LEE LITIGATION GROUP, PLLC

C.K. Lee (CL 4086) Anne Seelig (AS 3976) 30 East 39th Street, Second Floor New York, NY 10016 Tel.: 212-465-1188 Fax: 212-465-1181 Attorneys for Plaintiff and the Class

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JOHANA GARCIA, on behalf of herself and others similarly situated,

Plaintiff,

Case No.:

v.

JURY TRIAL DEMANDED

CLASS ACTION COMPLAINT

ATKINS NUTRITIONALS, INC.,

Defendant.

Plaintiff JOHANA GARCIA, individually and on behalf of all other persons similarly situated in New York and the United States, by her undersigned attorneys, pursuant to this Class Action Complaint against the Defendant, ATKINS NUTRITIONALS, INC, alleges the following:

NATURE OF THE ACTION

1. Plaintiff JOHANA GARCIA (herein, "Plaintiff GARCIA" or "Plaintiff"), on behalf of herself and others similarly situated, by and through her undersigned attorneys, brings this class action against Defendant, ATKINS NUTRITIONALS, INC. (herein, "Atkins" or "Defendant"), for the deceptive practice of marketing its food products with "Net Carbs" claims in order to mislead consumers about those products' impact on blood sugar levels.

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2. Defendant's "Net Carbs" claims figure prominently on the front labels of its various "meal bars," "snack bars," and "treats." Here is one representative example:



3. These Net Carbs claims are intended to communicate to consumers that the dietary fiber and "sugar alcohols" (synthetic substances that combine the chemical properties of both sugar and alcohol) in its products should not be counted as carbohydrates because they have a "minimal" or "negligible" effect on blood sugar levels. Defendant's website provides the following explanation for "How are Net Carbs Calculated?":

In order to calculate Net Carbs of any whole food item, it's a simple calculation based on the Nutrition Facts panel:

Total Carbohydrates - (Minus) Dietary Fiber = (Equals) Net Carbs

For low carb products sweetened with sugar alcohols (ie: glycerin, maltitol, etc), refer to the Nutrition Facts panel of the product:

Total Carbohydrates - (Minus) Dietary Fiber - (Minus) Sugar alcohol = Net carbs

This reflects the fact that Dietary Fiber doesn't impact blood sugar levels. Sugar alcohols also have a negligible impact on blood sugar, they too are subtracted from total carbs to yield the Net Carb count.¹

4. Similar representations are located on the back labels of products accompanied by

Net Carb representations. Here is an example from the Atkins® Chocolate Peanut Butter Pretzel

Bar:



5. Defendant makes the same claims where Net Carbs products are sold online. Here is

the text accompanying the Atkins® Endulge® Peanut Butter Cups on Amazon.com:

The Atkins Diet is based on delicious low-carb recipes and whole foods. If youre short on time, Atkins provides meal, snack and treat bars and shakes to keep you satisfied, even when you are on the go. Counting Carbs? <u>The Net Carb Count helps you count carbs that impact blood sugar</u>. Fiber, sugar alcohols, including glycerin, should be subtracted from the total carbs since they minimally impact blood sugar. Find out more details about the diet, and Atkins Bars and Shakes by visiting atkins.com. This product can be used in following phases of the Atkins Diet. Phases: 2 3 4 What can Atkins Bars do for you?Advantage Meal Great as a satisfying meal, or can be used as a super-filling snack.Advantage Snack A filling snack or a light meal helps fight off hunger between meals and on the run.Day Break Snack A filling morning snack or light breakfast helps fight hunger in

¹ https://www.atkins.com/products/bars/meals/peanut-butter-granola-bar

between meals and on the run. Endulge Treats When cravings strike, reach for a treat or dessert without the added sugar. $[emphasis added]^2$

6. Defendant's claims are false, deceptive, and unlawful, however, because two of

Defendant's most frequently used sugar alcohols, maltitol and maltitol syrup, have a significant

effect on blood sugar levels. On Defendant's own theory, carbohydrates derived from them should

not be subtracted from the "Total Carbohydrates" in determining the "Net Carbs" count.

7. Defendant sold Plaintiff and Class members, and continues to sell consumers, the

following products that contain maltitol and/or maltitol syrup and have misleading "Net Carbs"

language:

Atkins® Meal Bars

- a. Chocolate Chip Cookie Dough Bar
- b. Chocolate Peanut Butter Bar
- c. Chocolate Peanut Butter Pretzel bar
- d. Cookies n' Crème Bar
- e. Mudslide Bar
- f. Peanut Butter Granola Bar

Atkins® Snack Bars

- a. Classic Trail Mix
- b. Sweet & Salty Trail Mix
- c. Caramel Chocolate Nut Roll
- d. Caramel Chocolate Peanut Nougat Bar
- e. Caramel Double Chocolate Crunch Bar
- f. Cashew Trail Mix Bar
- g. Coconut Almond Delight Bar
- h. Dark Chocolate Almond Coconut Crunch Bar
- i. Dark Chocolate Decadence Bar
- j. Triple Chocolate Bar
- k. Chocolate Chip Crisp Bar
- l. Chocolate Hazelnut Bar
- m. Chocolate Oatmeal Fiber Bar

² https://www.amazon.com/Atkins-Endulge-Peanut-Butter-

Count/dp/B001OHV1GU/ref=sr_1_1_s_it?s=grocery&ie=UTF8&qid=1498750847&sr=1-1&keywords=atkins%2Bendulge%2Bpeanut%2Bbutter%2Bcups&th=1 (last accessed 07/10/17).

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Atkins® Endulge® Treats

- a. Dark Chocolate Raspberry Squares
- b. Dark Chocolate Fudge Squares
- c. Caramel Nut Chew Bar
- d. Chocolate Candies
- e. Chocolate Caramel Mousse Bar
- f. Chocolate Coconut Bar
- g. Chocolate Covered Almonds
- h. Chocolate Peanut Candies
- i. Milk Chocolate Caramel Squares
- j. Nutty Fudge Brownie
- k. Pecan Caramel Clusters
- 1. Peanut Butter Cups
- m. Peanut Caramel Cluster Bar

Collectively, these are the "Products," which also includes any other Atkins® product that contains maltitol and/or maltitol syrup and makes "Net Carbs" representations. Such Products are detailed under **EXHIBIT A.**

8. Defendant engaged in deceptive labeling practices by using "Net Carbs" language to mislead consumers about the actual glycemic effect of the Products (their impact on blood sugar) Defendant's Net Carbs representations communicate to consumers that the glycemic effect of maltitol- and maltitol syrup-derived carbohydrates is negligible. But the indisputable scientific truth is that it is not negligible and that the glycemic index of maltitol and maltitol syrup is closer to that of table sugar (sucrose) than it is to zero.

9. By marketing the Products as being low in Net Carbs, Defendant misled Plaintiff and the Class about the glycemic effect of the Products, wrongfully capitalizing on, and reaping enormous profits from, many consumers' strong preference for food products that have minimal carbohydrates or minimal glycemic effect.

10. For example, the Atkins® *Endulge*® Peanut Butter Cups purchased by Plaintiff, *see* **Exhibit A**, pp. 61-62, lists 18 grams of carbohydrates in the nutrition panel, of which 4 grams are dietary fiber and 12 grams are sugar alcohols. So, Defendant represents that the Peanut Butter

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Cups have "2g Net Carbs" on the theory that the carbohydrates derived from dietary fiber or sugar alcohols do not raise blood sugar and hence do not qualify as carbohydrates for purposes of maintaining a lower blood sugar level.

11. While this is true of dietary fiber and <u>some</u> sugar alcohols, it is not true of the sugar alcohol maltitol, which figures prominently at the very top of the Peanut Butter Cups' ingredients list and accounts for all of the sugar alcohols in the Product.

12. The quantity of sugar alcohols varies between different Products. And some of these also contain other sugar alcohols <u>in addition</u> to maltitol and/or maltitol syrup. But irrespective of these variations, it remains a deceptive practice to subtract any maltitol—or maltitol syrup— derived carbohydrates from the total carbohydrate count in calculating Net Carbs.

13. Plaintiff does not allege that Defendant's general carbohydrate-conscious nutritional philosophy (as explained in ¶¶ 28-35 below) is deceptive. Plaintiff also does not allege that all "Net Carbs" claims are inherently deceptive. However, Plaintiff does allege that the particular Net Carbs calculations for the Products are deceptive and unlawful because they discount sugar alcohols that do raise blood sugar levels.

14. Plaintiff bring this proposed consumer class action on behalf of herself and all other persons nationwide, who, from the applicable limitations period up to and including the present ("Class Period"), purchased any of the Products for consumption and not for resale.

15. Defendant violated statutes enacted in each of the fifty states and the District of Columbia that are designed to protect consumers against unfair, deceptive, fraudulent and unconscionable trade and business practices and false advertising. These statutes are:

4) Arkansas Deceptive Trade Practices Act, Ark. Code § 4-88-101, et seq.;

¹⁾ Alabama Deceptive Trade Practices Act, Ala. Statues Ann. §§ 8-19-1, et seq.;

²⁾ Alaska Unfair Trade Practices and Consumer Protection Act, Ak. Code § 45.50.471, et seq.;

³⁾ Arizona Consumer Fraud Act, Arizona Revised Statutes, §§ 44-1521, et seq.;

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- 5) California Consumer Legal Remedies Act, Cal. Civ. Code § 1750, *et seq.*, and California's Unfair Competition Law, Cal. Bus. & Prof Code § 17200, *et seq.*;
- 6) Colorado Consumer Protection Act, Colo. Rev. Stat. § 6 1-101, et seq.;
- 7) Connecticut Unfair Trade Practices Act, Conn. Gen. Stat § 42-110a, et seq.;
- 8) Delaware Deceptive Trade Practices Act, 6 Del. Code § 2511, et seq.;
- 9) District of Columbia Consumer Protection Procedures Act, D.C. Code § 28 3901, et seq.;
- 10) Florida Deceptive and Unfair Trade Practices Act, Fla. Stat. Ann. § 501.201, et seq.;
- 11) Georgia Fair Business Practices Act, § 10-1-390 et seq.;
- 12) Hawaii Unfair and Deceptive Practices Act, Hawaii Revised Statues § 480 1, *et seq.*, and Hawaii Uniform Deceptive Trade Practices Act, Hawaii Revised Statutes § 481A-1, *et seq.*;
- 13) Idaho Consumer Protection Act, Idaho Code § 48-601, et seq.;
- 14) Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS § 505/1, et seq.;
- 15) Indiana Deceptive Consumer Sales Act, Indiana Code Ann. §§ 24-5-0.5-0.1, et seq.;
- 16) Iowa Consumer Fraud Act, Iowa Code §§ 714.16, et seq.;
- 17) Kansas Consumer Protection Act, Kan. Stat. Ann §§ 50 626, et seq.;
- 18) Kentucky Consumer Protection Act, Ky. Rev. Stat. Ann. §§ 367.110, *et seq.*, and the Kentucky Unfair Trade Practices Act, Ky. Rev. Stat. Ann §§ 365.020, *et seq.*;
- 19) Louisiana Unfair Trade Practices and Consumer Protection Law, La. Rev. Stat. Ann. § § 51:1401, *et seq.*;
- 20) Maine Unfair Trade Practices Act, 5 Me. Rev. Stat. § 205A, *et seq.*, and Maine Uniform Deceptive Trade Practices Act, Me. Rev. Stat. Ann. 10, § 1211, *et seq.*,
- 21) Maryland Consumer Protection Act, Md. Com. Law Code § 13-101, et seq.;
- 22) Massachusetts Unfair and Deceptive Practices Act, Mass. Gen. Laws ch. 93A;
- 23) Michigan Consumer Protection Act, § § 445.901, et seq.;
- 24) Minnesota Prevention of Consumer Fraud Act, Minn. Stat §§ 325F.68, *et seq.*; and Minnesota Uniform Deceptive Trade Practices Act, Minn. Stat. § 325D.43, *et seq.*;
- 25) Mississippi Consumer Protection Act, Miss. Code Ann. §§ 75-24-1, et seq.;
- 26) Missouri Merchandising Practices Act, Mo. Rev. Stat. § 407.010, et seq.;
- 27) Montana Unfair Trade Practices and Consumer Protection Act, Mont. Code §30-14-101, *et seq.*;
- 28) Nebraska Consumer Protection Act, Neb. Rev. Stat. § 59 1601, *et seq.*, and the Nebraska Uniform Deceptive Trade Practices Act, Neb. Rev. Stat. § 87-301, *et seq.*;
- 29) Nevada Trade Regulation and Practices Act, Nev. Rev. Stat. §§ 598.0903, et seq.;
- 30) New Hampshire Consumer Protection Act, N.H. Rev. Stat. § 358-A:1, et seq. ;
- 31) New Jersey Consumer Fraud Act, N.J. Stat. Ann. §§ 56:8 1, et seq.;
- 32) New Mexico Unfair Practices Act, N.M. Stat. Ann. §§ 57 12 1, et seq.;
- 33) New York Deceptive Acts and Practices Act, N.Y. Gen. Bus. Law §§ 349, et seq.;
- 34) North Dakota Consumer Fraud Act, N.D. Cent. Code §§ 51 15 01, et seq.;
- 35) North Carolina Unfair and Deceptive Trade Practices Act, North Carolina General Statutes §§ 75-1, *et seq.;*
- 36) Ohio Deceptive Trade Practices Act, Ohio Rev. Code. Ann. §§ 4165.01. et seq.;
- 37) Oklahoma Consumer Protection Act, Okla. Stat. 15 § 751, et seq.;
- 38) Oregon Unfair Trade Practices Act, Rev. Stat § 646.605, et seq.;
- *39)* Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 Penn. Stat. Ann. § § 201-1, *et seq.*;
- 40) Rhode Island Unfair Trade Practices And Consumer Protection Act, R.I. Gen. Laws § 6-13.1-1, et seq.;
- 41) South Carolina Unfair Trade Practices Act, S.C. Code Laws § 39-5-10, et seq.;
- 42) South Dakota's Deceptive Trade Practices and Consumer Protection Law, S.D. Codified Laws §§ 37 24 *1, et seq.;*
- 43) Tennessee Trade Practices Act, Tennessee Code Annotated §§ 47-25-101, et seq.;

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- 44) Texas Stat. Ann. §§ 17.41, et seq., Texas Deceptive Trade Practices Act, et seq.;
- 45) Utah Unfair Practices Act, Utah Code Ann. §§ 13-5-1, et seq.;
- 46) Vermont Consumer Fraud Act, Vt. Stat. Ann. tit.9, § 2451, et seq.;
- 47) Virginia Consumer Protection Act, Virginia Code Ann. §§59.1-196, et seq.;
- 48) Washington Consumer Fraud Act, Wash. Rev, Code § 19.86.010, et seq.;
- 49) West Virginia Consumer Credit and Protection Act, West Virginia Code § 46A-6-101, *et seq.*;
- 50) Wisconsin Deceptive Trade Practices Act, Wis. Stat. §§ 100. 18, et seq.;
- 51) Wyoming Consumer Protection Act, Wyoming Stat. Ann. §§40-12-101, et seq.

JURISDICTION AND VENUE

16. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1332, because this is a class action, as defined by 28 U.S.C § 1332(d)(1)(B), in which a member of the putative class is a citizen of a different state than Defendant, and the amount in controversy exceeds the sum or value of \$5,000,000, excluding interest and costs. *See* 28 U.S.C. § 1332(d)(2).

17. The Court has jurisdiction over the federal claims alleged herein pursuant to 28 U.S.C.

§ 1331 because it arises under the laws of the United States.

18. This Court has personal jurisdiction over Plaintiff because Plaintiff submits to the Court's jurisdiction. This Court has personal jurisdiction over Defendant, pursuant to New York Statute N.Y. CVP. Law § 302, because it conducts substantial business in this District. Some of the actions giving rise to the Complaint took place in this District, and Plaintiff's claims arise out of Defendant operating, conducting, engaging in or carrying on a business or business venture in this state or having an office or agency in this state; committing a tortious act in this state; and causing injury to person or property in this state arising out of Defendant's acts and omissions outside this state. Additionally, this court has personal jurisdiction over Defendant because its Products are advertised, marketed, distributed, and sold throughout New York State; Defendant engaged in the wrongdoing alleged in this Complaint throughout the United States, including in New York State; and Defendant has sufficient minimum contacts with New York and/or has intentionally availed itself of the markets in New York State, rendering the exercise of jurisdiction

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by the Court permissible under traditional notions of fair play and substantial justice. Moreover, Defendant is engaged in substantial and not isolated activity within New York State.

19. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(a) because a substantial part of the events or omissions giving rise to these claims occurred in this District, the Defendant has caused harm to class members residing in this District, and the Defendant is a resident of this District under 28 U.S.C. 1391(c)(2) because it is subject to personal jurisdiction in this district.

PARTIES

Plaintiff

20. Plaintiff GARCIA is, and at all times relevant hereto has been, a citizen of the State of New York. Plaintiff GARCIA resides in Bronx County. On April 9, 2017, Plaintiff GARCIA purchased a 5-count box of Atkins® *Endulge*® Peanut Butter Cups for \$12.08 through Amazon.com for personal consumption within the State of New York.

21. Plaintiff GARCIA was exposed to Defendant's claims that sugar alcohols should be subtracted from total carbohydrates because they only minimally impact blood sugar levels both through Defendant's website and through representations on Amazon.com.

22. She did not know, and had no reason to know, that these claims are false as to maltitol. She would not have purchased the Peanut Butter Cups had she been aware of the truth about them.

23. Plaintiff GARCIA was financially injured when Defendant deprived her of the benefit of her bargain by delivering a product that had less value than Defendant had warranted.

24. Should Plaintiff GARCIA encounter the Products in the future, she could not rely on the truthfulness of the packaging, absent corrective changes to the packaging. However, Plaintiff GARCIA would still be willing to purchase the current formulation of the Products, absent the price premium, so long as Defendant engages in corrective advertising.

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Defendant

25. Defendant ATKINS NUTRITIONALS, INC. is a corporation organized under the laws of New York with its headquarters at 1050 17th Street, Suite 1500, Denver, CO 80265. Its address for service of process is C/O Corporation Service Company, 80 State Street, Albany, NY 12207-2543.

26. Defendant develops, markets and sells its extensive line of energy bars, snack food, frozen meal, and shake products under the "ATKINS®" brand name throughout the United States, through numerous retail and online outlets such as Target, Duane Reade, CVS, Rite Aid, and Amazon.com.

27. The advertising for the Products, relied upon by Plaintiff, was prepared and/or approved by Defendant and its agents, and was disseminated by Defendant and its agents. The advertising for the Products was designed to encourage consumers to purchase the Products and reasonably misled the reasonable consumer, i.e. Plaintiff and the Class, into purchasing the Products. Defendant owns, manufactures and distributes the Products, and created and/or authorized the unlawful, fraudulent, unfair, misleading and/or deceptive labeling and advertising for the Products.

FACTUAL ALLEGATIONS

The Atkins Diet: From Calorie Counting to Carb Counting

28. The founder of Atkins Nutritionals, Dr. Robert Coleman Atkins, was an early pioneer of the low-carbohydrate approach to dieting before it became popular and accepted by an increasing number of medical professionals and researchers. Traditional dieting approaches focused on limiting calories and fat. Since weight gain was believed to be the result of consuming more calories than one expends, the key to weight loss was calorie reduction. And since fat is a

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high-caloric nutrient, calorie-reduction could be achieved by minimizing fat (which was also considered unhealthy for other reasons).

29. But Dr. Atkins believed that the true villain is an excess of unhealthy carbohydrates. While not all carbohydrates are sugars, most carbohydrates are "glycemic" in that they turn into sugar upon entering the bloodstream and from there are turned into fat, causing weight gain and other health problems. Defendant's website explains:

"Glycemic" simply means "relating to sugar." The higher the glycemic impact of a food (more about this below), the greater and more rapid its effect on your blood sugar when you eat it—and the more insulin required to return your blood sugar to normal. Since insulin is a fat-storage hormone and since overweight people often already produce too much of it, high blood sugar and high insulin can sabotage your weight-management and better health efforts. Eating lower glycemic foods is definitely the way to go.³

30. Dr. Atkins considered traditional calorie-counting diets inadequate because they ignored that different kinds of calories had different levels of glycemic impact.⁴ Whereas calories from healthy fats can be readily used by the body for energy, calories from high-glycemic carbohydrates will quickly turn into fat. They therefore become unavailable for use, causing the individual to become hungry again quickly and eat prematurely. Thus, the Atkins approach seeks to regulate caloric intake indirectly, by regulating metabolism and appetite so that dieters will not feel impelled to eat excessively.

31. While Dr. Atkins was the first widely-known diet doctor to promote the low-carb approach, a number of other low-carb diets have since sprung up, including The Zone, Paleo, South Beach, Ketogenic, and others. While these diets' advocates do not agree with the Atkins approach on every particular, these various diets all form part of a general shift away from fat-counting and

³ <u>https://www.atkins.com/how-it-works/library/articles/the-low-glycemic-approach-to-healthy-eating</u> (last accessed 06/12/17).

