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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

ANIMAL OUTLOOK,

Plaintiff,

v.

RALPHS GROCERY COMPANY;
THE KROGER CO.; and DOES 1-10,

Defendants.

) **Case No. 26TRCV01040**

) **VERIFIED COMPLAINT FOR INJUNCTIVE**
) **RELIEF FOR VIOLATION OF THE UNFAIR**
) **COMPETITION LAW AND FALSE**
) **ADVERTISING LAW**

) **[Bus. & Prof. Code § 17200, et. seq.,**
) **Bus. & Prof. Code § 17500, et. seq.]**

1 Plaintiff ANIMAL OUTLOOK, a 501(c)(3) nonprofit (“AO”), on behalf of itself and the general
2 public, alleges as follows against Defendants RALPHS GROCERY COMPANY (“Ralphs”), an Ohio
3 corporation, THE KROGER CO. (“Kroger”), an Ohio corporation, and DOES 1-10:

4 **INTRODUCTION**

5 1. Plaintiff brings this private attorney general action under Bus. and Prof. Code § 17200, *et*
6 *seq.* (“UCL”) and Bus. and Prof. Code § 17500, *et seq.* (“FAL”) on its own behalf and on behalf of the
7 general public. Plaintiff seeks no different or greater relief for itself than for the general public in this
8 action, which is injunctive relief to stop unlawful business practices.

9 2. Defendant Ralphs, an Ohio corporation and fully-owned subsidiary of Kroger, owns and
10 operates grocery stores in Southern California.

11 3. Multiple Ralphs locations in Los Angeles County (the “Ralphs Stores”) have interior
12 refurbishments, which attract consumers with large painted signs over various sections of the
13 supermarkets. These signs make representations about health and animal welfare, touting to customers
14 that Ralphs is forward-thinking and responsible in how it stocks its products. On information and belief,
15 Ralphs is expanding this new signage to more locations—most recently to its Tarragona Plaza location.

16 4. Specifically, the Ralphs Stores use the terms “raised naturally,” “no antibiotics,” and “no
17 added hormones” over select meat cases and “well raised” over select meat counters.

18 5. These claims send consumers a holistic message about Ralphs’ sourcing compared to
19 other retail stores, and they concretely tell consumers to expect humane and healthy food underneath the
20 signage, rather than conventional factory-farmed meat.

21 6. Yet Ralphs stocks (1) products with antibiotics in the “no antibiotics”/ “raised naturally”
22 cases, and (2) products with no special indicators of high welfare, let alone certifications, in the “well
23 raised” meat sections. Indeed, much of the “well raised” meat selection fails to meet Kroger’s own
24 welfare standards.

25 7. Defendants know or reasonably should know that the statements in the Ralphs Stores are
26 untrue or misleading. A grocery store exercising reasonable care would know what products it stocks,
27 and what attributes they do and do not have.

1 8. Moreover, on information and belief, Defendants have continued to roll out this
2 misleading signage at new locations, like Ralphs Tarragona Plaza, despite correspondence from Plaintiff
3 Animal Outlook explaining that the signage is misleading.

4 9. Because Defendants are knowingly making untrue or misleading statements to customers,
5 they are engaging in an unlawful business practice that violates California’s FAL and UCL.

6 **PARTIES**

7 10. Plaintiff ANIMAL OUTLOOK (“AO”) is a nonprofit, tax exempt, 501(c)(3) corporation
8 organized and existing under the laws of the State of Delaware and based in Takoma Park, Maryland. It
9 transacts business in California and throughout the United States.

10 11. AO’s mission is to expose the cruel and deleterious practices of animal agribusinesses,
11 especially standard practices employed by conventional factory farm operations. To that end, AO
12 investigates animal production operations, educates the public about reasons to remove animal products
13 from their dietary staples, works to advance corporate policies that improve animal welfare in supply
14 chains, and helps to pass and defend legislation banning cruel standard practices.

15 12. Defendant RALPHS GROCERY COMPANY (“Ralphs”) is a corporation organized and
16 existing under the laws of the State of Ohio. On information and belief, Ralphs has its principal place of
17 business in Compton, California. Ralphs is a wholly owned subsidiary of Kroger.

18 13. Defendant THE KROGER CO. (“Kroger”) is a corporation organized and existing under
19 the laws of the State of Ohio. On information and belief, Kroger has its principal place of business in
20 Cincinnati, Ohio.

21 14. On information and belief, Kroger oversees merchandising decisions in the Ralphs
22 Stores. Kroger’s “key leaders” include a president of the Ralphs Division, Ms. Kendra Doyel, who was
23 formerly the vice president of merchandising for the Kroger Co.’s Ralphs Division.¹ As part of that role,
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27 ¹ *Kroger Announces Key Leader Updates*, Kroger – News Details (January 13, 2026),
28 <https://ir.kroger.com/news/news-details/2026/Kroger-Announces-Key-Leader-Updates/default.aspx>.

1 Ms. Doyel oversaw “sales and merchandising for 185 stores located throughout Southern California. . .
2 .”²

3 15. On information and belief, Kroger directly controls, standardizes, approves, or materially
4 influences merchandising, category management, private-label branding, in-store marketing, animal-
5 welfare messaging, and product assortment decisions implemented in Ralphs stores, including the
6 challenged meat-department signage and the placement of products beneath that signage.

7 16. On information and belief, the challenged “no antibiotics” and “well raised”
8 representations are not isolated store-level acts, but are part of merchandising, branding, signage, or
9 product-placement decisions made, approved, directed, standardized, or knowingly permitted by Kroger
10 and implemented through Ralphs.

11 17. AO is unaware of the true names and capacities of the Defendants DOES 1-10 (“Doe
12 defendants”) and therefore sues these Defendants under such fictitious names. Plaintiff will seek leave to
13 amend this complaint when their true names and capacities have been ascertained.

14 18. Plaintiff is informed and believes, and thereon alleges, that Doe defendants are legally
15 responsible in some manner for the events, acts, and omissions alleged herein, including but not limited
16 to directing or controlling the challenged business practices. Doe defendants include persons that
17 exercised control over Ralphs’ retail merchandising, branding, advertising, labeling, procurement,
18 compliance, and other practices. Doe defendants also include agents, servants, or employees of each and
19 every other Defendant that were or are acting within the course and scope of his or her agency and
20 employment and with the knowledge, ratification and consent of each respective principal.

21 19. Defendants’ business practices, outlined in this complaint, frustrate AO’s core mission of
22 encouraging consumers to avoid or reduce purchases of conventionally-produced animal products and
23 force AO to divert its resources.

