:

- 1 i. Whether the Challenged Representations and Omissions by Defendants, as
2 alleged herein, were and are material to Plaintiff and the Class Members.
3 ii. Whether the Challenged Representations and Omissions by Defendants, as
4 alleged herein, were and are false, deceptive and/or misleading in violation of
5 Business and Professions Code sections 17200, et seq. and 17500, et seq. and
6 California Civil Code 1750, et. seq.

7 127. Accordingly, the determination of Defendants' liability under each of the causes of
8 action presents legal issues that are common to Plaintiff and the class as a whole.

9 128. As set forth in detail herein, Defendants publicly disseminated the Challenged
10 Representations and Omissions.

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

17 130. In doing so, Defendants intentionally misrepresented material facts.

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

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

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

1 134. Defendants' 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.

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

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

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

12 138. On January 13, 2026, Defendant, Prestige Consumer Healthcare Inc was served by
13 Plaintiff with written notices pursuant to Civil Code section 1750, et seq., which set forth Plaintiff's
14 contentions. Plaintiff's letter was sent via certified mail with electronic return receipt to Defendant,
15 Prestige Consumer Healthcare Inc. This notice was forwarded to C. B. Fleet Company,
16 Incorporated, who acknowledged receipt. Defendants rejected Plaintiff's attempts to address the
17 concerns stated herein and instead has allowed the Products to continue to be sold with full
18 knowledge of the alleged claims.

19 139. All of Defendants' conduct alleged herein occurs and continues to occur in
20 Defendants' business.

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

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

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.

3 142. 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 Defendants were 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 Defendants 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 Defendants 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.

28 **FURTHER RELIEF**

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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 30, 2026

STEVENS, L.C.

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

EXHIBIT 1

Exhibit 1

GENERAL WEBSITE MARKETING:

1.



- Summer's Eve is a trusted, 'must have' brand that controls vaginal odor anytime, anywhere...
<https://www.summerseve.com/>

2.



- Say goodbye to odor, say hello to freshness
https://www.summerseve.com/feminine-hygiene-products?by_product_type%5B516%5D=516

3.


However you define yourself, however many roles you play or hats you wear, we SE you™. Fifty years ago, Summer's Eve® created the feminine care category by putting women first, listening to women's needs, and committing to deeply understanding how we want to care for our bodies. And as your definitions and days and dreams have evolved, so have we. That's why millions of women trust our expansive range of gynecologist-tested cleansing and care. Whether you're at home or on the go, whether you want to bask in fragrant lusciousness or prefer no scent at all, whether you prioritize ultra-gentle or high performance—we SE you™.

Because one thing that'll never change, is the Summer's Eve® mission to help you feel always and undeniably YOU. You, at your very best. The you that's "got this." With a daily intimate care routine that lets you experience that unique everyday Summer's Eve readiness. That wonderful, one-of-a-kind sense of YOUness.

- Fifty years ago, Summer's Eve created the feminine care category by putting women first listening to women's needs and committing to deeply understanding how we want to care for our bodies.
- That's why millions of women trust our expansive range of gynecologist-tested cleansing and care.
-whether you want to bask in fragrant lusciousness or prefer no scent at all, whether you prioritize ultra-gentle or high performance...
-With a daily intimate care routine that lets you experience that unique everyday Summer's Eve readiness...

<https://www.summerseve.com/who-we-are>


4.

I don't have much shower "real estate." Do I really need a special product just for my vagina? 

Short answer – yes! Just using ordinary soap can throw off the external vaginal pH balance and may cause resulting irritation. Fortunately, all Summer's Eve® products are pH balanced, gentle and soap-free for optimal comfort. Many women tell us once they experience the gentle comfort, clean rinse and fresh experience of Summer's Eve® washes they can't imagine going back to regular soap and water!

- Do I really need a special product just for my vagina?
Short answer – yes! Just using ordinary soap can throw off the external vaginal pH balance and may cause resulting irritation.
<https://www.summerseve.com/faqs#i-don-t-have-much-shower-real-estate-do-i-really-need-special-product-just-my-vagina>

5.