⁴ <u>https://www.atkins.com/how-it-works/library/articles/compare-weight-loss-programs</u> (last accessed 06/12/17).

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calorie-counting (the "calories in/calories out" approach to weight loss) toward carb-counting. Many consumers who may not identify as official adherents of any particular dieting philosophy have nevertheless been influenced by this trend and accordingly seek to minimize or restrict their intake of carbohydrates.⁵ An experimental study by the FDA that exposed participants to various food products with carbohydrate-related claims found:

Respondents who saw only the *front panel* with a claim that implied "low in carbohydrate," such as "Low Carb," "CarbConscious," or "1g Net Carb," perceived the product to be lower in carbohydrate and more helpful for weight management than those who saw the same product without a "low in carbohydrate" claim.⁶

32. Traditional dieting approaches distinguish between "simple carbohydrates" like sugar and white flour and "complex carbohydrates" like fruits, potatoes, and whole grains. But Dr. Atkins believed that this distinction failed to capture that actual effects of different carbohydrates on people's blood sugar (or "blood glucose") levels.⁷ The Atkins approach instead endorses the "glycemic index" as a "better gauge of the impact of various carbohydrates on your blood sugar." Dieters should therefore "pay closer attention not only to the amount of carbohydrates consumed, but also to their position on the glycemic index."⁸

33. As explained by Atkins, the glycemic index (or "GI") measures "the relative impact of carbohydrate foods on blood sugar. The GI of a particular food is determined by comparing the effect of a 50-gram portion on blood sugar to that of a 50-gram standard such as a glucose solution

⁵ *See* https://authoritynutrition.com/6-reasons-to-stop-calling-low-carb-a-fad/ (last accessed 06/12/17); <u>http://www.naturalproductsinsider.com/articles/2004/03/low-carb-diet-not-a-passing-fad.aspx</u> (last accessed 06/12/17).

⁶ <u>http://www.fda.gov/food/foodscienceresearch/consumerbehaviorresearch/ucm168989.htm</u> (last accessed 06/12/17).

⁷ <u>https://www.atkins.com/how-it-works/library/articles/the-importance-of-the-low-glycemic-impact-part-2</u> (last accessed 06/12/17).

⁸ <u>https://www.atkins.com/how-it-works/library/articles/the-importance-of-the-low-glycemic-impact-part-2</u> (last accessed 06/12/17).

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or white bread. The higher a food's GI, the faster and greater its effect on your blood sugar."⁹ Thus, glucose—the kind of sugar that enters the blood stream—is normalized to 100, and the glycemic index of other foods indicates how glycemic they are by comparison with this. For example, sucrose, or table sugar, has a glycemic index of 63,¹⁰ while a frozen white bagel has a glycemic index of 72.¹¹ A low-glycemic grain like pearled barley has a glycemic index of 25 while standard cheese pizza has a glycemic index of 70.¹²

34. A food's position on the glycemic index is not the only relevant measure of its glycemic impact, however, because the glycemic index is tied to a standard 50-gram portion and thus does not take a food's usual serving size into account. A publication of Harvard Medical School explains:

But the glycemic index tells only part of the story. What it doesn't tell you is how high your blood sugar could go when you actually eat the food, which is partly determined by how much carbohydrate is in an individual serving. To understand a food's complete effect on blood sugar, you need to know both how quickly the food makes glucose enter the bloodstream, and how much glucose it will deliver. A separate value called glycemic load does that. It gives a more accurate picture of a food's real-life impact on blood sugar. The glycemic load is determined by multiplying the grams of a carbohydrate in a serving by the glycemic index, then dividing by 100. A glycemic load of 10 or below is considered low; 20 or above is considered high. Watermelon, for example, has a high glycemic index (80). But a

⁹ <u>https://www.atkins.com/how-it-works/library/articles/the-low-glycemic-approach-to-healthy-eating</u> (last accessed 06/12/17).

¹⁰ <u>http://lpi.oregonstate.edu/mic/food-beverages/glycemic-index-glycemic-load</u> (last viewed 06/12/17)

¹¹ <u>http://www.health.harvard.edu/diseases-and-</u>

<u>conditions/glycemic_index_and_glycemic_load_for_100_foods</u> (last accessed 06/12/17). ¹² <u>http://www.health.harvard.edu/diseases-and-</u>

conditions/glycemic_index_and_glycemic_load_for_100_foods (last accessed 06/12/17).

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serving of watermelon has so little carbohydrate (6 grams) that its glycemic load is only 5.13

35. The Atkins diet endorses the glycemic load (or "GL") as an "improve[ment] on the measuring process of the GI. Because it takes portion size into account, it gives a more accurate reading."¹⁴

The Net Carbs Concept: "All Carbs Are Not Created Equal"

36. In addition to stating their total carbohydrate content as required by FDA regulations, Atkins food products prominently display what Defendant calls their "Net Carbs" or "Atkins Net Carbs," which are invariably lower than the actual carbohydrate count listed inside the nutrition panel. For example, the Atkins *Endulge*® Caramel Nut Chew Bar box lists "2g Net Carbs" on the front and provides the following equation on the back: 17g (Total Carbs) – 6g (Fiber) – 9g (Sugar Alcohols) = 2g (Atkins Net Carbs). The back of the box also explains the equation as follows: "**Counting Carbs?** Atkins Net Carb Count assists you in tracking carbs that impact blood sugar. Fiber and sugar alcohols should be subtracted from the total carbs since they minimally impact blood sugar."

37. Immediately below is a table documenting the Net Carbs calculations on a sampling of the Products:

¹³ <u>http://www.health.harvard.edu/diseases-and-</u>

<u>conditions/glycemic_index_and_glycemic_load_for_100_foods</u> (last accessed 06/12/17). ¹⁴ <u>https://www.atkins.com/how-it-works/library/articles/the-low-glycemic-approach-to-healthy-</u> eating (last accessed 06/12/17).

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PRODUCT	TOTAL CARBS	GRAMS OF FIBER	GRAMS OF SUGAR ALCOHOLS	"NET CARBS"
Atkins® <i>Endulge</i> ® Peanut Caramel Cluster Bar	13	6	4	3
Atkins® <i>Endulge</i> ® Chocolate Caramel Mouse Bar	23	9	12	2
Atkins® <i>Endulge</i> ® Peanut Butter Cups	18	4	12	2
Atkins® <i>Endulge</i> ® Chocolate Peanut Candies	18	2	15	1
Atkins® <i>Endulge</i> ® Caramel Nut Chew Bar	17	6	9	2
Atkins® Caramel Chocolate Nut Roll	19	6	10	3
Atkins® Chocolate Peanut Butter Pretzel Bar	19	6	10	3
Atkins® Peanut Butter Granola Bar	19	6	10	3

38. Defendant's website elaborates upon the Net Carbs Concept, telling consumers that "All Carbs Are Not Created Equal." Some carbohydrates like dietary fiber "pass through your body without having any impact on blood-sugar levels" and others, like sugar alcohols "have a minimal impact on blood-sugar levels."¹⁵ Providing "The Scoop on Sugar Alcohols," Defendant's

website explains:

Many low-carb products are sweetened with a form of sugar called sugar alcohols. Sugar alcohols come in the form of ingredients such as glycerin, mannitol, sorbitol, xylitol, erythritol, isomalt, lactitol and maltitol. Sugar alcohols provide a sweetness and mouth feel similar to sugar, without all the calories and unwanted metabolic effects. Sugar alcohols are not fully absorbed by the gut, which means they provide roughly half the calories that sugar does. Thanks to this incomplete and slower absorption, there is a minimal impact on blood sugar and insulin response. Because of this, sugar alcohols don't significantly interfere with fat burning, which makes them acceptable on Atkins. However, since a portion of sugar alcohols aren't fully absorbed in the gut, there is the potential that consuming too much may produce a laxative effect or cause some gastrointestinal problems. Most people can usually handle 20 to 30 grams a day. To calculate Net Carb count with sugar alcohols, simply subtract grams of sugar alcohols (including glycerin), as well as fiber, from total grams of carbs.¹⁶

39. Thus, the Net Carbs in an Atkins product are intended to represent the number of

grams of carbohydrates that will actually impact a person's blood sugar level. Since this is why followers of Atkins and other low-carb diets try to restrict their carbohydrate intake in the first place, they need only pay attention to those carbohydrates which have this undesired effect—that is, glycemic carbs.

The Net Carbs Deception: "All Sugar Alcohols Are Not Created Equal"

40. Most nutritionists, physicians, and researchers will agree with Atkins that dietary fiber is not digested and therefore has a minimal or non-existent impact on blood sugar levels. However, Atkins has engaged in a systematic campaign to deceive carb-conscious and carb-counting consumers that the same holds true of all sugar alcohols when the glycemic index of

¹⁵ <u>https://www.atkins.com/how-it-works/library/articles/how-to-read-a-food-label</u> (last viewed 06/12/17)

¹⁶ <u>https://www.atkins.com/how-it-works/library/articles/ask-the-nutritionist-the-scoop-on-sugar-alcohols</u> (last viewed 06/12/17)

some sugar alcohols is far from negligible. Below is a list of the most common sugar alcohols and their glycemic index, compiled by nutrition researcher Geoffrey Livesy:

Glycemic Index and Energy Values of Polyols				
Polyol	GI (glucose=100)	Calories/g		
Maltitol syrup (intermediate)	53	3		
Maltitol syrup (regular)	52	3		
Maltitol syrup (high)	48	3		
Polyglycitol (hydrogenated starch hydrolysate)	39	2.8		
Maltitol syrup (high-polymer)	36	3		
Maltitol	36	2.7		
Xylitol	13	3		
Isomalt	9	2.1		
Sorbitol	9	2.5		
Lactitol	6	2		
Erythritol	0	0.2		
Mannitol	0	1.5		

Geoffrey Livesey, "Health potential of polyols as sugar replacers, with emphasis on low glycemic properties," in *Nutrition Research Reviews* 2003; 16: 163-91, pp. 179, 180.

41. Atkins tells consumers that "Carbs Are Not All Created Equal." But it fails to disclose to them that likewise "Sugar Alcohols Are Not All Created Equal." While the glycemic index of *some* sugar alcohols is indeed quite low or even non-existent, this is not at all true of

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maltitol, GI=36, and maltitol syrup, GI= 36-53 depending on the kind. Maltitol and maltitol syrup are both used extensively in a variety of Atkins products, figuring quite high in the ingredient lists of many.

42. To put this into perspective, the glycemic impact of a gram of maltitol is 57% that of a gram of sucrose or table sugar (GI=63) while the glycemic impact of a gram of maltitol syrup may be up to 84% that of table sugar. The glycemic index of maltitol syrup can be higher than sponge cake (GI=46), corn tortilla (GI=52), baked beans (GI=40), and macaroni (GI=50) and almost as high as a hamburger bun (GI=61) and Coca-Cola (GI=63). The glycemic index of maltitol is higher than barley bread (GI=34), wheat tortilla (GI=30), and black beans (GI=30) and almost as high as navy beans (GI=39) and whole-grain spaghetti (GI=42).¹⁷

43. Thus, while the glycemic index of maltitol and maltitol syrup may be lower than that table sugar and certain other foods, it is hardly "minimal" or "negligible," as Atkins claims. The difference between these sugar alcohols and what reasonable consumers recognize to be a highly glycemic carbohydrate like ordinary table sugar is not vast.

44. Discounting maltitol and maltitol syrup carbs from the "Net Carbs" count right along with the fiber carbs suggests to the reasonable consumer that the glycemic effect of these sugar alcohols is approximately that of fiber—which is to say, zero. But the truth is that their glycemic index is closer to that of table sugar than it is to fiber (*much* closer when it comes to maltitol syrup). The first phase of the original Atkins diet—now renamed the "Atkins 20 Diet Plan"—prohibits a

¹⁷ <u>http://www.health.harvard.edu/diseases-and-</u> <u>conditions/glycemic_index_and_glycemic_load_for_100_foods</u> (last accessed 06/12/17).

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number of foods whose glycemic index is *lower* than maltitol and/or maltitol syrup,¹⁸ including whole milk (GI=31),¹⁹ legumes (GI between 13 and 50),²⁰ and cherries (GI=22).²¹

45. The inconsistency is readily explained by Atkins's desire to sell as many allegedly low-carb snack products as possible and its willingness to deceive the public in order to achieve this goal. Someone on Phase 1 of the Atkins 20 is permitted 20-25g of Net Carbs daily,²² which would allow that person to consume upward of 12 "2 Net Carbs" *Endulge*® Caramel Nut Chew Bars daily and remain within the diet. But this is only because the 9g of carbohydrates from maltitol and maltitol syrup in the product have been discounted from the Net Carb count along with the fiber. Include those carbohydrates and the Net Carbs count jumps to 11g, meaning that the same person could consume at most 2 Chew Bars daily and remain within the diet. Not every carb-conscious consumer is an official follower of the Atkins diet or strictly adheres to a pre-set daily carbohydrate limit. But all seek to limit or minimize carb-intake when possible or convenient, and will accordingly be much more willing to purchase a 2g Net Carbs product than an 11g Net Carbs product.

The Judgment of Experts

46. What any layperson can infer from the chart above is confirmed by the testimony of many nutritionists, physicians, researchers, and other health professionals:

Some food companies started using the term "net carbs" and defined it to mean the total grams of carbohydrate minus the grams of sugar alcohols, fiber, and glycerine.

¹⁸ <u>https://www.atkins.com/how-it-works/atkins-20</u> (last viewed 06/12/17)

¹⁹ http://www.health.harvard.edu/diseases-and-

<u>conditions/glycemic_index_and_glycemic_load_for_100_foods</u> (last viewed 06/12/17) ²⁰ <u>http://www.health.harvard.edu/diseases-and-</u>

<u>conditions/glycemic_index_and_glycemic_load_for_100_foods</u> (last viewed 06/12/17) ²¹ <u>http://www.livestrong.com/article/427337-the-glycemic-index-of-cherries/</u> (last viewed 06/12/17)

²² <u>https://www.atkins.com/how-it-works/atkins-20</u> (last viewed 06/12/17)

This equation is not entirely accurate, because some of the sugar alcohols and fiber are absorbed by the body. In fact, about half of the grams of sugar alcohols are metabolized to glucose.

Madelyn L. Wheeler, MS, RD, CDE, FADA, CD, Health Professional and Winner of American Diabetes Association's Outstanding Educator in Diabetes Award ²³

These terms have been made up by food companies. It's a way for the manufacturers of these products to draw attention to them and make them look appealing by saying, 'Look, you can eat all these carbs, but you're really not impacting your health, so to speak.' There are some sugar alcohols that can raise your blood sugar. Certain sugar alcohols do have a higher glycemic index, and they still are not counted as carbohydrates by these companies.

Dr. Wahida Karmally, DrPH, Director of Nutrition, Irving Center for Clinical Research, Columbia University²⁴

As far as sugar alcohols go, most of them are very low GI (ranging between 1-12), aside from maltitol at 35 GI. They still elicit a blood glucose response – but are not counted as a carbohydrate source on many labels.

Dr. John Rusin, Physical Therapist and Writer²⁵

Dr. Atkins and the vendors of low-carb products are correct that not only fiber but also glycerin and polydextrose have little or no effect on blood glucose. The story with sugar alcohols, however, is different. One of the most commonly used sugar alcohols, maltitol and its syrups, does have a considerable effect on blood glucose. Two sugar alcohols, erythritol and mannitol, have no effect, and four others have some effect.

David Mendosa, Medical Writer and Diabetes Consultant²⁶

[S]ubtracting 100% of the sugar alcohol from "net carbs" is misleading to [Atkins] customers as about half of the maltitol is absorbed.

Dr. Andreas Eenfeldt, M.D., Physician and Low Carb Advocate ²⁷

Some Nutrition Facts labels may also list sugar alcohols under total carbohydrate. Sugar alcohols may be found in products that are labeled "sugar-free" or "no sugar added." This can include sugar-free candies, chocolate, and energy bars. But don't be fooled – sugar alcohols are still a form of carbohydrate, and they still affect your blood sugar levels, if not as dramatically. Because sugar alcohols are hard for the body to digest, the effect on blood sugar levels is less than standard sugar. When counting carbohydrates for products made with sugar alcohols, subtract *half* of the

²³ <u>http://www.diabetesforecast.org/2010/aug/what-are-net-carbs.html</u> (last viewed 06/12/17)

²⁴ <u>http://www.webmd.com/women/features/net-carb-debate#1</u> (last viewed 06/12/17)

²⁵ <u>https://drjohnrusin.com/the-truth-about-net-carbohydrates/</u> (last viewed 06/12/17)

²⁶ <u>http://www.mendosa.com/netcarbs.htm</u> (last viewed 06/12/17)

²⁷ <u>http://www.dietdoctor.com/atkins-greed-and-the-fairy-tale-cookies</u> (last viewed 06/12/17)

grams of sugar alcohol listed on the food label from the total grams of carbohydrate. [emphasis added]

Diabetes Teaching Center at the University of California, San Francisco²⁸

This is the general concept that is now being applied – but with a twist – to the new food labels with "net carbs" or "zero carbs that count." The main concern with these new food labels is that the subtraction process has been generalized to all fiber grams and all sugar alcohols. However, eating sugar alcohols can cause blood sugar to rise.

Department of Human Nutrition, Kansas State University29

Dr. David Ludwig, director of the obesity program at Children's Hospital in Boston, said that some sugar alcohols affect blood sugar levels as much as "net" carbs do. "It's unclear whether the term has any nutritional significance," he said.

The New York Times³⁰

47. The judgment of experts is confirmed by peer-reviewed scientific journals.

Surveying a wide range of studies on the glycemic impact of sugar alcohols in the Canadian

Journal of Diabetes, Dr. Thomas M.S. Wolever of the University of Toronto and his colleagues

make the following observations:

"[T]he glucose of moiety of maltitol is absorbed and provides carbohydrates to the body for metabolism. In a study conducted by Felber and colleagues, carbohydrate oxidation increased and lipid oxidation decreased after normal subjects consumed 30 g of maltitol, although the magnitude of these effects was smaller than that observed after consumption of 30 g of sucrose [citation omitted]"³¹

"The glycemic response after maltitol administration was approximately 25% of that observed after administration of an equal amount of glucose [citation omitted] and 55% of that after an equal amount of sucrose [citation omitted]"³²

²⁸ <u>https://dtc.ucsf.edu/living-with-diabetes/diet-and-nutrition/understanding-carbohydrates/counting-carbohydrates/learning-to-read-labels/counting-sugar-alcohols/ (last viewed 06/12/17)</u>

²⁹ <u>https://www.ksre.k-state.edu/humannutrition/nutrition-topics/eatingwell-diabetes/diabetes-</u> documents/Net Carbs.pdf (last viewed 06/12/17)

³⁰ <u>http://www.nytimes.com/2004/12/05/business/yourmoney/is-the-lowcarb-boom-over.html</u> (last viewed 06/12/17)

³¹ Thomas M.S. Wolever MD, PhD, Ana Piekarz RD, Marjorie Hollands MSC RD CDE, Katherine Younker MBA RD CDE, *Canadian Journal of Diabetes*, 2002; 26(4): 356-362, pg. 357.

³² Ibid., pgs. 357-58.

"[R]esearch suggests that the glycemic effect of sugar alcohols depends on the type of sugar alcohol and on the nature of the food into which it is incorporated. Sorbitol, lactitol and xylitol do not raise PG [citations omitted]; however, maltitol and HSHs have demonstrated a modest effect on PG [citations omitted]. In fact, chocolate sweetened with maltitol elicited the same PG response in normal subjects as did chocolate sweetened with sucrose [citation omitted]."³³

48. The verdict is clear: While the glycemic effect of maltitol may be lower than that of some other carbohydrates, including table sugar (sucrose), it is far from "minimal" as Atkins claims. Indeed, the glycemic effect of maltitol is over half that of table sugar and is actually equal to it when used to sweeten chocolate (as Atkins does in many of its products). Crucially, the research cited by Dr. Wolever was conducted on *normal* subjects—not diabetics with a heightened susceptibility to unhealthy blood sugar fluctuations. Moreover, the research cited was examining only maltitol, not maltitol syrup, whose glycemic index may be considerably higher than maltitol's. Dr. Wolever is on record stating that "it's a big misconception to say maltitol does not raise blood sugar."³⁴

49. Dr. Wolever was at one point *retained by Atkins as an expert consultant*.³⁵ So Defendant is well aware of the truth about maltitol, proving that its fraud on carb-conscious consumers is knowing and willful.

50. Not only is maltitol's effect on blood sugar levels far from "minimal," as Atkins contends, there is evidence suggesting that its effect is *even greater* than that of regular sugar. The Center for Science in the Public Interest wrote to the FDA:

[T]he labels on a number of foods state that maltitol has a minimal impact on blood sugar. Some studies suggest that maltitol raises blood sugar less than sucrose.

³³ Ibid., pg. 360.

