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14 UNITED STATES DISTRICT COURT FOR THE  
15 DISTRICT OF NEVADA

16 UNITED STATES OF AMERICA

17 Plaintiff,

18 v.

19 AFFINITYLIFESTYLES.COM, INC., and REAL  
20 WATER, INC., corporations, and BRENT A.  
21 JONES and BLAIN K. JONES, individuals.

22 Defendants.

Case No. 21-cv-959

COMPLAINT FOR A PERMANENT  
INJUNCTION

23 Plaintiff, the United States of America, on behalf of the United States Food and Drug  
24 Administration (“FDA”) alleges:

25 1. This statutory injunction proceeding is brought under the Federal Food, Drug, and  
26 Cosmetic Act, 21 U.S.C. § 332(a), to halt the manufacture and distribution of adulterated and/or  
27 misbranded bottled drinking water and chemical concentrate. Defendants’ bottled drinking water has  
28 been associated with five cases of acute liver failure in children. Plaintiff seeks an injunction to restrain  
and enjoin Defendants from directly or indirectly doing or causing the following acts:





1 Next, Defendants claim to use a proprietary “ionizer” apparatus to apply an electrical current to this  
2 mixture, which allegedly creates positively-charged and negatively-charged solutions. Defendants then  
3 discard the positively-charged solution and store the negatively-charged solution as E<sup>2</sup> Concentrate.

4 18. Defendants use E<sup>2</sup> Concentrate for manufacturing Re<sup>2</sup>al Water at the Henderson Facility.  
5 Defendants also send E<sup>2</sup> Concentrate to the Mesa Facility for manufacturing Re<sup>2</sup>al Water there, and for  
6 repackaging the E<sup>2</sup> Concentrate into retail bottles.

7 19. Defendants manufacture Re<sup>2</sup>al Water by adding E<sup>2</sup> Concentrate and potassium hydroxide  
8 to municipal tap water that has been processed as described in paragraph 17. Defendants mix these  
9 ingredients in a large tank, and then fill containers with this mixture for distribution as Re<sup>2</sup>al Water.

10 20. Defendants distribute 5-gallon containers of Re<sup>2</sup>al Water from the Henderson Facility  
11 both to customers within Nevada and to customers located outside of Nevada, including Arizona and  
12 California. Defendants distribute 500-milliliter (mL), 1-liter (L), 1.5-L, and 1-gallon containers of Re<sup>2</sup>al  
13 Water from the Mesa Facility to distributors in Arizona, California, and Nevada. Defendants distribute  
14 4-ounce (oz) bottles of E<sup>2</sup> Concentrate from the Mesa Facility to online consumers throughout the  
15 United States.

16 21. Defendants market Re<sup>2</sup>al Water as “premium” drinking water that is a “clean,” “healthy”  
17 alternative to tap water.

18 22. Defendants market E<sup>2</sup> Concentrate as a taste enhancer that consumers can add to liquids,  
19 including, but not limited to, tea, coffee, and wine.

20 23. Defendants intend for Re<sup>2</sup>al Water and E<sup>2</sup> Concentrate to be consumed with no further  
21 processing. It is therefore crucial for Defendants to properly manufacture, process, prepare, bottle, pack,  
22 hold, and distribute Re<sup>2</sup>al Water and E<sup>2</sup> Concentrate to minimize the potential for chemical and  
23 microbial contamination and reduce the risk of illness to consumers.

24 **PREVENTIVE CONTROLS REQUIREMENTS**

25 24. The Federal Food, Drug, and Cosmetic Act requires that the owner, operator, or agent in  
26 charge of a facility evaluate the hazards that could affect food manufactured, processed, packed, or held  
27 by such facility, and identify and implement preventive controls to significantly minimize or prevent the  
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1 occurrence of those hazards and provide assurances that such food is not adulterated. See 21 U.S.C.  
2 § 350g (Hazard analysis and risk-based preventive controls).

3 25. The hazard analysis and risk-based preventive controls requirements set forth at 21  
4 C.F.R. Part 117, Subpart C (“Human Food Preventive Control Regulations”), implement 21 U.S.C.  
5 § 350g, and were promulgated to better protect the public health by, among other things, ensuring the  
6 production of safe and sanitary food through hazard analysis and risk-based preventive controls. See 21  
7 U.S.C. § 350g(n)(1)(A). Failure to comply with the Human Food Preventive Control Regulations  
8 violates the Federal Food, Drug, and Cosmetic Act. See 21 U.S.C. § 331(uu) and 21 C.F.R. § 117.1(b);  
9 see also Final Rule, Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive  
10 Controls in Human Food, 80 Fed. Reg. 55,908 (Sept. 17, 2015).