Aren't you not supposed to use anything on your vaginal area? 

A lot of women think the vaginal area is self-cleaning, which is only partly true. Think about this metaphor – even though your oven at home is self-cleaning, you still need to clean the stove-top! The vagina itself is self-cleaning, but the vulva (the external vaginal area) is exposed to bacteria daily and should be cleansed only with products specially formulated for this sensitive area.

- A lot of women think the vaginal area is self-cleaning, which is only partly true.
- The vagina itself is self-cleaning, but the vulva (the external vaginal area) is exposed to bacteria daily and should be cleansed only with products specially formulated for this sensitive area.

6.

What do you mean by “Safe Scents”?



At Summer’s Eve®, we want to provide you with safe, best smelling products for your intimate care routine. That’s why all of our scented cosmetic products are clinically tested by gynecologists to ensure that they are safe, even for those of us with sensitive skin. In fact, each cosmetic product is also tested by a dermatologist to make sure that it’s hypoallergenic and gentle enough for everyday use.

- At Summer's Eve, we want to provide you a safe, best smelling products for your intimate care routine.
- That’s why all of our scented cosmetic products are clinically tested by gynecologists to ensure that they are safe, even for those of us with sensitive skin.
- In fact, each cosmetic product is also tested by a dermatologist to make sure that it’s hypoallergenic and gentle enough for everyday use.”
<https://www.summerseve.com/faqs#what-do-you-mean-safe-scents>

7.

How is Summer's Eve® Cleansing Wash different than soap?



Unlike ordinary bar soap and some body washes, all Summer's Eve® Cleansing Washes are specially designed and extensively clinically tested on the vulva (which is the external vaginal area) to make sure they align with women's natural pH range of the vulva. They are all pH-balanced and Gynecologist-tested.

- Unlike ordinary bar soap and some body washes, all Summer's Eve® Cleansing Washes are specially designed and extensively clinically tested **on the vulva** (which is the external vaginal area) to make sure they align with women's natural pH range of the vulva.
<https://www.summerseve.com/faqs#how-summer-s-eve-cleansing-wash-different-soap>

PRODUCT MARKETING:

PRODUCT CATEGORY: CLEANSING WASHES

REPRESENTATIVE MARKETING EXAMPLE: Summer's Eve pH-balanced Cleansing Wash – Island Splash