³⁴ <u>http://www.nytimes.com/learning/students/pop/20040415snapthursday.html</u> (last viewed 06/12/17)

³⁵ <u>http://www.wsj.com/articles/SB109700319191636814</u> (last viewed 06/12/17)

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However, in other studies, maltitol has a glycemic index of 73, which is higher than that of sucrose (61).³⁶

The "Glycemic Impact" Obfuscation

51. While knowing the scientific truth, Atkins has engaged in a calculated campaign to sow scientific confusion in the public mind in order to conceal its Net Carbs Deception and further perpetuate its fraud on consumers. It has attempted to as it were "change the subject" from the glycemic index of sugar alcohols—and especially maltitol and maltitol syrup—to the issue of the "glycemic impact" of its products taken as a whole, which is altogether distinct from, and irrelevant to the truth or falsity of, its Net Carbs representations.

52. The Atkins website explains:

"Atkins Advantage nutrition bars and shakes are low-glycemic impact. A patentpending clinical testing method substantiates the low glycemic impact and confirm [sic] the accuracy of the Atkins net carb labeling claims."³⁷

This emphasis on "glycemic impact" is also found in Atkins representative Aliza Rothman's

response to Dr. Eenfeldt's criticisms of Atkins's Net Carb representations (quoted above):

I also would like to provide you with correct information about Atkins products. Atkins products have been clinically tested for blood sugar responses using the glycemic load methodology; (http://www.nutritionandmetabolism.com/content/3/1/33). We take pride in offering our customers products that have a minimal glycemic impact. There are simply some consumers who need a low sugar alternative to high sugar habits for better compliance.³⁸

53. That Atkins requires a "patent-pending clinical testing method" to substantiate its

claims is just one more data point in its pattern of deception, since truly scientific experiments can

be reproduced by other researchers who will either confirm or falsify their results without

³⁶ <u>http://www.fda.gov/ohrms/dockets/dailys/04/july04/071604/04p-0297-cp00001-01-vol1.pdf</u> (last viewed 06/12/17)

³⁷ <u>https://www.atkins.com/how-it-works/library/articles/the-low-glycemic-approach-to-healthy-eating</u> (last viewed 06/12/17)

³⁸ <u>http://www.dietdoctor.com/atkins-greed-and-the-fairy-tale-cookies</u> (last viewed 06/12/17)

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becoming liable for patent infringement. Real science does not require special, proprietary methods to prove its claims. Atkins science is mere pseudo-science, an alternative science that ignores indisputable facts about the glycemic index of maltitol and maltitol syrup in order to promote the alternative glycemic reality communicated by Atkins labels.

54. This need to deny reality is why Atkins assures consumers that it employs a "glycemic load methodology" to ensure that its products have a "low glycemic impact." This is a red herring because "glycemic load" and "low glycemic impact" are *relative* concepts that describe the glycemic effect of certain foods by comparison with others. So an Atkins bar may indeed have a low glycemic impact relative to a big bowl of pasta or a few slices of pizza. But this has nothing to do with Atkins's Net Carbs representations, which concern *the glycemic effect of the grams of sugar alcohols in Atkins products*. Atkins's Net Carbs counts represent that this effect is approximately zero when the truth is that it is very far from zero where maltitol and maltitol syrup are concerned.

55. The fact that carb-conscious consumers might still be better off eating an Atkins bar than a bowl of pasta or a subway sandwich does nothing to eliminate this basic deception. Consumers weighing whether to purchase Atkins bars are comparing their carbohydrate content to that of other snack foods or competing energy bars, not to the total carbohydrate content of full meals. So, the fact that the Products can be said to have a "low glycemic impact" relative to some other products on supermarket shelves is simply irrelevant.

56. The Glycemic Impact Obfuscation was repeated in Atkins's response to David Mendosa's criticisms (quoted above). Colette Heimowitz, Vice President of Education and Research at Atkins Health and Medical Information Services, retorted:

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It is "misleading to compare the quantity of sugar alcohol tested to determine the glycemic index with the quantity of sugar alcohol that is actually in our products" because the "glycemic index does not take into account serving size."³⁹

This last claim, that the glycemic index does not measure serving size, is of course true. But it has nothing to do with the question of whether Atkins is misleading consumers when it *treats the glycemic index of maltitol and maltitol-syrup-derived carbohydrates as though it was zero when it is very far from zero*. This is exactly what Atkins is doing when it issues its Net Carbs representations, which tell consumers that the glycemic effects of its maltitol and maltitol-syrup sugar alcohols can be discounted as readily as those of fiber. The fact that the glycemic index is not an all-encompassing measurement of everything a health-conscious consumer might wish to know about a food does nothing to exonerate Atkins of this fundamental fraud.

57. Heimowitz also argued that Mendosa's article did "not consider that other components in the product [besides sugar alcohol] such as fat, fiber and protein will have an impact on the metabolism of the sugar alcohol and, thus, the blood sugar response."⁴⁰ But Atkins's Net Carb claims have nothing to do with the Products' fat and protein content. Of course, the glycemic index is a scientific abstraction whose real-world significance for individuals is always going to be affected by the total nutritional context. But this holds true of *any* carbohydrate in *any* food and does justify Atkins in lying about its particular carbohydrates.

58. The truth is that Atkins has long been aware of its deceptive practices and conduct. For a period of time beginning around 2004 or 2005, Atkins announced its intent to abandon the use of Net Carb claims and replaced these with "net Atkins count" claims, which were supposedly based on actual scientific testing rather than a strict mathematical formula—as is now once again

³⁹ http://www.mendosa.com/netcarbs.htm

⁴⁰ <u>http://www.mendosa.com/netcarbs.htm</u> (last viewed 06/12/17)

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endorsed by Atkins. At that time, Atkins described its former Net Carbs claims as "imprecise,"41

which is a major understatement but marginally more honest than is now the norm at Atkins. The

Wall Street Journal reported in 2004:

Under the old method, the Atkins Endulge chocolate almond bar had two grams of "net carbs," according to the label. Under the "net Atkins count" method, the candy bar would come out with more than twice that amount. Atkins says it is discontinuing the product.

Products most likely to flunk Atkins's new carb-testing method are those containing a lot of sugar alcohols, such as candies and other sweets. Products with high fiber levels would be less likely to show such a discrepancy, Atkins says.⁴²

59. But Atkins discovered that candies and sweets sell, especially when consumers can

be persuaded that they are actually health foods. And this is why Atkins has reverted to its old ways, treating the most glycemic of its sugar alcohols as though they were non-existent in order to deceive consumers and line its pockets.

Defendant's Net Carbs Claims Violate Identical State And Federal Laws

60. Food manufacturers must comply with federal and state laws and regulations governing the labeling of food products. Defendant's false and deceptive labeling is misleading and in violation of FDA and consumer protection laws of each of the fifty states and the District of Columbia.

61. The FDCA provides that "[a] food shall be deemed misbranded – (a) (1) its labeling is false or misleading in any particular, or 21 U.S.C. §§ 343 (a)(1). Under the FDCA, the term "false" has its usual meaning of "untruthful," while the term "misleading" is a term of art. Misbranding reaches not only false claims, but also those claims that might be technically true, although still misleading. If anyone representation in the labeling is misleading, the entire food is

⁴¹ <u>http://www.wsj.com/articles/SB109700319191636814</u> (last viewed 06/12/17)

⁴² <u>http://www.wsj.com/articles/SB109700319191636814</u> (last viewed 06/12/17)

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misbranded. No other statement in the labeling cures a misleading statement. "Misleading" is judged in reference to "the ignorant, the unthinking and the credulous who, when making a purchase, do not stop to analyze." *United States v. El-O-Pathic Pharmacy*, 192 F.2d 62, 75 (9th Cir. 1951). Under the FDCA, it is not necessary to prove that anyone was actually misled.

62. While the FDA has not established regulations for the use or calculation of Net Carb claims, it has recognized that the substitution of sugar alcohols for sugar in a product cannot justify the suggestion that the product is low in carbohydrates—even when the nutrition facts panel accurately discloses the total carbohydrates in the product (as do the nutrition panels on Atkins® products). Denying a petition to brand certain food products "Carbolite," the FDA explained:

[S]everal of the Carbolite® brand product labels that were submitted with the petition indicate that these products contain the same or substantially similar amounts of carbohydrates as similar products that do not substitute sugar alcohols for sugars ("comparable reference products") … Use of the term "Carbolite" on products in which there is no reduction in carbohydrates compared to a similar product is not only inherently misleading, but is not truthful.⁴³

63. New York and federal law have placed similar requirements on food companies that are designed to ensure that the claims companies are making about their products to consumers are truthful and accurate. Defendant's packaging and advertising of the Products also violate various state laws against misbranding which mirror federal law. New York and other state law broadly prohibit the misbranding of food in language identical to that found in regulations promulgated pursuant to the FDCA, 21 U.S.C. §§ 343 et seq.

64. N.Y. Agm. Law § 201 states that "[f]ood shall be deemed to be misbranded: 1. If its labeling is false or misleading in any particular..." New York State law broadly prohibits the misbranding of food in language identical to that found in regulations promulgated pursuant to the

⁴³ <u>http://www.fda.gov/ohrms/dockets/02p0462/02p-0462-pdn0001-01-vol1.pdf</u> (last viewed 06/12/17)

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Federal Food, Drug, and Cosmetic Act, 21 U.S.C. § 301 *et seq.*: Pursuant to N.Y. State Education Law § 6815, "[f]ood shall be deemed to be misbranded: 1. If its labeling is false or misleading in any particular..." Defendant's Products were misbranded under New York law because they misled Plaintiff and Class members about the nature of the Products.

Defendant's Misrepresentations Mislead, And Are Relied Upon By, Reasonable Consumers

65. Defendant's Net Carbs representations are deceptive and likely to mislead a reasonable consumer, who cannot distinguish between Atkins Products and food that is genuinely low in carbohydrates. The FDA consumer behavior survey referenced above also discovered:

Respondents who saw only the *front panel* often perceived different claims that implied "low in carbohydrate" as having a shared meaning. Respondents often rated products similarly whether they had "Low Carb," "CarbConscious," or "Net Carb" on the front.⁴⁴

66. A representation that a product has a particular number of "Net Carbs" is material to a reasonable consumer when deciding to purchase a product, as proven by the popularity of lowcarb diets and the fact that Atkins's Net Carb concept is a central feature of its marketing strategy.

67. Defendant's deceptive labeling and other misleading representations were a material factor in Plaintiff's and Class members' decisions to purchase the Products. Relying on these misrepresentations, Plaintiff and Class members believed they were purchasing Products whose sugar alcohol carbohydrates have a minimal glycemic effect.

68. Defendant's Product labeling as alleged herein is deceptive and misleading and was designed to increase sales of the Products. Defendant's misrepresentations are part of its systematic practice of mislabeling its Products.

69. At the point of sale, Plaintiff and Class members did not know, and had no reason to know, that the Products were misbranded as set forth herein, and would not have bought the

⁴⁴ http://www.fda.gov/food/foodscienceresearch/consumerbehaviorresearch/ucm168989.htm

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Products had they known the truth about them. Defendant knew and intended that its Net Carbs misrepresentations would be relied upon. As a result of Defendant's misrepresentations, Plaintiff and thousands of others throughout the United States purchased the Products.

Plaintiff and The Class Were Injured as The Result of Defendant's Deceptive Practices

70. Plaintiff and the Class (defined below) were injured by Defendant's deceptive and unfair conduct when they were denied the benefit of their bargain and paid premium prices they otherwise would not have paid over other comparable products that did make deceptive "Net Carb" claims.

71. Plaintiff paid \$12.08 for a single 6.0 oz. box of Defendant's Peanut Butter Cups after Defendant induced in her the belief that the Atkins candy was significantly healthier, because significantly less glycemic, than other candies. Defendant warranted that Plaintiff was receiving a minimally glycemic product but delivered a significantly glycemic one, which had much less value for Plaintiff.

72. The table below compares the nutrients and economics of the Atkins® *Endulge*® Chocolate Peanut Candies against another product that looks and is very similar but has not participated in the Net Carbs Fraud:

	Atkins® <i>Endulge</i> ® Chocolate Peanut Candies	M&M's® Peanut
Calories Per Gram of Product	4.41	5.07
Grams of Fat Per Gram of	0.32	0.26
Product		
Grams of Carbohydrates Per	0.53	0.61
Gram of Product		
Price Per Gram of Product	5.20¢ (based on \$8.99	1.76¢ (based on \$5.29
	purchase of 170g box at	purchase of 299g pack at
	Duane Reade)	Duane Reade)

This comparison shows that there is very little nutritional difference between Defendant's Chocolate Peanut Candies and the "junk food" upon which it is obviously modeled. The Atkins

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Product has slightly fewer calories and carbohydrates per gram while M&M's have slightly less fat. The economics of the two candies are very different, however. While M&Ms can charge consumers only 1.76¢ per gram, Atkins can get away with charging 295% of that, nearly three times more. The reason is Atkins's deceptive "1g Net Carb' representation. Though a gram of Defendant's Product contains 87% of the amount of carbohydrates in a gram of M&Ms, the Net Carbs fraud has allowed it to pass off its Product as some kind of health food, and to accordingly charge a premium price.

73. One discovers the same phenomenon when one compares the Product purchased by Plaintiff GARCIA with the well-known junk foods upon which it was obviously modeled:

	Atkins® <i>Endulge</i> ® Peanut Butter Cups	Reese's Peanut Butter Cups	Nestle Butter Fingers Peanut Butter Cups
Calories Per Gram	4.71	5.14	5.48
Grams of Fat Per Gram of Product	0.38	0.29	0.33
Grams of Carbohydrates Per Gram of Product	0.53	0.57	0.57
Price Per Gram	5.20¢ (based on \$8.99 purchase of 170g box at Duane Reade)	1.44¢ (based on a \$4.29 purchase of a 297g pack at Duane Reade)	1.68¢ (based on a \$4.99 purchase of a 297.6g pack at Duane Reade)

Once again, there is very little nutritional difference between Defendant's Product and its "junk food" competitors. Defendant's peanut butter cups have slightly fewer calories and carbohydrates per gram while its competitors' have slightly less fat. Here too, however, the economics of the candies could not be more different, as Atkins can charge 361% and 310% of the prices charged by its competitors. The explanation lies in the Atkins® Product's deceptive "2g Net Carb" representation. Though a gram of the Atkins® Product contains a full 93% of the amount of

carbohydrates in a gram of its competitor products, the Net Carbs fraud has permitted it to pass off its own peanut butter cups as some kind of health food, and to accordingly charge a premium price.

CLASS ACTION ALLEGATIONS

74. Plaintiff GARCIA brings this action as a class action pursuant to Rule 23 of the

Federal Rules of Civil Procedure on behalf of the following class:

All persons or entities in the United States who made retail purchases of the Products during the applicable limitations period, and/or such subclasses as the Court may deem appropriate ("the Nationwide Class").

In the alternative, Plaintiff GARCIA seeks to represent

All persons who made retail purchases of the Products in New York during the applicable limitations period, and/or such subclasses as the Court may deem appropriate ("the New York Class").

The proposed Classes exclude current and former officers and directors of Defendant, members of the immediate families of the officers and directors of Defendant, Defendant's legal representatives, heirs, successors, assigns, and any entity in which they have or have had a controlling interest, and the judicial officer to whom this lawsuit is assigned.

75. Plaintiff reserves the right to revise the Class definition based on facts learned in the course of litigating this matter.

76. This action is proper for class treatment under Rules 23(b)(1)(B) and 23(b)(3) of the Federal Rules of Civil Procedure. While the exact number and identities of other Class members are unknown to Plaintiff at this time, Plaintiff is informed and believes that there are thousands of Class members. Thus, the Class is so numerous that individual joinder of all Class members is impracticable.

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77. Common questions of law and fact arise from Defendant's conduct described herein.

Such questions are common to all Class members and predominate over any questions affecting

only individual Class members and include:

a. Whether the Products' "Net Carbs" claims are false and misleading;

b. whether Defendant engaged in a marketing practice intended to deceive consumers about the glycemic significance of its sugar alcohols;

c. whether Defendant deprived Plaintiff and the Class of the benefit of their bargain because the Products they purchased were different from, and had less value than, what was represented by Defendant;

d. whether Defendant must disgorge any and all profits they have made as a result of its misconduct; and

e. whether Defendant should be barred from discounting maltitol- and maltitol syrup-derived carbohydrates in its "Net Carbs" calculations.

78. Plaintiff's claims are typical of those of Class members because Plaintiff and other

Class members sustained damages arising out of the same wrongful conduct, as detailed herein. Plaintiff purchased Defendant's Product and sustained similar injuries arising out of Defendant's conduct in violation of New York State law. Defendant's unlawful, unfair and fraudulent actions concern the same business practices described herein irrespective of where they occurred or were experienced. The injuries of the Class were caused directly by Defendant's wrongful misconduct. In addition, the factual underpinning of Defendant's misconduct is common to all Class members and represents a common thread of misconduct resulting in injury to all Class members. Plaintiff's claims arise from the same practices and course of conduct that give rise to the claims of other Class members and are based on the same legal theories.

79. Plaintiff will fairly and adequately represent and pursue the interests of the Class and have retained competent counsel experienced in prosecuting nationwide class actions. Plaintiff understands the nature of her claims herein, has no disqualifying conditions, and will vigorously

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represent the interests of the Class. Neither Plaintiff nor Plaintiff's counsel have any interests that conflict with or are antagonistic to the interests of the Class. Plaintiff has retained highly competent and experienced class action attorneys to represent their interests and those of the Class. Plaintiff and Plaintiff's counsel have the necessary financial resources to adequately and vigorously litigate this class action, and Plaintiff and counsel are aware of their fiduciary responsibilities to the Class and will diligently discharge those duties by vigorously seeking the maximum possible recovery for the Class.

80. A class action is superior to other available methods for the fair and efficient adjudication of this controversy. The damages suffered by any individual class member are too small to make it economically feasible for an individual Class member to prosecute a separate action, and it is desirable for judicial efficiency to concentrate the litigation of the claims in this forum. Furthermore, the adjudication of this controversy through a class action will avoid the potentially inconsistent and conflicting adjudications of the claims asserted herein. There will be no difficulty in the management of this action as a class action.

81. The prerequisites to maintaining a class action for injunctive relief or equitable relief pursuant to Rule 23(b)(2) are met, as Defendant has acted or refused to act on grounds generally applicable to the Class, thereby making appropriate final injunctive or equitable relief with respect to the Class as a whole.

82. The prerequisites to maintaining a class action for injunctive relief or equitable relief pursuant to Rule 23(b)(3) are met, as questions of law or fact common to the Class predominate over any questions affecting only individual members, and a class action is superior to other available methods for fairly and efficiently adjudicating the controversy.

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83. The prosecution of separate actions by members of the Class would create a risk of

establishing inconsistent rulings and/or incompatible standards of conduct for Defendant.

84. Defendant's conduct is generally applicable to the Class as a whole and Plaintiff seeks, *inter alia*, equitable remedies with respect to the Class as a whole. As such, Defendant's systematic policies and practices make declaratory relief with respect to the Class as a whole appropriate.

CAUSES OF ACTION

COUNT I

INJUNCTION FOR VIOLATIONS OF NEW YORK GENERAL BUSINESS LAW § 349 (DECEPTIVE AND UNFAIR TRADE PRACTICES ACT

(brought on behalf of the Nationwide Class in conjunction with substantively similar consumer protection laws of other states and the District of Columbia to the extent New York law does not reach the claims of out-of-state Class members or, alternatively, on behalf of the New York Class)

85. Plaintiff GARCIA realleges and incorporates herein by reference the allegations

contained in all preceding paragraphs, and further alleges as follows:

86. Plaintiff GARCIA brings this claim on behalf of herself and the other members of

the Class for an injunction for violations of New York's Deceptive Acts or Practices Law ("NY

GBL § 349").

87. NY GBL § 349 provides that "deceptive acts or practices in the conduct of any

business, trade or commerce or in the furnishing of any service in this state are . . . unlawful."

88. Under the § 349, it is not necessary to prove justifiable reliance. ("To the extent that

the Appellate Division order imposed a reliance requirement on General Business Law [§] 349 ...

claims, it was error. Justifiable reliance by the plaintiff is not an element of the statutory claim."

Koch v. Acker, Merrall & Condit Co., 18 N.Y.3d 940, 941 (N.Y. App. Div. 2012) (internal citations omitted)).

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89. Any person who has been injured by reason of any violation of the NY GBL may bring an action in their own name to enjoin such unlawful act or practice, an action to recover their actual damages or fifty dollars, whichever is greater, or both such actions. The court may, in its discretion, increase the award of damages to an amount not to exceed three times the actual damages up to one thousand dollars, if the court finds the Defendant willfully or knowingly violated this section. The court may award reasonable attorney's fees to a prevailing plaintiff.

90. The practices employed by Defendant, whereby Defendant advertised, promoted, and marketed its Products and their "Net Carbs" were unfair, deceptive, and misleading and are in violation of the NY GBL § 349.

91. The foregoing deceptive acts and practices were directed at customers.

92. Defendant should be enjoined from discounting maltitol- and maltitol-syrup-derived carbohydrates in its "Net Carbs" representations as described above.

93. Plaintiff GARCIA, on behalf of herself and all others similarly situated, respectfully demands a judgment enjoining Defendant's conduct, awarding costs of this proceeding and attorneys' fees, as provided by NY GBL § 349, and such other relief as this Court deems just and proper.