11 26. The hazard analysis requirements require the owner, operator, or agent in charge of a  
12 food facility to “conduct a hazard analysis to identify . . . known or reasonably foreseeable hazards . . .  
13 to determine whether there are any hazards requiring a preventive control” for each type of food  
14 manufactured, processed, packed, or held at the facility. 21 C.F.R. § 117.130(a) (Requirement for a  
15 hazard analysis); 21 U.S.C. § 350g(b). Hazards can be biological, chemical, or physical, and they can be  
16 naturally occurring, unintentionally introduced, or intentionally introduced for purposes of economic  
17 gain. See 21 U.S.C. § 350g(b); 21 C.F.R. § 117.130(b) (Hazard identification).

18 27. The owner, operator, or agent in charge of a food facility must, among other things,  
19 identify and implement preventive controls to provide assurances that any hazards requiring a preventive  
20 control are significantly minimized or prevented, and the food manufactured, processed, packed, or held  
21 by a facility is not adulterated under 21 U.S.C. § 342. See 21 U.S.C. § 350g(c); 21 C.F.R. § 117.135  
22 (Preventive controls).

23 28. Preventive controls include, as appropriate to the food and facility, process controls,  
24 sanitation controls, supply-chain controls, a recall plan, as well as any other controls necessary to  
25 provide assurances that the food is not adulterated under 21 U.S.C. § 342. 21 U.S.C. § 350g(c); 21  
26 C.F.R. § 117.135(c).



1 B. Failure to identify and implement preventive controls to provide assurances that  
2 the food manufactured, processed, packed, or held at Defendants' facilities is not adulterated under 21  
3 U.S.C. § 342, in violation of 21 U.S.C. § 350g(c) and 21 C.F.R. § 117.135;

4 C. Failure to monitor the effectiveness of preventive controls to provide assurances  
5 that the food manufactured, processed, packed, or held by Defendants' facilities is not adulterated under  
6 21 U.S.C. § 342, in violation of 21 U.S.C. § 350g(d) and 21 C.F.R. § 117.145;

7 D. Failure to establish appropriate corrective action procedures to ensure that the  
8 food manufactured, processed, packed, or held by Defendants' facilities and introduced into interstate  
9 commerce is not adulterated, in violation of 21 U.S.C. § 350g(e) and 21 C.F.R. § 117.150(b);

10 E. Failure to verify that preventive controls identified and implemented to provide  
11 assurances that the food manufactured, processed, packed, or held by Defendants' facilities is not  
12 adulterated under 21 U.S.C. § 342 are adequate to control the hazards so identified, in violation of 21  
13 U.S.C. § 350g(f) and 21 C.F.R. § 117.165(a);

14 F. Failure to establish and implement a risk-based supply-chain program for those  
15 raw materials and other ingredients for which the receiving facility has identified a hazard requiring a  
16 supply-chain-applied control, in violation of 21 U.S.C. § 350g(c) and 21 C.F.R. §§ 117.135(c)(4) and  
17 117.405; and

18 G. Failure to develop a written food safety plan, in violation of 21 U.S.C. § 350g(h)  
19 and 21 C.F.R. § 117.126.

20 **FOOD ADULTERATION**

21 34. Food is adulterated within the meaning of the Federal Food, Drug, and Cosmetic Act "if  
22 it has been prepared, packed, or held under insanitary conditions whereby it may have become  
23 contaminated with filth, or whereby it may have been rendered injurious to health." 21 U.S.C.  
24 § 342(a)(4).

25 35. Manufacturers that process, bottle, hold, or ship bottled drinking water must comply with  
26 FDA's current good manufacturing practice ("CGMP") requirements for bottled drinking water at 21  
27 C.F.R. Part 129 ("Bottled Water CGMP Regulations"). See 21 C.F.R. § 129.1. The Bottled Water  
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1 CGMP Regulations were promulgated to ensure that bottled drinking water is safe for human  
2 consumption and that it has been processed, bottled, held, and transported under sanitary conditions. 21  
3 C.F.R. § 129.1. Manufacturing according to Bottled Water CGMP Regulations means that the facilities,  
4 methods, practices, and controls used in the processing, bottling, holding, and transporting of bottled  
5 drinking water are administered in conformity with CGMP. 21 C.F.R. § 129.1.

