

1 UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF WASHINGTON

3  
4 Lauren Wolf and Elizabeth Correia,  
5 individually and on behalf of all others  
6 similarly situated,

7 Plaintiffs,

8 v.

9 Amazon.com, Inc., a Delaware  
10 corporation,

11 Defendant.

12 **CLASS ACTION COMPLAINT**

13 **JURY TRIAL DEMANDED**

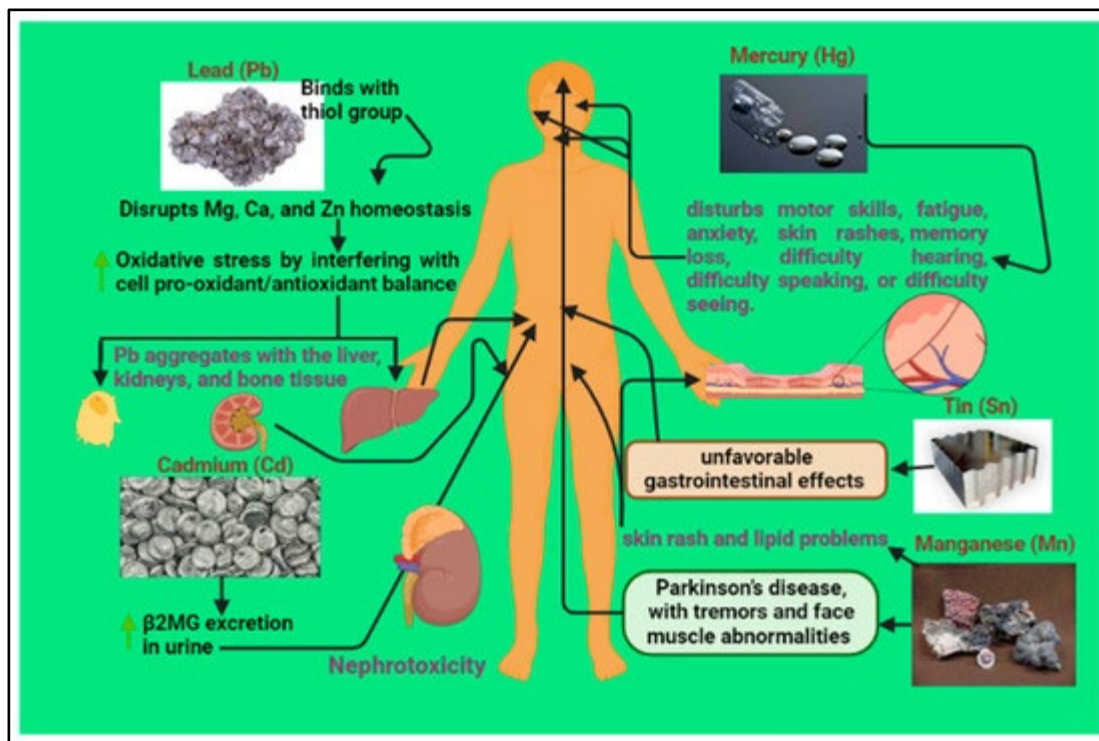
14 Plaintiffs Lauren Wolf and Elizabeth Correia (collectively, “Plaintiffs”), by their  
15 counsel, on their own behalf and on behalf of all others similarly situated, brings this Class  
16 Action Complaint against Defendant Amazon.com, Inc. (“Amazon” or “Defendant”). The  
17 following facts are alleged based upon personal knowledge, where applicable, information and  
18 belief, and the investigation of counsel:

19 **NATURE OF THE ACTION**

20 1. Heavy metals are known to pose significant and adverse health risks and  
21 consequences to humans. It is well-recognized that there are no safe levels of human exposure  
22 to any of the heavy metals, including cadmium and lead.<sup>1</sup> Exposure to heavy metals, including

23 <sup>1</sup> Transcript from Public Meeting, *Closer to Zero Action Plan: Impacts of Toxic Element*  
24 *Exposure and Nutrition at Different Crucial Developmental Stages for Babies and Young*  
*Children* (Nov. 18, 2021), <https://www.fda.gov/media/155396/download> at 32, 72, 179 (last  
accessed April 29, 2026) (“Closer to Zero Public Meeting Transcript”); *FDA Webinar: Action*  
*Levels for Lead in Food Intended for Babies and Young Children: Draft Guidance*, at 5 (March  
2, 2023), <https://www.fda.gov/media/166188/download> (last accessed April 29, 2026)  
 (“Although we may not be able to say the reference level is a safe level, it is a level we could

cadmium and lead, can cause negative health effects, such as various cancers, gastric and vascular disorders, liver, kidney, and brain damage, miscarriages, and reproductive disorders:<sup>2</sup>



rely on as a benchmark to measure exposure to foods.”); see also Kevin Loria, *Congressional Report Finds More Problems With Heavy Metals in Baby Food*, Consumer Reports (Sept. 29, 2021, updated Oct. 20, 2021), <https://www.consumerreports.org/food-safety/problems-with-heavy-metals-in-baby-food-congressional-report-a6400080224/#:~:text=%E2%80%9CThere%20is%20no%20safe%20level,research%20and%20testing%20at%20CR> (last accessed April 29, 2026); see, e.g., World Health Organization, *Lead Poisoning*, Sept. 27, 2024, <https://who.int/news-room/fact-sheets/detail/lead-poisoning-and-health> (last accessed April 29, 2026) (hereinafter “WHO Lead Poisoning”).

<sup>2</sup> Anirban Goutam Mukherjee, et al., *Heavy Metal and Metalloid Contamination in Food and Emerging Technologies for Its Detection*, Sustainability, Jan. 9, 2023, 15(2), <https://www.mdpi.com/2071-1050/15/2/1195> (last accessed April 29, 2026).

1 2. Experts stress the importance of applying sunscreen every day when outdoors.<sup>3</sup>  
2 And for infants and others with sensitive skin, they recommend mineral sunscreens whose  
3 active ingredient is titanium dioxide and/or zinc oxide.<sup>4</sup>

4 3. Recent testing of sunscreen sold by retailers show that certain sunscreen  
5 products sold by Amazon (“Sunscreen Products”) are contaminated with heavy metals,  
6 including cadmium and lead.<sup>5</sup>

7 4. Amazon controls the content of the product listings that describe the Sunscreen  
8 Products to consumers. It establishes requirements for manufacturers’ product descriptions and  
9 also inserts its own descriptions of the Sunscreen Products into product listings via “Rufus,”  
10 an artificial intelligence technology developed by Amazon.

11 5. Amazon also conveys the Sunscreen Products to consumers, by selling  
12 Sunscreen Products directly to consumers and by storing, shipping, and delivering Sunscreen  
13 Products that are listed by other parties on Amazon’s online marketplace.

14 6. Amazon sold these Sunscreen Products with alarmingly high levels of heavy  
15 metals, including cadmium and lead, with no warning to the intended consumer audience of  
16 children and adults. Reasonable consumers would want to know about the presence of toxins  
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18 <sup>3</sup> American Academy of Dermatology, *Sunscreen FAQs*, Feb. 11, 2025,  
19 <https://www.aad.org/media/stats-sunscreen> (last accessed April 29, 2026);  
20 healthychildren.org, *Sun Safety: Information for Parents About Sunburn & Sunscreen*, Aug. 9,  
21 2024, [https://www.healthychildren.org/English/safety-prevention/at-play/Pages/Sun-](https://www.healthychildren.org/English/safety-prevention/at-play/Pages/Sun-Safety.aspx)  
22 [Safety.aspx](https://www.healthychildren.org/English/safety-prevention/at-play/Pages/Sun-Safety.aspx) (last accessed April 29, 2026) (“Use sunscreen any time you or your child spend  
23 time outdoors.”).

21 <sup>4</sup> American Academy of Dermatology, *Sunscreen FAQs*, Feb. 11, 2025,  
22 <https://www.aad.org/media/stats-sunscreen> (last accessed April 29, 2026); Yaldo, Marissa, et  
23 al., *62644 Analysis of Popular Sunscreens for Babies and Children: Ingredient Profiles and*  
24 *Marketing Tactics*, JOURNAL OF THE AMERICAN ACADEMY OF DERMATOLOGY, Sept. 2025,  
[https://www.jaad.org/article/S0190-9622\(25\)00810-2/abstract](https://www.jaad.org/article/S0190-9622(25)00810-2/abstract) (last accessed April 29, 2026).

<sup>5</sup> Appendix A lists each of the brands and products that comprise the Sunscreen Products at  
issue in this case.

1 in any product, especially one that is put directly onto the bodies of their infants and children,  
2 such as sunscreen.

3 7. Exposure to any source of heavy metals should be avoided and minimized, and  
4 disclosure of the presence of heavy metals in products intended to be used on infants and  
5 children, is material and should be disclosed.

6 8. Consumers, including parents and other caregivers, reasonably believe that the  
7 sunscreen they purchase for their infants and children will *not* have detectable levels of heavy  
8 metals, such as cadmium and lead.

9 9. But Amazon fails to disclose that the Sunscreen Products contain heavy metals.  
10 Nowhere on Amazon’s point-of-sale webpages does it disclose that the Sunscreen Products  
11 contain heavy metals, including cadmium and lead (collectively, the “Omissions”).

12 10. Plaintiffs bring this class action against Amazon for deceptive business  
13 practices, including the Omissions, regarding the presence of heavy metals in the Sunscreen  
14 Products.

15 11. No reasonable consumer purchasing sunscreen after seeing Amazon’s point-of-  
16 sale disclosures would expect the Sunscreen Products to contain heavy metals. Furthermore,  
17 reasonable consumers, like Plaintiffs, would consider the inclusion of heavy metals a material  
18 fact when considering what sunscreen products to purchase.

19 12. Reasonable consumers, like Plaintiffs, could not learn of the inclusion of heavy  
20 metals in the Sunscreen Products unless Amazon included a proper disclosure, because  
21 identifying the presence of heavy metals requires expensive and sophisticated laboratory  
22 testing. But Amazon failed to perform or require any heavy metal testing, or to disclose the  
23 presence of heavy metals.