24 20. Defendants’ challenged business practices mislead the public into believing the products
25 Ralphs sells are not the conventional factory-farmed products that AO advocates against, when the
26 opposite is true. While AO works to educate the public on how conventional meat is unnatural and
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28 ² *Kendra Doyel*, LOS ANGELES TIMES, available at <https://www.latimes.com/b2b/business-visionaries/inspirational-women/kendra-doyel> (last visited Feb. 23, 2026).

1 derived from cruel treatment of animals, urging consumers to eliminate or cut back on consumption of
2 these products, the signage at the Ralphs Stores disguises them as different, higher-quality and more
3 ethical products, creates a false safe haven for its customers to feel good about purchasing standard meat
4 products, and capitalizes on AO's own public outreach efforts in promoting a shift away from cruel
5 factory farm practices. This in turn requires AO to expend more resources seeking to inform the public
6 that Ralphs' advertising is false and misleading, instead of simply promoting its core message that
7 factory farmed products are cruel. Now, AO must not only get its own message out, but must explain
8 why Ralphs' message—which appears to be aligned with AO's—is actually just capitalizing on AO's
9 message for advertising purposes, while Ralphs is carrying products that are the opposite of what it
10 claims.

11 21. Defendants' deceptive advertising practices have forced AO to divert organizational
12 resources to investigate, document, analyze, and respond to the challenged conduct. Among other things,
13 AO expended staff time and organizational resources to visit multiple Ralphs locations, review in-store
14 signage and product offerings, compare those offerings against product packaging and supplier
15 representations, document the challenged practices, communicate with the public regarding the alleged
16 deception, urge corrective action, and seek governmental enforcement.

17 22. These expenditures were necessary to counteract Defendants' deceptive practices and
18 were not part of AO's ordinary course of operations absent Defendants' unlawful business practices. As
19 a result, Defendants' conduct has caused AO to expend money and resources that otherwise would have
20 been devoted to its regular programmatic activities.

21 23. In addition, despite AO's best efforts to urge corrective action, Defendants have not
22 responded and, on information and belief, continue expanding their unlawful marketing, causing AO to
23 divert even more resources.

24 24. AO should not need to spend its time and money combatting marketing that is illegal, and
25 should instead be able to focus on investigating agricultural facilities, educating the public about
26 practices it exposes, working with law enforcement to enforce animal cruelty laws, and fighting for laws
27 and policies that protect animals in agriculture.

1 **JURISDICTION AND VENUE**

2 25. This Court has jurisdiction over the claims asserted because relief is sought under Bus. &
3 Prof. Code § 17200, *et seq.* and § 17500, *et seq.*

4 26. This Court has personal jurisdiction over all Defendants pursuant to Code Civ. Proc. §
5 410.10 because the acts and omissions complained of occurred in California, Defendants purposefully
6 directed their conduct toward California, and Plaintiff’s claims arise out of and relate to Defendants’
7 forum-related activities.

8 27. Defendant Ralphs is subject to general personal jurisdiction in California courts pursuant
9 to Code Civ. Proc. § 410.10 because Ralphs owns and operates its retail grocery stores throughout
10 Southern California including in this County, and has continuous and systematic contacts with the State
11 of California sufficient to render it essentially at home here.

12 28. Los Angeles County, in which this court is located, is a proper venue for this action under
13 Code Civ. Proc. § 395(a) because Defendants engage in the unlawful practices alleged hereinafter in this
14 County.

15 **FACTS**

16 29. The Ralphs Stores demarcate sections of their products with large, painted signs reading
17 “raised naturally,” “no antibiotics,” and “no added hormones” over select meat cases and “well raised”
18 over select meat counters.

19 30. This signage not only attracts customers to Ralphs Stores by sending a holistic message
20 about the stores’ products; it concretely indicates to customers that the products it sells under each sign
21 have distinctive qualities related to health and animal well-being.

22 31. Most products under these signs, however, do not have distinctive characteristics as
23 advertised, and are not distinguishable from products that consumers can buy at other grocery outlets or
24 even at other Ralphs locations with standard signage.

25 32. To a reasonable consumer, the phrases “raised naturally,” “no antibiotics,” and “no
26 hormones,” when used as overhead departmental signage above a meat case, represent that the meat
27 products displayed in that section are derived from animals not raised with antibiotics or added
28 hormones.

1 33. Likewise, to a reasonable consumer, the phrase “well raised,” when used as overhead
2 signage above a meat counter, represents that the meat products displayed in that section come from
3 animals raised under materially better animal-welfare conditions than conventional meat products.

4 34. Defendants know or reasonably should know that their statements are untrue or
5 misleading. A grocery store company exercising reasonable care would know what products it stocks
6 and what attributes they do and do not have.

7 35. AO also warned Ralphs and Kroger about Defendants’ misleading signage and urged
8 corrective action. On February 27, 2026, AO sent a formal letter to key executives of both companies,
9 and on March 14, 2026, AO posted on social media and tagged both companies. Neither Defendant has
10 responded to AO’s outreach.

11 36. A store employee stated on March 17, 2026, that Defendants added the “no antibiotics,”
12 “no added hormones,” “raised naturally,” and “well raised” signage to Ralphs’ Tarragona Plaza location
13 “in the last couple of weeks.” Thus, it appears that Defendants have continued to roll out new and
14 misleading signage after and in spite of AO’s correspondence.

15 37. Defendants’ use of health and animal welfare signage absent corresponding product
16 compliance is misleading under California’s UCL and FAL for the reasons set forth below.

17 **A. Ralphs’ “Raised Naturally,” “No Antibiotics,” and “No Added Hormones” Claims**

18 38. At least three Ralphs Stores display a large sign over a case of meat products with the
19 headline “raised naturally,” “no antibiotics,” and “no added hormones.”

20 39. In Ralphs’ Torrance store, Ralphs installed the sign above a refrigerated case.



1 40. On information and belief, the “no antibiotics” language is plainly false.

2 41. Ralphs Torrance displays pork products in the refrigerated case including Farmer John
3 pork sausage links, Farmer John bacon, Hormel bacon, Jimmy Dean pork sausage, Jimmy Dean bacon,
4 Johnsonville breakfast sausage, and Oscar Mayer bacon, none of which are antibiotic free.

5 42. For each of the listed products, a third-party analytics report, which ranks food products
6 based on nutrition, ingredient, and processing concerns (the “EWG Report”), states “Antibiotics were
7 likely used in the production of this meat.”³

8 43. The EWG Report is consistent with industry practice⁴ and with the companies’ own
9 statements and policies. Hormel’s antibiotic policy is to “use antibiotics responsibly,” not to omit
10 antibiotics entirely from its products.⁵

11 44. Hormel owns one antibiotic-free brand called Applegate, but Hormel bacon is not related
12 to that product line.