A. PRODUCT LABEL

FRONT OF PRODUCT

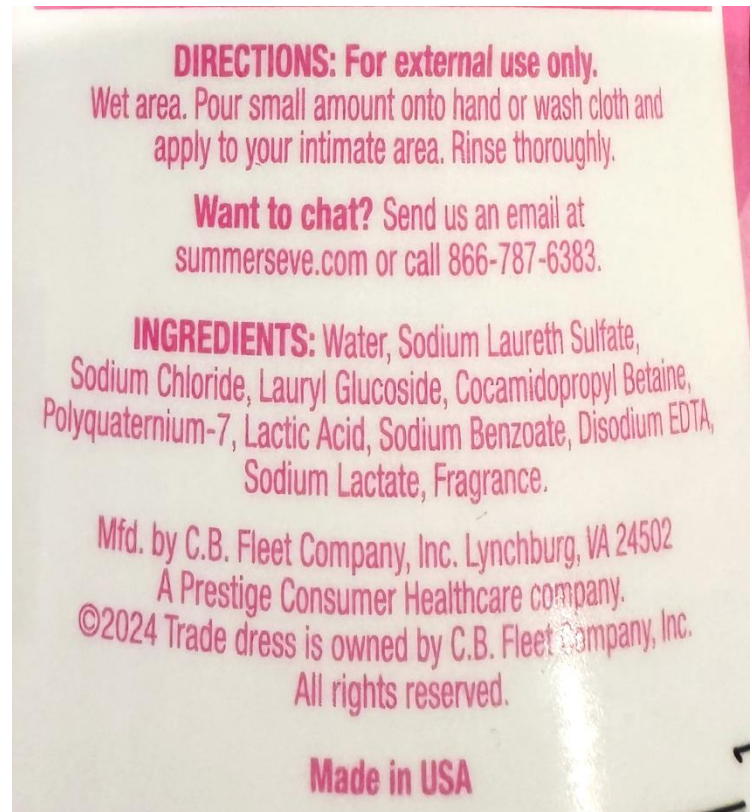


BACK OF PRODUCT



- Clinically tested
- Gynecologist tested
- Gentle for daily use

BACK OF PRODUCT



- A refreshing, cleansing experience for your intimate area
- Directions: apply to your intimate area.

B. WEBSITE – PRODUCT PHOTOS & CLAIMS



- Clinically tested
 - Gynecologist tested
 - A refreshing, cleansing experience for your intimate area
 - Intimate Care, Elevated
 - A refreshing cleansing experience for your intimate area
- <https://www.summerseve.com/feminine-hygiene-products/vaginal-wash/island-splash-cleansing-wash>

i.



Removes Odor



Gynecologist Tested



pH-Balanced



SafeScents™

A refreshing, cleansing experience for your intimate area, so you can take on anything. Uniquely formulated and pH-balanced to match your body's natural chemistry. Intimate care, elevated.

- Removes odor
 - A refreshing, cleansing experience for your intimate area...
 - Intimate care, elevated
- <https://www.summerseve.com/feminine-hygiene-products/vaginal-wash/island-splash-cleansing-wash>

ii.

VAGINAL ODOR STOPS HERE

Not all products are created equal. Summer's Eve® offers a variety of products to control odor and meet every woman's needs.

- Not all products are created equal.
 - ...variety of products to control odor and meet every woman's needs.
- <https://www.summerseve.com/feminine-hygiene-products/vaginal-wash/island-splash-cleansing-wash>

iii.

REMOVE ODOR CAUSING BACTERIA

And provides up to 24 hours
of freshness

SPECIALLY DESIGNED FOR YOUR FEMININE AREA

Matches the body's
natural chemistry

A REFRESHING CLEANSING EXPERIENCE

Gentle enough to
use everyday

- Remove odor causing bacteria
 - Specially designed for your feminine area
 - Gentle enough to use everyday
- <https://www.summerseve.com/feminine-hygiene-products/vaginal-wash/island-splash-cleansing-wash>

iv.



- Odor control safe for your sensitive skin
- Gynecologist & clinically tested
<https://www.summerseve.com/feminine-hygiene-products/vaginal-wash/island-splash-cleansing-wash>

v.



- Gynecologist tested
- pH-balanced
- Removes odor
<https://www.summerseve.com/feminine-hygiene-products/vaginal-wash/island-splash-cleansing-wash>

PRODUCT CATEGORY: CLEANSING CLOTHS

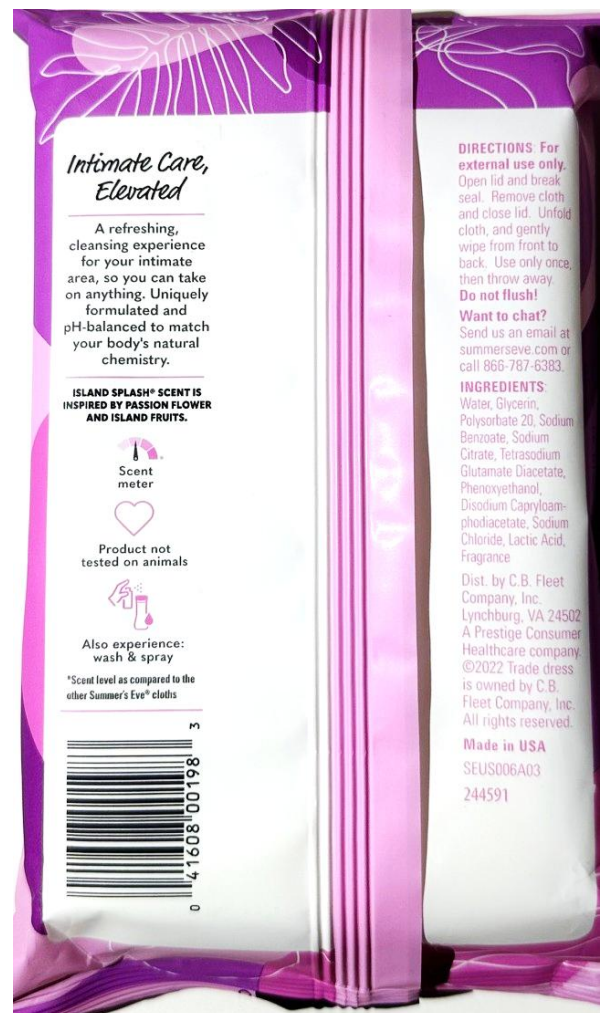
REPRESENTATIVE MARKETING EXAMPLE: pH balanced Cleansing Cloths