1 13. A recent report published by Lead Safe Mama, LLC, a lead-poisoning  
 2 prevention and consumer goods safety advocate,<sup>6</sup> found that certain sunscreen products  
 3 contain cadmium and lead:

4 <b>Product (Testing by LSM)</b>	<b>Cadmium</b>	<b>Lead</b>
5 Sun Bum Baby Bum Mineral Sunscreen 6 Lotion (SPF 50)	232.4 ppb	495.1 ppb
7 Blue Lizard Sensitive Mineral Sunscreen 8 Lotion (SPF 50)	266.7 ppb	666.3 ppb
9 Coppertone Pure & Simple Baby Sunscreen 10 Lotion (SPF 50)	356.10 ppb	1,017.5 ppb
11 ThinkBaby Clear Zinc 20% Sunscreen Lotion 12 (SPF 30)	645 ppb	1,235.4 ppb
ThinkBaby Zinc Oxide Sunscreen Lotion (SPF 50)	575.5 ppb	1,251.1 ppb

13 14. Plaintiffs' testing also confirmed the presence of detectable levels of cadmium  
 14 and lead in the Sunscreen Products:

15 <b>Product (Testing by Plaintiffs)</b>	<b>Cadmium</b>	<b>Lead</b>
16 365 by Whole Foods Market Sport Mineral Sunscreen 17 Lotion (SPF 30)	78.5 ppb	1,705.3 ppb
18 Sun Bum Baby Bum Mineral Sunscreen Lotion (SPF 19 50)	177.7 ppb	548 ppb
20 Sun Bum Baby Bum Mineral Sunscreen Lotion (SPF 50) <sup>7</sup>	24.7 ppb	409.8 ppb

21  
 22 <sup>6</sup> See Lead Safe Mama, *Sunscreen Heavy Metals Comparison Chart, Lab Test Results*, June  
 23 17, 2025, [https://tamararubin.com/wp-content/uploads/2025/06/June-17-Draft-2-Lead-Safe-](https://tamararubin.com/wp-content/uploads/2025/06/June-17-Draft-2-Lead-Safe-Mama-Sunscreen-Chart.png)  
 24 [Mama-Sunscreen-Chart.png](https://tamararubin.com/wp-content/uploads/2025/06/June-17-Draft-2-Lead-Safe-Mama-Sunscreen-Chart.png) (last accessed April 29, 2026) (hereinafter "Lead Safe Mama  
 Chart" and attached hereto as Exhibit 1).

<sup>7</sup> This testing represents results from product purchased by Plaintiff Wolf.

Product (Testing by Plaintiffs)	Cadmium	Lead
Sun Bum Baby Bum Mineral Roll-On Sunscreen (SPF 50) <sup>8</sup>	117.1 ppb	982.7 ppb
Banana Boat Simply Protect Baby Sunscreen Lotion (SPF 50)	10.78 ppb	455.92 ppb
Banana Boat Simply Protect Kids Sunscreen Lotion (SPF 50)	97 ppb	323.9 ppb
Blue Lizard Baby Mineral Sunscreen Stick (SPF 50)	96.5 ppb	2,728.5 ppb
Blue Lizard Kids Mineral Sunscreen Stick (SPF 50)	221.3 ppb	1,021.5 ppb
Coppertone Kids Tear Free Sunscreen Lotion (SPF 50)	12.59 ppb	264.1 ppb
Coppertone Pure & Simple Baby Sunscreen Lotion (SPF 50)	360.7 ppb	986.2 ppb
Coppertone Pure & Simple Kids Sunscreen Lotion (SPF 50)	429.7 ppb	1,350.9 ppb
Thinkbaby Baby Mineral Sunscreen Lotion (SPF 50)	613.9 ppb	658.2 ppb
Thinkbaby Baby Sunscreen for Sensitive Skin (SPF 50)	656.5 ppb	1,364.7 ppb
Thinkbaby Baby Sunscreen for Sensitive Skin (SPF 50) <sup>9</sup>	133.7 ppb	869.3 ppb

15. Further, because of Amazon's Misrepresentations and partial misrepresentations, with no disclosures as to the presence or risk of significant levels of heavy metals in the Sunscreen Products, Plaintiffs did not expect the Sunscreen Products to contain heavy metals.

<sup>8</sup> This testing represents results from product purchased by Plaintiff Correia.

<sup>9</sup> This testing represents results from product purchased by Plaintiff Wolf.

1 16. The inclusion or real risk of high levels of cadmium and lead contradict and  
2 impede the central function of the Sunscreen Products. The Sunscreen Products are intended  
3 to provide sun protection to infants and children. Cadmium and lead provide no such  
4 protection and instead pose health risks to infants and children.

5 17. Based on the messaging and overall impression communicated by Amazon's  
6 point-of-sale webpages, including the Misrepresentations and material Omissions, no  
7 reasonable consumers, including Plaintiffs, could expect or understand the Sunscreen Products  
8 contained or risked containing high levels of cadmium, lead, or other heavy metals.

9 18. No reasonable consumer purchasing sunscreen or seeing the  
10 Misrepresentations or partial misrepresentations on Amazon's point-of-sale webpages would  
11 expect the Sunscreen Products to contain heavy metals. Furthermore, reasonable consumers,  
12 like Plaintiffs, would consider the inclusion of heavy metals like cadmium or lead a material  
13 fact when considering what sunscreen products to purchase.

14 19. Amazon intended for consumers to rely on the Misrepresentations, partial  
15 misrepresentations, Omissions, concealment, and other deceptive conduct regarding the  
16 Sunscreen Products' quality, ingredients, standards, and suitability for use. Amazon's business  
17 practices, including the Misrepresentations and Omissions, were deceptive, misleading, unfair,  
18 and/or false because, among other things, the Sunscreen Products contained undisclosed toxic  
19 heavy metals.

20 20. Amazon knows its customers trust the quality of the products sold through its  
21 platform and expect the Sunscreen Products to be properly and safely manufactured and to not  
22 contain or risk containing alarming levels of heavy metals.

1 21. Amazon also knows that certain consumers will seek out and wish to purchase  
2 sunscreen products that do not have detectable levels of contaminants such as heavy metals  
3 and that these consumers will pay more for sunscreen products that they believe possess these  
4 qualities.

5 22. Indeed, Amazon has intentionally and knowingly positioned itself in the market  
6 as the world's top e-commerce company selling consumer goods such as the Sunscreen  
7 Products.<sup>10</sup>

8 23. Plaintiffs seek injunctive and monetary relief on behalf of the proposed Class,  
9 including (i) requiring Amazon to fully disclose the presence of heavy metals in its marketing,  
10 advertising, and labeling of Sunscreen Products; (ii) requiring Amazon to test all Sunscreen  
11 Products' ingredients and final products for heavy metals; and (iii) restoring monies to the  
12 members of the proposed Class.

13 24. Plaintiffs bring this proposed consumer class action individually and on behalf  
14 of all other members of the Class (as defined herein), who purchased for personal/household  
15 use and not resale any of the Sunscreen Products. Plaintiffs assert claims under the Washington  
16 Consumer Protection Act and Washington common law.

17 **JURISDICTION AND VENUE**

18 25. This Court has jurisdiction over this action pursuant to the Class Action  
19 Fairness Act of 2005 ("CAFA"), 28 U.S.C. §1332(d)(2), because at least one Class Member is  
20 of diverse state citizenship from Defendant, there are more than 100 Class Members, and the  
21 aggregate amount in controversy exceeds \$5 million, exclusive of interest and costs. Amazon  
22

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23 <sup>10</sup> *Leading E-Commerce Companies Worldwide as of February 2026, By Market Cap*,  
24 STATISTA, <https://www.statista.com/statistics/245340/leading-large-cap-e-commerce-companies-market-cap/> (last accessed April 29, 2026).

1 sells its Sunscreen Products from coast to coast in the United States and, as such, Class  
2 Members are citizens of numerous diverse states outside of Washington. Any exemptions to  
3 jurisdiction under 28 U.S.C. §1392(d)(2) do not apply.

4 26. The Western District of Washington has personal jurisdiction over Amazon as  
5 it is headquartered in this District and conducts substantial business in this State and in this  
6 District through its headquarters and sale of products, including the Sunscreen Products.

7 27. Venue is appropriate in this District pursuant to 28 U.S.C. § 1391(b)(1) because  
8 Amazon is headquartered and resides in this District. Venue is further appropriate in this  
9 district pursuant to the forum selection clause in Amazon’s online “conditions of use,” which  
10 are available when a consumer signs up for an Amazon account and makes purchases. The  
11 conditions provide that “[a]ny dispute or claim relating in any way to your use of any Amazon  
12 Service will be adjudicated in the state or Federal courts in King County, Washington, and you  
13 consent to exclusive jurisdiction and venue in these courts.”

14 **PARTIES**

15 28. Plaintiff Lauren Wolf (“Plaintiff Wolf”) is, and at all times relevant, has been a  
16 citizen and resident of the state of Texas, residing in Fort Worth, in Tarrant County, Texas.  
17 Plaintiff Wolf purchased the Sunscreen Products from Amazon, including Sun Bum Baby Bum  
18 Mineral Sunscreen Stick SPF 50 and Thinkbaby Baby Sunscreen for Sensitive Skin (SFP 50),  
19 in approximately June 2025 and March 2026.

20 29. Before making these purchases, Plaintiff Wolf viewed the information available  
21 on Amazon’s Product Detail Pages for Sun Bum Baby Bum Mineral Sunscreen Stick (SPF 50)  
22 and Thinkbaby Baby Sunscreen for Sensitive Skin (SFP 50). None of that information  
23 disclosed that the sunscreen contained detectable levels of heavy metals.

1 30. When Plaintiff Wolf purchased Sun Bum Baby Bum Mineral Sunscreen Stick  
2 (SPF 50) via Amazon’s marketplace, Amazon was the seller of the sunscreen.

3 31. Plaintiff Elizabeth Correia (“Plaintiff Correia”) is, and at all times relevant, has  
4 been a citizen and resident of the state of California, residing in Cardiff, in San Diego County,  
5 California. Plaintiff Correia purchased the Sunscreen Products from Amazon, including Sun  
6 Bum Baby Bum Mineral Roll-On Sunscreen (SPF 50) in approximately October 2023,  
7 December 2023, and June 2024; Sun Bum Baby Bum Sunscreen Lotion (SPF 50) in  
8 approximately June 2021, March 2022, and March 2023; Sun Bum Baby Bum Sunscreen  
9 Spray (SPF 50) in approximately April 2022; Blue Lizard Baby Mineral Sunscreen Stick (SPF  
10 50) in approximately October 2023, November 2023, December 2023, May 2024, June 2024,  
11 and August 2025; Blue Lizard Kids Mineral Sunscreen Stick (SPF 50) in approximately April  
12 2026, and Thinkbaby Baby Mineral Sunscreen Lotion (SPF 50) in approximately June 2020.

13 32. Before making these purchases, Plaintiff Correia viewed the information  
14 available on Amazon’s Product Detail Pages for Sun Bum Baby Bum Mineral Roll-On  
15 Sunscreen (SPF 50), Sun Bum Baby Bum Sunscreen Lotion (SPF 50), Sun Bum Baby Bum  
16 Sunscreen Spray (SPF 50), Blue Lizard Baby Mineral Sunscreen Stick (SPF 50), Blue Lizard  
17 Kids Mineral Sunscreen Stick (SPF 50), and Thinkbaby Baby Mineral Sunscreen Lotion (SPF  
18 50). None of that information disclosed that the sunscreens contained detectable levels of  
19 heavy metals.

20 33. When Plaintiff Correia purchased Sun Bum Baby Bum Mineral Roll-On  
21 Sunscreen (SPF 50), Sun Bum Baby Bum Sunscreen Lotion (SPF 50), Blue Lizard Baby  
22 Mineral Sunscreen Stick (SPF 50), Blue Lizard Kids Mineral Sunscreen Stick (SPF 50), and  
23  
24

1 Thinkbaby Baby Mineral Sunscreen Lotion (SPF 50) via Amazon’s marketplace, Amazon was  
2 the seller of the sunscreens.