6 36. Among other things, failure to follow Bottled Water CGMP Regulations can render  
7 bottled drinking water adulterated within the meaning of 21 U.S.C. § 342(a)(4). See 21 C.F.R. § 129.1.

8 *Defendants' Violations*

9 37. Defendants violate the Federal Food, Drug, and Cosmetic Act, 21 U.S.C. § 331(a), by  
10 introducing or delivering for introduction into interstate commerce, or causing the introduction or  
11 delivery for introduction into interstate commerce, articles of food that are adulterated within the  
12 meaning of 21 U.S.C. § 342(a)(4).

13 38. Defendants violate the Federal Food, Drug, and Cosmetic Act, 21 U.S.C. § 331(k), by  
14 causing articles of food that are held for sale after shipment of one or more of their components in  
15 interstate commerce to become adulterated within the meaning of 21 U.S.C. § 342(a)(4).

16 39. Defendants fail to comply with Bottled Water CGMP Regulations by, among other  
17 things, their:

18 A. Failure to adequately clean and sanitize product water-contact surfaces of all  
19 multiservice containers, utensils, pipes, and equipment used in the transportation, processing, handling,  
20 and storage of product water, in violation of 21 C.F.R. § 129.37 (Sanitary operations), as those terms are  
21 defined by 21 C.F.R. § 129.3 (e.g., “product water” is processed water that a plant uses for bottled  
22 drinking water, and “multiservice containers” are containers intended to be used more than once);

23 B. Failure to process product water under processes and controls necessary to ensure  
24 that Defendants’ treatment of their product water is effective and will not adulterate the bottled product,  
25 in violation of 21 C.F.R. § 129.80(a);

26 C. Failure to adequately sample and test cleaning and sanitizing solutions to assure  
27 adequate performance in the cleaning and sanitizing operations, in violation of 21 C.F.R. § 129.80(c);

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1 D. Failure to identify each unit package with a production code that identifies the  
2 batch and date produced, and record and maintain information as to the kind of product, volume  
3 produced, date produced, lot code used, and the distribution of product to wholesale and retail outlets, in  
4 violation of 21 C.F.R. § 129.80(e);

5 E. Failure to adequately monitor and record the performance of their filling, capping,  
6 and sealing process to assure that containers and closures are free from contamination, in violation of 21  
7 C.F.R. § 129.80(f); and

8 F. Failure to adequately analyze product samples to assure that production of bottled  
9 drinking water complies with applicable standards, laws, and regulations, in violation of 21 C.F.R.  
10 § 129.80(g).

11 **MISBRANDED FOOD**

12 40. A food is misbranded within the meaning of the Federal Food, Drug, and Cosmetic Act  
13 if, among other things, it is fabricated from two or more ingredients and its label fails to bear the  
14 common or usual name of each ingredient. 21 U.S.C. § 343(i)(2).

15 41. Food must comply with labeling requirements that declare the ingredients by listing them  
16 by common or usual name in descending order of predominance by weight on either the principle  
17 display panel or the information panel. *See* 21 C.F.R. § 101.4 (Food; designation of ingredients).

18 *Defendants' Violations*

19 42. Defendants violate the Federal Food, Drug, and Cosmetic Act, 21 U.S.C. § 331(a), by  
20 introducing or delivering for introduction into interstate commerce, or causing to be introduced or  
21 delivered for introduction into interstate commerce, articles of food that are misbranded under 21 U.S.C.  
22 § 343(i)(2).

23 43. Defendants violate the Federal Food, Drug, and Cosmetic Act, 21 U.S.C. § 331(k), by  
24 causing articles of food that are held for sale after shipment of one or more components in interstate  
25 commerce to become misbranded under 21 U.S.C. § 343(i)(2).