COUNT II

INJUNCTION FOR VIOLATIONS OF NEW YORK GENERAL BUSINESS LAW § 349 (DECEPTIVE AND UNFAIR TRADE PRACTICES ACT)

(brought on behalf of the Nationwide Class in conjunction with substantively similar consumer protection laws of other states and the District of Columbia to the extent New York law does not reach the claims of out-of-state Class members or, alternatively, on behalf of the New York Class)

94. Plaintiff GARCIA realleges and incorporates herein by reference the allegations

contained in all preceding paragraphs, and further alleges as follows:

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95. Plaintiff GARCIA brings this claim individually and on behalf of the other members of the Class for violations of NY GBL § 349.

96. Defendant's conduct and/or omissions as alleged herein constitute deceptive acts or practices under NY GBL § 349, which was enacted to protect the consuming public from those who engage in unconscionable, deceptive or unfair acts or practices in the conduct of any business, trade or commerce.

97. The practices of Defendant described throughout this Complaint, were specifically directed to consumers and violate NY GBL § 349 for, *inter alia*, the following reasons:

a. Defendant engaged in deceptive, unfair and unconscionable commercial practices in failing to reveal material facts and information about the Products, which did, or tended to, mislead Plaintiff and the Class about facts that could not reasonably be known by them;

b. Defendant knowingly and falsely represented and advertised a deceptive "Net Carb" count with an intent to cause Plaintiff and Class members to underestimate the glycemic effect of the Products;

c. Defendant caused Plaintiff and the Class to suffer a probability of confusion and a misunderstanding of legal rights, obligations and/or remedies by and through its conduct.

98. The practices employed by Defendant, whereby Defendant advertised, promoted, and

marketed its Products and their "Net Carbs" counts were unfair, deceptive, and misleading and are in violation of NY GBL § 349.

99. Under the circumstances, Defendant's conduct in employing these unfair and deceptive trade practices was malicious, willful, wanton and outrageous such as to shock the conscience of the community and warrant the imposition of punitive damages.

100. Defendant's deceptive acts, omissions and practices were directed at consumers. Defendant's actions impact the public interest because Plaintiff and members of the Class were injured in exactly the same way as thousands of others purchasing the Products.

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101. By committing the acts alleged in this Complaint, Defendant has misled Plaintiff and the Class into purchasing the Products, in part or in whole, due to an erroneous belief about the Products' content. This is a deceptive business practice that violates NY GBL § 349.

102. Defendant's "Net Carbs" claims misled Plaintiff and are likely in the future to mislead reasonable consumers. Had Plaintiff and Class members known the true facts about the Products, they would not have purchased them at the given price.

103. The foregoing deceptive acts, omissions and practices set forth in connection with Defendant's violations of NY GBL § 349 proximately caused Plaintiff and other members of the Class to suffer damages in the form of, *inter alia*, monies spent to purchase the Products and the ingestion of carbohydrates that were more glycemic than was warranted to them. Plaintiff and other members of the Class are entitled to recover such damages, together with statutory damages, equitable and declaratory relief, appropriate damages, including punitive damages, attorneys' fees and costs.

COUNT III

DAMAGES FOR VIOLATIONS OF NEW YORK GENERAL BUSINESS LAW § 350 (FALSE ADVERTISING LAW)

(brought on behalf of the Nationwide Class, in conjunction with the substantively similar consumer protection laws of other states and the District of Columbia to the extent New York law is inapplicable to out-of-state Class members, or, in the alternative, on behalf of the New York Class

104. Plaintiff GARCIA realleges and incorporates by reference the allegations contained

in all preceding paragraphs and further alleges as follows:

105. Plaintiff GARCIA brings this claim individually, as well as on behalf of members of

the Class, for violations of NY GBL § 350.

106. Defendant has been and/or is engaged in the "conduct of ... business, trade or commerce" within the meaning of N.Y. Gen. Bus. Law § 350.

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107. New York Gen. Bus. Law § 350 makes unlawful "[f]alse advertising in the conduct of any business, trade or commerce." False advertising includes "advertising, including labeling, of a commodity ... if such advertising is misleading in a material respect," taking into account "the extent to which the advertising fails to reveal facts material in light of ... representations [made] with respect to the commodity ..." N.Y. Gen. Bus. Law § 350-a(1).

108. Defendant caused to be made or disseminated throughout New York, through advertising, marketing and other publications, statements that were untrue or misleading, and that were known, or which by the exercise of reasonable care should have been known to Defendant, to be untrue and misleading to consumers and the Class.

109. Defendant's Net Carbs misrepresentations as alleged herein were material and substantially uniform in content, presentation, and impact upon consumers at large.

110. Defendant has violated N.Y. Gen. Bus. Law § 350 because its Net Carbs misrepresentations were material and likely to deceive a reasonable consumer.

111. Plaintiff GARCIA and members of the Class have suffered an injury, including the loss of money or property, as a result of Defendant's false and misleading advertising.

112. Pursuant to N.Y. Gen. Bus. Law § 350-e, Plaintiff GARCIA and members of the Class seek monetary damages (including actual damages and minimum, punitive, or treble and/or statutory damages pursuant to GBL § 350-a (1)), injunctive relief, restitution and disgorgement of all monies obtained by means of Defendants' unlawful conduct, interest, and attorneys' fees and costs.

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COUNT IV

BREACH OF EXPRESS WARRANTIES

(brought on behalf of the Nationwide Class in conjunction with the express warranty laws of the other states and the District of Columbia to the extent New York law is inapplicable to out-of-state Class members, or, alternatively, on behalf of the New York Class)

113. Plaintiff GARCIA realleges and incorporates herein by reference the allegations contained in all preceding paragraphs, and further allege as follows:

114. Defendant provided Plaintiff GARCIA and other members of the Class with written express warranties, including, but not limited to, warranties that the Products contain only minimally glycemic sugar alcohols. The "Net Carbs" claims made by Defendant are an affirmation of fact—that the discounted carbohydrates have a "minimal" impact on blood sugar. This affirmation of fact became part of the basis of the bargain and created an express warranty that the good would conform to the stated promise. Plaintiff and Class members placed importance on Defendant's claims.

115. Defendant breached the terms of its express warranty to Plaintiff and the Class by not providing Products with the qualities promised.

116. As a proximate result of Defendant's breach of warranties, Plaintiff and Class members suffered damages in an amount to be determined by the Court and/or jury, in that they purchased and paid for products that did not conform to what Defendant promised in its promotion, marketing, advertising, packaging and labeling. They were deprived of the benefit of their bargain and spent money on products that did not have any value or had less value than was warranted.

COUNT V

COMMON LAW FRAUD

(brought on behalf of the Nationwide Class, in conjunction with the substantively similar common law of other states and the District of Columbia to the extent New York common law is inapplicable to out-of-state Class members, or, in the alternative, on behalf of the New York Class)

117. Plaintiff GARCIA realleges and incorporates herein by reference the allegations contained in all preceding paragraphs, and further alleges as follows:

118. Defendant intentionally made materially false and misleading claims through its "Net

Carb" representations, intending that Plaintiff and the Class rely on them.

119. Plaintiff and Class members reasonably relied on Defendant's false and misleading

representations and omissions. They did not know, and had no reason to know, the truth about the

Products at the time they purchased them. They would not have purchased the Products had they

known the truth-viz., that Defendant's Net Carbs claims understate the glycemic effect of the

sugar alcohols in the Products.

120. Plaintiff and members of the Class have been injured as a result of Defendant's

fraudulent conduct and must be compensated in an amount to be determined at trial.

COUNT VI

NEGLIGENT MISREPRESENTATION

(brought on behalf of the Nationwide Class, in conjunction with the substantively similar common law of other states and the District of Columbia to the extent New York common law is inapplicable to out-of-state Class members, or, in the alternative, on behalf of the New York Class)

121. Plaintiff GARCIA realleges and incorporates by reference the allegations contained

in all preceding paragraphs and further alleges as follows:

122. Plaintiff GARCIA brings this claim individually, as well as on behalf of members of the Class, for negligent misrepresentation.

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123. To state a claim for negligent misrepresentation, a plaintiff must allege that "(1) the parties stood in some special relationship imposing a duty of care on the defendant to render accurate information, (2) the defendant negligently provided incorrect information, and (3) the plaintiff reasonably relied upon the information." *Amos v. Biogen Idec, Inc.*, No. 13-CV-6375T, 2014 WL 2882104, at *5 (W.D.N.Y. June 25, 2014).

124. Element #1 is satisfied because Plaintiff GARCIA and Atkins stood in a special relationship imposing a duty of care on Defendant.

125. To determine the existence of a "special relationship" in a commercial transaction, a court examines three factors: "whether the person making the representation held or appeared to hold a unique or special expertise; whether a special relationship of trust or confidence existed between the parties; and whether the speaker was aware of the use to which the information would be put and supplied it for that purpose." *Hughes v. Ester C Co.*, 930 F. Supp. 2d 439, 474–75 (E.D.N.Y 2013).

126. Defendant holds itself out as possessing special scientific expertise in the subject of dieting, with knowledge of human physiology and the impact of different foods on it. This expertise is presupposed in nearly all of its website articles promoting the Atkins dieting approach. In fact, an entire section of Defendant's website is devoted to disseminating what purports to be scientific information.⁴⁵

127. A special relationship of trust exists between Atkins and consumers. Atkins is recommending which foods consumers should and should not be putting into their bodies, instructing them about what is required to achieve their health and weight loss goals. Consumers

⁴⁵ https://www.atkins.com/how-it-works/library/articles/scientific-research

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trust that this advice is accurate and that Atkins will not use its claims to scientific authority to augment its profits at the expense of consumers' health.

128. Element #2 is satisfied because Defendants, directly or through its agents and employees, negligently represented to Plaintiff and the Class that it maltitol- and maltitol syrup-derived carbohydrates would only minimally impact their blood sugar levels.

129. Element #3 is satisfied because Plaintiff GARCIA and Class members reasonably relied upon Defendant's misrepresentations when purchasing the Products.

130. As a result of Defendant's negligent misrepresentation, Plaintiff GARCIA and Class members have suffered and continue to suffer economic loss.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, individually and on behalf of all other similarly situated, seeks judgment against Defendant, as follows:

- a. An Order that this action be maintained as a class action and appointing Plaintiff as representative of the Nationwide Class or, in the alternative, the New York Class;
- b. An Order appointing the undersigned attorney as class counsel in this action;
- c. Restitution and disgorgement of all amounts obtained by Defendant as a result of its misconduct, together with interest thereon from the date of payment, to the victims of such violations;
- d. All recoverable compensatory and other damages sustained by Plaintiff and the Class;
- e. Actual and/or statutory damages for injuries suffered by Plaintiff and the Class and in the maximum amount permitted by applicable law;
- f. An order (i) requiring Defendant to immediately cease its wrongful conduct as set forth in this Complaint; (ii) enjoining Defendant from continuing to misrepresent and

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conceal material information and conduct business via the unlawful, unfair and deceptive business acts and practices complained of herein; (iii) ordering Defendant to engage in a corrective advertising campaign; and (iv) requiring Defendant to reimburse Plaintiff and all members of the Class in an amount up to the purchase price of the Products;

- g. Statutory pre-judgment and post-judgment interest on any amounts;
- h. Payment of reasonable attorneys' fees and costs; and
- i. Such other relief as the Court may deem just and proper.

DEMAND FOR TRIAL BY JURY

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff, on behalf of herself and all others similarly situated, demands a trial by jury on all questions of fact raised by the Complaint.

Dated: July 11, 2017

Respectfully submitted,

By: <u>/s/ C.K. Lee</u> C.K. Lee, Esq.

LEE LITIGATION GROUP, PLLC

C.K. Lee (CL 4086) Anne Seelig (AS 3976) 30 East 39th Street, Second Floor New York, NY 10016 Tel.: 212-465-1188 Fax: 212-465-1181 Attorneys for Plaintiff and the Class

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Atkins® Meal Bars – Chocolate Chip Cookie Dough Bar



		10-00	
Nutri	tio	n Fa	cts
Serving S	Size 1	Bar (60	g)
Servings	Per Co	ontainer	5
Amour	nt Pe	r Ser	ving
Calories 22		Fat Calo	
			ly Value
Total Fat	10g		15%
Saturate		′q	35%
Trans Fa		0	
Cholester			0%
Sodium 33			14%
Potassiur	~	1	4%
Total Carl			11%
Dietary		•	56%
Sugars		.9	
Sugar A		15a	
		109	23%
FIULCIII	/u		
Protein 13 Vitamin A		Vitamin C	
Vitamin A	15% •	Vitamin C Iron	15%
Vitamin A Calcium	15% • 4% •	Iron	<u>15%</u> 20%
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INGREDIENTS: CHOCOLATE FLAVORED COATING [PALM KERNEL OI L, POLYDEXTROSE, MALTITOL, WHEY PROTEIN CONCENTRATE, COCOA POWDER (PROCESSED WITH ALKALI), WHOLE MILK POWDER, SOY LECITH SALT, NATURAL AND ARTIFICIAL FLAVOR, SUCRALOSE, ACESULFAME POTASSIUM], SOY PROTEIN ISOLATE, POLYDEXTROSE, GLYCERIN, CHOCOLATE CHIPS [MALTITOL, UNSWEETENED CHOCOLATE (PROCESSED WITH ALKALI), COCOA BUTTER, SOY LECITHIN, VANILLA E X TR ACT], PALM OIL, WAT ER, HYDROLYZED GELATIN, CANOLA OIL, NATURAL AND ARTIFICIAL FLAVORS, SALT, SOY LECITHIN, VITAMIN MINERAL MIX [MAGNESIU OXIDE, SODIUM ASCORBATE, ASCORBIC ACID (VI TAMIN C), DL-ALPHA-TOCOPHERYL ACETATE (VITAMIN E), NIACINAMIDE, ZINC OXIDE, D-CALCIUM PANTOTHENATE, VITAMIN A PALMITATE, THIAMIN MONONITRATE, PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), RIBOFLAVIN (VITAMIN B2), FOLIC ACID, BIOTIN, PHYLLOQUINONE (VITAMIN K1), CYANOCOBALAMIN (VITAMIN B12)], SUCRALOSE, ACESULFAME POTASSIU 1014 01

CONTAINS MILK, SOY.

MADE IN A FACILITY THAT ALSO USES EGGS, PEANUTS, TREE NUTS AND WHEAT.

Atkins® Meal Bars – Chocolate Peanut Butter Pretzel bar



	2000000	100	
Nutri Serving S	itio	n Fa	cts
Serving S	Size 1	Bar (48	q)
Servings	Per Co	ontainer	5
Amou			ving
Calories 2	10	Fat Calo	ries 90
			ly Value
Total Fat	10g		15%
Saturat		4 5a	23%
Trans Fa	5. 20 5 5 5 5		
the second s	0		0%
Cholester Oction 00	<u> </u>		
Sodium 33	0		14%
Potassiu			4%
Total Car	bohydra	ate 19g	6%
Dietary	Fiber 6	a	24%
Sugars		3	
Sugar A		100	
		illy	000/
Protein 16	og		26 %
Vitamin A		Vitamin C	25%
Calcium	10% •		10%
Vitamin E	15% •	Vitamin K	15%
Thiamin	15% •	Riboflavin	15%
Niacin	15% •	Vitamin B	6 15%
Folate	15% •	Vitamin B	12 15%
Biotin	15% •	Pantothenic /	Acid 15%
Phosphorus	15% •	Magnesiu	m 10%
Zinc	15%	<u> </u>	
Percent Daily		re based or	1 a 2,000
calorie di et. Y	our Daily	Values may	be higher
or lower depe	Calories:	2.000	2,500
Total Fat	Less than	65g	80g
Saturated Fat	Less than	20g	25g
Cholesterol	Less than	300 m g	300mg
Sodium	Less than	2,400mg	2,400mg
Potassium		3,500mg	3,500mg
Total Carb		300g	375g
Dietary Fiber Protein		25g 50g	30g 65g

INGREDIENTS: SOY PROTEIN ISOLATE, ROASTED PEANUTS (PEANUTS, SOYBEAN OIL OR CANOLA OIL, SALT), CHOCOLATE FLAVORED COATING [PALM KERNEL OIL, POLYDEXTROSE, MALTITOL, WHEY PROTEIN CONCEN-TRATE, COCOA POWDER (PROCESSED WITH ALKALI), WHOLE MILK POWDER, SOY LECITHIN, SALT, NATURAL AND ARTIFICIAL FLAVOR, SUCRALOSE, ACESULFAME POTASSIUM], GLYCERIN, PRETZEL STICKS (SOY PROTEIN ISOLATE, CORN STARCH, SOY FLOUR, SESAME SEEDS, PALM OIL, TAPIOCA STARCH, INULIN, PEA FIBER, RICE SYRUP, SALT, XANTHAN GUM, BAKING POWDER, YEAST), POLYDEXTROSE, HYDROLYZED GELATIN, MALTITOL, PEANUT BUTTER (GROUND, ROASTED PEANUTS), PALM KERNEL AND PALM OIL, WHEY PROTEIN ISOLATE, GUAR GUM, NATURAL AND ARTIFICIAL FLAVORS, SALT, PARTIALLY DEFATTED PEANUT FLOUR, NONFAT DRY MILK, VITAMIN MINERAL MIX [MAGNESIUM OXIDE, SODIUM ASCORBATE, ASCORBIC ACID (VITAMIN C), DL-ALPHA-TOCOPHERYL ACETATE (VITAMIN E), NIACINAMIDE, ZINC OXIDE, D-CALCIUM PANTOTHENATE, VITAMIN A PALMITATE, THIAMIN MONONITRATE, PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), RIBOFLAVIN (VITAMIN B2), FOLIC ACID, BIOTIN, PHYLLOQUINONE (VITAMIN K1), CYANOCOBALAMIN (VITAMIN B12)], WATER, SOY LECITHIN, SESAME OIL, WHE Y POWDER, ANHYDROUS MILK FAT, SUCRALOSE. 1021 02 CONTAINS SOY, PEANUTS, MILK.

Atkins® Meal Bars – Cookies n' Crème Bar



Nutrit Serv. Size	1 Bar (Fac (50g)	IS
Amoun	t Per	Serv	ing
Calories	200 F	at Cal	. 100
	%	aily V	alue*
Total Fat			17%
Saturate	<u> </u>	1	35%
Trans Fa		2	
Cholester	-		0%
Sodium 20	Ŷ		8%
Potassium	<u> </u>	a	5%
Total Carbo		•	7%
Dietary F		<u> </u>	36%
			30%
Sugars 1	•	0.0	
Sugar Al		эy	000/
Protein 14	<u> </u>		22%
	20% • Vi		20%
Calcium	8% • In		10%
	15% • Vi		15%
	15% • Ri		15%
	15% • Vi		
	15% • Vi		
	15% • Pa 10% • M		
	10% • M 15%	aynesiun	1070
 Percent Daily 2,000 calorie may be highe your calorie 	Values a diet. You er or lowe	ır dailv v	alues
Total Fat Saturated Fat Cholesterol Sodium Potassium Total Carbohydrate Dietary Fiber Protein	Less than Less than Less than Less than	20g 300mg	80g 25g 300mg 2,400mg 3,500mg 375g 30g 65g

*

★ Sugar Alcohols total includes 2g of glycerin.

Rounded Values

INGREDIENTS: VANILLA CREAM FLAV ORED LAYER (MALTITOL, POLYDEXTROSE, PALM KERNEL AND PALM OIL, SOYBEAN OIL, NONFAT DRY MILK, TITANIUM DIOXIDE COLOR, NATURAL AND ARTIFICIAL FLAVORS, SOY LECITHIN, SALT, SUCRALOSE), COCOA SOY NUGGETS [SOY PROTEIN ISOLATE, COCOA POWDER (PROCESSED WITH ALKALI), TAPIOCA STARCH], CHOCOLATE FLAVORED COATING (POLYDEXTROSE, PALM KERNEL AND PALM OIL, WHEY PROTEIN ISOLATE, COCOA POWDER, ARTIFICIAL FLAVOR, SOY LECITHIN, SUCRALOSE), GLYCERIN, INULIN, HYDROLYZED GELATIN, MALTITOL SYRUP, MALTITOL, UNSWEETENED CHOCOLATE (PROCESSED WITH ALKALI), SUNFLOWER OIL, PALM KERNEL AND PALM OIL, POLYDEXTROSE, COCOA POWDER (PROCESSED WITH ALKALI), SOLUBLE CORN FIBER, WATER, VITAMIN MINERAL MIX [MAGNESIUM OXIDE, SODIUM ASCORBATE, ASCORBIC ACID (VITAMIN C), DL-ALPHA-TOCOPHERYL ACETATE (VITAMIN E), NIACINAMIDE, ZINC OXIDE, D-CALCIUM PANTOTHENATE, VITAMIN A PALMITATE, THIAMIN MONONITRATE, PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), RIBOFLAVIN (VITAMIN B2), FOLIC ACID, BIOTIN, PHYLLOQUINONE (VITAMIN K1), CYANOCOBALAMIN (VITAMIN B12)], WHEY PROTEIN ISOLATE, COCOA BUTTER, SALT, NATURAL AND ARTIFICIAL FLAVORS, NONFAT DRY MILK, SOY LECITHIN, SUCRALOSE, SALTED BUTTER (CREAM, SALT), ACESULFAME POTASSIUM. FR03

CONTAINS MILK AND SOY.