3 34. Plaintiffs believed they were purchasing sunscreen products that were nontoxic  
4 and without detectable levels of heavy metals, including cadmium and lead. During the time  
5 they purchased and used the Products, and due to the Misrepresentations, partial  
6 misrepresentations, and Omissions by Amazon, they were unaware the Sunscreen Products  
7 contained (or had a material risk of containing) significant levels of cadmium and lead. If  
8 Amazon had disclosed that the Sunscreen Products contained (or had a material risk of  
9 containing) heavy metals including cadmium and lead, or that Amazon had inadequately  
10 tested, or never tested, or never required third-party sellers to test, for heavy metals, in its  
11 ingredients and/or finished Sunscreen Products, Plaintiffs would not have purchased the  
12 Sunscreen Products or otherwise would have paid less for them. Plaintiffs would be willing to  
13 purchase the Sunscreen Products in the future if they could be certain they do not contain (or  
14 have a material risk of containing) heavy metals.

15 35. Plaintiffs relied on the Sunscreen Products’ point-of-sale webpages,  
16 Misrepresentations and partial misrepresentations and Omissions by Amazon, which were  
17 prepared, reviewed, and/or approved by Amazon and its agents at its headquarters in  
18 Washington and disseminated by Amazon and its agents through the point-of-sale disclosures.  
19 The Omissions were material content that reasonable consumers would consider important  
20 when purchasing the Sunscreen Products, and the Misrepresentations and partial  
21 misrepresentations were misleading, unfair, and deceptive based on the inclusion and/or risk  
22 of significant levels of cadmium and lead.

1 36. Amazon is an American multinational consumer goods and technology  
2 company that conducts business in all 50 states and the District of Columbia. Amazon is a  
3 Delaware corporation with principal executive offices located at 410 Terry Avenue North,  
4 Seattle, Washington 98109.

5 37. Amazon knowingly created, oversaw, and/or authorized the unlawful,  
6 fraudulent, unfair, misleading, and/or deceptive point-of-sale webpages and related marketing  
7 for the Sunscreen Products that did not disclose the presence of heavy metals, including  
8 cadmium or lead.

9 38. Plaintiffs relied on the point-of-sale webpages and Omissions, which were  
10 prepared, reviewed, and/or approved by Amazon and its agents at its headquarters in Seattle  
11 and disseminated by Amazon and its agents. The Omissions were nondisclosed material  
12 content that a reasonable consumer would consider important when purchasing the Sunscreen  
13 Products.

14 **FACTUAL ALLEGATIONS**

15 **I. Amazon Sells Sunscreen Products in Its Online Marketplace and Delivers These  
16 Products Directly to Consumers**

17 39. Amazon operates the largest online retail marketplace in the United States,  
18 which includes its website, applications for mobile devices, and voice-controlled devices that  
19 allow consumers to make purchases from Amazon (“Amazon’s marketplace”).

20 40. Amazon directly sells a wide range of consumer goods—approximately 12  
21 million goods—to customers on its marketplace.<sup>11</sup> Some of these products are manufactured  
22 by third parties but sold to consumers by Amazon as a traditional first-party retailer. Other

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<sup>11</sup> *Amazon Statistics: Key Numbers and Fun Facts*, AMAZON SCOUT,  
24 <https://amzscout.net/blog/amazon-statistics> (last accessed April 29, 2026).

1 products are manufactured by Amazon or its subsidiaries and marketed under one of Amazon's  
2 many in-house brand names.

3 41. Amazon is the manufacturer and seller of one Sunscreen Product at issue: 365  
4 Whole Foods Sport Mineral Sunscreen Lotion SPF 30.<sup>12</sup>

5 42. Amazon also sells several of the Sunscreen Products directly to consumers as  
6 a first party, including 365 by Whole Foods Market Sport Mineral Sunscreen (SPF 30), Sun  
7 Bum Baby Bum Mineral Sunscreen (SPF 50), Blue Lizard Baby Mineral Sunscreen (SPF 50),  
8 Blue Lizard Kids Mineral Sunscreen (SPF 50), Thinkbaby Baby Mineral Sunscreen (SPF 50),  
9 and Coppertone Pure & Simple Baby Sunscreen (SPF 50). In other words, Amazon itself—  
10 not a third party—lists these Sunscreen Products on Amazon's marketplace and sells, ships,  
11 and delivers them to consumers.

12 43. In addition to selling goods as a first party, Amazon allows third-party sellers  
13 to list products on Amazon's marketplace. Such sellers enter into an agreement with Amazon  
14 to participate in its ecommerce marketplace by executing Amazon's Business Solutions  
15 Agreement as well as other related agreements.

16 44. Amazon's Business Solutions Agreement with third-party sellers provides,  
17 *inter alia*, that Amazon controls: the formatting of product listings on its online marketplace;  
18 all communications about the third party's products with Amazon customers, which must take  
19 place exclusively through Amazon's online platform; and the processing of all payments,  
20 including what the permissible means of purchase are, and remittance of payments to  
21 merchants minus Amazon's substantial service fees—which range from 15-40% of the  
22 purchase price.

23 \_\_\_\_\_  
24 <sup>12</sup> Whole Foods is a wholly owned subsidiary of Amazon. Whole Foods' CEO, Jason Buechel,  
is also Amazon's Vice President of Worldwide Grocery Stores.

1 45. Amazon operates a fulfillment service known as “Fulfillment by Amazon.” For  
2 third-party sellers participating in Fulfillment by Amazon, there are additional policies and  
3 requirements that govern the third party’s products’ presence on Amazon’s marketplace.

4 46. When a third-party seller participates in Fulfillment by Amazon, Amazon  
5 undertakes numerous activities to put the seller’s goods in consumers’ hands. Amazon stores  
6 Fulfillment by Amazon products at Amazon warehouses and tracks data related to inventory  
7 of the product. When a consumer places an order for the goods on Amazon’s marketplace,  
8 Amazon facilitates the transaction, sorts and packages the goods in its warehouses, ships the  
9 goods directly to the consumer’s doorstep, often via Amazon delivery vehicles, and handles  
10 customer service, including processing of returns, complaints, and refund requests.<sup>13</sup>

11 47. Sales on Amazon’s marketplace make up between 65% and 70% of all online  
12 marketplace sales in the United States and account for over 50% of all online retail sales  
13 revenue in the United States.<sup>14</sup> The vast majority of sales on Amazon’s marketplace are of  
14 products that are either sold by Amazon as a first party or handled and shipped by Amazon via  
15 Fulfillment by Amazon.

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17  
18 <sup>13</sup> *In the Matter of Amazon.com, Inc.*, No. 21-2, Decision and Order of the United States  
19 Consumer Product Safety Commission at 7–11 (July 29, 2024). In regulatory proceedings,  
20 Amazon has attempted to avoid responsibility for selling dangerous products by arguing that  
21 it is a “third-party logistics provider” rather than a distributor. *Id.* at 6. In 2024, the United  
22 States Consumer Product Safety Commission rejected that argument, finding that Amazon acts  
23 as a distributor via Fulfillment by Amazon, and noting that Amazon “controls communications  
24 between [third-party sellers] and customers,” and that “Amazon controls the distribution of  
Fulfilled by Amazon products from the initial transactions on Amazon.com through product  
returns.” *Id.* at 34, 39.

<sup>14</sup> *Investigation of Competition in Digital Markets, Majority Staff Report and  
Recommendations*, SUBCOMMITTEE ON ANTITRUST, COMMERCIAL, AND ADMINISTRATIVE LAW  
OF THE COMMITTEE ON THE JUDICIARY OF THE HOUSE OF REPRESENTATIVES, 117th Congress,  
(released Oct. 2020, adopted Apr. 2021), at 255, [https://www.govinfo.gov/content/pkg/CPRT-  
117HPRT47832/pdf/CPRT-117HPRT47832.pdf](https://www.govinfo.gov/content/pkg/CPRT-117HPRT47832/pdf/CPRT-117HPRT47832.pdf) (last accessed April 29, 2026).

1 48. The Sunscreen Products, including Coppertone Pure & Simple Kids Sunscreen  
2 (SPF 50) and Thinkbaby Baby Sunscreen for Sensitive Skin (SPF 50), are listed and sold by  
3 third parties, but stored, handled, and shipped to consumers by Amazon via Fulfillment by  
4 Amazon.

5 **II. Amazon Controls and Creates Content for the Sunscreen Products' Detail Pages**

6 49. Amazon refers to the point-of-sale webpages for individual products sold on  
7 Amazon as "Product Detail Pages."

8 50. Amazon exercises extensive control over the format and content of Product  
9 Detail Pages, even for products listed by third parties. The Business Solutions Agreement  
10 requires third-party sellers to provide certain "Required Product Information," on Detail  
11 Pages, including a description, SKU number, information regarding in-stock status and  
12 availability, product category information, digital images, price information, shipping and  
13 handling information, product dimensions, and "any text, disclaimers, warnings, notices,  
14 labels, warranties, or other content required by applicable Law to be displayed, or that are  
15 necessary for the safe use of Your Product, in connection with the offer, merchandising,  
16 advertising, or sale of Your Product."<sup>15</sup>

17 51. Amazon monitors the content of product listings. If Amazon determines that  
18 Required Product Information is missing from a product listing, it asks the seller to provide  
19 the required information, and it removes the product listing from Amazon's marketplace if the  
20 seller does not comply.

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23 <sup>15</sup> *Amazon Services Business Solutions Agreement*, AMAZON SELLER CENTRAL,  
24 <https://sellercentral.amazon.com/help/hub/reference/external/G1791> (last accessed April 29,  
2026).

1 52. Amazon provides third-party sellers with “Product detail page rules” that  
2 specify the format and content of product descriptions on Detail Pages. The rules include  
3 “policies for writing listings,” which specify the number of characters a product title can have,  
4 prohibit the use of emojis, and forbid sellers from including quotes, testimonials, or requests  
5 for positive customer reviews in Detail Page content.

6 53. When more than one third-party seller sells a given product on Amazon’s  
7 marketplace, Amazon decides what information is displayed on the Detail Page.

8 54. Amazon sells the Sunscreen Products to consumers on its platform.

9 55. Each of the Sunscreen Products is sold on Amazon’s website via a Product  
10 Detail Page. The Detail Page for each Sunscreen Product includes a product description and a  
11 picture of the product’s ingredients panel, the specifications of which are set by Amazon.

12 56. Amazon does not require sellers of Sunscreen Products to test their products  
13 for heavy metals or include the results of such tests on Detail Pages.

14 57. Amazon also does not include the results of heavy metals tests on Detail Pages  
15 for the Sunscreen Products manufactured by Amazon itself or its subsidiaries.

16 58. The Sunscreen Products at issue in this case, and the levels of heavy metals  
17 found in each product, are listed in Appendix A.

