

product of urea). Elevated levels of blood carbamylated proteins in dialysis patients predicts higher death risk. Carbamylated proteins promote atherosclerosis of blood vessels, increase kidney injury through fibrosis (abnormal collagen deposition), and worsen anemia by impairing the function of erythropoietin hormone.

In summary, there is mounting evidence that suggests a negative impact of elevated urea on patient outcomes. Consequently, urea *per se* probably participates in the pathogenesis of cardiovascular disease, loss of kidney function, insulin resistance, intestinal disease and anemia (Fig. 1), and has re-emerged as a true toxin and Dark Force in chronic kidney disease.

52. No product labeled “non-toxic,” “safer,” “made without known carcinogens, reproductive toxins, or endocrine disruptors,” “climate positive,” “Earth Friendly,” and/or “sustainable” should contain any of these ingredients. And yet, the ECOS Products contain the following, non-exhaustive, list of toxic, harmful dangerous, and environmentally damaging ingredients, which, at their given concentrations in the Products, can cause harm to humans, animals and/or the environment:

| <u>Product</u> | <u>Toxic, Harmful, Dangerous, and Environmentally Damaging Ingredients</u> |
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| ECOS® All-Purpose Cleaner - Parsley Plus® | Caprylyl/Myristyl Glucoside Propanediol Potassium Sorbate Alcohol Denat |
| ECOS® All-Purpose Cleaner - Orange Plus® | Caprylyl/ Myristyl Glucoside Potassium Sorbate (preservative) Alcohol Denat. Limonene |
| ECOS® Cream Cleanser - Lemon | Phenoxyethanol Cocamidopropyl Betaine Limonene |

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| | Sodium Metasilicate Pentahydrate |
| ECOS® Fruit + Veggie Wash | Alcohol Denat. Caprylyl/Myristyl Glucoside Potassium Sorbate |
| ECOS® Furniture Polish + Cleaner - Orange | Limonene Phenoxyethanol Sodium Hydroxide |
| ECOS® Shower Cleaner - Tea Tree | Caprylyl/Myristyl Glucoside Alcohol Denat. Potassium Sorbate Melaleuca Alternifolia (Tea Tree) Leaf Oil Lavandula Angustifolia (Lavender) Oil |
| ECOS® Stain + Odor Remover - Lemon | Alcohol Denat. Caprylyl/Myristyl Glucoside Potassium Sorbate Limonene |
| ECOS® Stainless Steel Cleaner + Polish | Phenoxyethanol (preservative), Methylisothiazolinone (preservative). |
| ECOS® Toilet Cleaner - Cedar | Caprylyl/Myristyl Glucoside Potassium Sorbate |
| ECOS® Window Cleaner - Vinegar | Alcohol Denat. Caprylyl/Myristyl Glucoside Acetic Acid |
| ECOS® Between Baths™ Grooming Spray - Peppermint | Propanediol Cocamidopropylamine Oxide Phenoxyethanol Melaleuca Alternifolia (Tea Tree) Oil |
| ECOS® Kitty Litter Deodorizer | Alcohol Denat. Sodium Coco-Sulfate Cocamidopropylamine Oxide Phenoxyethanol Geraniol |
| ECOS® Hypoallergenic Laundry Detergent with Enzymes - Magnolia & Lily | Cocamidopropyl Betaine Sodium Coco-Sulfate Cocamidopropylamine Oxide Phenoxyethanol Sodium Formate Fragrance Sodium Hydroxide Hexyl Cinnamal |
| ECOS® Liquidless Laundry Detergent Squares - Lavender Vanilla | Sodium Lauryl Sulfate Caprylyl/Capryl Glucoside |

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| | <p>Cocamidopropyl Betaine PEG-12 Dimethicone Cocamidopropylamine Oxide Propylene Glycol Phenoxyethanol Dimethicone Linalool Coumarin</p> |
| <p>ECOS® Liquidless Laundry Detergent Squares - Free & Clear</p> | <p>Sodium Lauryl Sulfate Caprylyl/Capryl Glucoside Cocamidopropyl Betaine PEG-12 Dimethicone Cocamidopropylamine Oxide Propylene Glycol Phenoxyethanol Dimethicone</p> |
| <p>ECOS® Liquidless Laundry Detergent Squares - Magnolia & Lily</p> | <p>Sodium Lauryl Sulfate Caprylyl/Capryl Glucoside Cocamidopropyl Betaine PEG-12 Dimethicone Cocamidopropylamine Oxide Propylene Glycol Phenoxyethanol Fragrance Dimethicone Benzyl Salicylate Coumarin Hexyl Cinnamal</p> |
| <p>ECOS® Hypoallergenic Laundry Detergent Pack - Free & Clear</p> | <p>Sodium Carbonate Sodium Metasilicate Tetrasodium Iminodisuccinate Sodium Coco-Sulfate Lauryl Glucoside</p> |
| <p>ECOS® Hypoallergenic Hand Soap - Free & Clear</p> | <p>Cocamidopropyl Betaine Sodium Coco-Sulfate Cocamidopropylamine Oxide Phenoxyethanol</p> |
| <p>ECOS® Hypoallergenic Pet Shampoo - Peppermint</p> | <p>Sodium Coco-Sulfate Cocamidopropyl Betaine Phenoxyethanol Potassium Cocoate Cocamidopropylamine Oxide</p> |