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15 ³ Environmental Working Group, *Farmer John Classic Pork Sausage Links, Classic Pork*,
16 EWG’s FOOD SCORES, [https://www.ewg.org/foodscores/products/050500813051-
17 FarmerJohnClassicPorkSausageLinksClassicPork/](https://www.ewg.org/foodscores/products/050500813051-FarmerJohnClassicPorkSausageLinksClassicPork/) (last visited Mar. 3, 2026).; Environmental Working
18 Group, *Farmer John Premium Bacon, Classic*, EWG’s FOOD SCORES,
19 <https://www.ewg.org/foodscores/products/050500000451-FarmerJohnPremiumBaconClassic/> (last
20 visited Mar. 3, 2026).; Environmental Working Group, *Hormel Black Label Black Label, Original*
21 *Bacon*, EWG’s FOOD SCORES, [https://www.ewg.org/foodscores/products/037600336710-
22 HormelBlackLabelBlackLabelOriginalBacon/](https://www.ewg.org/foodscores/products/037600336710-HormelBlackLabelBlackLabelOriginalBacon/) (last visited Mar. 3, 2026).; Environmental Working
23 Group, *Jimmy Dean Premium Pork Sausage*, EWG’s FOOD SCORES,
24 <https://www.ewg.org/foodscores/products/077900117534-JimmyDeanPremiumPorkSausage/> (last
25 visited Mar. 3, 2026).; Environmental Working Group, *Johnsonville Original Breakfast Sausages,*
26 *Original Breakfast*, EWG’s FOOD SCORES, [https://www.ewg.org/foodscores/products/077782012897-
27 JohnsonvilleOriginalBreakfastSausagesOriginalBreakfast/](https://www.ewg.org/foodscores/products/077782012897-JohnsonvilleOriginalBreakfastSausagesOriginalBreakfast/) (last visited Mar. 3, 2026).; Environmental
28 Working Group, *Oscar Mayer Naturally Hardwood Smoked Thick Cut Bacon, 12 Oz Pack*, EWG’s
FOOD SCORES, [https://www.ewg.org/foodscores/products/0044700102817-
OscarMayerNaturallyHardwoodSmokedThickCutBacon12OzPack/](https://www.ewg.org/foodscores/products/0044700102817-OscarMayerNaturallyHardwoodSmokedThickCutBacon12OzPack/) (last visited Mar. 3, 2026).

⁴ Antibiotic use is standard in the pork industry unless specially disclaimed. *See, e.g.,* Lee L. Schulz, M.D., *Defining the Percentage of Pigs Raised without Antibiotics for a Label Claim* at 23, PORK CHECKOFF (June 30, 2021) (“about 8% of annual commercial barrow and gilt slaughter in the United States is eligible for a “Raised Without Antibiotics” claim”).

⁵ *Animal Well-being*, HORMEL FOODS, [https://www.hormelfoods.com/global-
impact/planet/supply-chain/animal-wellbeing/](https://www.hormelfoods.com/global-impact/planet/supply-chain/animal-wellbeing/) (last visited Mar. 3, 2026).

1 45. On information and belief, Farmer John, Jimmy Dean, Johnsonville, and Oscar Mayer do
2 not produce antibiotic-free pork products.

3 46. For example, Jimmy Dean is a Tyson Foods brand and follows the Tyson Foods
4 Antibiotic Stewardship policy, which does not make antibiotic-free claims.⁶

5 47. Ralphs Torrance also displays private label products in the refrigerated case including
6 Simple Truth pork sausage, Kroger fully cooked bacon, and Kroger pork sausage.

7 48. On information and belief, Simple Truth is the only one of these products that is
8 antibiotic free: Kroger fully cooked bacon and Kroger pork sausage are not.

9 49. Simple Truth is Kroger's private label for products that are "free from unwanted
10 ingredients," and the packaging for the Simple Truth sausage states that it is antibiotic free.

11 50. By contrast, the packages for Kroger fully cooked bacon and Kroger pork sausage
12 include no such antibiotic-free claim.

13 51. In Ralphs' Carson Abalone store, Ralphs installed the same signage above a freezer.



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⁶ *Where can I learn more about your sustainability and animal welfare practices?, Contact Us,* JIMMY DEAN, <https://stage.jimmydean.com/contact-us#accordion-2cb5730d78-item-16c585cc28> (Last visited Mar. 3, 2026); *Antibiotic Stewardship*, TYSON FOODS, <https://www.tysonfoods.com/sustainability/product-responsibility/animal-health-welfare/antibiotic-stewardship> (last visited Mar. 3, 2026); *Position Statement on Antibiotic Stewardship*, TYSON FOODS (Jan. 2025), https://www.tysonfoods.com/sites/default/files/2025-03/Tyson%20Foods%20Antimicrobial%20Position%20Statement_2025.pdf.

1 52. Ralphs Carson Abalone displays primarily poultry products in the freezer, including
2 Tyson breaded & stuffed chicken, Tyson hot honey wings, Tyson buffalo style wings, Butterball
3 boneless turkey breast roast, and Country Pride raw chicken breast nuggets. The freezer also includes a
4 few non-poultry products such as Skylark beef liver.

5 53. For each of the enumerated products, the EWG Report states, “Antibiotics were likely
6 used in the production of this meat.”⁷

7 54. The EWG Report is consistent with industry practice—that antibiotic use is standard
8 unless specially disclaimed—and with the companies’ own statements and policies.

9 55. Tyson Foods’ Antibiotic Stewardship policy addresses its efforts to use antibiotics
10 responsibly, not to eliminate them from production.⁸

11 56. Tyson labels a small selection of its products as antibiotic free, but the Tyson products in
12 Ralphs’ freezer do not include that claim.