18 59. For example, the Detail Page for the Sun Bum Baby Bum Mineral Sunscreen  
19 Stick (SPF 50) purchased by Plaintiff Wolf is set forth below:  
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Baby Products > Baby Care > Grooming > Skin Care > Sun Protection

Sun Bum Baby Bum Mineral SPF 50 Sunscreen Stick - Hawaii 104 Act Compliant (Without Octinoxate & Oxybenzone) - UVA/UVB Face and Body Protection - Unscented for Sensitive Skin - Travel Size - 0.45 Oz

Visit the Sun Bum Store

4.6 ★★★★☆ (4,946) | Search this page

4K+ bought in past month

\$12.99 (\$28.87 / ounce)

Price history

prime Today

FREE Returns

Savings \$5 Amazon credit when you spend \$20 Shop items >

Save up to 31% with business pricing. Sign up for a free Amazon Business account

Size: 0.45 Ounce (Pack of 1)

0.45 Ounce (Pack of 1)	0.45 Ounce (Pack of 2)
\$12.99 (\$28.87 / ounce)	\$25.98 (\$28.87 / ounce)
FREE Delivery Today 2 PM - 6 PM	FREE Delivery Overnight 7 AM - 11 AM

Style: Face Stick

Top highlights

Features & Specs

Measurements

See all product specifications

Delivery Pickup

One-time purchase

\$12.99 (\$28.87 / ounce)

prime Today

FREE delivery Today 2 PM - 6 PM

Or \$4.99 delivery in 3 hours

Shorter shipping distance

Deliver to Krista - Minneapolis 55431

In Stock

Quantity: 1

Add to cart

Buy Now

Shipper / Seller Amazon.com

Returns FREE 30-day refund/replacement

Packaging Ships in product packaging

See more

FSA or HSA eligible Details

Subscribe & Save

\$11.04 (\$24.53 / ounce)

First delivery on May 8

60. The Product Detail Page contains language touting the superiority of this particular product, describing it as “gentle,” “meet[ing] the needs of delicate baby skin,” and “specifically formulated for kids, toddlers, and babies.” Nowhere does it disclose that the sunscreen contains dangerous heavy metals, including arsenic and cadmium:

**Top highlights** ^

**Scent**                      Unscented

**Product**                    Gentle Mineral-active, Ultra-Violet Protection

**Benefits**

**Sun Protection**    15 Sun Protection Factor (SPF)

**Factor**

**Item Weight**        0.03 Pounds

**Number of**            1

**Items**

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**About this item**

- **BABY BUM SPF 50 SUNSCREEN FACE STICK.** Our convenient, get-out-the-door faster format is gentle mineral-active based protection. The easy roll-on face stick applies and absorbs quickly to face (and body) with a non-oily feel for UVA/UVB protection. Fit this mini size in your carry-on for your next sunny vacation.
- **GENTLE, PLANT-BASED SKIN CARE.** Our plant-based formula contains zinc oxide, coconut oil, shea butter and cocoa butter to nourish and hydrate all skin types. Vegan, Cruelty, Gluten and Dye Free to meet the needs of delicate baby skin.
- **HOW TO USE.** Chase 'em down and get their face. Swipe across forehead starting at the hairline and work your way down careful not to miss a spot. Apply 15 minutes before sun. Reapply after 80 minutes of swimming, and immediately after a towel dry.
- **FORMULATED FOR OUR RAD LITTLE KIDS.** Specifically formulated for kids, toddlers and babies with naturally moisturizing ingredients. Pediatrician and Dermatologist tested. Paraben, Sulfate, Silicone and Phthalate free.
- **TRUST THE BUM.** What does that mean? It means trust us, the ones who live on the beach and need products that work on the most intense days in the sun. The simple truth is, when you make products to protect the ones you love, you make 'em better.
- **Baby Bum SPF 50 Mineral Sunscreen Face Stick** is FSA/HSA eligible and meets FDA requirements for sun protection, giving you peace of mind while you protect your skin

61. Another section of the Detail Page claims that the sunscreen is “made of safe minerals to protect babies’ skin[.]” This product description also does not disclose that the sunscreen contains dangerous heavy metals, including arsenic and cadmium:

**Product Description**

Broad spectrum, lightweight, and non-greasy, our SPF 50 sunscreen face stick is made of safe minerals to protect babies' skin from UVA/UVB rays. Water resistant (80 mins).

62. Amazon also includes statements from the manufacturer on the Detail Page, including claims that the sunscreen is “super gentle” and “uses the best ingredients for delicate and sensitive skin,” that “was designed with sensitive skin in mind and made without using synthetic fragrances, dyes, or parabens.” None of the statements disclose the presence of heavy metals.

**Made for our rad little ones.**

We make our products for our own little ones, so every detail matters. Our Baby Bum collection is super gentle and uses the best ingredients for delicate and sensitive skin.

**Vegan Approved** **FOR SENSITIVE SKIN** **PEDIATRICIAN TESTED** **GLUTEN FREE** **FRAGRANCE FREE**

**Cruelty Free** **PARABENS MADE WITHOUT PARABENS** **FORMULA ACT 100% COMPLIANT** **Made Without:**  
• Oxybenzone • Octinoxate

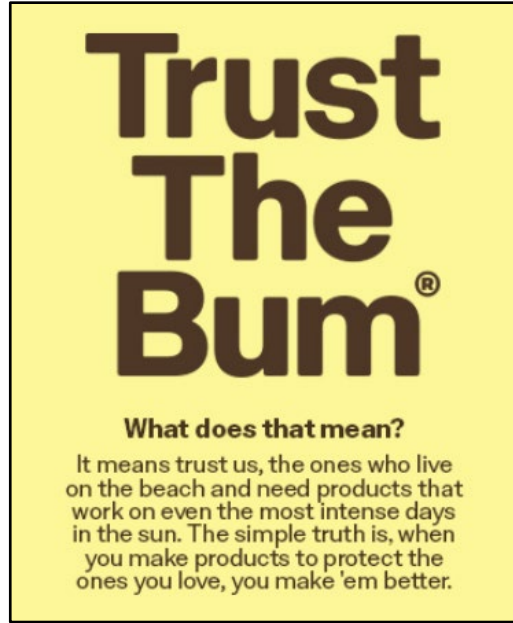


**Pediatrician Tested**  
Thumbs up for overall safety & sensitivity. Still important to consult with your doctor.

**Fragrance Free**  
Our Baby Sunscreen formula was designed with sensitive skin in mind and made without using synthetic fragrances, dyes, or parabens.

**Non-Nano Zinc**  
Non-nano zinc reflects UVA and UVB rays from the surface of our skin.

63. Further, the Detail Page also includes claims meant to invoke trust in the manufacturer, “Trust the Bum... It means trust us... The simple truth is, when you make products to protect the ones you love, you make ‘em better.”



64. The Detail Page for the Thinkbaby Baby Sunscreen for Sensitive Skin (SPF 50)

purchased by Plaintiff Wolf is set forth below:

Baby Products › Baby Care › Grooming › Skin Care › Sun Protection

**thinkbaby**  
CLEAR ZINC OXIDE  
SUNSCREEN  
(SENSITIVE SKIN)  
**50** SPF

broad spectrum UVA/UVB  
essential vitamins  
blends to quickly  
fragrance-free  
sunblock, shea butter  
& zinc oxide

3 fl oz • 87 ml

Click to see full view

**Thinkbaby Baby Sunscreen for Sensitive Skin, 3 Fl Oz, SPF 50 Clear Zinc Oxide Baby Mineral Sunscreen, Broad Spectrum UVA/UVB Protection, Natural, Water Resistant, Reef Safe, Vegan**

Visit the THINK Store  
4.7 ★★★★★ (199) | Search this page

High price  
Learn more

Deliver to Krista - Minneapolis 55431

See All Buying Options

Add to List

**Top highlights**

**Features & Specs**

**Measurements**

See all product specifications

**Additional Details**

Small Business  
This product is from a small business brand. Support small. Learn more

Report an issue with this product or seller

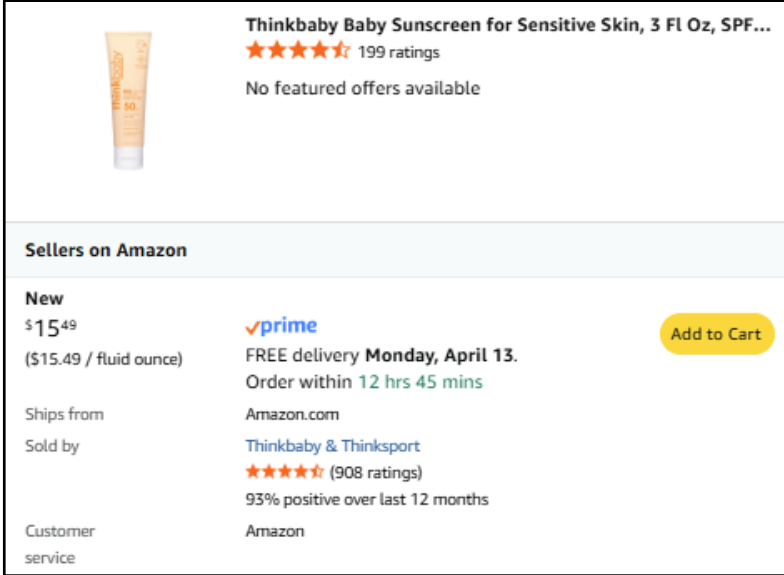
**Amazon Key In-Garage Delivery**  
Enjoy every trip knowing your deliveries are safe inside your garage. Learn more

**Ask Rufus**

Is this sunscreen fragrance free? Does it leave a white cast? Can it be used on the face?

Why you might like this Compare with similar Ask something else

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65. The Product Detail Page contains language touting the superiority of this particular product, describing it as “formulated without fragrance or harmful ingredients,” “Dermatologist recommended as a safe and effective choice for sensitive skin,” and “CLEAN MINERAL FORMULA: Suitable for sensitive skin.” Nowhere does it disclose that the sunscreen contains dangerous heavy metals, including arsenic and cadmium:

**Top highlights** ^

<b>Scent</b>	Chamomile
<b>Product Benefits</b>	SPF 50, broad spectrum UVA/UVB protection, water resistant for 80 minutes, soothing for sensitive skin
<b>Sun Protection Factor</b>	50 Sun Protection Factor (SPF)
<b>Item Weight</b>	0.12 Kilograms
<b>Number of Items</b>	1

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**About this item**

- **CALMING PROTECTION:** Our non-nano zinc oxide mineral sunscreen is formulated without fragrance or harmful ingredients and infused with soothing chamomile & moisturizing shea butter to help calm and nourish extra sensitive skin
- **WATER RESISTANT:** This baby and kids sunscreen provides reliable, long-lasting sun protection and is water-resistant for up to 80 minutes. Dermatologist recommended as a safe and effective choice for sensitive skin
- **EASY APPLICATION:** Kids hate standing still, so this is sunscreen kids and adults can quickly and easily apply, and protection begins instantly. The fast absorbing sunscreen for kids won't leave skin feeling oily or sticky, and has no unpleasant chemical scent.
- **CLEAN MINERAL FORMULA:** Suitable for sensitive skin and active lifestyles. This children and toddler sunscreen has no BPA, vegan, never tested on animals, reef-friendly, travel-sized, and TSA-approved
- **SUNCARE BY THINK SUN:** Thinkdaily, Thinkbaby, Thinkkids & Thinksports have got your family covered with gentle and reef-safe ingredient based clean sunscreen, made to be effective for delicate and sensitive skin without sacrificing protection