A. PRODUCT LABEL

FRONT OF PRODUCT



BACK OF PRODUCT



- Removes odor
- Clinically tested
- Gentle for daily use Gynecologist tested
- A refreshing cleansing experience for your intimate area.

B. WEBSITE – PRODUCT PHOTOS & CLAIMS

a. PRODUCT: pH balanced Cleansing Clothes



- Clinically tested
- Gentle for daily use
- Gynecologist tested
- Intimate Care, Elevated
- A refreshing cleansing experience for your intimate area.

<https://www.summerseve.com/feminine-hygiene-products/vaginal-wipes/island-splash-cleansing-cloths#directions>

i.



Removes Odor



Gynecologist Tested



pH-Balanced



SafeScents™

A refreshing, cleansing experience for your intimate area, so you can take on anything. Uniquely formulated and pH-balanced to match your body's natural chemistry.

- Removes odor
- A refreshing cleansing experience for your intimate area
<https://www.summerseve.com/feminine-hygiene-products/vaginal-wipes/island-splash-cleansing-cloths#directions>

ii.

VAGINAL ODOR STOPS HERE

Not all products are created equal. Summer's Eve® offers a variety of products to control odor and meet every woman's needs.

- Not all products are created equal.
- ...variety of products to control odor and meet every woman's needs.
<https://www.summerseve.com/feminine-hygiene-products/vaginal-wipes/island-splash-cleansing-cloths#directions>

iii.

REMOVE ODOR CAUSING BACTERIA

And provides up to 24 hours
of freshness

SPECIALLY DESIGNED FOR YOUR FEMININE AREA

Matches the body's
natural chemistry

A REFRESHING CLEANSING EXPERIENCE

Gentle enough to
use everyday

- REMOVE ODOR CAUSING BACTERIA
- SPECIALLY DESIGNED FOR YOUR FEMININE AREA
- GENTLE ENOUGH TO USE EVERYDAY

<https://www.summerseve.com/feminine-hygiene-products/vaginal-wipes/island-splash-cleansing-cloths#directions>

iv.



- Odor control safe for your sensitive skin
- Gynecologist & clinically tested
<https://www.summerseve.com/feminine-hygiene-products/vaginal-wipes/island-splash-cleansing-cloths#directions>

v.



- Removes odor
- gynecologist tested
- Gynecologist & clinically tested
<https://www.summerseve.com/feminine-hygiene-products/vaginal-wipes/island-splash-cleansing-cloths#directions>