15 ⁷ [Environmental Working Group, *Tyson Chicken Cordon Bleu Breaded & Stuffed Raw Chicken Breast With Rib Meat Filled With Blended Cheeses & Cooked Ham, EWG’s FOOD SCORES*, <https://www.ewg.org/foodscores/products/023700060587-TysonChickenCordonBleuBreadedStuffedRawChickenBreastWithRibMeatFilledWithBlendedCheesesCookedHamChickenCordonBleu/> \(last visited Mar. 3, 2026\).](https://www.ewg.org/foodscores/products/023700060587-TysonChickenCordonBleuBreadedStuffedRawChickenBreastWithRibMeatFilledWithBlendedCheesesCookedHamChickenCordonBleu/); Environmental Working Group, *Tyson Hot Honey Seasoned Wings, Hot Honey, EWG’s FOOD SCORES*, <https://www.ewg.org/foodscores/products/023700059048-TysonHotHoneySeasonedWingsHotHoney/> (last visited Mar. 3, 2026).; Environmental Working Group, *Tyson Buffalo Style Wings, EWG’s FOOD SCORES*, <https://www.ewg.org/foodscores/products/023700029416-TysonBuffaloStyleWings/> (last visited Mar. 3, 2026).; Environmental Working Group, *Butterball Boneless Turkey Breast Roast Meat, EWG’s FOOD SCORES*, <https://www.ewg.org/foodscores/products/0022655274872-ButterballBonelessTurkeyBreastRoastMeat/> (last visited Mar. 3, 2026). Environmental Working Group, *Country Pride Tempura Raw Chicken Breast Nuggets, EWG’s FOOD SCORES*, <https://www.ewg.org/foodscores/products/077013146100-CountryPrideTempuraRawChickenBreastNuggets/> (last visited Mar. 3, 2026).; Environmental Working Group, *Skylark Beef Liver, EWG’s FOOD SCORES*, <https://www.ewg.org/foodscores/products/079041226380-SkylarkBeefLiver/> (last visited Mar. 3, 2026).

25 ⁸ *Position Statement on Antibiotic Stewardship*, TYSON FOODS (Jan. 2025),
26 https://www.tysonfoods.com/sites/default/files/2025-03/Tyson%20Foods%20Antimicrobial%20Position%20Statement_2025.pdf; *Antibiotic Stewardship*,
27 TYSON FOODS, <https://www.tysonfoods.com/sustainability/product-responsibility/animal-health-welfare/antibiotic-stewardship> (last visited Mar. 3, 2026).

1 57. Butterball likewise confirms that it “administer[s] antibiotics as needed.”⁹

2 58. Butterball has a line of antibiotic-free products called Farm to Family, but Butterball
3 boneless turkey breast roast is not related to that product line.¹⁰

4 59. On information and belief, Skylark does not produce, and does not purport to produce,
5 antibiotic-free products.

6 60. In Ralphs’ Tarragona Plaza store, Ralphs installed the same sign over a refrigerated case
7 of pork and turkey products “in the last couple of weeks.”¹¹



17 61. Ralphs Tarragona Plaza displays several of the same pork products that Ralphs Torrance
18 displays, including Farmer John bacon, Hormel bacon, Jimmy Dean pork sausage, Jimmy Dean bacon,
19 Johnsonville breakfast sausage, and Oscar Mayer bacon, which on information and belief and as set
20 forth above are not antibiotic free.

21 62. Ralphs Tarragona Plaza displays additional pork products under the sign including
22 Greenfield bacon, Hoffy bacon, Kroger bacon, Simple Truth bacon and Wright bacon, as well as several
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25 ⁹ *Our commitment to humane animal care and well-being*, BUTTERBALL,
<https://www.butterball.com/animal-care-well-being-commitment> (last visited Mar. 3, 2026).

26 ¹⁰ *Farm To Family*, BUTTERBALL, <https://www.butterball.com/farmtofamily/> (last visited Mar. 3,
27 2026).

28 ¹¹ Interview with store employee, Ralphs’ Tarragona Plaza store at 1050 N Western Ave, San
Pedro, CA, 90732 (Mar. 17, 2026).

1 turkey products including Jennie-O ground turkey, Jennie-O taco seasoned ground turkey, Jennie-O
2 ground turkey NAE, Jennie-O turkey patties, Jennie-O turkey bacon, Jimmy Dean turkey sausage,
3 Kroger ground turkey, Kroger turkey bacon and Simple Truth turkey bacon.

4 63. For all but two of the enumerated products that EWG evaluated, the EWG report states,
5 “[a]ntibiotics were likely used in the production of this meat.”¹²

6 64. The EWG report is consistent with industry practice and the companies’ own statements
7 and policies.

8 65. Jennie-O is a Hormel brand and as set forth above, Hormel’s antibiotic policy is to “use
9 antibiotics responsibly,” not to omit antibiotics entirely from its products.¹³

10 66. Jennie-O has one antibiotic-free product line called NAE (“No Antibiotics Ever”) and
11 only one of the several Jennie-O products under the sign is NAE.¹⁴

12 67. Jimmy Dean and Wright Brand are Tyson Foods brands and as set forth above, Tyson
13 Foods’ Antibiotic Stewardship policy addresses its efforts to use antibiotics responsibly, not to eliminate
14 them from production.¹⁵

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16 ¹² Environmental Working Group, *Wright Hickory Smoked Bacon*, EWG’S FOOD SCORES,
17 [https://www.ewg.org/foodscores/products/079621005046-
18 WrightHickorySmokedBaconSteakCutHickorySmokedBacon/](https://www.ewg.org/foodscores/products/079621005046-WrightHickorySmokedBaconSteakCutHickorySmokedBacon/) (last visited Mar. 18, 2026).;
19 Environmental Working Group, *Jennie-O Fresh Ground Turkey*, [EWG’S FOOD SCORES,
20 https://www.ewg.org/foodscores/products/0042222313070-JennieO85Lean15FatFreshGroundTurkey/
21 \(last accessed Mar. 18, 2026\).; Environmental Working Group, *Jennie-O Ground Turkey Breast*,
22 EWG’S FOOD SCORES, \[https://www.ewg.org/foodscores/products/042222832489-
23 JennieOGroundTurkeyBreast/\]\(https://www.ewg.org/foodscores/products/042222832489-JennieOGroundTurkeyBreast/\) \(last visited Mar. 18, 2026\).; Environmental Working Group, *Jimmy
24 Dean Turkey Sausage Patties*, EWG’S FOOD SCORES,
25 <https://www.ewg.org/foodscores/products/077900194160-JimmyDeanTurkeySausagePatties/> \(last
26 visited Mar. 18, 2026\).; Environmental Working Group, *Greenfield Natural Meat Co. Bacon*, EWG’S
27 FOOD SCORES, \[https://www.ewg.org/foodscores/products/0063100004873-
28 GreenfieldNaturalMeatCoApplewoodSmokedUncuredBacon12Oz/\]\(https://www.ewg.org/foodscores/products/0063100004873-GreenfieldNaturalMeatCoApplewoodSmokedUncuredBacon12Oz/\) \(last visited Mar. 18, 2026\).](https://www.ewg.org/foodscores/products/0042222313070-JennieO85Lean15FatFreshGroundTurkey/)

¹³ *Making a big impact with a small footprint*, HORMEL FOODS,
<https://www.hormelfoods.com/inspired/story/making-a-big-impact-with-a-small-footprint/> (last visited
Mar. 18, 2026).