66. Another section of the Detail Page claims that the sunscreen as “perfect for extra sensitive little ones!” “gentle on skin,” “free of harmful chemicals,” and “dermatologist recommended.” This product description also does not disclose that the sunscreen contains dangerous heavy metals, including arsenic and cadmium:

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**thinkbaby**

Non-nano Zinc Oxide UV filters combine with soothing Aloe Vera and Jojoba Seed Oil for advanced protection — perfect for extra sensitive little ones!

clear zinc oxide spf 50 sensitive skin

**gentle on skin, tough on rays**

enriched with soothing chamomile & shea butter

non-nano mineral zinc oxide SPF 50 for complete broad-spectrum defense

blends quickly for all skin types & tones

**thinksun**  
mineral sunscreen

water resistant 80 min

EWG VERIFIED & RATED

free of harmful chemicals


dermatologist recommended

reef friendly

cruelty-free

67. The Detail Page for the Sun Bum Baby Bum Mineral Roll-On Sunscreen (SPF 50) purchased by Plaintiff Correia is set forth below:

Beauty & Personal Care › Skin Care › Sunscreens & Tanning Products › Sunscreens › Body Sunscreens



**Sun Bum Baby Bum Mineral SPF 50 Roll-On Sunscreen - Vegan and Hawaii 104 Act Compliant (Without Octinoxate & Oxybenzone) - Broad Spectrum Moisturizing UVA/UVB - Travel Size - 3 oz | Mineral, Vegan, Broad Spectrum, Moisturizing, UVA/UVB**

Visit the Sun Bum Store

4.8 ★★★★★ (805) | Search this page

6K+ bought in past month

Price history

**\$16<sup>49</sup>** (\$5.50 / fluid ounce)

**Get \$175 off instantly:** Pay \$0.00 upon approval for Prime Visa.

prime Today  
FREE Returns

Size: **3 Fl Oz (Pack of 1)**

One-time purchase

**\$16<sup>49</sup>** (\$5.50 / fluid ounce)

prime Today

FREE delivery **Today**  
7 AM - 11 AM. Order within 4 hrs 17 mins

Shorter shipping distance

Deliver to Krista - Minneapolis 55431

In Stock

Quantity: 1

Add to cart

Buy Now

Shipper / Seller Amazon.com

Returns FREE 30-day refund/replacement

Customer service Amazon.com

See more

FSA or HSA eligible Details

Click to see full view

Ask Rufus

Is this sunscreen water resistant? Does it leave a white cast?

Can it be used on the face? Why you might like this Compare with similar

68. The Product Detail Page contains language touting the superiority of this particular product, describing it as “gentle,” “meet[ing] the needs of delicate baby skin,” and “specifically formulated for kids, toddlers, and babies.” Nowhere does it disclose that the sunscreen contains dangerous heavy metals, including arsenic and cadmium:

**Top highlights** ^

<b>Scent</b>	Unscented
<b>Product Benefits</b>	Gentle Mineral-active, Ultra-Violet Protection
<b>Sun Protection Factor</b>	50 Sun Protection Factor (SPF)
<b>Brand</b>	Sun Bum
<b>Item Weight</b>	88 Grams

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**About this item**

- BABY BUM SPF 50 MINERAL ROLL-ON LOTION. We know how tough it can be to get our little ones to stand still. So, we made a sunscreen option that's gentle mineral-active based, lightweight, and most importantly, easy to apply. Fit this mini size in your carry-on for your next sunny vacation.
- Baby Bum SPF 50 Mineral Roll-On Sunscreen Lotion is FSA/HSA eligible and meets FDA requirements for sun protection, giving you peace of mind while you protect your skin
- GENTLE, PLANT-BASED SKIN CARE. Our plant-based formula contains natural zinc oxide, coconut oil, shea butter and cocoa butter to nourish and hydrate all skin types. Vegan, Cruelty, Gluten and Dye Free to meet the needs of delicate baby skin.
- TRUST THE BUM. What does that mean? It means trust us, the ones who live on the beach and need products that work on the most intense days in the sun. The simple truth is, when you make products to protect the ones you love, you make 'em better.
- FORMULATED FOR OUR RAD LITTLE KIDS. Specifically formulated for kids, toddlers and babies with naturally moisturizing ingredients. Pediatrician and Dermatologist tested. Paraben, Sulfate, Silicone and Phthalate free.
- HOW TO USE. Shake well before use. Chase 'em down, apply liberally and spread by hand 15 minutes before sun exposure. Reapply: after 80 minutes of swimming or sweating. Immediately after towel drying. At least every 2 hours.

69. Another section of the Detail Page claims that the sunscreen is “made of safe minerals to protect babies’ skin[.]” This product description also does not disclose that the sunscreen contains dangerous heavy metals, including arsenic and cadmium:

**Product Description**

Broad spectrum, lightweight, and non-greasy, our SPF 50 roll on sunscreen is made of safe minerals to protect babies' skin from UVA/UVB rays. Water resistant (80 mins).

70. Amazon also includes statements from the manufacturer on the Detail Page, including claims that the sunscreen is “super gentle” and “uses the best ingredients for delicate

1 and sensitive skin,” that “was designed with sensitive skin in mind and made without using  
2 synthetic fragrances, dyes, or parabens.” None of the statements disclose the presence of heavy  
3 metals:

**Made for our rad little ones.**

We make our products for our own little ones, so every detail matters. Our Baby Bum collection is super gentle and uses the best ingredients for delicate and sensitive skin.










**Made Without:**  
• Oxybenzone • Octinoxate



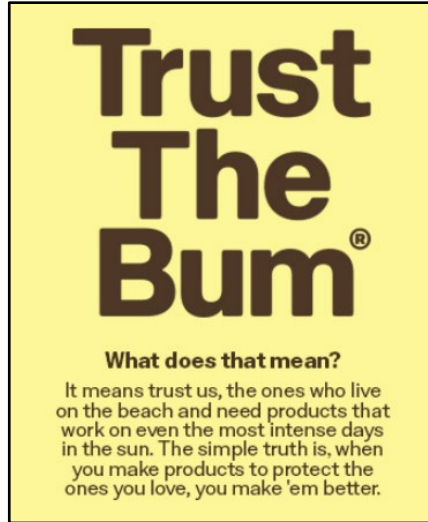


**Pediatrician Tested**  
Thumbs up for overall safety & sensitivity. Still important to consult with your doctor.

**Fragrance Free**  
Our Baby Sunscreen formula was designed with sensitive skin in mind and made without using synthetic fragrances, dyes, or parabens.

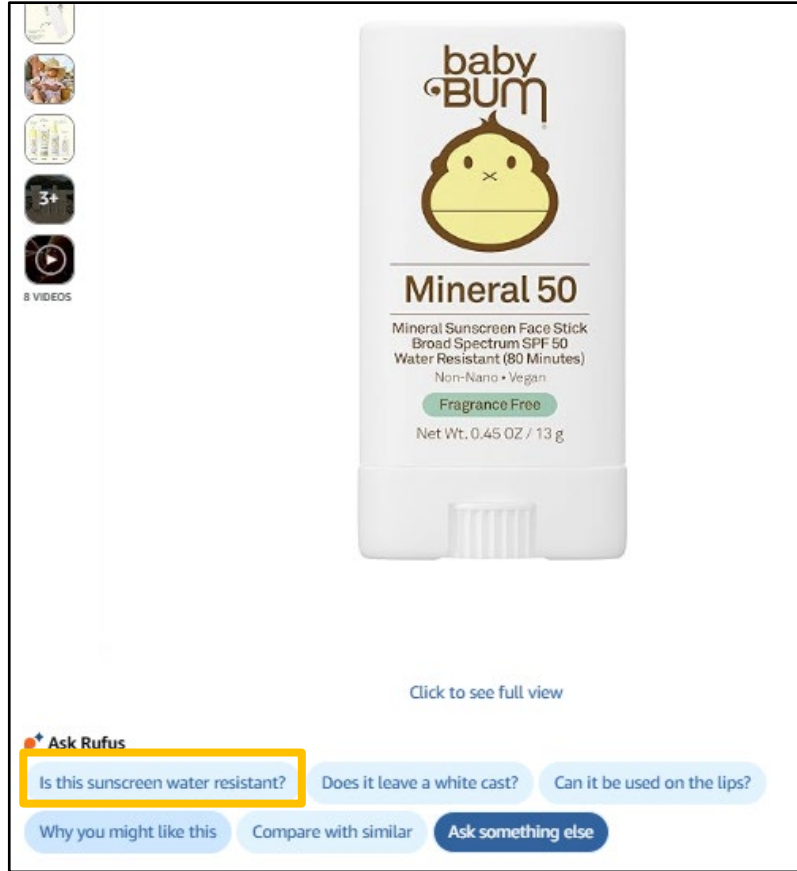
**Non-Nano Zinc**  
Non-nano zinc reflects UVA and UVB rays from the surface of our skin.

14 71. Further, the Detail Page also includes claims meant to invoke trust in the  
15 manufacturer, “Trust the Bum... It means trust us... The simple truth is, when you make  
16 products to protect the ones you love, you make ‘em better.”

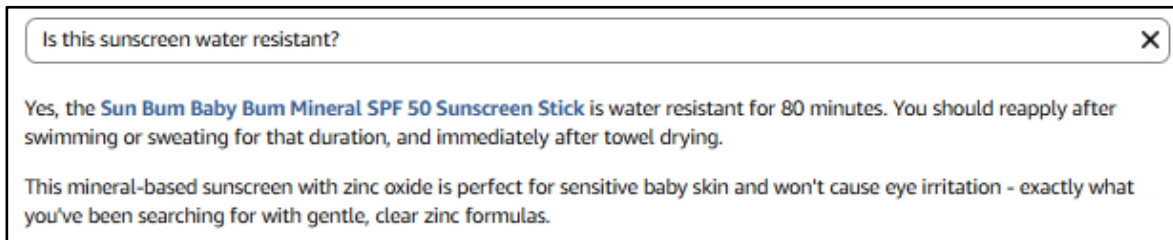


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72. The Detail Pages also contain a feature called “Ask Rufus.” “Rufus” is Amazon’s “AI-powered conversational shopping assistant.” It is powered by technology that is proprietary to Amazon, and Amazon—not third parties—causes Rufus to appear on Product Detail Pages.

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73. On the Detail Page for Sun Bum Baby Bum Mineral Sunscreen Stick (SPF 50), Amazon—via “Rufus”—poses the question “Is this sunscreen water resistant?”:



74. When consumers click on that question, Amazon states that “The product information does not provide explicit details about the presence or absence of additives or preservatives”:



75. The “Ask Rufus” feature currently appears on the Detail Pages for each of the Sunscreen Products sold on Amazon.

1 76. The contents of the point-of-sale Detail Pages for the Sunscreen Products show  
 2 that (1) Amazon knows that the benefits and ingredients of a sunscreen product are material to  
 3 consumers, and (2) Amazon fails to disclose to consumers the fact that the Sunscreen Product  
 4 contains heavy metals.