THIS PRODUCT IS MANUFACTURED IN A FACILITY THAT USES PEANUTS, TREE NUTS, WHEAT AND SEEDS.

Atkins® Meal Bars – Mudslide Bar



utrition Facts

Nutrition Facts Serv. Size 1 Bar (48g)			
Amount Per Serving			
Calories 210 Fat Cal. 90			
% Daily Value*			
Total Fat 10g 15%			
Saturated Fat 4.5g 23%			
Trans Fat Og			
Cholesterol Omg 0%			
Sodium 170mg 7%			
Potassium 140mg 4%			
Total Carbohydrate 19g 6%			
Dietary Fiber 5g 20%			
Sugars 1g			
Sugar Alcohols 11g			
Protein 15g 30%			
Vitamin A 15% • Vitamin C 15%			
Calcium 25% • Iron 10%			
Vitamin E 10% • Vitamin K 10%			
Thiamin 10% • Riboflavin 10% Niacin 10% • Vitamin B6 10%			
Folate 10% • Vitamin B12 10%			
Biotin 10% • Partatheric Acid 10%			
Phoenharus 20% • Mannasium 6%			

INGREDIENTS: SOY NUGGETS [SOY PROTEIN ISOLATE, TAPIOCA STARCH, COCOA POWDER (PROCESSED WITH ALKALI), CALCIUM CARBONATE], GLYCERIN, HYDROLYZED GELATIN, ROASTED PECANS, POLYDEXTROSE, PALM KERNEL AND PALM OIL, SUNFLOWER OIL, COCOA POWDER (PROCESSED WITH ALKALI), MALTITOL, CHOCOLATE LIQUOR (PROCESSED WITH ALKALI), MARSHMALLOW NUGGETS (LACTITOL, MALTODEXTRIN, PALM KERNEL OIL, NATURAL AND ARTIFICIAL FLAVORS, GUM ARABIC, GLYCERIN, MAGNESIUM STEARATE), WHEY PROTEIN ISOLATE, MILK PROTEIN ISOLATE, VITAMIN MINERAL MIX (TRICALCIUM PHOSPHATE, CALCIUM CARBONATE, MAGNESIUM OXIDE, VITAMIN A PALMITATE, ASCORBIC ACID (VITAMIN C), SODIUM ASCORBATE, THIAMIN MONONITRATE (VITAMIN B1), RIBOFLAVIN (VITAMIN B2), PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), CYANOCOBALAMIN (VITAMIN B1), RIBOFLAVIN (VITAMIN B2), PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), CYANOCOBALAMIN (VITAMIN B1), RIBOFLAVIN (VITAMIN B2), PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), CYANOCOBALAMIN (VITAMIN B1), RIBOFLAVIN (VITAMIN B2), PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), CYANOCOBALAMIN (VITAMIN B1), RIBOFLAVIN (VITAMIN B2), PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), CYANOCOBALAMIN (VITAMIN B1), RIBOFLAVIN (VITAMIN B2), PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), CYANOCOBALAMIN (VITAMIN B1), RIBOFLAVIN (VITAMIN B2), PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), CYANOCOBALAMIN (VITAMIN B1), RIBOFLAVIN (VITAMIN B2), PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), CYANOCOBALAMIN (VITAMIN B1), RIBOFLAVIN (VITAMIN B2), PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), CYANOCOBALAMIN (VITAMIN B1), RIBOFLAVIN (VITAMIN B2), PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), CYANOCOBALAMIN (VITAMIN B1), RIBOFLAVIN (VITAMIN B2), PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), CYANOCOBALAMIN (VITAMIN B1), RIBOFLAVIN (VITAMIN B2), PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), CYANOCOBALAMIN (VITAMIN B1), SODIUM SELENTE], CELLULOSE, WHOLE MILK POWDER, NATURAL AND ARTIFICIAL FLAVORS, SOY LECITHIN, COCOA BUTTER, SALT, SUCRALOSE, ACESULFAME POTASSIUM. FR02 CONTAINS SOY, MILK AND PECANS. THIS PRODUCT IS MANUFACTURED IN A FACILITY THAT USES PEANUTS, OTHER NUTS AND

Atkins® Meal Bars – Peanut Butter Granola Bar



Nutri	itio	n Fa	cts
Serving			
Servings	Per Co	nta iner	5
Amou			
Calor ies 2		FatCalo	~
0 101 103 2	10		y Value
Total Fat	110		17%
Saturat	-	30	15%
Trans Fa		3	
Cholester	~		0%
So dium 24	~		10%
-			2%
Potassiu Total Con	<u> </u>	4 . 10 -	
Total Car			6%
Dietary		g	20%
Sugars	-		
Sugar A		11 g	
Protein	5g		23%
Vitamin A		Vitamin C	25%
Vitamin A Calcium	35% •	ron	25% 10%
	35% • 15% •	lr on Vitamin K	10 % 15%
Calcium	35% • 15% • 15% •	lron Vitamin K Riboflavin	10 % 15% 15%
Calcium Vitamin E Thiamin Niacin	35% • 15% • 15% • 15% •	Iron Vitamin K Riboflavin Vitamin B	10 % 15% 15% 6 15%
Calcium Vitamin E Thiamin Niacin Folate	35% • 15% • 15% • 15% •	Iron Vitamin K Riboflavin Vitamin B Vitamin B	10 % 15% 15% 6 15% 12 15%
Calcium Vitamin E Thiamin Niacin Folate Biotin	35% • 15% • 15% • 15% • 15% •	Ir on Vitamin K Ribofla vin Vitamin B Vitamin B Pantothenic	10 % 15% 15% 6 15% 12 15% Add 15%
Calcium Vitamin E Thiamin Niacin Folate Biotin Phosph orus	35% • 15% • 15% • 15% • 15% • 20% •	Ir on Vitamin K Riboflavin Vitamin B Vitamin B Pantothenic Magn es iu	10 % 15% 15% 6 15% 12 15% Add 15% m 8%
Calcium VitaminE Thiamin Niacin Folate Biotin Phosphorus Zinc	35% • 15% • 15% • 15% • 15% • 20% • 15% •	Ir on Vitamin K Ribofla vin Vitamin B Vitamin B Pantothenic	10 % 15% 15% 6 15% 12 15% Add 15%
Calcium Vitamin E Thiamin Niacin Folate Biotin Phosph orus Zinc Chro mium	35% • 15% • 15% • 15% • 15% • 15% • 20% • 15% •	Ir on Vitamin K Ribofla vin Vitamin B Vitamin B Pantothenic Magn esiu Selenium	10 % 15% 56 15% 12 15% Add 15% m 8% 15%
Calcium Vitamin E Thiamin Niacin Folate Biotin Phosph orus Zinc Chro mium Percent Daily	35% • 15% • 15% • 15% • 15% • 20% • 15% • 10% Values al	Ir on Vitamin K Riboflavin Vitamin B Vitamin B Pantothenic Magn es iu Selenium	10 % 15% 15% 6 15% 12 15% Add 15% m 8% 15%
Calcium Vitamin E Thiamin Niacin Folate Biotin Phosph orus Zinc Chro mium	35% • 15% • 15% • 15% • 15% • 20% • 15% • 10% Values a four Daily V ending on	Ir on Vitamin K Riboflavin Vitamin B Vitamin B Pantothenic/ Magn es iu Selenium	10 % 15% 15% 6 15% 6 15% 12 15% Mod 15% m 8% 15%
Calcium Vitamin E Thiamin Niacin Folate Biotin Phosphorus Zinc Chromium PercentDaily calorie diet. Y or lower depe	35% • 15% • 15% • 15% • 15% • 15% • 20% • 15% • 10% values ar four Daily V ending on Catories:	Ir on Vitamin K Ribofla vin Vitamin B Vitamin B Pantothenic, Magn es iu Selenium re based or Values may y our calor 2,000	10 % 15% 15% 6 15% 6 15% 12 15% Mod 15% m 8% 15% n a2,000 be higher ie nee ds. 2,500
Calcium Vitamin E Thiamin Niacin Folate Biotin Phosphorus Zinc Chromium Percent Daily calorie diet Y or low er depo	35% • 15% • 15% • 15% • 15% • 15% • 20% • 20% • 15% • 10% Valuesar four Daily V ending on Catories: Lessthan	Ir on Vitamin K Ribofla vin Vitamin B Vitamin B Pantothenic, Magn es iu Selenium re based or Values may y our calor 2,000 65g	10 % 15% 15% 6 15% 12 15% 12 15% m 8% 15% n a2,000 be higher ie nee ds. 2,500 80g
Calcium Vitamin E Thiamin Niacin Folate Biotin Phosphorus Zinc Chromium PercentDaily calorie diet. Y or lower depe	35% • 15% • 15% • 15% • 15% • 15% • 20% • 15% • 10% values ar four Daily V ending on Catories:	Ir on Vitamin K Ribofla vin Vitamin B Vitamin B Pantothenic, Magn es iu Selenium re based or Values may y our calor 2,000	10 % 15% 5 15% 6 15% 12 15% 12 15% 15% 15% 15% 15% 15% 250 80g 25g
Calcium Vitamin E Thiamin Niacin Folate Biotin Phosphorus Zinc Chromium Percent Daily calorie diet y or low er depu Total Fat Saturat ed Fat Chole ste pol Sodium	35% • 15% • 15% • 15% • 15% • 15% • 20% • 15% • 10% Valuesar four Daily V ending on Catories: Lessthan Lessthan	Ir on Vitamin K Ribofla vin Vitamin B Vitamin B Pantothenic, Magn es iu Sel en ium re based or /alues may y our calor 2,000 65g 20g 300mg 2,400mg	10 % 15% 6 15% 6 15% 12 15% 12 15% 15% 15% 15% 15% 15% 250 259 300mg 2,400mg
Calcium Vitamin E Thiamin Niacin Folate Biotin Phosphorus Zinc Chromium Percent Daily calorie di et. Y or low er depu Total Fat Saturated Fat Chole se tol Sodium Potassium	35% • 15% • 15% • 15% • 15% • 15% • 20% • 15% • 10% Values al our Daily Values al our Daily ending on Catories: Lessthan Lessthan	Ir on Vitamin K Ribofla vin Vitamin B Vitamin B Pantothenic, Magn es iu Sel en ium re based or /alues may y our calor 2,000 65g 20g 300mg 2,400mg 3,500mg	10 % 15% 6 15% 6 15% 12 15% 12 15% 15% 15% 15% 15% 15% 2.500 80g 2.500 80g 2.500 80g 2.500 80g 2.500 80g 2.500 80g 2.500 80g 2.500 80g 2.500 80g 2.500 80g
Calcium Vitamin E Thiamin Niacin Folate Biotin Phosphorus Zinc Chromium Percent Daily calorie diet y or low er depu Total Fat Saturat ed Fat Chole ste pol Sodium	35% • 15% • 15% • 15% • 15% • 15% • 20% • 15% • 10% Values al our Daily Values al our Daily ending on Catories: Lessthan Lessthan	Ir on Vitamin K Ribofla vin Vitamin B Vitamin B Pantothenic, Magn es iu Sel en ium re based or /alues may y our calor 2,000 65g 20g 300mg 2,400mg	10 % 15% 6 15% 6 15% 12 15% 12 15% 15% 15% 15% 15% 15% 250 259 300mg 2,400mg

INGREDIENTS: SOY NUGGETS (SOY PROTEIN ISOLATE, OAT FLOUR), ROASTED PEANUTS (PEANUTS, SOYBEAN OIL OR CANOLA OIL, SALT), GLYCERIN, PEANUT FLAVORED COATING (MALTITOL, PALM KERNEL AND PALM OIL, PARTIALLY DEFATTED PEANUT FLOUR, NONFAT DRY MILK SOLIDS, WHEY POWDER, PEANUTS, SALT, SOY LECITHIN, ANHYDROUS MILK FAT), HYDROLYZED GELATIN, POLYDEXTROSE, WHOLE GRAIN ROLLED OATS, SUNFLOWER OIL, PEANUT BUTTER (GROUND PEANUTS), PEANUT OIL, CELLULOSE, VITAMIN MINERAL MIX (TRICALCIUM PHOSPHATE, CALCIUM CARBONATE, MAGNESIUM OXIDE, VITAMIN A PALMITATE, ASCORBIC ACID [VITAMIN C], SODIUM ASCORBATE, THIAMIN MONONITRATE [VITAMIN B1], RIBOFLAVIN [VITAMIN B2], PYRIDOXINE HYDROCHLORIDE [VITAMIN B6], CYA NOCOB A L AMIN [V I TAMIN B12], DL-ALPHA-TOCOPHERYL ACETATE [VITAMIN E], NIACINAMIDE, BIOTIN, D-CALCIUM PANTOTHENATE, ZINC OXIDE, FOLIC ACID, CHROMIUM CHELATE, PHYTONADIONE [VITAMIN K1], SODIUM SELENITE], WHEY PROTEIN ISOLATE, NATURAL AND ARTIFICIAL FLAVORS, GUAR GUM, SOY LECITHIN, SALT, SUCRALOSE. 1016 01 CONTAINS SOY, PEANUTS, MILK, WHEAT. MADE IN A FACILITY THAT ALSO USES EGGS AND TREE NUTS.

Atkins® Snack Bars – Classic Trail Mix



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	Nutrition Facts Serving Size 1 Pack (38g) Servings Per Container 5		
	Amount Per Serving		
	Calories 190 Fat Calories 140		
	% Daily Value		
	Total Fat 15g 24%		
	Saturated Fat 3.5g 18%		
	Trans Fat Og		
	Cholesterol Omg 0%		
	Sodium 140mg 6%		
	Potassium 200mg 6%		
	Total Carbohydrate 13g 4%		
	Dietary Fiber 4g 18%		
	Sugars 2g		
*			
*	Sugar Alcohols 5g		
*	Sugar Alcohols 5g Protein 7g 9%		
*	Sugar Alcohols 5g Protein 7g 9% Vitamin A 0% Vitamin C 0%		
*	Sugar Alcohols 5g Protein 7g 9%		
*	Sugar Alcohols 5g Protein 7g 9% Vitamin A 0% Vitamin C 0% Calcium 6% Iron 8% Percent Daily Values are based on a 2,000 9000 1000 1000		
*	Sugar Alcohols 5g Protein 7g 9% Vitamin A 0% Vitamin C 0% Calcium 6% Iron 8% Percent Daily Values are based on a 2,000 calorie diet. Your Daily Values may be higher 000000000000000000000000000000000000		
*	Sugar Alcohols 5g Protein 7g 9% Vitamin A 0% Vitamin C 0% Calcium 6% Iron 8% Percent Daily Values are based on a 2,000 calorie diet. Your Daily Values may be higher or lower depending on your calorie needs.		
*	Sugar Alcohols 5g Protein 7g 9% Vitamin A 0% Vitamin C 0% Calcium 6% Iron 8% Percent Daily Values are based on a 2,000 calorie diet. Your Daily Values may be higher or lower depending on your calorie needs. Calories: 2,000 2,500		
*	Sugar Alcohols 5g Protein 7g 9% Vitamin A 0% Vitamin C 0% Calcium 6% Iron 8% Percent Daily Values are based on a 2,000 calorie diet. Your Daily Values may be higher or lower depending on your calorie needs. Calories: 2,000 2,500 Calories: 2,000 2,500 1000 1000 1000		
*	Sugar Alcohols 5g Protein 7g 9% Vitamin A 0% Vitamin C 0% Calcium 6% Iron 8% Percent Daily Values are based on a 2,000 calorie diet. Your Daily Values may be higher or lower depending on your calorie needs. Calories: 2,000 2,500		
*	Sugar Alcohols 5g Protein 7g 9% Vitamin A 0% Vitamin C 0% Valacium 6% Iron 8% Percent Daily Values are based on a 2,000 calorie diet. Your Daily Values may be higher or lower depending on your calorie needs. 2,000 2,500 Total Fat Less than 65g 80g Saluraled Fat Less than 25g Cholesterol Less than 300mg 2,400mg 2,400mg 2,400mg		
*	Sugar Alcohols 5g Protein 7g 9% Vitamin A 0% Vitamin C 0% Calcium 6% Iron 8% Percent Daily Values are based on a 2,000 calorie diet. Your Daily Values may be higher or lower depending on your calorie needs. 2,000 2,500 Total Fat Less than 65g 80g 25g Cholesterol Less than 300mg 300mg Sodum Less than 300mg 3,500mg 3,500mg		
*	Sugar Alcohols 5g Protein 7g 9% Vitamin A 0% Vitamin C 0% Calcium 6% Iron 8% Percent Daily Values are based on a 2,000 calorie det. Your Daily Values may be higher or lower depending on your calorie needs. Calories: 2,000 2,500 Total Fat Less than 65g 80g Saturated Fat Less than 2,400mg 2,400mg Sodum Less than 2,400mg 2,400mg Sodum 3,500mg 3,500mg 3,500mg		
*	Sugar Alcohols 5g Protein 7g 9% Vitamin A 0% Vitamin C 0% Calcium 6% Iron 8% Percent Daily Values are based on a 2,000 calorie diet. Your Daily Values may be higher or lower depending on your calorie needs. 2,000 2,500 Total Fat Less than 65g 80g 25g Cholesterol Less than 300mg 300mg Sodum Less than 300mg 3,500mg 3,500mg		

★ Sugar Alcohols total includes 0g of glycerin.

INGREDIENTS: PEANUTS, ALMONDS, CHOCOLATE COATED SOY CLUSTERS (CHOCOLATE COATING [MALTITOL, COCOA BUTTER, INULIN, UNSWEETENED CHOCOLATE, MILK, MILK FAT, SOY LECITHIN, NATURAL FLAVORS, SUCRALOSE], SOY CLUSTERS [ISOLATED SOY PROTEIN, TAPIOCA STARCH, MALT EXTRACT, SALT], CONFECTIONER'S GLAZE, WATER, GUM ACACIA), CHOCOLATE COATED RAISINS (CHOCOLATE COATING [MALTITOL, COCOA BUTTER, INULIN, UNSWEETENED CHOCOLATE, MILK, MILK FAT, SOY LECITHIN, NATURAL FLAVORS, SUCRALOSE], RAISINS, CONFECTIONER'S GLAZE, WATER, GUM ACACIA), CHOCOLATE CANDIES (CHOCOLATE COATING [MALTITOL, COCOA BUTTER, INULIN, UNSWEETENED CHOCOLATE, MILK, MILK FAT, SOY LECITHIN, NATURAL FLAVORS, SUCRALOSE], WATER, MALTITOL, GUM ACACIA, TITANIUM DIOXIDE [COLOR], CONFECTIONER'S GLAZE, YELLOW 5 LAKE, RED 40 LAKE, NATURAL FLAVOR, YELLOW 6 LAKE, CARNAUBA WAX, BLUE 2 LAKE, BLUE 1 LAKE, YELLOW 6), CORN OIL, SALT. 1117 01

Atkins® Snack Bars – Sweet & Salty Trail Mix



	Nutri Serving Servings	Size 1	Pack	(38g)
	Amou	nt Pe	r Ser	ving
	Calories 1	90 F a	at Calor	ies 120
			% Daily	
	Total Fat	14g		21%
	Saturat		5g	25%
	Trans F	at Og		
	Choleste	r ol Omg		0%
	Sodium 24			10%
	Potassiu	m 160m	g	4%
	Total Car	bohydr	ate 15g	5%
	Dietary	Fiber 3	g	12%
	Sugars			
×	Sugar A	lcohols	s 8g	
	Protein 7	g		9%
	Vitamin A	0% •	Vitamin	C 0%
	Calcium	6% •	Iron	8%
	Percent Daily calorie diet. Y or lower depe	our Daily V ending on	'alues may your calor	be higher ie needs.
	Total Fat	Calories: Less than		2,500 80g
	Saturated Fat	Less than	20g	25g
	Cholesterol Sodium	Less than Less than		300mg 2,400mg
	Potassium	core mun	3,500mg	3,500mg
	Total Carb Dietary Fiber		300g 25a	375g 30a
	Protein		50g	65g

* Sugar Alcohols total includes Og of glycerin.