¹⁴ *All products*, JENNIE-O, <https://www.jennieo.com/products/> (last visited Mar. 18, 2026).

¹⁵ *Position Statement on Antibiotic Stewardship*, TYSON FOODS (Jan. 2025),
[https://www.tysonfoods.com/sites/default/files/2025-
03/Tyson%20Foods%20Antimicrobial%20Position%20Statement_2025.pdf](https://www.tysonfoods.com/sites/default/files/2025-03/Tyson%20Foods%20Antimicrobial%20Position%20Statement_2025.pdf).; *Antibiotic Stewardship*,

1 68. Tyson labels a small selection of its products as antibiotic free, but the Jimmy Dean and
2 Wright Brand products under the sign do not include that claim.

3 69. On information and belief, Hoffy does not produce, and does not purport to produce,
4 antibiotic-free pork products.

5 70. On information and belief, Kroger bacon, Kroger ground turkey, and Kroger turkey
6 bacon are not antibiotic free.

7 71. As set forth above, Kroger’s private label products are sold under the Simple Truth brand
8 if they are antibiotic free.

9 72. Unlike their Simple Truth counterparts in the case, the packages for Kroger bacon,
10 Kroger ground turkey, and Kroger turkey bacon include no antibiotic-free claim.

11 73. The “no added hormones” signage in the Ralphs Stores is likewise false and misleading.

12 74. The meat cases contain mostly pork and poultry products, which already cannot have
13 added hormones by law, but on information and belief, the non-poultry, non-pork products are not
14 hormone-free.

15 75. For example, the EWG report states about Skylark beef that, “[h]ormones and/or growth
16 promoters were likely used in production of meat ingredients.”¹⁶

17 76. The EWG Report is consistent with industry practice—that added hormone use is
18 standard in the beef industry unless specially disclaimed.

19 77. On information and belief, Skylark does not produce, and does not purport to produce,
20 beef liver products with no added hormones.

21 78. Because the “no antibiotics” and “no added hormones” claims on the sign are false and
22 misleading, the sign’s headline “raised naturally” claim that those two specific claims support is
23 likewise misleading.

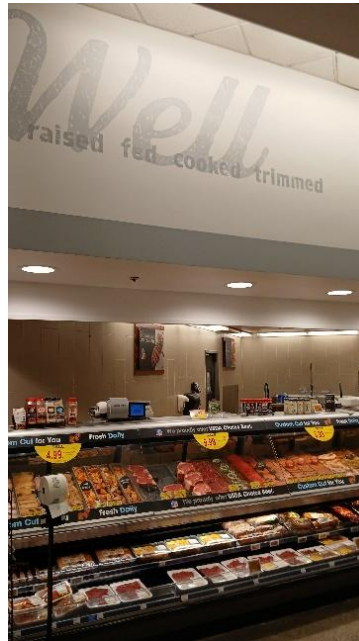
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25 TYSON FOODS, [https://www.tysonfoods.com/sustainability/product-responsibility/animal-health-
26 welfare/antibiotic-stewardship](https://www.tysonfoods.com/sustainability/product-responsibility/animal-health-welfare/antibiotic-stewardship) (last visited Mar. 3, 2026).

27 ¹⁶ Environmental Working Group, *Skylark Beef Liver*, EWG’s FOOD SCORES,
28 <https://www.ewg.org/foodscores/products/079041226380-SkylarkBeefLiver/> (last visited Mar. 16,
2026).

1 79. Moreover, consumers interpret a claim that meat is “natural” to mean that it comes from
2 an animal that was given no antibiotics and no added hormones.¹⁷

3 **B. The “Well Raised” Representations**

4 80. The Ralphs Stores display large, painted signs that read “well raised” above their meat
5 counters.



17 81. Despite this signage, Defendants do not ensure that the various meat products under the
18 sign satisfy any distinguishable animal welfare standards, let alone Kroger’s own animal welfare
19 standards where applicable.

20 82. On information and belief, no products under the “well raised” signs assert animal
21 welfare certifications or even claims on their packaging.

22 83. Indeed, as further alleged below, many products under the “well raised” signs—both
23 packaged and from Kroger’s private label—are from the companies’ *lower* welfare brands.

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¹⁷ S.R. Dominick, Chelsea Fullerton, Nicole J. Olynk Widmar & Holly Wang, *Consumer*
28 *Associations with the “All Natural” Food Label*. 24:3 J. FOOD PROD. MKTG. 249, 257 (2018).

1 84. Animal welfare claims are important to consumers: “[p]eople are informed and
2 concerned about animal farming methods, and in surveys assessing shoppers’ attitudes toward factory
3 farming, a majority of respondents prefer practices that are more humane.”¹⁸

4 85. For example, a 2015 national survey published by Consumer Reports found that 84% of
5 consumers say “providing better living conditions for animals” is a key objective when shopping for
6 food,¹⁹ and a 2018 study published in the journal *Food Policy* further found that consumers are willing
7 to pay a premium price on products with increased animal welfare standards.²⁰

8 86. Moreover, consumers interpret welfare-related claims to indicate that a product offers a
9 better level of welfare than conventional products: a 2022 study published in the journal *Food Ethics*
10 found that 89% of respondents who purchased an animal product with a welfare-related claim did so
11 because they thought it indicated better welfare practices.²¹

12 **i. Defendants’ Animal Welfare Standards**

13 87. Kroger has a public-facing Animal Welfare Policy (“AWP”), in which it sets out welfare
14 standards and goals for animals in its supply chain.

15 88. First, the AWP sets welfare standards for broiler chickens (*i.e.*, chickens raised for meat),
16 which recognize the importance of space, lighting, litter, and slaughter methods.²²

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18 ¹⁸ Simon, David Robinson, *Meatonomics*, pp. 134-135 (2013 Kindle Edition).

19 ¹⁹ *Natural Food Labels Survey: 2015 Nationally Representative Phone Survey*, Consumer
20 Reports National Research Center, 4 (2015), [https://www.foodpolitics.com/wp-
content/uploads/Consumer-Reports-Natural-Food-Labels-Survey-Report.pdf](https://www.foodpolitics.com/wp-content/uploads/Consumer-Reports-Natural-Food-Labels-Survey-Report.pdf).

21 ²⁰ D.L. Ortega & C.A. Wolf, *Demand for Farm Animal Welfare and Producer Implications:
22 Results from a Field Experiment in Michigan*, 74 FOOD POL’Y 74 (2018); *see also* Simon, David
23 Robinson, *Meatonomics*, pp. 134-135 (2013 Kindle Edition) (“agricultural economists F. Bailey
24 Norwood and Jayson Lusk show in their 2011 book, *Compassion by the Pound*, that consumers are
actually willing to spend their own, real money—in average amounts ranging from \$23 to \$57 per
thousand animals—to improve farm animals’ lives.”).