5 77. Excerpts from the Product Detail Pages for the Sunscreen Products are attached  
 6 in Appendix B.

7 **III. The Heavy Metals in the Sunscreen Products Are Material to Reasonable**  
 8 **Consumers**

9 78. Although Amazon misleadingly causes consumers to believe the Sunscreen  
 10 Products do not contain heavy metals due to the Misrepresentations, partial  
 11 misrepresentations, the Omissions, concealment, and other deceptive conduct, the Sunscreen  
 12 Products do in fact contain undisclosed, detectable levels of heavy metals, including cadmium  
 13 and lead, which is material information to reasonable consumers.

14 79. Plaintiffs' counsel had samples of the Sunscreen Products tested. That testing  
 15 confirmed the presence of undisclosed heavy metals:

Product (Testing by Plaintiffs)	Cadmium	Lead
365 by Whole Foods Market Sport Mineral Sunscreen Lotion (SPF 30)	78.5 ppb	1,705.3 ppb
Sun Bum Baby Bum Mineral Sunscreen Lotion (SPF 50)	177.7 ppb	548 ppb
Sun Bum Baby Bum Mineral Sunscreen Lotion (SPF 50) <sup>16</sup>	24.7 ppb	409.8 ppb
Sun Bum Baby Bum Mineral Roll-On Sunscreen (SPF 50) <sup>17</sup>	117.1 ppb	982.7 ppb

23 <sup>16</sup> This testing represents results from product purchased by Plaintiff Wolf.

24 <sup>17</sup> This testing represents results from product purchased by Plaintiff Correia.

Product (Testing by Plaintiffs)	Cadmium	Lead
Banana Boat Simply Protect Baby Sunscreen Lotion (SPF 50)	10.78 ppb	455.92 ppb
Banana Boat Simply Protect Kids Sunscreen Lotion (SPF 50)	97 ppb	323.9 ppb
Blue Lizard Baby Mineral Sunscreen Stick (SPF 50)	96.5 ppb	2,728.5 ppb
Blue Lizard Kids Mineral Sunscreen Stick (SPF 50)	221.3 ppb	1,021.5 ppb
Coppertone Kids Tear Free Sunscreen Lotion (SPF 50)	12.59 ppb	264.1 ppb
Coppertone Pure & Simple Baby Sunscreen Lotion (SPF 50)	360.7 ppb	986.2 ppb
Coppertone Pure & Simple Kids Sunscreen Lotion (SPF 50)	429.7 ppb	1,350.9 ppb
Thinkbaby Baby Mineral Sunscreen Lotion (SPF 50)	613.9 ppb	658.2 ppb
Thinkbaby Baby Sunscreen for Sensitive Skin (SPF 50)	656.5 ppb	1,364.7 ppb
Thinkbaby Baby Sunscreen for Sensitive Skin (SPF 50) <sup>18</sup>	133.7 ppb	869.3 ppb

80. Testing conducted by lead-poisoning prevention and consumer goods safety advocate Lead Safe Mama, LLC (“LSM”) in May 2025 also confirmed the presence of heavy metals in popular sunscreen products, including certain Sunscreen Products.<sup>19</sup>

81. In June 2025, LSM published its testing results that showed five of the Sunscreen Products, contained extremely high levels of cadmium and lead.<sup>20</sup>

<sup>18</sup> This testing represents results from product purchased by Plaintiff Wolf.

<sup>19</sup> See Exhibit 1 (Lead Safe Mama Chart), *supra*.

<sup>20</sup> See *id.*; see also Lab Results from Purity Laboratories for Sunscreen Products tested by Lead Safe Mama, attached hereto as Exhibit 2.

Product (Testing by LSM)	Cadmium	Lead
Sun Bum Baby Bum Mineral Sunscreen Lotion (SPF 50)	232.4 ppb	495.1 ppb
Blue Lizard Sensitive Mineral Sunscreen Lotion (SPF 50)	266.7 ppb	666.3 ppb
Coppertone Pure & Simple Baby Sunscreen Lotion (SPF 50)	356.10 ppb	1,017.5 ppb
ThinkBaby Clear Zinc 20% Sunscreen Lotion (SPF 30)	645 ppb	1,235.4 ppb
ThinkBaby Zinc Oxide Sunscreen Lotion (SPF 50)	575.5 ppb	1,251.1 ppb

82. The levels of lead, in particular, are significantly high and far exceed the action level set by the U.S. Environmental Protection Agency (“EPA”) of 15 parts per billion (“ppb”) for public water that requires actions and treatment technique requirements.<sup>21</sup>

83. Regardless of level, though, as stated herein, no level of heavy metals is safe.<sup>22</sup>

84. Moreover, the inclusion or real risk of high levels of cadmium and lead contradict and impede the central function of the Sunscreen Products. The Sunscreen Products

<sup>21</sup> Forensic Analytical Consulting Services, *Guide to PPB and “Safe” Lead Levels in Water: Understanding the Standards*, Mar. 20, 2024 (last updated Mar. 20, 2026), <https://facs.com/blog/guide-to-ppb-and-safe-lead-levels-in-water-understanding-the-standards/#:~:text=There%20is%20no%20safe%20level%20of%20lead.,include%20replacement%20of%20lead%20plumbing> (last accessed April 29, 2026).

<sup>22</sup> Closer to Zero Public Meeting Transcript at 32, 72, 179; *FDA Webinar: Action Levels for Lead in Food Intended for Babies and Young Children: Draft Guidance*, at 5 (March 2, 2023), <https://www.fda.gov/media/166188/download> (last accessed April 29, 2026); Kevin Loria, *Congressional Report Finds More Problems With Heavy Metals in Baby Food*, Consumer Reports (Sept. 29, 2021, updated Oct. 20, 2021), <https://www.consumerreports.org/food-safety/problems-with-heavy-metals-in-baby-food-congressional-report-a6400080224/#:~:text=%E2%80%9CThere%20is%20no%20safe%20level,research%20and%20testing%20at%20CR> (last accessed April 29, 2026).

1 are intended to provide sun protection. Cadmium and lead provide no such protection and  
2 instead pose health risks to infants and children

3 85. Based on the Misrepresentations, partial misrepresentations, and Omissions,  
4 and other deceptive conduct, reasonable consumers, including Plaintiffs, would not expect  
5 heavy metals, including cadmium and lead, to be present in the Sunscreen Products.

6 86. Further, reasonable consumers would not be able to detect the presence of  
7 heavy metals in the Sunscreen Products without conducting their own scientific tests or  
8 reviewing scientific testing.

9 87. Accordingly, reasonable consumers must and do rely on Amazon to honestly  
10 report what the Sunscreen Products it sells contain.

11 88. Plaintiffs relied on the Products' point-of-sale webpages, Misrepresentations,  
12 partial misrepresentations, and Omissions by Amazon when making their purchasing  
13 decisions.

14 **IV. Amazon Has Actively Concealed the Truth About the Sunscreen Products from**  
15 **Consumers**

16 89. Amazon actively and knowingly concealed from and failed to disclose to  
17 consumers, including Plaintiffs and the Class, that the Sunscreen Products it sells to consumers  
18 contain or materially risk containing heavy metals, including cadmium and lead.

19 90. Amazon actively and knowingly concealed and failed to disclose material facts  
20 to Plaintiffs and other consumers about the negative health effects of the Sunscreen Products  
21 it sells.

22 91. Information regarding the presence of heavy metals in the Sunscreen Products  
23 is in the exclusive possession of Amazon and not readily available to consumers. Amazon  
24

1 chose to not disclose such information to consumers and thus actively concealed the presence  
2 of heavy metals in the Sunscreen Products.

3 92. Amazon knowingly and actively concealed the material facts from consumers  
4 because it knew consumers cared about the Sunscreen Products' quality, ingredients,  
5 standards, and suitability for use, and if consumers were to learn the truth about Amazon's  
6 claims, it would negatively affect Amazon's finances.

7 93. Amazon knew or should have known of the negative health effects caused by  
8 exposure to heavy metals, yet knowingly and actively concealed the presence or material risk  
9 of heavy metals in the Sunscreen Products.

10 94. The knowing and active concealment of these material facts render the point-  
11 of-sale webpages for the Sunscreen Products' deceptive, misleading, and unfair because  
12 without full disclosure, reasonable consumers, including Plaintiffs and the Class, believe the  
13 Sunscreen Products to be of a certain quality and suitable for use when they are not.

14 95. Plaintiffs and the Class Members made purchases they would not have made  
15 or paid a premium price for the Sunscreen Products had they known the truth based on  
16 Amazon's active concealment, Omissions, Misrepresentations, and partial representations  
17 regarding the presence or material risk of heavy metals in the Sunscreen Products.

18 96. Amazon charged, and Plaintiffs purchased Sunscreen Products, paying a  
19 premium price, despite the availability of comparable, lesser-priced sunscreen products sold  
20 by other retailers with no detectable levels of heavy metals:

Sunscreen Products	Price/ Ounce	Competitor Sunscreen Product	Price/ Ounce
Thinkbaby Baby Mineral Sunscreen Lotion (SPF 50)	\$3.50	Up & Up Kids' Sunscreen Spray Lotion (SPF 50)	\$0.82
Sun Bum Baby Bum Sunscreen Lotion (SPF 50)	\$3.66	Up & Up Kids' Sunscreen Lotion (SPF 50)	\$0.62
Sun Bum Baby Bum Sunscreen Spray (SPF 50)	\$3.84	Up & Up Kids' Sunscreen Spray (SPF 50)	\$0.91
Thinkbaby Baby Sunscreen for Sensitive Skin (SPF 50)	\$5.16	Coppertone Water Babies Sunscreen Lotion (SPF 50)	\$1.11
Sun Bum Baby Bum Mineral Roll-On Sunscreen (SPF 50)	\$5.50	Coppertone Kids Sunscreen Spray (SPF 50)	\$1.36
Blue Lizard Baby Mineral Sunscreen Stick (SPF 50)	\$17.48		
Blue Lizard Kids Mineral Sunscreen Stick (SPF 50)	\$17.54		
Sun Bum Baby Bum Mineral Sunscreen Stick (SPF 50)	\$28.87		

97. The facts concealed, omitted, or not disclosed by Amazon were material such that reasonable consumers, including Plaintiffs and the Class, would have considered them when deciding whether to purchase the Sunscreen Products. Had Plaintiffs known the truth, she would not have purchased the Sunscreen Products or paid the premium price.

**V. Due to the Presence and Material Risk of Heavy Metals, the Misrepresentations, Partial Misrepresentations, and Omissions Make Amazon's Point-of-Sale Webpages Materially Misleading**

98. Testing conducted by Plaintiffs and LSM show the Sunscreen Products contain detectable levels of both cadmium and lead.