PRODUCT CATEGORY: DOUCHES

REPRESENTATIVE MARKETING EXAMPLE: ISLAND SPLASH® DOUCHE

A. PRODUCT PACKAGING

FRONT OF PRODUCT

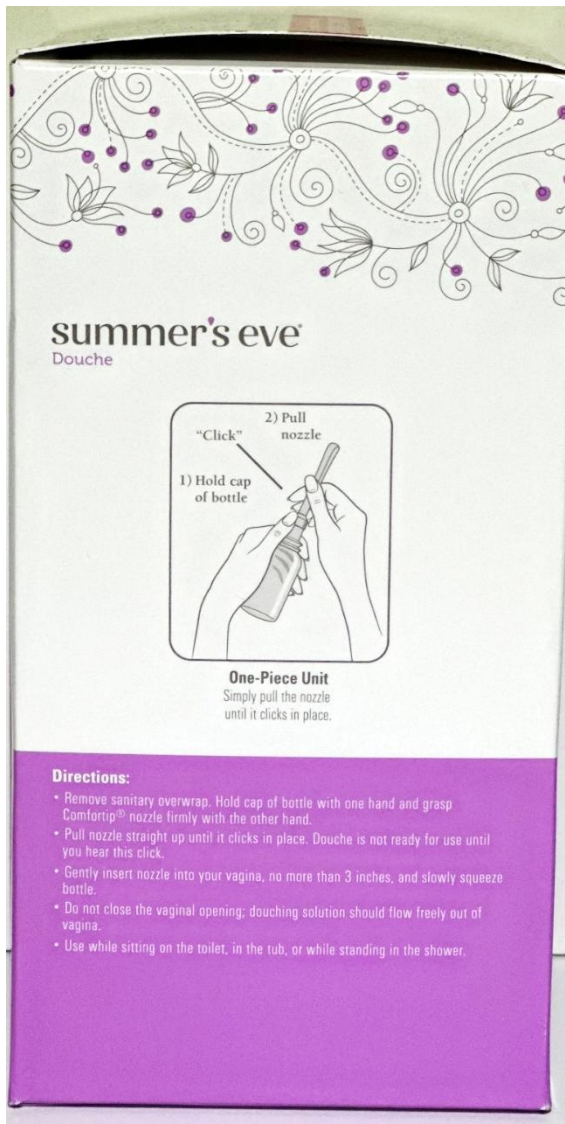


BACK OF PRODUCT

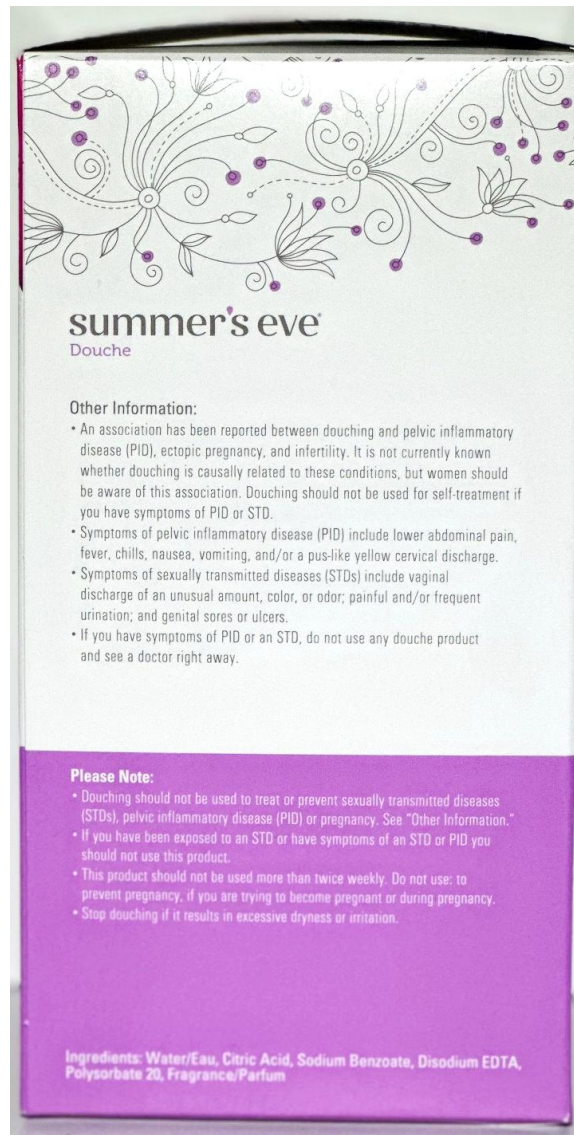


- Gynecologist tested
- For a fresh clean feeling anytime

SIDE (1) OF PRODUCT



SIDE (2) OF PRODUCT



- An association has been reported between douching and pelvic inflammatory disease (PID), ectopic pregnancy, and infertility. It is not currently known whether douching is causally related to these conditions, but women should be aware of this association. Douching should not be used for self-treatment if you have symptoms of PID or STD.
- Symptoms of pelvic inflammatory disease (PID) include lower abdominal pain, fever, chills, nausea, vomiting, and/or a pus-like yellow cervical discharge.
- Symptoms of sexually transmitted diseases (STDs) include vaginal discharge of an unusual amount, color, or odor; painful and/or frequent urination; and genital sores or ulcers.
- If you have symptoms of PID or an STD, do not use any douche product and see a doctor right away.

B. WEBSITE – PRODUCT PHOTOS & CLAIMS



- Gynecologist tested
- For a fresh clean feeling anytime, experience Summers Eve Washes Clothes and Sprays

<https://www.summerseve.com/feminine-hygiene-products/douche/island-splash>

i.



Gynecologist
Tested



pH-Balanced

Summer's Eve® Douche will leave you feeling clean and fresh. The mild, yet effective, pH-balanced formula has been gynecologist tested for gentleness to make sure you're getting the proper attention you so rightly deserve without irritation.

- Product not tested on animals ❤️

- Gynecologist Tested
- Summers eve douche will leave you feeling clean and fresh. The mild, yet effective, pH balanced formula has been gynecologist tested for gentleness to make sure you're getting the proper attention you so rightly deserve without irritation.