25 ²¹ M. Thibault, S. Pailler & D. Freund, *Why Are They Buying It?: United States Consumers’
26 Intentions When Purchasing Meat, Eggs, and Dairy with Welfare-Related Labels*, 7 FOOD ETHICS art. 12
(2022).

27 ²² *The Kroger Family of Companies Animal Welfare Policy*, KROGER (Aug. 2022),
28 https://www.thekrogerco.com/wp-content/uploads/2022/08/The-Kroger-Co_AnimalWelfarePolicy.pdf
(hereinafter “AWP”).

1 89. Specifically, Kroger aims for “at least 50% of [its] supply for Simple Truth Organic® and
2 Simple Truth Natural® fresh chicken” to come from facilities where chickens have at least 1 square foot
3 of space, have access to litter, have proper lighting, and are slaughtered without “pre-stun handling” and
4 using “controlled atmosphere systems.”²³

5 90. The AWP does not, however, set any welfare goals for Kroger’s other private label
6 chicken products.

7 91. The AWP also does not set any welfare goals for other suppliers who sell their products
8 in Defendants’ stores.

9 92. Second, Kroger does not provide any welfare standards for its beef products, or any
10 discernible goals for improving welfare in its beef supply.

11 93. The AWP states vaguely that Kroger “continue[s] to work with suppliers to advance
12 animal welfare for cattle.”²⁴

13 94. The Animal Welfare Update to the AWP adds only that Kroger “will define future
14 outcome-based standards for fresh beef production.”²⁵

15 95. Third, Kroger provides only one welfare measure for pigs: it “expect[s] that sows should
16 be transitioned from breeding stalls to group housing no later than six weeks after breeding” in order to
17 “enhance sow health and welfare.”

18 96. The AWP does not address other common welfare issues for pigs, such as flooring,
19 weaning periods, tail docking or teeth clipping.²⁶

21 ²³ *Id.* Controlled atmosphere systems render poultry unconscious through exposure to a mixture
22 of gas before slaughter. The primary alternative is live-hang slaughter, whereby the animals are hung
23 upside down and "moved by the shackle conveyor" until their throats are cut for slaughter. *AVMA*
24 *Guidelines for the Humane Slaughter of Animals: 2024 Edition*, American Veterinary Medical
25 Association (2024), [https://www.avma.org/sites/default/files/2024-09/Humane-Slaughter-Guidelines-
26 2024.pdf](https://www.avma.org/sites/default/files/2024-09/Humane-Slaughter-Guidelines-2024.pdf).

25 ²⁴ *AWP* at 2.

26 ²⁵ *Id.*

27 ²⁶ In many systems, piglets have their tails cut and teeth trimmed because overcrowded
28 conditions lead to pigs gnawing on each other’s tails. *See Mission*, APPLGATE, available at
<https://applegate.com/mission/animal-welfare> (last visited Mar. 4, 2026).

1 **ii. Chicken Products Under the “Well Raised” Signage**

2 97. The Ralphs Stores include both “fresh” and packaged chicken in the display case under
3 their “well raised” signs.

4 98. On information and belief, the “fresh” chicken wings, breasts, and thighs in the “well
5 raised” meat counter are from Kroger’s regular private label.

6 99. As discussed *supra* ¶¶ 88-91, Kroger’s welfare standards are not implemented in the
7 supply chain for these products—only in Kroger’s supply chain for Simple Truth.

8 100. The fresh chicken under the well-raised signage can be sourced from animals without a
9 single square foot of space, litter, or proper lighting, and that were subjected to pre-stun handling and
10 live-hang slaughter.

11 101. Therefore, fresh chicken under the “well raised” signs need not be well raised, even by
12 Kroger’s own standards.²⁷

13 102. In addition to fresh products, the “well raised” chicken selection includes packaged
14 chicken such as Isernio’s diced chicken thighs and Golden West Food Group’s Calle Sabor Street Taco
15 Cart Pollo Asada.

16 103. Neither of these chicken products include welfare claims or certifications on their
17 packaging, and Kroger’s welfare goals are not applicable to these products.

18 104. Further, on information and belief, Isernio’s does not have its own welfare policy or
19 make any marketing claims pertaining to animal welfare, and Golden West Food Group has only
20 barebones welfare language in its Sustainability Policy with no clear welfare standards.²⁸

21 105. Accordingly, both the fresh and packaged chicken products in the “well raised” sections
22 of the Ralphs Stores are inconsistent with Defendants’ marketing.

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26 ²⁷ Even if Ralphs sold its higher-welfare Simple Truth products at the meat counter, around 50%
27 of the chicken would not be “well-raised” by its own standards.

28 ²⁸ *Sustainability Initiative*, GOLDEN WEST FOOD GRP., <https://www.gwfg.com/sustainability/> (last
visited March 4, 2026).

1 **iii. Beef Products Under the “Well Raised” Signage**

2 106. The Ralphs Stores also include both “fresh” and packaged beef in the display case under
3 their “well raised” signs.

4 107. On information and belief, the fresh steaks and beef patties in the meat counter are from
5 Kroger’s regular private label.

6 108. Because Kroger does not set or implement any animal welfare standards for its beef
7 suppliers, Defendants have no basis for describing Kroger beef as “well raised.”

8 109. Moreover, because these beef products, like the chicken products, are not sourced for
9 Kroger’s premium Simple Truth brand, they are sourced from a supply chain for which Kroger has
10 lower, rather than higher, ingredient requirements.

11 110. The “well raised” beef selection further includes packaged beef products like
12 MarcAngelo Montreal Spice Bacon Beef Skewers (labeled Beef & Bacon Twisters) and Golden West
13 Food Group’s Calle Sabor Street Taco Cart Carne Asada.

14 111. Neither product has welfare claims or certifications on its packaging.

15 112. Moreover, MarcAngelo has no animal welfare policy, and Golden West Food Group has
16 only barebones welfare language in its Sustainability Policy with no clear welfare standards.²⁹

17 113. Accordingly, nothing in Kroger’s policy, and nothing in the companies’ marketing,
18 support that these products come from cows that were well raised.

19 **iv. Pork Products Under the “Well Raised” Signage**

20 114. Finally, the Ralphs Stores include both “fresh” and packaged pork products in the display
21 case under their “well raised” signs.

22 115. On information and belief, the fresh pork products in the meat counter are from Kroger’s
23 regular private label.

24 116. While it is illegal in California to sell pork from pigs “confined in a cruel manner” as
25 defined in Health & Safety Code § 25991, complying with this law does not make the pork “well raised”
26 as consumers reasonably understand this term.