Product (Testing by Plaintiffs)	Cadmium	Lead
365 by Whole Foods Market Sport Mineral Sunscreen Lotion (SPF 30)	78.5 ppb	1,705.3 ppb

Product (Testing by Plaintiffs)	Cadmium	Lead
Sun Bum Baby Bum Mineral Sunscreen Lotion (SPF 50)	177.7 ppb	548 ppb
Sun Bum Baby Bum Mineral Sunscreen Lotion (SPF 50) <sup>23</sup>	24.7 ppb	409.8 ppb
Sun Bum Baby Bum Mineral Roll-On Sunscreen (SPF 50) <sup>24</sup>	117.1 ppb	982.7 ppb
Banana Boat Simply Protect Baby Sunscreen Lotion (SPF 50)	10.78 ppb	455.92 ppb
Banana Boat Simply Protect Kids Sunscreen Lotion (SPF 50)	97 ppb	323.9 ppb
Blue Lizard Baby Mineral Sunscreen Stick (SPF 50)	96.5 ppb	2,728.5 ppb
Blue Lizard Kids Mineral Sunscreen Stick (SPF 50)	221.3 ppb	1,021.5 ppb
Coppertone Kids Tear Free Sunscreen Lotion (SPF 50)	12.59 ppb	264.1 ppb
Coppertone Pure & Simple Baby Sunscreen Lotion (SPF 50)	360.7 ppb	986.2 ppb
Coppertone Pure & Simple Kids Sunscreen Lotion (SPF 50)	429.7 ppb	1,350.9 ppb
Thinkbaby Baby Mineral Sunscreen Lotion (SPF 50)	613.9 ppb	658.2 ppb
Thinkbaby Baby Sunscreen for Sensitive Skin (SPF 50)	656.5 ppb	1,364.7 ppb
Thinkbaby Baby Sunscreen for Sensitive Skin (SPF 50) <sup>25</sup>	133.7 ppb	869.3 ppb

<sup>23</sup> This testing represents results from product purchased by Plaintiff Wolf.

<sup>24</sup> This testing represents results from product purchased by Plaintiff Correia.

<sup>25</sup> This testing represents results from product purchased by Plaintiff Wolf.

Product (Testing by LSM)	Cadmium	Lead
Sun Bum Baby Bum Mineral Sunscreen Lotion (SPF 50)	232.4 ppb	495.1 ppb
Blue Lizard Sensitive Mineral Sunscreen Lotion (SPF 50)	266.7 ppb	666.3 ppb
Coppertone Pure & Simple Baby Sunscreen Lotion (SPF 50)	356.10 ppb	1,017.5 ppb
ThinkBaby Clear Zinc 20% Sunscreen Lotion (SPF 30)	645 ppb	1,235.4 ppb
ThinkBaby Zinc Oxide Sunscreen Lotion (SPF 50)	575.5 ppb	1,251.1 ppb

99. Government agencies and other experts acknowledge and agree there are no known safe levels of heavy metals:

- Conrad Choiniere, Director of the Office of Analytics and Outreach in the U.S. Food and Drug Administration’s (“FDA”) Center for Food Safety and Applied Nutrition: “However overall exposure adds up because many of the foods we eat contain these contaminants in small amounts. This is not to say that we should not be concerned. On the contrary, for the contaminants we are discussing today, we have not identified safe levels of exposure for developmental outcomes.”<sup>26</sup>
- Dr. Aparna Bole, pediatrician speaking on behalf of the American Academy of Pediatrics (“AAP”): “There is no known safe level of exposure to these metals for children. Exposure to toxic elements has a disproportionate effect on infants and toddlers because their brains are rapidly developing, especially during their first 1,000 days.”<sup>27</sup>

<sup>26</sup> Closer to Zero Public Meeting Transcript at 32.

<sup>27</sup> *Id.* at 179.

- Dr. Karagas, Professor and Chair of the Department of Epidemiology at the Geisel School of Medicine at Dartmouth College: “Arsenic, cadmium, mercury and lead, shown here, circled in these red circles, they do not have any known physiologic essential function in the body and there is no known safe level to our knowledge.”<sup>28</sup>

100. Heavy metals are neurotoxins, or poisons, which affect the nervous system.<sup>29</sup>

101. With respect to children, exposure to these heavy metals “diminish[es] quality of life, reduce[s] academic achievement, and disturb[s] behavior, with profound consequences for the welfare and productivity of entire societies.”<sup>30</sup> Heavy metals can harm the “developing brain and nervous system” and cause negative impacts such as “the permanent loss of intellectual capacity and behavioral problems like attention-deficit hyperactivity disorder (‘ADHD’).”<sup>31</sup> Even in trace amounts, heavy metals can alter the developing brain and erode a child’s intelligence quotient (“IQ”).<sup>32</sup>

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<sup>28</sup> *Id.* at 72.

<sup>29</sup> *See, e.g.*, U.S. House of Representatives, Committee on Oversight and Reform, Subcommittee on Economic and Consumer Policy, *Staff Report: Baby Foods Are Tainted with Dangerous Levels of Arsenic, Lead, Cadmium, and Mercury*, at 2, Feb. 4, 2021, <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/2021-02-04%20ECP%20Baby%20Food%20Staff%20Report.pdf> (last accessed April 29, 2026) (hereinafter “Congressional Committee Report”) (“The Food and Drug Administration and the World Health Organization have declared them [heavy metals] dangerous to human health, particularly to babies and children, who are most vulnerable to their neurotoxic effects. Even low levels of exposure can cause serious and often irreversible damage to brain development.”).

<sup>30</sup> Healthy Babies Bright Futures, *What’s in My Baby’s Food?*, at 13, Oct. 2019, [https://hbbf.org/sites/default/files/2022-12/BabyFoodReport\\_ENGLISH\\_R6\\_0.pdf](https://hbbf.org/sites/default/files/2022-12/BabyFoodReport_ENGLISH_R6_0.pdf) (last accessed April 30, 2026) (hereinafter “HBBF Report”).

<sup>31</sup> *Id.* at 6.

<sup>32</sup> *See* Congressional Committee Report, *supra*, at 2.

1 102. Due to their smaller physical size and still-developing brain and organs, babies  
2 and toddlers are particularly susceptible to the toxic effects of heavy metals because “[t]hey  
3 also absorb more of the heavy metals that get into their bodies than adults do.”<sup>33</sup>

4 103. Of additional concern to developing children are the health risks related to  
5 simultaneous exposure to multiple heavy metals as “co-exposures can have interactive adverse  
6 effects.”<sup>34</sup> Heavy metals disturb the body’s metabolism and cause “significant changes in  
7 various biological processes such as cell adhesion, intra- and inter-cellular signaling, protein  
8 folding, maturation, apoptosis, ionic transportation, enzyme regulation, and release of  
9 neurotransmitters.”<sup>35</sup>

10 104. According to Victor Villarreal, Ph.D., Assistant Professor in the Department of  
11 Educational Psychology at the University of Texas at San Antonio who has studied the effects  
12 of heavy metals on childhood development, “[t]he effects of early exposure to heavy metals  
13 can have long-lasting impacts that may be impossible to reverse.”<sup>36</sup>

14 105. Research continues to confirm that exposures to heavy metals cause “troubling  
15 risks for babies, including cancer and lifelong deficits in intelligence[.]”<sup>37</sup>

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17 <sup>33</sup> Jesse Hirsch, *Heavy Metals in Baby Food: What You Need to Know*, CONSUMER REPORTS,  
18 (Aug. 16, 2018, updated June 27, 2023, [https://www.consumerreports.org/food-safety/heavy-  
metals-in-baby-food/](https://www.consumerreports.org/food-safety/heavy-metals-in-baby-food/) (last accessed April 29, 2026) (internal citation omitted) (hereinafter  
19 “Consumer Reports: Heavy Metals in Baby Food”).

20 <sup>34</sup> Rachel Morello-Frosch, et al., *Environmental Chemicals in an Urban Population of  
Pregnant Women and Their Newborns from San Francisco*, ENVIRONMENTAL SCIENCE &  
TECHNOLOGY, Oct. 26, 2016, <https://pmc.ncbi.nlm.nih.gov/articles/PMC6681912/> (last  
21 accessed April 29, 2026).

22 <sup>35</sup> Monisha Jaishankar, et al., *Toxicity, Mechanism and Health Effects of Some Heavy Metals*  
at 62, INTERDISCIPLINARY TOXICOLOGY, Nov. 14, 2014, [https://reference-  
global.com/article/10.2478/intox-2014-0009?tab=preview](https://reference-global.com/article/10.2478/intox-2014-0009?tab=preview) (last accessed April 29, 2026).

23 <sup>36</sup> Consumer Reports: Heavy Metals in Baby Food, *supra*.

24 <sup>37</sup> HBBF Report, *supra*, at 1.

1 106. As Dr. James E. Rogers, the director of food safety research and testing at  
2 Consumer Reports, has said “[t]here is no safe level of heavy metals, so the goal should be to  
3 have no measurable levels of any heavy metal in baby and toddler foods.”<sup>38</sup>

4 107. The FDA and the World Health Organization (“WHO”) have declared heavy  
5 metals “dangerous to human health, particularly to babies and children, who are most  
6 vulnerable to their neurotoxic effects.”<sup>39</sup>

7 108. The health effects associated with exposure to heavy metals are not limited to  
8 infants and young children. Exposure to heavy metals, even in small amounts, can lead to life-  
9 long effects. Heavy metals can remain in the human body for years and as a result, can  
10 accumulate in the body, such as in the kidneys and other internal organs, increasing their risk  
11 to a person over time.<sup>40</sup>

12 109. Because heavy metals can bioaccumulate in the body, even regular exposure to  
13 small amounts can increase the material risk of various health issues, including bladder, lung,  
14 and skin cancer; cognitive and reproductive problems; and type 2 diabetes.<sup>41</sup>

15 110. Exposure to heavy metals has also been shown to have long-lasting effects on  
16 cardiovascular toxicity, hypertension, arrhythmia, atherosclerosis,<sup>42</sup> as well as gastrointestinal  
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19 <sup>38</sup> Congressional Report Finds More Problems with Heavy Metals in Baby Food, *supra*  
(emphasis added).

20 <sup>39</sup> Congressional Committee Report, *supra*, at 2.

21 <sup>40</sup> *See id.*

22 <sup>41</sup> *See id.*

23 <sup>42</sup> Pan Ziwei, Gong Tingyu, and Ping Liang, *Heavy Metal Exposure and Cardiovascular*  
24 *Disease*, CIRCULATION RESEARCH, Apr. 26, 2024,  
<https://www.ahajournals.org/doi/epub/10.1161/CIRCRESAHA.123.323617> (last accessed  
April 29, 2026).

1 and kidney dysfunction, nervous system disorders, skin lesions, vascular damage, immune  
2 system dysfunction, birth defects, and cancer.<sup>43</sup>

### 3 **A. Children are Especially Vulnerable to Exposure to Heavy Metals**

4 111. Infants and children can be exposed to heavy metals through a variety of  
5 pathways, including through hand-to-mouth behavior and dermal absorption.