<https://www.summerseve.com/feminine-hygiene-products/douche/island-splash>

ii.



- Feel fresh & clean
<https://www.summerseve.com/feminine-hygiene-products/douche/island-splash>

iii.



- Gynecologist Tested
<https://www.summerseve.com/feminine-hygiene-products/douche/island-splash>

iv.

VAGINAL ODOR STOPS HERE

Not all products are created equal. Summer's Eve® offers a variety of products to control odor and meet every woman's needs.

- Vaginal odor stops here
- Summer's Eve® offers a variety of products to control odor and meet every woman's needs.
<https://www.summerseve.com/feminine-hygiene-products/douche/island-splash>

v.

**REMOVE ODOR
CAUSING BACTERIA**

And provides up to 24 hours
of freshness

**SPECIALLY DESIGNED
FOR YOUR FEMININE AREA**

Matches the body's
natural chemistry

**A REFRESHING
CLEANSING EXPERIENCE**

Gentle enough to
use everyday

- REMOVE ODOR CAUSING BACTERIA
- SPECIALLY DESIGNED FOR YOUR FEMININE AREA
- GENTLE ENOUGH TO USE EVERYDAY

<https://www.summerseve.com/feminine-hygiene-products/douche/island-splash>

vi.



- Odor control safe for your sensitive skin
- Gynecologist & clinically tested

<https://www.summerseve.com/feminine-hygiene-products/douche/island-splash>

PRODUCT CATEGORY: FRESHENING SPRAYS

REPRESENTATIVE MARKETING EXAMPLE: INTIMATE BODY SPRAY Amber Nights Dry Deodorant Spray

A. PRODUCT LABEL

FRONT OF PRODUCT



BACK OF PRODUCT

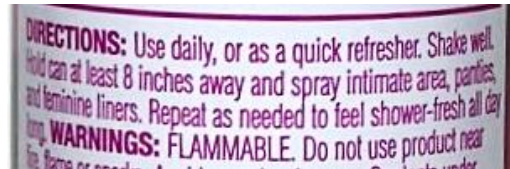


BACK OF PRODUCT – CLOSE UPS

TOP



DIRECTIONS



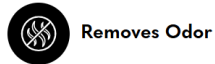
- Neutralizes Odor
- Intimate Care, Elevated
- A boost of freshness anytime
- Use daily or as a quick refresher

B. WEBSITE – PRODUCT PHOTOS & CLAIMS



- Neutralizes odor
 - Clinically tested
 - Gynecologist tested
- https://www.summerseve.com/feminine-hygiene-products?by_product_type%5B526%5D=526

i.