INGREDIENTS: PEANUTS, PEANUT BUTTER FLAVORED COATED SOY CLUSTERS (PEANUT BUTTER FLAVORED COATING [MALTITOL, PALM AND PALM KERNEL OIL, PEANUT FLOUR, NONFAT MILK, WHEY, PEANUTS, SALT, SOY LECITHIN, MILK FAT], SOY CLUSTERS [ISOLATED SOY PROTEIN, TAPIOCA STARCH, MALT EXTRACT, SALT], CONFECTIONER'S GLAZE, WATER, SALT, GUM ACACIA, NATURAL AND ARTIFICIAL FLAVORS), CHOCOLATE CRISPS (CHOCOLATE COATING [MALTITOL, COCOA BUTTER, INULIN, UNSWEETENED CHOCOLATE, MILK, MILK FAT, SOY LECITHIN, NATURAL FLAVORS, SUCRALOSE], SOY PUFFS [ISOLATED SOY PROTEIN, RICE STARCH, CORN FLOUR, INULIN, SALT, MIXED TOCOPHEROLS {TO PRESERVE FRESHNESS}], CONFECTIONER'S GLAZE, WATER, GUM ACACIA), SALTED CARAMEL FLAVORED CRISPS (SALTED CARAMEL FLAVORED COATING [MALTITOL, PALM KERNEL OIL, NONFAT MILK, MILK, SALT, YELLOW 6 LAKE, YELLOW 5 LAKE, BLUE 2 LAKE, SOY LECITHIN, NATURAL AND ARTIFICIAL FLAVOR], SOY PUFF [ISOLATED SOY PROTEIN, RICE STARCH, CORN FLOUR, INULIN, SALT, MIXED TOCOPHEROLS {TO PRESERVE FRESHNESS}], CONFECTIONER'S GLAZE, WATER, GUM ACACIA), PEANUT BUTTER FLAVORED CANDIES (PEANUT COATING [MALTITOL, PALM AND PALM KERNEL OIL, PEANUT FLOUR, NONFAT MILK, WHEY, PEANUTS, SALT, SOY LECITHIN, MILK FAT], MALTITOL, WATER, GUM ACACIA, TITANIUM DIOXIDE [COLOR], CONFECTIONER'S GLAZE, NATURAL FLAVOR, YELLOW 5 LAKE, YELLOW 6 LAKE, CARNAUBA WAX, YELLOW 6, BLUE 2 LAKE, RED 40 LAKE), CORN OIL, SALT. 1119 01

CONTAINS PEANUTS, MILK, SOY. Made in a facility that also uses wheat and tree nuts.

CONTAINS PEANUTS, ALMONDS, MILK, SOY. Made in a facility that also uses wheat and other tree nuts.

Atkins® Snack Bars – Caramel Chocolate Nut Roll



Amount	Per Ser	vina	
Calories		Fat Ca	. 120
		Daily \	
Total Fat			20%
	ed Fat 5g		25%
Trans Fa	v		20,0
Cholester	~		2%
Sodium 2			8%
Potassiu	~		4%
Total Car		e 19a	6%
	Fiber 6g	e log	24%
Sugars	~		L-4/0
	-s lcohols 1	Ωα	
Protein 7		vy	11%
Vitamin A	15% • VI	tamin C	15%
Calcium	4% • In		2%
Vitamin E	10% • VI		10%
Thiamin	10% • R		10%
Niacin	10% • VI	tamin B6	10%
Folate	10% • Vi	tamin B1	2 10%
Biotin	10% • Pa	ntothenic A	cid 10%
Phosphorus	8% • M	agnesiur	n 6%
Zinc	10% • Se	elenium	10%
Chromium	6%		
*Percent Daily calorie diet. Y or lower depe	Values are b our daily valu nding on you Calories:	ased on a ues may b ur calorie n 2.000	2,000 e higher ieeds. 2,500
Total Fat	Less than	65g	2,500 80g
Saturated Fat	Less than	200	25g 300mg
Cholesterol Sodium	Less than Less than	300mg 2,400mg	
Potassium		3,500mg	3,500mg
Total Carbohydra Dietary Fiber	ate	300g -	375g 30g
Protein		50g	65g

Nutrition Facts

★ Sugar Alcohols total Includes 0g of glycerin. INGREDIENTS: ROASTED PEANUTS (PEANUTS, SALT), MILK CHOCOLATE FLAVORED COATING (MALTITOL, PALM KERNEL OIL, NONFAT DRY MILK, COCOA POWDER, SOY LECITHIN, SALT, NATURAL FLAVOR), MALTITOL SYRUP, WHEY PROTEIN ISOLATE, INULIN, POLYDEXTROSE, SALTED BUTTER (CREAM, SALT), WATER, PEANUT BUTTER (PEANUTS, MONO AND DIGLYCERIDES, SALT, MIXED TOCOPHEROLS), PALM KERNEL OIL, MILK PROTEIN ISOLATE, NONFAT DRY MILK, PEANUT OIL, VITAMIN MINERAL MIX (MAGNESIUM OXIDE, SODIUM ASCORBATE, ASCORBIC ACID (VITAMIN C), DL-ALPHA-TOCOPHERYLACETATE (VITAMIN E), NIACINAMIDE, ZINC OXIDE, D-CALCIUM PANTOTHENATE, VITAMIN A PALMITATE, THIAMIN MONONITRATE, PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), RIBOFLAVIN (VITAMIN B2), CHROMIUM AMINO ACID CHELATE, FOLIC ACID, BIOTIN, SODIUM SELENITE, PHYLLOQUINONE (VITAMIN K1), CYANOCOBALAMIN (VITAMIN B12)], SALT, SOY LECITHIN, SUCRALOSE. FR04

CONTAINS PEANUTS, SOY AND MILK. This product is manufactured in a facility that uses tree nuts and wheat.

Atkins® Snack Bars – Caramel Chocolate Peanut Nougat Bar



Nutri	tion	Facts

Serv. Size 1 Bar (44g)

Amount Per Serving

Allouit Fer Serving			
Calories	170 H	Fat Cal	. 100
	%	Daily V	alue*
Total Fat	11g		17%
Saturate	d Fat 6g		30%
Trans Fa	t Og		
Cholester	ol <5mg		1%
Sodium 17	Omg		7%
Potassium	140mg		4%
Total Carb		e 20g	7%
Dietary F	iber 11g		44%
Sugars 1			
Sugar Al	cohols 7	g	
Protein 9g			12%
Vitamin A	15% • Vi	tamin C	15%
Calcium	4% • Iro)n	4%
Vitamin E	10% • Vi	tamin K	10%
Thiamin	10% • Ri		10%
Niacin	10% • Vi	tamin B6	10%
Folate	10% • Vi	tamin B12	2 10%
Biotin	10% • Pa	ntothenic Ad	id 10%
Phosphorus	6% • M	agnesiur	1 6%
Zinc	10% • Se	elenium	10%
Chromium	6%		
*Percent Daily calorie diet. Yo or lower deper	/alues are b our daily valu nding on you	ased on a 2 ies may be r calorie n	2,000 higher eeds.
	Calories:	2,000	2,500
Total Fat Saturated Fat	Less than Less than	65g 20g	80g 25g
Cholesterol	Less than Less than	300mg	300mg
Sodium Potassium	Less than	2,400mg 3,500mg	2,400mg 3,500mg
Total Carbohydrat	he	3,000mg	375a

*

30g 65g Protein * Sugar Alcohols total includes

300g

25g

50a

375g

4g of glycerin.

Total Carbohydrate

Dietary Fiber

INGREDIENTS: CARAMEL LAYER [FRUCTOOLIGOSACCHARIDES, POLYDEXTROSE, PALM KERNEL AND PALM OIL, SALTED BUTTER (CREAM, SALT), WATER, NONFAT DRY MILK, GLYCERIN, SOY LECITHIN, MONO AND DIGLYCERIDES, SALT, NATURAL FLAVOR, SODIUM CITRATE, CARRAGEENAN, SUCRALOSE], CHOCOLATE FLAVORED COATING [PALM KERNEL OIL, POLYDEXTROSE, MALTITOL, WHEY PROTEIN CONCENTRATE, COCOA POWDER (PROCESSED WITH ALKALI), WHOLE MILK POWDER. SOY LECITHIN, SALT, NATURAL AND ARTIFICIAL FLAVOR, SUCRALOSE, ÁCESUL FAME POTASSIÚMI, ROASTED PEÁNUTS (PEANUTS, SOYBEAN OIL, SALT), PROTEIN BLEND (SOY PROTEIN ISOLATE, HYDROLYZED GELATÍN, WHEY PROTEIN ISOLATE), GLYCERIN, WATER, POLYDEXTROSE, PEANUT BUTTER (GROUND, ROASTED PEANUTS), CELLULÓSE, PEANUT OIL, OLIVE OIL BLEND (ÓLIVE OIL, MALTODEXTRIN, SODIUM CASEINATE, MONO AND DIGLYCERIDES, DIPOTASSIUM PHOSPHATE), PALM KERNEL AND PALM OIL, CLARIFIED BUTTER, SOY LECITHIN, NATURAL AND ARTIFICIAL FLAVORS, VITAMIN MINERAL MIX [MAGNESIUM OXIDE, SODIUM ASCORBATE, ASCORBIC ACID (VITAMIN C), DL-ALPHA-TOCOPHERYL ACETATE (VITAMIN E), NIACINAMIDE, ZINC OXIDE, D-CALCIUM PANTOTHEÑATE, VITAMIN A PALMITATE, THIAMIN MONOÑITRATE, PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), RÍBOFLAVIN (VITAMIN B2), CHROMIUM AMINO ACIÓ CHELATE, FOLIC ACID, BIOTIN, ŠODIUM SELĖNITE, PHYLLÒQUINONE (VITAMIN K1), CYANOCOBALAMIN (VITAMIN B12)), SALT, CITRIC ACID, SUCRALOSE. FR03

CONTAINS PEANUTS, MILK AND SOY.

THIS PRODUCT IS MANUFACTURED IN A FACILITY THAT USES TREE NUTS, EGGS, WHEAT AND SESAME SEEDS.

Atkins® Snack Bars – Caramel Double Chocolate Crunch Bar



Nutrition Facts

Serv. Size 1 Bar (44g)

Amount Per Serving

Calories 160	Fat Cal. 80
% D	aily Value*
Total Fat 9g	14%
Saturated Fat 6g	30%
Trans Fat Og	
Cholesterol <5mg	1%
Sodium 210mg	9%
Potassium 130mg	4%
Total Carbohydrate	22g 7%
Dietary Fiber 11g	44%
Sugars 1g	
Sugar Alcohols 8g	

Sugar Alcohols 8g Protein 9g 13%

	·		
Vitamin A	15% • Vi	itamin C	15%
Calcium	6% • Ir	on	10%
Vitamin E	10% • Vi	itamin K	10%
Thiamin	10% • R	iboflavin	10%
Niacin	10% • Vi	itamin B6	10%
Folate	10% • Vi	itamin B12	2 10%
Biotin	10% • Pa	intothenic Ad	id 10%
Phosphorus	10% • M	lagnesium	ı 6%
Zinc	10% • S	elenium	10%
Chromium	6%		
*Percent Daily calorie diet. Yo or lower deper	our daily val	ues may be	higher
	Calories:	2,000	2,500
Total Fat Saturated Fat Cholesterol Sodium	Less than Less than Less than Less than	65g 20g 300mg 2,400mg	80g 25g 300mg 2,400mg
Potassium Total Carbohydra Dietary Fiber Protein	te	3,500mg 300g 25g 50g	3,500mg 375g 30g 65g

Sugar Alcohols total includes 3g of glycerin. INGREDIENTS: CHOCOLATE FLAVORED COATING [PALM KERNEL OIL, POLYDEXTROSE, MALTITOL, WHEY PROTEIN CONCENTRATE, COCOA POWDER (PROCESSED WITH ALKALI), WHOLE MILK POWDER, SOY LECITHIN, SALT, NATURAL AND ARTIFICIAL FLAVOR, SUCRALOSE, ACESULFAME POTASSIUM], CARAMEL LAYER [FRUCTOCLIGOSACCHARIDES, POLYDEXTROSE, PALM KERNEL AND PALM OIL, SALTED BUT TER (CREAM, SALT), WATER, NONFAT DRY MILK, GLYCERIN, SOY LECITHIN, MONO AND DIGLYCERIDES, SALT, NATURAL FLAVOR, SODIUM CITRATE, CARRAGEENAN, SUCRALOSEJ, COCOA SOY NUGGETS [SOY PROTEIN ISOLATE, COCOA POWDER (PROCESSED WITH ALKALI), TAPIOCA STARCHJ, GLYCERIN, SUNFLOWER OIL, INULIN, HYDROLYZED GELATIN, MALTITOL SYRUP, MALTITOL, UNSWEETENED CHOCOLATE (PROCESSED WITH ALKALI), POLYDEXTROSE, COCOA POWDER (PROCESSED WITH ALKALI), SOLUBLE CORN FIBER, PALM KERNEL AND PALM OIL, WATER, MILK PROTEIN ISOLATE, COCOA BUTTER, VITAMIN MINERAL MIX [MAGNESIUM OXIDE, SODIOMASCORBATE, ASCORBIC ACID (VITAMIN C), DL-ALPHA-TOCOPHERYL ACETATE (VITAMIN E), NIACINAMIDE, ZINC OXIDE, D-CALCIUM PANTOTHENATE, VITAMIN A PALMITATE, THIAMIN MONONITRATE, PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), RIBOFLAVIN (VITAMIN B2), CHROMIUM AMINO ACID CHELATE, FOLIC ACID, BIOTIN, SODIUM SELENITE, PHYLLOQUINONE (VITAMIN K1), CYANOCOBALAMIN (VITAMIN B12)), SALT, NATURAL AND ARTIFICIAL FLAVORS, CELLULOSE, NONFAT DRY MILK, SOY LECITHIN, SUCRALOSE, SALTED BUTTER (CREAM, SALT), ACESULFAME POTASSIUM. FR03

CONTAINS MILK AND SOY.

THIS PRODUCT IS MANUFACTURED IN A FACILITY THAT USES PEANUTS, OTHER NUTS, WHEAT AND SEEDS.

Atkins® Snack Bars – Cashew Trail Mix bar



	Nutrition Fa Serv. Size 1 Bar (40g						
	Amount Per Serving						
	Calories 170 Fat C	al. 100					
	% Daily Value*						
	Total Fat 11g	17%					
	Saturated Fat 4.5g	23%					
	Trans Fat Og						
	Cholesterol Omg	0%					
	Sodium 140mg	6%					
	Potassium 105mg	3%					
	Total Carbohydrate 19g 6%						
	Dietary Fiber 6g	24%					
	Sugars 3g						
7	Sugar Alcohols 7g						
	Protein 7g	10%					
	Vitamin A 0% • Vitamin	C 0%					
	Calcium 4% • Iron	10%					
	*Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs.						
	Calories: 2,000	2,500					
	Total Fat Less than 650 Saturated Fat Less than 20g Solum Sodium Less than 300mg Sodium Less than 2.400T Potassium 3.500r Total Carbohydrate 300g Dietary Fiber 25g Protain 550	ng 2,400mg					

★ Sugar Alcohols total includes 1g of glycerin. Rounded values.

INGREDIENTS: NUT BLEND (ROASTED PEANUTS (PEANUTS, SOYBEAN OIL, SALT), ALMONDS, ROASTED CASHEWS (CASHEWS, VEGETABLE OIL (PEANUT, COTTONSEED, SOYBEAN AND/OR SUNFLOWER OILS))], CHOCOLATE FLAVORED COATING (MALTITOL, PALM KERNEL OIL, POLYDEXTROSE, SUMPLOWER OILS JIJ, CHOCULATE FLAVORED CUATING (MALTITUL, PALM KERNEL OIL, POLYDEXTROSE, COCOAPOWDER, NONFAT DRY MILK SOLIDS, NATURAL FLAVOR, SOY LECITHIN, SALT, SUCRALOSE), PRETZEL STICKS (SOY PROTEIN ISOLATE, CORN STARCH, SESAME SEEDS, PALM OIL, TAPIOCA STARCH, INULIN, PEA FIBER, RICE SYRUP, XANTHAN GUM, SALT, BAKING POWDER, YEAST), CHOCOLATE FLAVORED CHIPS [MALTITOL, CHOCOLATE LIQUOR (PROCESSED WITH ALKALI), COCOA BUTTER, SOY LECITHIN, VANILLA EXTRACT], POLYDEXTROSE, MALTITOL SYRUP, RAISINS, SOY PROTEIN ISOLATE, WATER, PALM KERNEL AND PALM OIL, GLYCERIN, SALT, MIXED TOCOPHEROLS AND TRHO (TO PRESERVE FRESHNESS). SUCRAIOSE AND TBHQ (TO PRESERVE FRESHNESS), SUCRALOSE. FRO1 CONTAINS PEANUTS, ALMONDS, CASHEWS, MILK, SOY AND SESAME SEEDS.

THIS PRODUCT IS MÁNUFACTURED IN A FACILITY THAT USES TREE NUTS AND WHEAT.

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Atkins® Snack Bars – Coconut Almond Delight Bar



	Nutri Serv. Siz			cts				
	Amount	mount Per Serving						
	Calories 200 Fat Cal. 1							
	% Daily Value							
	Total Fat			23 %				
	Saturated Fat 11g		1	55 %				
	Trans Fa							
	Cholester	ol Omg		0%				
	Sodium 90)mg		4%				
	Potassium	110mg		3%				
	Total Carb		e 18g	6%				
	Dietary Fiber 6g 24%							
	Sugars 1	g						
×	Sugar Al	cohols 9	g					
	Protein 7g			14%				
	Vitamin A	15% • Vi	tamin C	15%				
	Calcium	25% • In		4%				
	Vitamin E	10% • Vi		10%				
	Thiamin	10% • Ni		10%				
	Vitamin B6	10% • Vi	tamin B12	2 10%				
	Biotin Phosphorus	10% • Pa	agnesium					
	Zinc	10% • S	agnesiun elenium	10%				
	Chromium	6%	a vin min	10/10				
	Percent Daily Values are based on a 2,000 *calorie diet. Your daily values may be higher or lower depending on your calorie needs.							
	Total Fact	Calories:	2,000	2,500				
	Total Fat Saturated Fat Cholesterol Sodium Potassium Total Carbohydra	Less than Less than Less than Less than	65g 20g 300mg 2,400mg 3,500mg 300g	80g 25g 300mg 2,400mg 3,500mg 375g				
	Dietary Fiber Protein	-	25g 50g	30g 65g				

★ Sugar Alcohols total includes 3g of glycerin. Rounded values. INGREDIENTS: CHOCOLATE FLAVORED COATING (MALTITOL, PALM KERNEL OIL, MILK PRC CONCENTRATE, COCOA POWDER, CALCIUM CARBONATE, SOY LECITHIN, NATURAL FLAN COCONUT, ALMONDS, POLYDEXTROSE, GLYCERIN, MALTITOL SYRUP, WHEY PROTEIN ISOL WATER, PALM KERNEL AND PALM OIL, VITAMIN MINERAL MIX [TRICALCIUM PHOSPHATE, CAL CARBONATE, MAGNESIUM OXIDE, VITAMIN A PALMITATE, ASCORBIC ACID (VITAMIN C), SOI ASCORBATE, THIAMIN MONONITRATE (VITAMIN B1), PYRIDOXINE HYDROCHLORIDE (VITAMIN CYANOCOBALAMIN (VITAMIN B12), DL-ALPHA-TOCOPHERYL ACETATE (VITAMIN E), NIACINAN BIOTIN, D-CALCIUM PANTOTHENATE, ZINC OXIDE, CHROMIUM CHELATE, PHY TONADIONE (VIT. K1), SODIUM SELENITE], GUM ARABIC, SALT, NATURAL FLAVOR, SOY LECITHIN, MIXED TOCOPHEROL: POTASSIUM SORBATE, SUCRALOSE, SODIUM METABISULFITE. FR01 CONTAINS COCONUT, ALMONDS, SOY, MILK AND SULFITES. THIS PRODUCT IS MANUFACTURED IN A FACILITY THAT USES PEANUTS, OTHER NUTS AND SEEDS.

Atkins® Snack Bars – Dark Chocolate Almond Coconut Crunch Bar



ſ		-				
	Nutritio	n Fa	cts			
	Serving Size 1 Bar (40g) Servings Per Container 5					
	Servings Per U	Jontain	ers			
	Amount Per Serving					
	Calories 190 Fat Calories 130					
		% Daily	Value			
	Total Fat 15g		23%			
	Saturated Fat	7g	35%			
	Trans Fat Og					
	Cholesterol Omg		0%			
	Sodium 40mg		2%			
	Potassium 115mg 3 Total Carbohydrate 17g 6					
	Dietary Fiber 8g 329 Sugars 2g					
*	Sugar Alcohols 6g Protein 5g 6					
	Vitamin A 0% •	Vitamin	C 0%			
	Calcium 6% •	Iron	6%			
	Percent Daily Values a calorie diet. Your Daily ' or lower depending or	Values may I your calor	be higher 'ie needs.			
	Calories: Total Fat Less than		2,500			
	Saturated Fat Less than	20g	80g 25g			
	Cholesterol Less than		300mg			
	Sodium Less than Potassium	2,400mg 3,500mg	2,400mg 3.500mg			
	Total Carb	300g	375g			
	Dietary Fiber Protein	25g 50g	30g 65 g			

NGREDIENTS: ROASTED ALMONDS, TOASTED COCONUT, POLYDEXTROSE, MALTITOL SYRUP, DARK CHOCOLATE FLAVORED COATING (PALM KERNEL OIL, MILK PROTEIN CONCENTRATE, MALTITOL, COCOA [PROCESSED WITH ALKALI], DEXTROSE, SOY LECITHIN, VANILLA EXTRACT), ISOLATED SOY PROTEIN, SUNFLOWER OIL, GLYCERIN, WATER, TAPIOCA STARCH, SALT, NATURAL FLAVOR, SUCRALOSE. 1028 01

CONTAINS ALMONDS, COCONUT, SOY AND MILK.