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| ECOS® Hypoallergenic Pet Shampoo – Fragrance Free | Sodium Coco-Sulfate Lauryl/Myristyl Glucoside Cocamidopropyl Betaine Phenoxyethanol Potassium Cocoate Cocamidopropylamine Oxide |
| ECOS® Pet Stain & Odor Remover | Caprylyl/Myristyl Glucoside ethoxylated propoxylated Phenoxyethanol Alcohol Denat. Fragrance Limonene Methylisothiazolinone |
| ECOS® Hypoallergenic Dish Soap - Lavender | Sodium Coco-Sulfate Cocamidopropylamine Oxide Lauramine Oxide Phenoxyethanol Coco Betaine Ethylhexylglycerin Lavandula Angustifolia (Lavender) Oil |
| ECOS® Hypoallergenic Dish Soap - Bamboo Lemon | Sodium Coco-Sulfate Cocamidopropylamine Oxide Lauramine Oxide Phenoxyethanol Coco Betaine Ethylhexylglycerin Citral Limonene |
| ECOS® Hypoallergenic Dish Soap - Grapefruit | Sodium Coco-Sulfate Cocamidopropylamine Oxide Lauramine Oxide Phenoxyethanol Coco-Betaine Ethylhexylglycerin |
| ECOS® Hypoallergenic Dish Soap - Apricot | Sodium Coco-Sulfate Cocamidopropylamine Oxide Lauramine Oxide Phenoxyethanol Coco Betaine Ethylhexylglycerin Limonene |
| ECOS® Hypoallergenic Dish Soap - Pear | Sodium Coco-Sulfate Cocamidopropylamine Oxide |

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| | Lauramine Oxide Phenoxyethanol Coco Betaine Ethylhexylglycerin Propylene Glycol |
| ECOS® Hypoallergenic Dishmate Dish Soap – Free & Clear | Sodium Coco-Sulfate Cocamidopropylamine Oxide Lauramine Oxide Phenoxyethanol Coco Betaine Ethylhexylglycerin |
| ECOS® Hypoallergenic Dishmate Dish Soap – Grapefruit | Sodium Coco-Sulfate Cocamidopropylamine Oxide Lauramine Oxide Phenoxyethanol Coco-Betaine Ethylhexylglycerin |
| ECOS® Hypoallergenic Dishmate Dish Soap – Almond | Sodium Coco-Sulfate Cocamidopropylamine Oxide Lauramine Oxide Phenoxyethanol Coco Betaine Ethylhexylglycerin |
| ECOS® Wave® Dishwasher Gel - Free & Clear | Caprylyl/Myristyl Glucoside Potassium Sorbate |
| ECOS® Wave® Dishwasher Packs - Free & Clear | Tetrasodium Iminodisuccinate Caprylyl/Myristyl Glucoside Cocamidopropylamine Oxide |
| ECOS® WaveJet® Rinse Aid | Urea Phenoxyethanol Limonene Methylisothiazolinone |
| ECOS® Hypoallergenic Hand Soap - Lavender | Cocamidopropyl Betaine Sodium Coco-Sulfate Cocamidopropylamine Oxide Phenoxyethanol Lavandula Angustifolia (Lavender) Oil Linalool |
| ECOS® Hypoallergenic Hand Soap - Lemongrass | Cocamidopropyl Betaine Sodium Coco-Sulfate Cocamidopropylamine Oxide Phenoxyethanol Citral |