26 44. Defendants cause their Re<sup>2</sup>al Water and E<sup>2</sup> Concentrate to be misbranded within the  
27 meaning of the Federal Food, Drug, and Cosmetic Act as follows:



1           B.       Failure to identify and implement preventive controls to provide assurances that  
2 the food manufactured, processed, packed, or held by Defendants' facilities is not adulterated under 21  
3 U.S.C. § 342, in violation of 21 U.S.C. §350g(c) and 21 C.F.R. § 117.135. For example, FDA  
4 investigators observed at the Henderson and Mesa Facilities that Defendants have no written process  
5 control and/or supply-chain control procedures to ensure that the correct type and amount of chemicals  
6 are added to each batch of product water. Defendants also do not have written sanitation controls at the  
7 Henderson and Mesa Facilities to control the risk of recontamination with environmental pathogens  
8 during the mixing and bottling processes;

9           C.       Failure to monitor the effectiveness of preventive controls to provide assurances  
10 that the food manufactured, processed, packed, or held at Defendants' facilities is not adulterated under  
11 21 U.S.C. § 342, in violation of 21 U.S.C. § 350g(d) and 21 C.F.R. § 117.145. Specifically, Defendants  
12 do not have any monitoring records documenting Defendants' formulation and mixing steps of their E<sup>2</sup>  
13 Concentrate at the Henderson Facility, and do not have any monitoring records documenting  
14 Defendants' formulation and mixing steps of their Re<sup>2</sup>al Water at the Henderson and the Mesa Facilities;

15           D.       Failure to establish appropriate corrective action procedures to ensure that the  
16 food manufactured, processed, packed, or held by Defendants' facilities from and entering interstate  
17 commerce is not adulterated in violation of 21 U.S.C. § 350g(e) and 21 C.F.R. § 117.150(b).  
18 Specifically, Defendants did not implement or record appropriate corrective actions in response to  
19 illness complaints and equipment failure;

20           E.       Failure to verify that preventive controls identified and implemented to provide  
21 assurances that the food manufactured, processed, packed, or held by Defendants' facilities is not  
22 adulterated under 21 U.S.C. § 342 are adequate to control the hazard so identified, in violation of 21  
23 U.S.C. § 350g(f) and 21 C.F.R. § 117.165(a). Specifically, Defendants failed to collect and test  
24 environmental samples that verify the effectiveness of their sanitation controls to prevent contamination  
25 by environmental pathogens;

26           F.       Failure to establish and implement a risk-based supply-chain program for those  
27 raw materials and other ingredients for which the receiving facility has identified a hazard requiring a  
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1 supply-chain-applied control, in violation of 21 U.S.C. § 350g(c) and 21 C.F.R. §§ 117.135(c)(4) and  
2 117.405. Specifically, FDA investigators observed that Defendants do not have preventive controls at  
3 the Mesa Facility for the E<sup>2</sup> Concentrate received from the Henderson Facility to verify that the  
4 Henderson Facility is controlling the chemical hazard that could result due to misformulation of the E<sup>2</sup>  
5 Concentrate. Defendants also do not have records documenting the Mesa Facility's receipt of the E<sup>2</sup>  
6 Concentrate, which is needed for a valid supply-chain program; and

7 G. Failure to develop a written food safety plan, in violation of 21 U.S.C. § 350g(h)  
8 and 21 C.F.R. § 117.126. Defendants are required to have a written food safety plan that contains a  
9 hazard analysis, preventive controls, a supply-chain program, a recall plan, procedures for monitoring  
10 the preventive control implementation, corrective action procedures, and verification procedures, but  
11 they do not have such a plan for their E<sup>2</sup> Concentrate. Thus, Defendants have not taken adequate  
12 measures to protect against the hazards of chemical contamination in E<sup>2</sup> Concentrate or in Re<sup>2</sup>al Water  
13 that contains E<sup>2</sup> Concentrate and is distributed directly to consumers.