THIS PRODUCT IS MANUFACTURED IN A FACILITY THAT USES WHEAT, SEEDS, PEANUTS AND TREE NUTS.

Atkins® Snack Bars – Dark Chocolate Decadence Bar



Nutri Serv. Siz			cts	
Amount Per Serving				
Calories	160	Fat Ca	al. 80	
% Daily Valu				
Total Fat	14%			
	ed Fat 6g		30%	
Trans Fa				
Choleste	~		0%	
Sodium 2	v		9%	
Potassiu			4%	
Total Car	~		7%	
	Fiber 11g		44%	
			44 70	
Sugars 1g Sugar Alcohols 8g				
· ·		g	470/	
Protein 9g 1			17%	
Vitamin A	15% • V		15%	
Calcium	6% • Ir		10%	
Vitamin E	10% • V		10%	
Thiamin	10% • R		10%	
Niacin	10% • V			
Folate	10% • V			
Biotin	10% • Pa			
Phosphorus	10% • M			
Zinc	10% • S	elenium	10%	
Chromium	6%			
*Percent Daily calorie diet. Y or lower depe	/our daily val Inding on you	ues may be ur calorie n	e higher eeds.	
Total Fak	Calories:	2,000	2,500	
Total Fat Saturated Fat	Less than Less than	65g 20g	80g 25g	
Cholesterol Sodium	Less than Less than	300mg 2,400mg	25g 300mg 2,400mg	
Potassium		3,500mg	3,500mg	
Total Carbohydr Dietary Fiber	ate	300g 25g	375g 30g	
Protein		50g	65g	

3g of glycerin.

INGREDIENTS: CHOCOLATE FLAVORED LAYER [FRUCTOOLIGOSACCHARIDES, POLYDEXTROSE, PALM KERNEL AND PALM OIL, WATER, GLYCERIN, COCOA POWDER (PROCESSED WITH ALKALI), UNSWEETENED CHOCOLATE, NONFAT DRY MILK, SALTED BUTTER (CREAM, SALT), MONO AND DIGLYCERIDES, SOY LECITHIN, SALT, SODIUM CITRATE, NATURAL FLAVOR, SUCRALOSE, CARRAGEENAN], CHOCOLATE FLAVORED COATING [PALM KERNEL OIL, POLYDEXTROSE, MALTITOL, WHEY PROTEIN CONCENTRATE, COCCA POWDER (PROCESSED WITH ALKALI), WHOLE MILK POWDER, SOY LECITHIN, SALT, NATURAL AND ARTIFICIAL FLAVOR, SUCRALOSE, ACESULFAME POTASSIUM], COCOA SOY NUGGETS [SOY PROTEIN ISOLATE, COCCA POWDER (PROCESSED WITH ALKALI), TAPIOCA STARCH], GLYCERIN, MALTITOL, SUNFLOWER OIL, HYDROLYZED GELATIN, MALTITOL SYRUP, UNSWEETENED CHOCOLATE (PROCESSED WITH ALKALI), INULIN, COCCA POWDER (PROCESSED WITH ALKALI), PALM KERNEL AND PALM OIL, FRUCTOOLIGOSACCHARIDES, POLYDEXTROSE, SOLUBLE CORN FIBER, MILK PROTEIN ISOLATE, COCCA BUTTER, WATER, SALT, VITAMIN MINERAL MIX [MAGNESIUM OXIDE, SODIUM ASCORBATE, ASCORBIC ACID (VITAMIN C), DL-ALPHA-TOCOPHERYL ACETATE (VITAMIN E), NIACINAMIDE, ZINC OXIDE, D-CALCIUM PANTOTHENATE, VITAMIN A PALMITATE, THIAMIN MONONITRATE, PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), RIBOFLAVIN (VITAMIN B2), CHROMIUM AMINO ACID CHELATE, FOLIC ACID, BIOTIN, SODIUM SELENITE, PHYLLOQUINONE (VITAMIN K1), CYANOCOBALAMIN (VITAMIN B12)], NONFAT DRY MILK, NATURAL AND ARTIFICIAL FLAVORS, CELLULOSE, SOY LECITHIN, SUCRALOSE, SALTED BUTTER (CREAM, SALT), ACESULFAME POTASSIUM. FR03

CONTAINS MILK AND SOY.

THIS PRODUCT IS MANUFACTURED IN A FACILITY THAT USES PEANUTS, TREE NUTS, EGGS, Wheat and sesame seeds.

Atkins® Snack Bars – Triple Chocolate Bar



Nut	tritio	on Fa	acts
_			

Serv. Size 1 Bar (40g)

Amount F	Per Se	rving	
Calories	160	Fat Ca	al. 80
	%	Daily V	alue*
Total Fat 9	g		14%
Saturated	Fat 4g		20%
Trans Fat	Og		
Cholestero	l Omg		0%
Sodium 18	Omg		8%
Potassium	120mg	J	3%
Total Carb	ohydra	te 17g	6%
Dietary F	ber 5g	-	20%
Sugars 0	g		
Sugar Alc	ohols	8g	
Protein 12)		19 %
Vitamin A	15% • V	ltamin C	15%
Calcium	6% • I	ron	15%
Vitamin E	10% • V	'itamin K	10%
Thiamin		liboflavin	10%
Niacin		'itamin B6	10%
Folate		'itamin B12	
Biotin	10% • P	antothenic Ac	
Phosphorus	10% • I	Nagnesium	1 6%
Zinc		elenium	10%
Chromium	6%		
*Percent Daily V calorie diet. You or lower depend	alues are ur daily va ding on yo Calories:	based on a 2 lues may be ur calorie n 2,000	2,000 higher eeds. 2,500
Total Fat	Less than	2,000 65g	2,500
Saturated Fat	Less than	20g	25g
Cholesterol Sodium	Less than Less than	300mg 2,400mg	300mg 2,400mg
Potassium		3,500mg	3,500mg
Total Carbohydrate Dietary Fiber		300g 25g	375g 30g
Protein		50g	65g

*

★ Sugar Alcohols total includes 3g of glycerin. Rounded values. INGREDIENTS: SOY NUGGETS [SOY PROTEIN ISOLATE, COCOA POWDER (PROCESSED WITH ALKALI), TAPIOCA STARCH], CHOCOLATE FLAVORED COATING [PALM KERNEL OIL, POLYDEXTROSE, MALTITOL, WHEY PROTEIN CONCENTRATE, COCOA POWDER (PROCESSED WITH ALKALI), WHOLE MILK POWDER, SOY LECITHIN, SALT, NATURAL AND ARTIFICIAL FLAVOR, SUCRALOSE, ACESULFAME POTASSIUM], CHOCOLATE FLAVORED CHIPS [MALTITOL, CHOCOLATE LIQUOR (PROCESSED WITH ALKALI), COCOA BUTTER, SOY LECITHIN, VANILLA EXTRACT], GLYCERIN, WALNUTS, SUNFLOWER OIL, HYDROLYZED GELATIN, MALTITOL SYRUP, INULIN, COCOA POWDER (PROCESSED WITH ALKALI), POLYDEXTROSE, FRUCTOOLIGOSACCHARIDES, SOLUBLE CORN FIBER, PALM KERNEL AND PALM OIL, MILK PROTEIN ISOLATE, WATER, SALT, VITAMIN MINERAL MIX [MAGNESIUM OXIDE, ASCORBIC ACID (VITAMIN C), SODIUM ASCORBATE, DL-ALPHA-TOCOPHEROL ACETATE (VITAMIN E), NIACINAMIDE, ZINC OXIDE, D-CALCIUM PANTOTHENATE, PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), THIAMIN MONONITRATE (VITAMIN B1), RIBOFLAVIN (VITAMIN B2), VITAMIN A PALMITATE, FOLIC ACID, BIOTIN, CHROMIUM AMINO ACID CHELATE, SODIUM SELENITE, PHYLLOQUINONE (VITAMIN K1), CYANOCOBALAMIN (VITAMIN B12)], CELLULOSE, NATURAL AND ARTIFICIAL FLAVORS, SKIM MILK POWDER, SOY LECITHIN, SUCRALOSE, BUTTER (CREAM, SALT), ACESULFAME POTASSIUM. FR01 **CONTAINS SOY, MILK AND WALNUTS**.

THIS PRODUCT IS MANUFACTURED IN A FACILITY THAT USES PEANUTS, OTHER NUTS, WHEAT AND SEEDS.

Atkins® Snack Bars – Chocolate Chip Crisp Bar



. 60 alue 97 187 07 57 27 67 207
9% 18% 0% 5% 2% 6%
189 09 59 29 69
0% 5% 2% 6%
59 29 69
59 29 69
2 9 6 9
69
20/
16%
107
10%
10%
10%
10%
10%
1 1 1

Nutrition Facts

★ Sugar Alcohols total includes 5g of glycerin. Rounded Values. INGREDIENTS: SOY CRISPS (SOY PROTEIN ISOLATE, WHOLE OAT FLOUR), GLYCERIN, POLYDEXTROSE, WHOLE GRAIN ROLLED OATS, CHOCOLATE FLAVORED CHIPS [MALTITOL, CHOCOLATE LIQUOR (PROCESSED WITH ALKALI), COCOA BUTTER, SOY LECITHIN, VANILLA EXTRACT], PALM KERNEL OIL, MALTITOL, SUNFLOWER OIL, HYDROLYZED GELATIN, WHEY PROTEIN ISOLATE, ROASTED ALMONDS, CELLULOSE, COCONUT, COCOA POWDER (PROCESSED WITH ALKALI), NATURAL AND ARTIFICIAL FLAVORS, SOY LECITHIN, CALCIUM CARBONATE, WHOLE MILK POWDER, SALT, VITAMIN MIX [VITAMIN A PALMITATE, ASCORBIC ACID (VITAMIN C), NIACINAMIDE, RIBOFLAVIN (VITAMIN B2), THIAMIN MONONITRATE (VITAMIN B1), FOLIC ACID, DL-ALPHA-TOCOPHERYL ACETATE (VITAMIN E)], SUCRALOSE, ACESULFAME POTASSIUM. FR03

CONTAINS SOY, MILK, ALMONDS, COCONUT AND WHEAT. This product is manufactured in a facility that uses peanuts, other nuts and seeds.

Atkins® Snack Bars – Chocolate Hazelnut Bar



Serv. Size 1 Bar (40g)	13
Amount Per Serving	
Calories 180 Fat Cal.	120
% Daily Va	lue*
Total Fat 14g	22%
Saturated Fat 4g	20%
Trans Fat Og	
Cholesterol Omg	0%
Sodium 95mg	4%
Potassium 180mg	5%
Total Carbohydrate 18g	6%
Dietary Fiber 7g	28%
Sugars 1g	
Sugar Alcohols 8g	
Protein 6g	12%
Vitamin A 0% • Vitamin C	2%
Calcium 6% • Iron	10%
*Percent Daily Values are based on a 2,0 calorie diet. Your daily values may be hi or lower depending on your calorie need	gher Is.
	500
Saturated Fat Less than 20g 25	Dg 5g
	00ma
	400mg
Potassium 3,500mg 3, Total Carbohydrate 300g 3	

Nutrition Facts

★ Sugar Alcohols total includes 1g of glycerin. Rounded values. INGREDIENTS: HAZELNUTS, CHOCOLATE FLAVORED COATING (MALTITOL, PALM KERNEL OIL, POLYDEXTROSE, COCOA POWDER, NONFAT DRY MILK SOLIDS, NATURAL FLAVOR, SOY LECITHIN, SALT, SUCRALOSE), SOY NUGGETS (SOY PROTEIN ISOLATE, TAPIOCA STARCH, CALCIUM CARBONATE, OAT FIBER, RICE FLOUR, MALT EXTRACT, SALT), CHOCOLATE FLAVORED CHIPS [MALTITOL, CHOCOLATE LIQUOR (PROCESSED WITH ALKALI), COCOA BUTTER, SOY LECITHIN, VANILLA EXTRACT], POLYDEXTROSE, MALTITOL SYRUP, WATER, PALM KERNEL AND PALM OIL, GLYCERIN, NATURAL FLAVOR, COCOA POWDER (PROCESSED WITH ALKALI), SALT, SUCRALOSE. FR01 CONTAINS HAZELNUTS, SOY AND MILK. THIS PRODUCT IS MANUFACTURED IN A FACILITY THAT USES PEANUTS, OTHER NUTS AND SEEDS.

Atkins® Snack Bars – Cranberry Almond Bar



		-	-		
Nutri					
Serving	Size 1	Bar (35g	g)		
Servings	PerCo	ontainer	5		
Amou					
Calories 1		Fat Calo	-		
o unorno o m	00		yValue		
Total Fat	6a		8%		
Saturat		2a	15%		
Trans Fa		y	10 /0		
			00/		
Choles ter			0%		
Sodium 10			4%		
Potassiur	n 70mg		2%		
Total Car	bohydra	ate 16g	5%		
Dietary			20%		
Sugars		1			
Sugar Alcohols 9g					
Protein 10	Jg		20%		
V itamin A	10% •	Vita min C	10%		
Calcium	40% •	Iron	8%		
VitaminE	10% •	Thiamin	10%		
Riboflavin	10% •	Niacin	10%		
Folate	and a local division of the	Phosphor	and shows the second second		
Percent Daily					
calorie diet. Y	our Daily V	alues may b	be higher		
or lower dep	ending on	your c alori	e needs.		
	Calories:	2,000	2,500		
Total Fat	Less than	65 g	80 g		
Saturated Fat	Less than	20 g	25g		
Cholesterol	Lessthan	300mg	30 0mg		
Sodium	Less than	2,400mg	2,400mg		
Potassium		3,50 0mg	3,500mg		
Total Carb		30 0g	375 g		
D11 51					
Dietary Fiber Protein		25 g 50 g	30g 65 g		

INGREDIENTS: SOY CRISPS (SOY PROTEIN ISOLATE, CALCIUM CARBONATE, OAT FIBER), GLYCERIN, ALMOND: MALTITOL, PALM KERNEL AND PALM OIL, POLYDEXTROSE, GUM ARABIC, WHEY PROTEIN ISOLATE, DEHYDRATED CRANBERRIES, SUNFLOWER SEEDS, WHOLE GRAIN ROLLED OATS , HYDROLYZED GELATIN, NATURAL AND ARTIFICIAL FLAVORS, WATER, COCONUT, CALCIUM CARBONATE, SOY LECITHIN, VITAMIN MIX [VITAMIN A PALMITATE, ASCORBIC ACID (VITAMIN C), NIACINAMIDE, RIBOFLAVIN (VITAMIN B2), THIAMIN MONONITRATE (VITAMIN B1), FOLIC ACID, DL-ALPHA-TOCOPHERYL ACETATE (VITAMIN E)], SUCRALOSE, SUNFLOWER OIL. 1045 02

CONTAINS SOY, ALMONDS, MILK, COCONUT.

Atkins® Snack Bars – Chocolate Oatmeal Fiber Bar



utrition Facts

	Nutri Serving S					
	Amount Per Serving					
	Calories 13	al. 45				
			% Dally	Value*		
	Total Fat 5g			8%		
	Saturated	Fat 2g		10%		
	Trans Fat ()g				
	Cholesterol	Omg		0%		
	Sodiam 110r	ng		5%		
	Petassiun 65mg			2%		
	Total Carbo	hydrate 2	4a	8%		
	Dietary Fib	40%				
	Sugars 1g					
*	Sugar Alco	_				
-	Protein 6g	12%				
	Vitamin A	15% •	Vitamin C	15%		
	Calcium	20% *	iron	8%		
	Vitamin E	15% .	Thiamin	20%		
	Ribofiavin	15% .	Niacin	15%		
	Folate	15% .	Phosphoru			
	Percent Daily calorie diet. Y or lower depe	our daily va	based on a 2 dues may be our calorie te	,000 higher		
	Total Fat Saturated Fat Cholesterol Sodium Potassium Total Cachebratio	Less that Less that Less that Loss that	n 65g n 20g n 300mg	80g 25g 300mg 2,400mg 3,500mg 3,500mg		

INGREDIENTS: WHOLE GRAIN ROLLED OATS, INULIN (CHICORY EXTRACT), CHOCOLATE FLAVORED CHIPS [MALTITOL, CHOCOLATE LIQUOR (PROCESSED WITH ALKALI), COCOA BUTTER, SOY LECITHIN, VANILLA EXTRACT), SOY CRISPS (SOY PROTEIN ISOLATE, CALCIUM CARBONATE, OAT FIBER), MALTITOL SYRUP, POLYDEXTROSE, GLYCERIN, SUNFLOWER OIL, MILK CHOCOLATE FLAVORED COATING (POLYDEXTROSE, PALM KERNEL OIL, NONFAT DRY MILK, COCOA POWDER, SOY LECITHIN, SALT, SUCRALOSE, NATURAL FLAVOR), NATURAL AND ARTIFICIAL FLAVORS, WATER, VITAMIN MINERAL MIX (TRICALCIUM PHOSPHATE, VITAMIN A PALMITATE, ASCORBIC ACID (VITAMIN C), NIACINAMIDE, RIBOFLAVIN (VITAMIN B2), THIAMIN MONONITRATE (VITAMIN B1), FOLIC ACID, DL-ALPHA-TOCOPHERYL ACETATE (VITAMIN E)], CORN STARCH, PALM KERNEL OIL, SALT, SOY LECITHIN, CARAMEL COLOR, PECTIN, XANTHAN GUM, SUCRALOSE. FR02 CONTAINS SOY, MILK AND WHEAT. This product is manufactured in a facility that uses eggs, seeds, peanuts and tree

NUTS.

Atkins® Endulge® Treats – Dark Chocolate Raspberry Squares



INGREDIENTS: DARK CHOCOLATE FLAVORED COATING (MALTITOL, UNSWEETENED CHOCOLATE [PROCESSED WITH ALKALI], COCOA BUTTER, MILKFAT, SOY LECITIHIN, SUCRALOSE, VANILLIN, SALT), RASPBERRY FILLING (MALTITOL SYRUP, POLYDEXTROSE, GLYCERIN, RASPBERRY PUREE CONCENTRATE, NATURAL FLAVORS, CITRIC ACID, PECTIN, LOCUST BEAN GUM, SODIUM BENZOATE [PRESERVATIVE], RED 40, SUCRALOSE, BLUE 1). 1103 01 CONTAINS MILK, SOY.

Atkins® Endulge® Treats – Dark Chocolate Fudge Squares



INGREDIENTS: DARK CHOCOLATE FLAVORED COATING (MALTITOL, UNSWEETENED CHOCOLATE [PROCESSED WITH ALKALI], COCOA BUTTER, MILKFAT, SOY LECITIHIN, SUCRALOSE, VANILLIN, SALT), FUDGE FILLING (MALTITOL SYRUP, POLYDEXTROSE, GLYCERIN, UNSWEETENED CHOCOLATE, WATER, PALM OIL, COCOA [PROCESSED WITH ALKALI], MILK PROTEIN ISOLATE, NATURAL FLAVOR, SALT, MONO AND DIGLYCERIDES, DISODIUM PHOSPHATE, POTASSIUM SORBATE [PRESERVATIVE], CARRAGEENAN, SUCRALOSE). 1102 01

CONTAINS MILK, SOY.

Atkins® Endulge® Treats – Caramel Nut Chew Bar



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		Feete	-	
	Nutrition Facts			
	Serving Size 1 Bar (34g)			
	Amount Per Serving			
	Calories 130	Fat Cal. 80		
		% Daily Value*		
	Total Fat 8g	12%	-	
	Saturated Fat 4g	20%		
	Trans Fat Og			
	Cholesterol <5mg	2%	-	
	Sodium 70mg	3%		
	Potassium 80mg	2%	-	
	Total Carbohydrate	17g 6%		
	Dietary Fiber 6g	24%		
	Sugars 1g			
×	Sugar Alcohols 9g		-	
	Protein 5g	9%		
	Vitamin A 0% 🔹	Vitamin C 0%		
	Calcium 2% •	Iron 2%		
	Percent Daily Values are t calorie diet. Your daily val			
	or lower depending on yo	ur calorie needs.		
	Calories:	2,000 2,500		
	Total Fat Less than Saturated Fat Less than	65g 80g 20g 25g		
	Cholesterol Less than Sodium Less than	300mg 300mg 2,400mg 2,400mg		
	Potassium Total Carbohydrate	3,500mg 3,500mg 300g 375g		
	Dietary Fiber Protein	25g 30g		
	riotent	50g 65g		

* Sugar Alcohols total includes 0g of glycerin.