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| ECOS® Hypoallergenic Hand Soap – Orange Blossom | Cocamidopropyl Betaine Sodium Coco-Sulfate Cocamidopropylamine Oxide Phenoxyethanol |
| ECOS® Hypoallergenic Laundry Detergent - Lavender | Cocamidopropyl Betaine Sodium Coco Sulfate Cocamidopropylamine Oxide Phenoxyethanol Lavandula Angustifolia (Lavender) Oil, Methylisothiazolinone |
| ECOSNEXT™ Hypoallergenic Liquidless Laundry Detergent - Magnolia & Lily | Sodium Lauryl Sulfate Caprylyl/Capryl Glucoside Cocamidopropyl Betaine PEG-12 Dimethicone Cocamidopropylamine Oxide Propylene Glycol Phenoxyethanol Fragrance Dimethicone Benzyl Salicylate Coumarin Hexyl Cinnamal |
| ECOSNEXT™ Hypoallergenic Liquidless Laundry Detergent – Lavender Vanilla | Sodium Lauryl Sulfate Caprylyl/Capryl Glucoside Cocamidopropyl Betaine PEG-12 Dimethicone Cocamidopropylamine Oxide Propylene Glycol Phenoxyethanol Dimethicone Linalool Coumarin |
| ECOSNEXT™ Hypoallergenic Liquidless Laundry Detergent – Free & Clear | Sodium Lauryl Sulfate Caprylyl/Capryl Glucoside Cocamidopropyl Betaine PEG-12 Dimethicone Cocamidopropylamine Oxide Propylene Glycol Phenoxyethanol Dimethicone |
| ECOS® Hypoallergenic Laundry Detergent with Enzymes - Free & Clear | Cocamidopropyl Betaine Sodium Coco-Sulfate Cocamidopropylamine Oxide |

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| | Phenoxyethanol Sodium Formate Sodium Hydroxide |
| ECOS® Hypoallergenic Laundry Detergent with Enzymes - Lavender | Cocamidopropyl Betaine Sodium Coco-Sulfate Cocamidopropylamine Oxide Phenoxyethanol Sodium Formate Sodium Hydroxide |
| ECOSBreeze® Odor Eliminator - Magnolia & Lily | Alcohol Denat. Caprylyl/Myristyl Glucoside Potassium Sorbate Fragrance Hexyl Cinnamal |
| ECOSBreeze® Odor Eliminator - Lemongrass | Alcohol Denat. Caprylyl/Myristyl Glucoside Potassium Sorbate |
| ECOSBreeze® Odor Eliminator – Lavender Vanilla | Alcohol Denat. Caprylyl/Myristyl Glucoside Potassium Sorbate Linalool |
| ECOS® Hypoallergenic Dish Soap - Free & Clear | Sodium Coco-Sulfate Cocamidopropylamine Oxide Lauramine Oxide Phenoxyethanol Coco Betaine Ethylhexylglycerin |
| ECOS® Hypoallergenic Laundry Detergent - Magnolia & Lily | Cocamidopropyl Betaine Sodium Coco-Sulfate Cocamidopropylamine Oxide Phenoxyethanol Fragrance Methylisothiazolinone |
| ECOS® Hypoallergenic Laundry Detergent - Lemongrass | Cocamidopropyl Betaine Sodium Coco-Sulfate Cocamidopropylamine Oxide Phenoxyethanol Citral Methylisothiazolinone |
| ECOS® Hypoallergenic Baby Laundry Detergent - Free & Clear | Cocamidopropyl Betaine Sodium Coco-Sulfate Cocamidopropylamine Oxide |

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| | Phenoxyethanol Methylisothiazolinone |
| ECOS® Hypoallergenic Baby Laundry Detergent - Lavender Chamomile | Cocamidopropyl Betaine Sodium Coco-Sulfate Cocamidopropylamine Oxide Phenoxyethanol Alcohol Denat. Methylisothiazolinone Lavandula Angustifolia (Lavender) Oil |
| ECOS® Baby Bottle & Dish Wash - Free & Clear | Cocamidopropyl Betaine Sodium Coco-Sulfate Cocamidopropylamine Oxide Phenoxyethanol Methylisothiazolinone |
| ECOS® Baby Stain & Odor Remover | Alcohol Denat. Caprylyl/Myristyl Glucoside Potassium Sorbate Limonene |
| ECOS® Baby Toy & Table Cleaner - Free & Clear | Alcohol Denat. Caprylyl/Myristyl Glucoside Potassium Sorbate |

Plaintiff and Reasonable Consumers Were Misled by the Products

53. Given the significant presence of these toxic, harmful, dangerous, and environmentally damaging ingredients in the Products, Earth Friendly’s representations that they are “non-toxic,” “safer,” “made without known carcinogens, reproductive toxins, or endocrine disruptors,” “climate positive,” “Earth Friendly,” and/or “sustainable” are deceptive and misleading.

54. By misleadingly and deceptively labeling and marketing the Products, as described herein, Earth Friendly sought to take advantage of consumers’ desire for true non-toxic, safe, and environmentally-friendly cleaning products. Earth Friendly has done so at the expense of unwitting consumers—many of whom seek to protect their household members and