A refreshing experience for your intimate area, so you can take on anything. Uniquely formulated and won't disrupt your body's natural pH. Intimate care, elevated.

- Product not tested on animals ❤️
- Scent level as compared to other Summer's Eve® sprays

- Removes odor
- A refreshing experience for your intimate area
- Intimate care, elevated

<https://www.summerseve.com/feminine-hygiene-products/vaginal-spray/amber-nights-freshening-spray#fragrance-description>

ii.

Directions



Use daily, or as a quick refresher. Shake well, remove cap. Hold can at least 8 inches away and spray external vaginal area. For extra freshness, spray panties and feminine liners. Repeat as needed to feel shower-fresh all day long

- Use daily, or as a quick refresher.
 - For extra freshness, spray panties and feminine liners.
 - Repeat as needed to feel shower-fresh all day long
- <https://www.summerseve.com/feminine-hygiene-products/vaginal-spray/amber-nights-freshening-spray#fragrance-description>

PRODUCT CATEGORY: WHOLE BODY DEODORANT

REPRESENTATIVE MARKETING EXAMPLE: Ultimate Odor Protections Whole Body Deodorant

A. PRODUCT LABEL

FRONT PRODUCT LABEL



- Ultimate Odor Protection
- WHOLE BODY DEODORANT
- Intimate area, pits and beyond

BACK OF PRODUCT LABEL



- ViaFresh for odor protection so you can take on anything. Summers Eve Whole Body Deodorant absorbs invisibly on skin, is Gynecologist and Dermatologist tested, safe for intimate skin.
- Directions: apply to areas where you want to control odor

B. WEBSITE – PRODUCT PHOTOS & CLAIMS



- WHOLE BODY DEODORANT
- Intimate area, pits and beyond
- All day odor control
- Safe for intimate skin

<https://www.summerseve.com/feminine-hygiene-products/whole-body-deodorant-cream-simply-sensitive>

i.



Experience Ultimate Odor Protection with ViaFresh™ acidified formula so you can take on anything. Summer's Eve Whole Body Deodorant Cream absorbs invisibly on skin, is Gynecologist and Dermatologist tested, safe for intimate skin, strong enough for full body, and made without aluminum, dyes and parabens.

- Removes odor
 - Gynecologist tested
 - safe for intimate skin, strong enough for all body
- <https://www.summerseve.com/feminine-hygiene-products/whole-body-deodorant-cream-simple-sensitive>

ii.



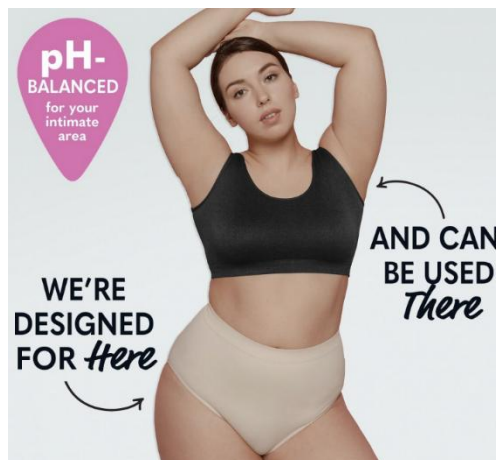
- Designed to be gentle enough for intimate skin & strong enough for whole body
- <https://www.summerseve.com/feminine-hygiene-products/whole-body-deodorant-cream-simple-sensitive>

iii.



- All day odor control
- Gynecologist & Dermatologist tested
<https://www.summerseve.com/feminine-hygiene-products/whole-body-deodorant-cream-simply-sensitive>

iv.



- We're designed for here
- pH-balanced for your intimate area
<https://www.summerseve.com/feminine-hygiene-products/whole-body-deodorant-cream-simply-sensitive>