14 *Bottled Water CGMP*

15 47. Defendants' significant deviations from CGMP regulations included, but were not limited  
16 to, the following:

17 A. Failure to adequately clean and sanitize product water-contact surfaces of all  
18 multiservice containers, utensils, pipes, and equipment used in the transportation, processing, handling,  
19 and storage of their product water, in violation of 21 C.F.R. § 129.37. For example, during the  
20 inspections at the Mesa and Henderson Facilities, FDA investigators observed that Defendants have not  
21 properly cleaned and sanitized the water tanks in which they mix processed municipal tap water with E<sup>2</sup>  
22 Concentrate, potentially leading to chemical and microbial contamination;

23 B. Failure to process product water under processes and controls necessary to ensure  
24 that Defendants' treatment of their processed product water is effective and will not adulterate the  
25 bottled product, in violation of 21 C.F.R. § 129.80(a). For example, during the inspection at the  
26 Henderson Facility, FDA investigators observed that Defendants use a combination of carbon, reverse  
27 osmosis, ultraviolet light, and ozone filtration to process municipal tap water prior to its use as an  
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1 ingredient in E<sup>2</sup> Concentrate and Re<sup>2</sup>al Water. However, Defendants fail to record the results of any  
2 inspections of the equipment used for these processes, conditions found, and the performance or  
3 effectiveness of the equipment. In addition, at the Henderson and Mesa Facilities, the investigators  
4 observed that Defendants do not sample the processed municipal tap water to assure the effectiveness of  
5 these processes, potentially leading to impure and unsafe water;

6 C. Failure to adequately sample and test cleaning and sanitizing solutions to assure  
7 adequate performance in the cleaning and sanitizing operations, in violation of 21 C.F.R. § 129.80(c).  
8 For example, during the inspection at the Henderson Facility, FDA investigators observed that  
9 Defendants use recycled detergent and sanitizer water to clean and sanitize their reusable 5-gallon water  
10 containers that hold Re<sup>2</sup>al Water, but fail to record the results of any sampling and testing of the  
11 recycled detergent and sanitizer water to assure adequate performance, potentially leading to chemical  
12 and microbial contamination;

13 D. Failure to identify each unit package with a production code that identifies the  
14 batch and date produced, and record and maintain information as to the kind of product, volume  
15 produced, date produced, lot code used, and the product distribution to wholesale and retail outlets, in  
16 violation of 21 C.F.R. § 129.80(e). For example, FDA investigators observed no production codes on  
17 unit packages of Re<sup>2</sup>al Water held at the Henderson Facility. Defendants were unable to provide  
18 production records from the Mesa Facility. These failures further complicated recall and traceback  
19 activities;

20 E. Failure to adequately monitor and record the performance of their filling, capping,  
21 and sealing processes to assure that containers and closures are free from contamination, in violation of  
22 21 C.F.R. § 129.80(f). Specifically, FDA investigators observed that Defendants do not monitor and  
23 record the performance of their filling, capping, and sealing operations, and they do not inspect and  
24 sample the containers and closures for bacteriological contamination; and

25 F. Failure to adequately analyze product samples to assure that production of bottled  
26 drinking water complies with applicable standards, laws, and regulations, in violation of 21 C.F.R.  
27 § 129.80(g). Specifically, Defendants fail to take and analyze representative product samples at least  
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1 once a week for total coliform organisms, fail to take and analyze representative product samples at least  
2 annually for chemical, radiological, physical, and radiological purposes, and fail to keep records of such  
3 analysis.

4 *Illnesses*

5 48. On March 13, 2021, FDA received information regarding five cases of acute non-viral  
6 hepatitis (resulting in acute liver failure) in infants and children that appeared to be associated with Re<sup>2</sup>al  
7 Water. The patients are from four different households, and all consumed Re<sup>2</sup>al Water prior to  
8 becoming ill.

9 49. FDA, the Centers for Disease Control and Prevention (“CDC”), and State health  
10 departments are investigating these illnesses and collecting additional data as part of an ongoing  
11 epidemiological investigation. To date, CDC has identified only one common exposure for the above  
12 five cases – Re<sup>2</sup>al Water. No other common exposures, including medications, food, supplements,  
13 activities, travel history, or ill contacts have been reported or linked to the illnesses.

14 50. During the 2021 Inspections, FDA investigators documented that Defendants had  
15 received complaints of illness from consumers, including complaints of nausea and vomiting after  
16 consuming Re<sup>2</sup>al Water.

17 51. After FDA warned consumers, restaurants, distributors, and retailers not to drink, cook  
18 with, sell, or serve Re<sup>2</sup>al Water because of its association with the illnesses, FDA received additional  
19 consumer complaints of illnesses alleged to be caused by Re<sup>2</sup>al Water.

20 **WARNINGS**

21 52. On March 16, 2021, FDA notified Defendants that Re<sup>2</sup>al Water appeared to be associated  
22 with five cases of non-viral hepatitis in children. In response, Defendants assured FDA that they would  
23 complete a thorough recall of all Re<sup>2</sup>al Water.