27
28 _____
²⁹ *Id.*

1 117. The pork products advertised by Ralphs are not “well raised” because Kroger’s animal
2 welfare policy for fresh pork does not address cruel practices that are standard in conventional pork
3 production, including inhumane flooring, weaning periods, tail docking and teeth clipping.³⁰

4 118. Moreover, because these pork products, like the chicken and beef products, are not
5 sourced for Kroger’s premium Simple Truth brand, they are sourced from a supply chain for which
6 Kroger has lower, rather than higher, ingredient requirements.

7 119. Moreover, the packaged pork selection includes conventional products with no welfare
8 claims or certifications, and which are sourced from companies linked to high incidences of welfare
9 violations.

10 120. For example, the selection includes Hormel pork loin filets and Lloyd’s BBQ Baby Back
11 Ribs; Lloyd’s is owned by Hormel.

12 121. Both products are among Hormel’s *lower* welfare options; the “well raised” pork
13 selection does not include Hormel’s Applegate brand, which has higher welfare policies in place like
14 prohibiting tail docking and teeth clipping.³¹

15 122. Moreover, decades of investigations into Hormel’s suppliers, including by Plaintiff AO,
16 documented incidents of cruelty to pigs that resulted in criminal charges and that the USDA described as
17 “appalling and completely unacceptable.”³²

19 ³⁰ In many systems, piglets have their tails cut and teeth trimmed because overcrowded
20 conditions lead to pigs gnawing on each other’s tails. *See Mission*, APPLGATE,
21 <https://applegate.com/mission/animal-welfare> (last visited Mar. 4, 2026).

22 ³¹ *Id.*

23 ³² *See, e.g.*, Kenny Torrella, *How America Broke the Turkey*, Vox (Nov. 22, 2023),
[https://www.vox.com/future-perfect/2023/11/22/23970874/thanksgiving-turkey-farming-jennie-o-](https://www.vox.com/future-perfect/2023/11/22/23970874/thanksgiving-turkey-farming-jennie-o-hormel-white-house-pardon)
24 [hormel-white-house-pardon](https://www.vox.com/future-perfect/2023/11/22/23970874/thanksgiving-turkey-farming-jennie-o-hormel-white-house-pardon); FOX 9 Minneapolis-St. Paul, *Hormel suspends pork supplier after*
undercover video released, YOUTUBE (2017),
25 https://www.youtube.com/watch?v=hvb6F_7IAks; Roberto A. Ferdman, “*That one was definitely*
alive”: *An undercover video at one of the nation’s biggest pork processors*, THE WASH. POST (Nov. 11,
26 2015), [https://www.washingtonpost.com/news/wonk/wp/2015/11/11/that-one-was-definitely-alive-an-](https://www.washingtonpost.com/news/wonk/wp/2015/11/11/that-one-was-definitely-alive-an-undercover-video-at-one-of-the-fastest-pork-processors-in-the-u-s/)
27 [undercover-video-at-one-of-the-fastest-pork-processors-in-the-u-s/](https://www.washingtonpost.com/news/wonk/wp/2015/11/11/that-one-was-definitely-alive-an-undercover-video-at-one-of-the-fastest-pork-processors-in-the-u-s/); *22 Charges Filed Based on PETA*
Investigation at Hormel Supplier, PETA (Oct. 2, 2008), [https://www.peta.org/news/22-charges-filed-](https://www.peta.org/news/22-charges-filed-based-peta-investigation-hormel-supplier/)
28 [based-peta-investigation-hormel-supplier/](https://www.peta.org/news/22-charges-filed-based-peta-investigation-hormel-supplier/).

1 123. The “well raised” packaged pork selection also includes Golden West Food Group’s
2 Calle Sabor Diced Pork al Pastor and Farmer Johns pork filets.

3 124. Golden West Food Group has only barebones welfare language in its Sustainability
4 Policy, with no clear welfare standards.³³

5 125. Smithfield, which owns Farmer Johns, has one of the worst humane handling records
6 among livestock processors, according to a published review of USDA records by the Animal Welfare
7 Institute.³⁴

8 **FIRST CAUSE OF ACTION**

9 **VIOLATIONS OF THE FALSE ADVERTISING LAW**

10 **(BUS. & PROF. CODE § 17500, *et seq.*)**

11 126. Plaintiff realleges and incorporates by reference each of the preceding paragraphs as if
12 fully set forth herein.

13 127. Bus. & Prof. Code § 17500, *et seq.* broadly prohibits any form of false or misleading
14 advertising.

15 128. Defendants have made and continue to make representations that constitute false
16 advertising as that term is defined in § 17500 *et seq.* of the Business & Professions Code.

17 129. Under the FAL, it is unlawful for any corporation to make any statement concerning any
18 circumstance or matter of fact connected with a sale “which is untrue or misleading, and which is
19 known, or which by the exercise of reasonable care should be known, to be untrue or misleading.” Cal.
20 Bus. & Prof. Code § 17500.

21 130. Defendants are making statements to customers that are untrue or misleading: namely
22 that selections of its meat products are antibiotic free or well raised. In fact, the selections are largely
23 comprised of conventional factory-farmed meat.

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25 ³³ *Sustainability Initiative*, GOLDEN WEST FOOD GROUP, <https://www.gwfg.com/sustainability/>
26 (last visited March 4, 2026).

27 ³⁴ ANIMAL WELFARE INSTITUTE, FEDERAL AND STATE OVERSIGHT OF THE WELFARE OF
28 LIVESTOCK AT SLAUGHTER 23 (2025),
https://awionline.org/sites/default/files/publication/digital_download/awi-humane-slaughter-update-2025.pdf.

1 131. Ralphs knows or reasonably should know that the statements are untrue or misleading.
2 Grocery store companies exercising reasonable care would know what products they stock, and what
3 attributes the products do and do not have.

4 132. Moreover, claims that products are antibiotic free and well raised are belied by
5 companies' own representations about their products and are inconsistent with standards Kroger itself
6 sets for animal welfare.

7 133. On information and belief, Kroger has provided substantial assistance and encouragement
8 to its subsidiary Ralphs' display of the false and misleading signage, and has also ratified use of such
9 false and misleading signage after the fact.

10 134. On information and belief, Kroger directly participated in, controlled, approved,
11 authorized, standardized, implemented, or knowingly permitted the challenged signage, product
12 assortment, and product placement in Ralphs stores, including the display of Kroger-controlled private-
13 label products beneath the challenged representations.

14 135. AO is a party "who has suffered injury in fact and has lost money or property as a result
15 of . . . false advertising" under Bus. & Prof. Code § 17535 and thereby has standing to enjoin
16 Defendants' false advertising.