INGREDIENTS: MILK CHOCOLATE FLAVORED COATING (MALITITOL, CHOCOLATE LIOUOR, COCOA BUTTER, SODIUM CASEINATE, MILK FAT, SOY LECITHIN, SUCRALOSE, NATURAL AND ARTIFICIAL FLAVORS, SALT), ROASTED PEANUTS, MALITIOL SYRUP, PROTEIN BLEND (WHEY PROTEIN ISOLATE, MILK PROTEIN ISOLATE), INULIN, POLYDEXTROSE, WATER, BUTTER (CREAM, SALT), PALM KERNEL OIL, PEANUT BUTTER (PEANUTS, MONO AND DIGLYCERIDES, SALT, MIXED TOCOPHEROLS), NONFAT DRY MILK, SOY LECITHIN, SALT, NATURAL AND ARTIFICIAL FLAVORS, SUCRALOSE. FRO3 CONTAINS PEANUTS, SOY AND MILK. THIS PRODUCT IS MANUFACTURED IN A FACILITY THAT USES PEANUTS, OTHER NUTS, WHEAT AND SEEDS.

AND SEEDS.

Atkins® Endulge® Treats – Chocolate Candies



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	Nutrition Facts Serving Size 1 Pack (28g)			
	Servings Per Container 5			
	Amount Per Serving			
	Calories 110 Fat Calories 60 % Daily Value			
	Total Fat 7g 11%			
	Saturated Fat 4.5g 23%			
	Trans Fat 0g			
	Cholesterol <5mg 1%			
	Sodium 5mg 0%			
	Potassium 60mg 2%			
	Total Carbohydrate 19g 6%			
	Dietary Fiber 4g 16%			
	Sugars 1g			
	Sugar Alcohols 14g			
*	Protein 10 1%			
	Vitamin A 0% • Vitamin C 0%			
	Calcium 2% • Iron 2%			
	Percent Daily Values are based on a 2,000 calorie diet. Your Daily Values may behigher or lower depending on your calorie needs.			
	Calories: 2,000 2,500			
	Total Fall Less than 65g 80g Saturated Fat Less than 20g 25g			
	Cholesteral Less than 300mg 300mg			
	Sodium Less than 2,400mg 2,400mg			
	Polassium 3,500mg 3,500mg Total Carb 300g 3,75g			
	Dietary Fiber 25g 30g			
	Profein 50g 65g			

INGREDIENTS: CHOCOLATE COATING [MALTITOL, COCOA BUTTER, INULIN, UNSWEETENED CHOCOLATE, WHOLE MILK POWDER, MILK FAT, COCOA POWDER (PROCESSED WITH ALKALI), SOY LECITHIN, VANILLA, NATURAL FLAVORS, SUCRALOSE], MALTITOL, LESS THAN 1% OF PURE VANILLA EXTRACT, CONFECTIONER'S GLAZE, CARNAUBA WAX, BEESWAX, TITANIUM DIOXIDE COLOR, YELLOW 5 LAKE, RED 40 LAKE, BLUE 1 LAKE, BLUE 2 LAKE, YELLOW 6 LAKE, YELLOW 6, GUM ARABIC. 1163 01

CONTAINS MILK, SOY. MADE IN A FACILITY THAT ALSO USES PEANUTS, TREE NUTS AND WHEAT.

* Sugar Alcohols total includes Og of glycerin.

Atkins® Endulge® Treats – Chocolate Caramel Mousse Bar



Nutritic Serving Size 1			C	ts
Amount Per	Sei	rving		
Calories 120		Fat	Cal.	40
	9	6 Daily	Va	lue*
Total Fat 4.5g				7%
Saturated Fat 4	g			20%
Trans Fat Og				
Cholesterol Omg				0%
Sodium 85mg				4%
Potassium 80mg				2%
Total Carbohydra	ate 2	3g		8%
Dietary Fiber 9)			36%
Sugars 1g				
 Sugar Alcohols 	12g			
Protein 3g				6%
Vitamin A 0%	• \	/itamin	C	0%
Calcium 4%	•	ron		4%
Percent Daily Values calorie diet. Your dail or lower depending o	iy valu n your	es may b calorie i	e hig need:	her 3.
Calor Total Fat Less		2,000	2,5	
Saturated Fat Less	than	65g 20g	80 25	í
Cholesterol Less Sodium Less	than than	300mg 2,400mg	30	lmg 00mg
Potassium		3,500mg	3,5	00mg
Total Carbohydrate Dietary Fiber		300g 25g	37 30	ĵ.
Protein		50g	65]

INGREDIENTS: CHOCOLATE FLAVORED COATING (MALTITOL, PALM KERNEL OIL, POLYDEXTROSE, COCOA POWDER, NONFAT DRY MILK, NATURAL FLAVOR, SOY LECITHIN, SALT, SUCRALOSE), POLYDEXTROSE, MALTITOL SYRUP, MALTITOL, WATER, GLYCERIN, PALM KERNEL AND PALM OIL, ENZYME MODIFIED SOY PROTEIN, CALCIUM CASEINATE, SOY PROTEIN ISOLATE, INULIN, WHEY PROTEIN ISOLATE, OAT FIBER, COCOA POWDER (PROCESSED WITH ALKALI), NONFAT DRY MILK, WHEY PROTEIN CONCENTRATE, NATURAL AND ARTIFICIAL FLAVORS, CELLULOSE GEL, BARLEY MALT EXTRACT, HEAVY CREAM (CREAM, MILK, CELLULOSE GEL, MILK SOLIDS, CARRAGEENAN, CELLULOSE GUM), CARAMEL COLOR, BUTTER (CREAM, SALT), CARRAGEENAN, TITANIUM DIOXIDE, CORN, SOY LECITHIN, SALT, SODIUM CITRATE, CALCIUM CARBONATE, SUCRALOSE. FR02 CONTAINS SOY AND MILK.

THIS PRODUCT IS MANUFACTURED IN A FACILITY THAT USES PEANUTS, TREE NUTS, EGGS, WHEAT AND SESAME SEEDS.

★ Sugar Alcohols total includes 1g of glycerin. Rounded values.

Atkins® Endulge® Treats – Chocolate Coconut Bar



	Nutrition Facts Serving Size 1 Bar (40g)			
	Amount Per Serving			
	Calories 170	Fat Ca	I. 110	
		% Daily	Value*	
	Total Fat 12g		18%	
	Saturated Fat 10g		50 %	
	Trans Fat Og			
	Cholesterol Omg		0%	
	Sodium 65mg		3%	
	Potassium 150mg		4%	
	Total Carbohydrate 1	19g	6 %	
	Dietary Fiber 9g		36 %	
	Sugars 1g			
r	Sugar Alcohols 8g			
	Protein 5g		9 %	
	Vitamin A 0% •	Vitamin (0%	
	Calcium 4% •	Iron	4%	
	Percent Daily Values are b calorie diet. Your daily valu or lower depending on you Calories:	ues may be ir calorie ne	higher eds.	
	Total Fat Less than Saturated Fat Less than Cholesterol Less than Sodurn Less than Potassium Total Carbohydrate Dictary Fiber Protein		2,500 80g 25g 300mg 2,400mg 3,500mg 375g 30g 650	

★ Sugar Alcohols total includes 3g of glycerin. Rounded values.

INGREDIENTS: COCONUT, DARK CHOCOLATE FLAVORED COATING [POLYDEXTROSE, COCOA BUTTER, COCOA POWDER (PROCESSED WITH ALKALI), SODIUM CASEINATE, CALCIUM CASEINATE, SOY LECITHIN, ARTIFICIAL FLAVOR, SUCRALOSEJ, MALTITOL SYRUP, POLYDEXTROSE, GLYCERIN, WHEY PROTEIN ISOLATE, WATER, NATURAL AND ARTIFICIAL FLAVORS, SALT, SOY LECITHIN, POTASSIUM SORBATE, SUCRALOSE, SODIUM METABISULFITE. FR03a CONTAINS COCONUT, SOY, MILK AND SULFITES.

THIS PRODUCT IS MANUFACTURED IN A FACILITY THAT USES PEANUTS, OTHER NUTS, WHEAT AND SEEDS.

Atkins® Endulge® Treats – Chocolate Covered Almonds



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	Nutrition Serving Size 1 pa		ts	
	Amount Per Serving			
	Calories 140	Fat Cal.	100	
		% Daily V	alue*	
	Total Fat 12g		18%	
	Saturated Fat 4g		20 %	
	Trans Fat Og			
	Cholesterol Omg		0%	
	Sodium 25mg		1%	
	Potassium 115mg Total Carbohydrate 12g			
	Dietary Fiber 2g		8%	
	Sugars 1g			
*	Sugar Alcohols 9g			
	Protein 3g		3%	
	Vitamin A 0% •	Vitamin C	0%	
	Calcium 4% •	Iron	4%	
	Percent Daily Values are calorie diet. Your daily va or lower depending on yo Calories:	ilues may be h our calorie nee	igher	
	Total Fat Less than	650 8	00	
	Saturated Fat Less than Cholesterol Less than	20g 2 300mg 3	5g 00mg	
	Sodium Less than Potassium	2,400mg 2	,400mg ,500mg	
	Total Carbohydrate	300g 3	75g 🍈	
	Dietary Fiber Protein		0g 5g	

★ Sugar Alcohols total includes 0g of glycerin. Rounded Values. INGREDIENTS: ROASTED ALMONDS (ALMONDS, CORN OIL), MALTITOL, UNSWEETENED CHOCOLATE, COCOA BUTTER, MILK FAT, SODIUM CASEINATE, LESS THAN 1% OF VANILLA, NATURAL AND ARTIFICIAL FLAVORS, CONFECTIONER'S GLAZE, COCONUT OIL, SALT, SOY LECITHIN, SUCRALOSE, GUM ARABIC. FR01 CONTAINE AL MOURS SOX AND MILK

CONTAINS ALMONDS, SOY AND MILK. This product is manufactured on equipment that processes peanuts, other tree NUTS and wheat.

Atkins® Endulge® Treats – Chocolate Peanut Candies



			_	
	Nutrition Serving Size 1 Servings Per C	Pack (3	4g)	
	o or ringo r or o	omeanne		
	Amount Pe	r Ser	ving	
		nt Calori		
		% Daily		
	Total Fat 11g		17%	
	Saturated Fat	3.5g	18%	
	Trans Fat Og			
	Cholesterol Omg		0%	
	Sodium 25mg		1%	
	Potassium 115mg	·	3%	
	Total Carbohydrate 18g 6%			
	Dietary Fiber 2		8%	
	Sugars 1g			
\star	Sugar Alcohols	: 15g		
	Protein 4g		4%	
	Vitamin A 0% •	Vitamin	C 0%	
	Calcium 2% •	Iron	4%	
	Percent Daily Values and	re based or	na 2,000	
	calorie diet. Your Daily \ or lower depending on	vour calor	ie needs.	
	Calories		2,500	
	Total Fat Less than		80g	
	Saturated Fat Less than		25g	
	Cholesterol Less than		300mg	
	Sodium Less than	2,400mg	2,400mg	
	Potassium Total Conte	3,500mg	3,500mg	
	Total Carb Dietary Fiber	300g 25a	375g 30a	
	Protein	20g 50g	50g 65g	
	Ourses Alles hale to table	July 0	oog (

★ Sugar Alcohols total includes 0g of glycerin.

INGREDIENTS: CHOCOLATE COATING (MALTITOL, UNSWEETENED CHOCOLATE, COCOA BUTTER, SODIUM CASEINATE, MILK FAT, SOY LECITHIN, VANILLA, NATURAL AND ARTIFICIAI FLAVORS, SALT, SUCRALOSE), ROASTED PEANUTS (PEANUTS, CORN OIL), MALTITOL, LESS THAN 1% OF PURE VANILLA EXTRACT, CONFECTIONER'S GLAZE, CARNAUBA WAX, BEESWAX, TITANIUM DIOXIDE COLOR, YELLOW 5 LAKE, RED 40 LAKE, BLUE 1 LAKE, BLUE 2 LAKE, YELLOW 6 LAKE, YELLOW 6, GUM ARABIC. 1063 01

CONTAINS MILK, SOY, PEANUTS. MADE IN A FACILITY THAT ALSO USES TREE NUTS AND WHEAT.

Atkins® Endulge® Treats – Milk Chocolate Caramel Squares



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Serving Size	3 Pie	ces (35	g)
Amount Per Serving			
Calories 140 Fat Cal. 80			I. 80
% Daily Value*			
Total Fat 9g			14%
Saturated Fat	t 6g		30%
Trans Fat Og			
Cholesterol <5	img		1%
Sodium 35mg			1%
Potassium Om			0%
Total Carbohy		2g	7%
Dietary Fiber	5g		20 %
Sugars 1g			
Sugar Alcoho	ols 15g		
Protein 1g			1%
Vitamin A 0%	• \	/itamin C	0%
Calcium 2%	•	ron	4%
Percent Daily Val calorie diet. Your or lower dependin	2,000 higher eeds.		
Total Eat	Calories:		2,500
Total Fat Saturated Fat Cholesterol Sodium Potassium Total Carbohydrate _Dietary Fiber	Less than Less than Less than Less than	20g 300ma	80g 25g 300mg 2,400mg 3,500mg 375g 300

Nutrition Facts

★ Sugar Alcohols total includes Og of glycerin.

INGREDIENTS: MALTITOL SYRUP, MALTITOL, COCOA BUTTER, INULIN, UNSWEETENED CHOCOLATE, WHOLE MILK POWDER, MILK FAT, POLYDEXTROSE, COCOA POWDER (PROCESSED WITH ALKALI), LESS THAN 1.5% OF HEAVY CREAM, BUTTER (CREAM, SALT), MILK PROTEIN CONCENTRATE, PALM KERNEL OIL, VANILLA, NATURAL AND ARTIFICIAL FLAVORS, SOY LECITHIN, SALT, GLYCERIN, DISODIUM PHOSPHATE, CARRAGEENAN, POTASSIUM SORBATE AND VITAMIN E MIXED TOCOPHEROLS (TO PRESERVE FRESHNESS), SUCRALOSE. FR01

CONTAINS MILK AND SOY. This product is manufactured on equipment that processes peanuts and tree nuts.

Atkins® Endulge® Treats – Nutty Fudge Brownie



	Nutrition Serving Size 1 Ba		cts	
	Amount Per Serving			
	Calories 170	Fat Ca	I. 110	
	% Daily Value*			
	Total Fat 12g		18%	
	Saturated Fat 6g		30%	
	Trans Fat Og			
	Cholesterol Omg		0%	
	Sodium 90mg		4%	
	Potassium 170mg		5%	
	Total Carbohydrate	18g	6%	
	Dietary Fiber 6g		24%	
	Sugars Og			
1	Sugar Alcohols 10g			
	Protein 7g		10 %	
	Vitamin A 0% 🔹	Vitamin (0%	
	Calcium 2% •	Iron	8%	
	Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs.			
	Calories:	2,000	2,500	
	Total Fat Less than Saturated Fat Less than Cholesterol Less than	20g	80g 25g 300mg	
	Sodium Less than	2,400mg	2,400mg	
	Potassium Total Carbohydrate Dietary Fiber Protein	300g 25g	3,500mg 375g 30g 65g	

 Sugar Alcohols total includes 4g of glycerin. Rounded values. **INGREDIENTS:** PROTEIN BLEND (SOY PROTEIN ISOLATE, WHEY PROTEIN ISOLATE, SODIUM CASEINATE), WALNUTS, GLYCERIN, POLYDEXTROSE, MALTITOL,COCOA POWDER (PROCESSED WITH ALKALI), VEGETABLE OIL BLEND (PALM, PALM KERNEL AND SOYBEAN OIL), COCONUT OIL, CHOCOLATE LIQUOR, LACTITOL, WATER, COCOA BUTTER, HYDROLYZED GELATIN, OLIVE OIL, GUM ARABIC, NATURAL AND ARTIFICIAL FLAVORS, MALTODEXTRIN, SOY LECITHIN, GUAR GUM, MILK FAT, SALT, CITRIC ACID, MONO AND DIGLYCERIDES, DIPOTASSIUM PHOSPHATE, SUCRALOSE, ACESULFAME POTASSIUM. FR03

CONTAINS SOY, MILK AND WALNUTS.

THIS PRODUCT IS MANUFACTURED IN A FACILITY THAT USES PEANUTS, OTHER NUTS AND SEEDS.

Atkins® Endulge® Treats – Pecan Caramel Clusters



Amount Per Serving			
Calories 120 Fat Cal. 90			I. 90
% Daily Va			Value*
Total Fat 10	g		15%
Saturated	Fat 5g		25%
Trans Fat ()g		
Cholesterol	<u> </u>		1%
Sodium 60m			3%
Potassium 4			1%
Total Carbo		īa	5%
Dietary Fit	-	.9	32%
Sugars 1g	,or og		01.70
Sugar Alco	phole 5a		
Protein 1g	JIIOIS JY		1%
		itamin C	
		on	2%
Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs.			
	Calories:		2,500
Total Fat Saturated Fat	Less than Less than	200	80g 25g
Cholesterol Sodium	Less than Less than	300ma	300mg
Potassium		2,400mg 3,500mg	2,400mc 3,500mc
Total Carbohydra Dietary Fiber	te	300g ° 25g	375g 30g
Protein		500	650

Nutrition Facts

INGREDIENTS: PECANS, MALTITOL, FRUCTOOLIGOSACCHARIDES, POLYDEXTROSE, COCOA BUTTER, INULIN, UNSWEETENED CHOCOLATE, PALM KERNEL OIL, NONFAT DRY MILK, WATER, GLYCERIN, WHOLE MILK POWDER, SALTED BUTTER (CREAM, SALT), MILK FAT, LESS THAN 1.5% OF COCOA POWDER (PROCESSED WITH ALKALI), VANILLA, NATURAL AND ARTIFICIAL FLAVORS, SOY LECITHIN, SALT, SODIUM CITRATE, CARRAGEENAN, SUCRALOSE. FR01

CONTAINS MILK, SOY AND PECANS. This product is manufactured on equipment that processes peanuts, other tree nuts and wheat.

Atkins® Endulge® Treats – Peanut Butter Cups



Nutr Serving Servings	Size 2	Pieces	(34g)		
Amou	nt Pe	er Ser	ving		
Calories	160 F	at Calor	ies 120		
		% Daily	Value		
Total Fat	13g		20%		
Saturat	ed Fat	7g	35%		
Trans F	at Og				
Choleste	rol Omg	ļ	0%		
Sodium 11	~		5%		
Potassiu			2%		
Total Car			6%		
Dietary		4g	16 %		
Sugars	0				
Sugar A		s 12g			
Protein 2	g		3%		
Vitamin A	0% •	Vitamin	C 0%		
Calcium	0% •	Iron	2%		
Percent Daily Values are based on a 2,000 calorie diet. Your Daily Values may be higher or lower depending on your calorie needs.					
Total Fat	Calories: Less that	El Fisico	2,500 80a		
Saturated Fat Cholesterol Sodium Potassium Total Carb Dietary Fiber Protein		n 20ğ n 300mg	809 25g 300mg 2,400mg 3,500mg 375g 30g 65g		

INGREDIENTS: MALTITOL, COCOA BUTTER, PEANUTS, POLYDEXTROSE, UNSWEETENED CHOCOLATE, LESS THAN 2% OF: MILK FAT, PALM AND PALM KERNEL OIL, SALT, SODIUM CASEINATE, MONO- AND DIGLYCERIDES, NATURAL AND ARTIFICIAL FLAVOR, SOY LECITHIN, SUCRALOSE, MIXED TOCOPHEROLS (TO PRESERVE FRESHNESS), PEANUT OIL. 1059 01 CONTAINS PEANUTS, MILK, SOY.

Atkins® Endulge® Treats – Peanut Caramel Cluster Bar



	Nutrition Facts Serving Size 1 Bar (34g)				
	Amount Per Serving				
	Calories 140	Fat Cal. 90			
	% Daily Value				
	Total Fat 10g	15%			
	Saturated Fat 3g	15%			
	Trans Fat Og		-		
	Cholesterol <5mg	2%			
	Sedium 180mg	8%			
	Potassium 110mg	3 %			
	Total Carbohydrate	13g 4 %			
	Dietary Fiber 6g	24 %			
	Sugars 1g				
k	Sugar Alcohols 4g				
	Protein 7g	10%			
	Vitamin A 2% •	Vitamin C 0%			
	Calcium 4% •	Iron 2%			
	Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs.				
	Calories: Total Fat Less than	650 800	-		
	Saturated Fat Less than Cholesterol Less than Sodium Less than Potassium	20g 25g 300mg 300mg 2,400mg 2,400mg 3,500mg 3,500mg			
	Total Carbohydrate Dietary Fiber Protein	300g 375g 25g 30g 50g 65g			

★ Sugar Alcohols total includes 0g of glycerin.

INGREDIENTS: ROASTED PEANUTS (PEANUTS, SALT), MALTITOL SYRUP, WHEY PROTEIN ISOLATE, INULIN, POLYDEXTROSE, BUTTER (CREAM, SALT), WATER, PEANUT BUTTER (PEANUTS, MONO AND DIGLYCERIDES, SALT, MIXED TOCOPHEROLS), PALM KERNEL OIL, NONFAT DRIED MILK, SALT, SOY LECITHIN, SUCRALOSE. FR03 CONTAINS PEANUTS, SOY AND MILK. THIS PRODUCT IS MANUFACTURED IN A FACILITY THAT USES WHEAT AND OTHER TREE NUTS.