24 53. Despite such assurances, FDA’s subsequent recall audit revealed that several distributors  
25 and retail establishments appeared to be unaware of the recall.

26 54. During the inspections, FDA investigators received conflicting information from  
27 Defendant Blain K. Jones about ingredients, manufacturing processes, and manufacturing and  
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1 processing dates for Re<sup>2</sup>al Water and E<sup>2</sup> Concentrate. For example, Blain K. Jones initially stated that  
2 the 5-gallon containers of Re<sup>2</sup>al Water were manufactured only in the Mesa Facility in November 2020,  
3 but FDA investigators later determined that the Henderson Facility was Defendants' only facility  
4 capable of bottling 5-gallon containers of Re<sup>2</sup>al Water. Additionally, Blain K. Jones stated that  
5 Defendants' E<sup>2</sup> Concentrate had only been manufactured before August 2020, at a prior Las Vegas  
6 location. FDA investigators later determined that Defendants manufactured E<sup>2</sup> Concentrate at the  
7 Henderson Facility at least three times since September 2020. Blain K. Jones also denied any change in  
8 the formulation of Defendants' Re<sup>2</sup>al Water, but FDA investigators later determined that Defendants had  
9 changed the formulation in November 2020 because of customer complaints regarding taste and possible  
10 illness.

11 55. Based on the foregoing, Plaintiff believes that, unless restrained by this Court,  
12 Defendants will continue to violate the Federal Food, Drug, and Cosmetic Act in the manner set forth  
13 above.

14 **PRAYER FOR RELIEF**

15 WHEREFORE, Plaintiff respectfully requests that this Court:

16 I. Order that Defendants, and each and all of their directors, officers, agents,  
17 representatives, employees, attorneys, successors, assigns, and any and all persons in active concert or  
18 participation with any of them, cease manufacturing, processing, preparing, bottling, packing, labeling,  
19 holding, or distributing articles of food, unless and until Defendants' facilities, methods, processes, and  
20 controls used to manufacture, process, prepare, bottle, pack, labeling, hold, and distribute articles of  
21 food are established, operated, and administered in conformity with the Federal Food, Drug, and  
22 Cosmetic Act and applicable regulations, in a manner acceptable to FDA; and

23 II. Order that Defendants, and each and all of their directors, officers, agents,  
24 representatives, employees, attorneys, successors, assigns, and any and all persons in active concert or  
25 participation with any of them, be restrained and enjoined under 21 U.S.C. § 332(a) from directly or  
26 indirectly doing or causing to be done any of the following acts:  
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1 a. Violating 21 U.S.C. § 331(uu), by operating a facility that manufactures,  
2 processes, packs, or holds food for sale in the United States, and not doing so in compliance with the  
3 hazard analysis and risk-based preventive controls requirements in 21 U.S.C. § 350g; and

4 b. Violating 21 U.S.C. § 331(a), by introducing or delivering for introduction, or  
5 causing to be introduced or delivered for introduction, into interstate commerce articles of food that are  
6 adulterated within the meaning of 21 U.S.C. § 342(a)(4) and/or misbranded within the meaning of 21  
7 U.S.C. § 343; and

8 c. Violating 21 U.S.C. § 331(k), by causing articles of food that are held for sale  
9 after shipment of one or more of their components in interstate commerce to become adulterated within  
10 the meaning of 21 U.S.C. § 342(a)(4) and/or misbranded within the meaning of 21 U.S.C. § 343; and

11 III. Order that FDA be authorized pursuant to this injunction to inspect Defendants' place(s)  
12 of business and all records relating to the manufacture, processing, preparing, bottling, packing,  
13 labeling, holding, and distribution of Defendants' products to ensure continuing compliance with the  
14 terms of the injunction, and that the Defendants bear the costs of such inspections at the rates prevailing  
15 at the time of the inspection(s) are accomplished; and

16 IV. Award Plaintiff costs incurred in pursuing this action, including the costs of investigation  
17 to date; and

18 V. Order such other and further equitable relief as this Court deems just and proper.  
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1 Dated this 19th day of May, 2021.

2  
3 Respectfully submitted,

4 CHRISTOPHER CHIOU  
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6 District of Nevada

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