17 136. By misrepresenting to consumers that conventional meat products are "well-raised" and
18 antibiotic free, Defendants' practices frustrate AO's core mission of exposing the harms of agribusiness
19 and urging consumers to avoid the exact products Ralphs is falsely advertising as being consistent with
20 AO's message of compassion.

21 137. In frustrating AO's mission, Defendants' business practices have caused AO to divert its
22 limited organizational resources to combatting Ralphs' false and illegal marketing. Absent Defendants'
23 challenged conduct, AO would expend its resources to expose cruel practices on factory farms and urge
24 corporations to shift their supply chains away from such practices and consumers to eschew such
25 products; instead, AO must divert its limited resources to also refute Ralphs' false claims that its
26 products are higher-quality, higher-welfare options that align with AO's mission, and which ethical
27 consumers can feel good about.

28

1 138. Plaintiff requests that this Court enter such orders or judgments as may be necessary to
2 enjoin Defendants from continuing their false and misleading advertising.

3 **SECOND CAUSE OF ACTION**

4 **VIOLATIONS OF THE UNFAIR COMPETITION LAW**

5 **(BUS. & PROF. CODE § 17200, *et seq.*)**

6 139. Plaintiff realleges and incorporates by reference each of the proceeding paragraphs as if
7 fully set forth herein.

8 140. Bus. & Prof. Code § 17200, *et seq.* prohibits businesses from engaging in unlawful,
9 unfair or fraudulent business practices.

10 141. A business practice is “unlawful” under the UCL when it violates another federal, state,
11 or local law. The violated law that serves as a basis for a UCL claim is referred to as a predicate law.

12 142. Defendants have violated the UCL by violating the FAL as alleged above.

13 143. In addition to violating a predicate law, Defendants are engaging in an unfair business
14 practice as that term is defined in § 17200 *et seq.* of the Business & Professions Code.

15 144. Ralphs’ misleading signage about the healthiness and humane attributes of its products
16 draws consumers to its stores, rather than other grocery chains, only to sell them conventional meat
17 products under the guise of being “well raised” and antibiotic-free.

18 145. Further, attracting customers with claims that the products they are purchasing have
19 specific desirable qualities, when the products do not, in fact, have such qualities, is an unfair
20 competitive practice and a fraudulent business practice.

21 146. On information and belief, Kroger directly participated in, controlled, approved,
22 authorized, standardized, implemented, or knowingly permitted the challenged conduct alleged herein,
23 and is therefore liable for the unlawful, unfair, and fraudulent practices alleged in this Complaint.

24 147. Kroger has provided substantial assistance and encouragement to its subsidiary Ralphs’
25 display of the false and misleading signage, and has also ratified use of such false and misleading
26 signage after the fact.

27 148. Bus. & Prof. Code § 17203 allows private parties who have lost money or property to ask
28 a court to enjoin unlawful, unfair, or fraudulent business practices. AO is a party “who has suffered

1 injury in fact and has lost money or property as a result of . . . unfair competition” under Bus. & Prof.
2 Code §§ 17203, 17204 and thereby has standing to enjoin Defendants’ practices that constitute unfair
3 competition.

4 149. By misrepresenting to consumers that conventional meat products are well-raised and
5 antibiotic free, Defendants’ practices frustrate AO’s core mission of exposing the harms of agribusiness
6 and urging consumers to avoid the exact products Ralphs is falsely advertising as being consistent with
7 AO’s message of compassion.

8 150. In frustrating AO’s mission, Defendants’ business practices have caused AO to divert its
9 limited organizational resources to combatting Ralphs’ false and illegal marketing. Absent Defendants’
10 challenged conduct, AO would expend its resources to expose cruel practices on factory farms, urge
11 corporations to shift their supply chains away from such practices, and encourage consumers to eschew
12 such products; instead, AO must divert its limited resources to refute Ralphs’ false claims that its
13 products are higher-quality, higher-welfare options that align with AO’s mission and that ethical
14 consumers can feel good about.

15 151. All of the wrongful conduct alleged herein occurred, and continues to occur, in the
16 conduct of Defendants’ business.

17 152. Plaintiff requests that this Court enter such orders or judgments as may be necessary to
18 enjoin Defendants from continuing their unlawful business practices.

19 **PRAYER FOR RELIEF**

20 WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

21 1. For injunctive relief pursuant to Bus. & Prof. Code § 17203 and Bus. & Prof. Code § 17535,
22 enjoining Defendants and anyone acting on their behalf from:

- 23 (a) Displaying signage stating “no antibiotics” above products that are not free from
24 antibiotics, “no added hormones” above products that are not free from added hormones,
25 and “raised naturally” above products that are not free from antibiotics and added
26 hormones;
- 27 (b) Displaying signage stating “well raised” above products unless the products meet a
28 distinguishable and discernible animal welfare standard set forth by the company:

- 1 i. For chickens, for which Defendants have published a definition of animal welfare
2 that constitutes a distinguishable characteristic for California consumers, the
3 product must conform with Defendants’ own definition. Per that standard, a “well
4 raised” chicken product must come from a supplier where chickens have at least 1
5 square foot of space, have access to litter, have proper lighting, and are
6 slaughtered without pre-stun handling and using controlled atmosphere systems.
- 7 ii. For pork, Defendants cannot market products as well-raised unless and until they
8 set forth welfare standards that distinguish Ralphs’ pork products from
9 conventional products sold in California.
- 10 iii. For beef, Defendants cannot market products as well-raised unless and until they
11 set forth welfare standards that distinguish Ralphs’ beef products from
12 conventionally-raised beef.

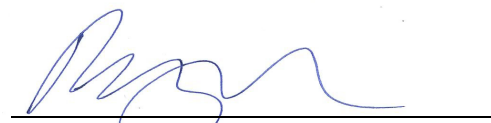
13 2. For attorneys’ fees as allowed by law (including, but not limited to, Code of Civil Procedure §
14 1021.5);

15 3. For costs of suit herein incurred; and

16 4. For such other and further relief as the court may deem proper.

17
18
19 Dated: March 20, 2026

By:




Bryan W. Pease
Attorney for Plaintiff

1 **VERIFICATION**

2 I, Ben Williamson, am Executive Director of Animal Outlook, Plaintiff in the above Verified
3 Complaint, and am familiar with its contents. The same is true of my own personal knowledge, except as
4 to those matters alleged on information and belief, and as to those matters, I believe them to be true.

5 I declare under penalty of perjury under the laws of California the foregoing is true and correct.

6
7 Dated: March 20, 2026

8 By: 
9 Ben Williamson