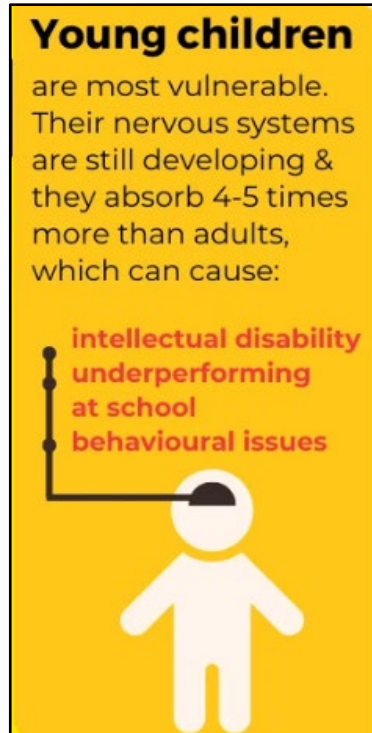
6 112. Children are especially vulnerable to the negative health effects associated with  
7 exposure to heavy metals like lead.<sup>44</sup> The EPA has stated that vulnerability is because  
8 children’s “growing bodies absorb more lead than adults do and their brains and nervous  
9 systems are more sensitive to the effects of lead.”<sup>45</sup> The Centers for Disease Control and  
10 Prevention (“CDC”) has also stated that “Children have a higher intake of lead per unit of  
11 body weight than adults.... Children absorb more lead via the gastrointestinal tract than adults.  
12 Lead can cross the blood-brain barrier. As children’s central nervous systems are still  
13 developing, they are particularly vulnerable to neurotoxic effects of lead.”<sup>46</sup>

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15 <sup>43</sup> Mahdi Balali-Mood, et al., *Toxic Mechanisms of Five Heavy Metals: Mercury, Lead, Chromium, Cadmium, and Arsenic*, FRONTIERS IN PHARMACOLOGY, Apr. 12, 2021, <https://www.frontiersin.org/journals/pharmacology/articles/10.3389/fphar.2021.643972/full> (last accessed April 29, 2026).

17 <sup>44</sup> Mayo Clinic, *Lead Poisoning*, Dec. 24, 2025, <https://www.mayoclinic.org/diseases-conditions/lead-poisoning/symptoms-causes/syc-20354717> (last accessed April 21, 2026) (“Children younger than age 6 are especially vulnerable to lead poisoning, which can severely affect how a child’s body grows and brain develops.”).

19 <sup>45</sup> U.S. Environmental Protection Agency, *Learn About Lead*, April 24, 2026, <https://www.epa.gov/lead/learn-about-lead> (last accessed April 29, 2026).

21 <sup>46</sup> World Health Organization, *Preventing Disease Through Health Environments: Exposure to Lead: A Major Public Concern*, at 5, 4th Ed., <https://iris.who.int/server/api/core/bitstreams/48b6e05d-1d82-4ccd-adc6-a0bbea71b456/content> (last accessed April 21, 2026); see also CDC, *Lead Exposure Symptoms and Complications*, April 10, 2024, <https://www.cdc.gov/lead-prevention/symptoms-complications/index.html> (last accessed April 21, 2026); World Health Organization, *Lead Poisoning*, Sept. 27, 2024, <https://www.who.int/news-room/fact-sheets/detail/lead-poisoning-and-health> (last accessed April 21, 2026) (“Young children are particularly vulnerable to lead



113. Like children’s hands or other objects like toys or soil that are contaminated with lead dust, after sunscreen (that contains heavy metals such as lead and cadmium) is applied, children can be exposed to heavy metals after they put their hands or skin in their mouths.

114. The AAP has stated that “children [can] unintentionally ingest [lead] through normal hand-to-mouth behavior.<sup>47</sup> Similarly, the WHO has recognized that “children’s innate

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poisoning as they may absorb up to 4-5 times as much lead as adults from an ingested dose.”); World Health Organization, *Lead Poisoning*, [https://www.who.int/health-topics/lead-poisoning#tab=tab\\_2](https://www.who.int/health-topics/lead-poisoning#tab=tab_2) (last accessed April 21, 2026) (“Young children are particularly vulnerable because they have higher exposures than adults and because lead affects the developing brain, potentially resulting in reduced intellectual ability.”); WHO, *FACT: Lead is toxic*, <https://cdn.who.int/media/images/default-source/headquarters/campaigns/international-lead-poisoning-prevention-week-of-action/2025/lead-exposure-lppw2025-4.png> (last accessed April 21, 2026).

<sup>47</sup> American Academy of Pediatrics, *Lead Exposure in Children*, May 12, 2025, <https://www.aap.org/en/patient-care/lead-exposure/lead-exposure-in-children/> (last accessed April 29, 2026).

1 curiosity and their age-appropriate and frequent hand-to-mouth and object-to-mouth behaviors  
2 increase their risk of exposure to lead-contaminated dust, soil and paint.”<sup>48</sup> As the CDC stated,  
3 “[c]hildren younger than 6 years are more likely to be exposed due to their hand-to-mouth  
4 behavior.”<sup>49</sup>

5 115. “Dermal absorption happens when a chemical goes through the skin and  
6 travels into the body.”<sup>50</sup> “Cosmetics don’t just stay on our skin. Our bodies’ skin not only  
7 absorbs some of the harmful chemicals that are applied to it, but we can also inhale the  
8 chemicals or wind up ingesting them from products like lipstick.”<sup>51</sup>

9 116. “Scientific evidence from multiple research approaches confirms that  
10 chemicals from personal care products are readily absorbed through the skin and can be  
11 detected throughout the body.”<sup>52</sup>

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13 <sup>48</sup> World Health Organization, *Lead Poisoning*, Sept. 27, 2024, <https://www.who.int/news-room/fact-sheets/detail/lead-poisoning-and-health> (last accessed April 29, 2026); World Health Organization, *Preventing Disease Through Health Environments: Exposure to Lead: A Major Public Concern*, at 5, 4th Ed., <https://iris.who.int/server/api/core/bitstreams/48b6e05d-1d82-4ccd-adc6-a0bbea71b456/content> (last accessed April 29, 2026) (“Contaminated dust and soil are important sources of lead exposure for infants due to their high levels of hand-to-mouth and object-to-mouth behaviors.”).

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17 <sup>49</sup> CDC, *About Childhood Lead Poisoning Prevention*, Aug. 21, 2025, <https://www.cdc.gov/lead-prevention/about/index.html> (last accessed April 29, 2026); *see also* CDC, *Risk Factors and Children*, Aug. 21, 2025, <https://www.cdc.gov/lead-prevention/risk-factors/children.html> (last accessed April 29, 2026) (“Young children may also put their hands or other objects with lead dust, into their mouths.”).

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20 <sup>50</sup> CDC, *Skin Exposures and Effects*, Mar. 4, 2026, <https://www.cdc.gov/niosh/skin-exposure/about/index.html#:~:text=Dermal%20Absorption,of%20reported%20occupational%20skin%20disease> (last accessed April 29, 2026).

21  
22 <sup>51</sup> Toxic-Free Future, *Implementation of the Toxic-Free Cosmetics Act*, <https://toxicfreefuture.org/washington-state/implementation-of-the-toxic-free-cosmetics-act/> (last accessed April 29, 2026).

23  
24 <sup>52</sup> Breast Cancer Prevention Partners, *BCPP Overview: How Do We Know Cosmetics Are Absorbed Into the Body?*, Jan. 15, 2026, <https://www.bcpp.org/how-do-we-know-cosmetics-are-absorbed-into-the-body/> (last accessed April 29, 2026).

1 117. Infants are particularly susceptible to dermal exposure to heavy metals because  
2 “[i]nfant skin is thinner and more absorbent than adult skin, and babies lack the detoxification  
3 capacity of older children or adults . . . . even small amounts of contamination can become  
4 clinically meaningful when exposure is repeated day after day . . . . Repeated dermal exposure  
5 to toxicants during this window is not benign, even when individual exposures seem small . .  
6 . . . . When applied frequently to permeable infant skin during rapid brain development, even  
7 low-level contamination becomes meaningful.”<sup>53</sup>

8 118. While sunscreen products are considered over the counter drugs, not cosmetics,  
9 their routes of application (e.g., rubbed into or sprayed onto skin) are similar to cosmetics,  
10 which can cause negative health effects. For example, the New York City Health Department  
11 recently warned consumers about the danger of using skin lightening cream that contains  
12 elevated levels of mercury.<sup>54</sup> “Mercury in skin products can harm the user. Household  
13 members who are not using the products themselves can also be exposed by breathing in  
14 mercury vapors emitted by the products and by coming into contact with bed linens, towels or  
15 other clothing contaminated by the products.”<sup>55</sup> Similarly, certain religious cosmetics and  
16 powders that contain lead “can enter your body if you put your hands in your mouth after  
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18 <sup>53</sup> Perro, Michelle, *What Parents Can Do About Diaper Creams After Disturbing Heavy-Metal*  
19 *Test Results*, Jan. 19, 2026, [https://michelleperromd337477.substack.com/p/what-parents-can-](https://michelleperromd337477.substack.com/p/what-parents-can-do-about-diaper)  
20 [do-about-diaper](https://michelleperromd337477.substack.com/p/what-parents-can-do-about-diaper) (last accessed April 29, 2026); *see also* Children’s Health Defense, Canada  
21 Chapter, *Heavy Metals and Infant Exposure: What Parents Need to Know About Diaper*  
22 *Creams and Baby Formula*, Jan. 23, 2026, [https://childrenshealthdefense.ca/news/heavy-](https://childrenshealthdefense.ca/news/heavy-metals-and-infant-exposure-what-parents-need-to-know-about-diaper-creams-and-baby-formula/)  
23 [metals-and-infant-exposure-what-parents-need-to-know-about-diaper-creams-and-baby-](https://childrenshealthdefense.ca/news/heavy-metals-and-infant-exposure-what-parents-need-to-know-about-diaper-creams-and-baby-formula/)  
24 [formula/](https://childrenshealthdefense.ca/news/heavy-metals-and-infant-exposure-what-parents-need-to-know-about-diaper-creams-and-baby-formula/) (last accessed April 29, 2026).

<sup>54</sup> NYC Health, *New York City Health Department Warns New Yorkers About Skin Lightening*  
22 *Products That Contain Dangerous Amounts of Mercury*, Mar. 18, 2025,  
23 [https://www.nyc.gov/site/doh/about/press/pr2025/health-department-warns-new-yorkers-](https://www.nyc.gov/site/doh/about/press/pr2025/health-department-warns-new-yorkers-about-skin-lightening-products.page)  
24 [about-skin-lightening-products.page](https://www.nyc.gov/site/doh/about/press/pr2025/health-department-warns-new-yorkers-about-skin-lightening-products.page) (last accessed April 29, 2026).

<sup>55</sup> *Id.*

1 handling these products. Children are at an increased risk because they often put their hands  
2 in their mouths.”<sup>56</sup>

3 119. Heavy metals can “absorb through the skin and enter into the blood due to the  
4 long-term exposure.”<sup>57</sup> Further, heavy metals can accumulate in the outermost layer of the  
5 skin and “may penetrate through the skin appendages or through trans-cellular and intracellular  
6 pathways and reach blood circulatory system of human body.”<sup>58</sup> Dermal absorption of heavy  
7 metals, including cadmium and lead, can lead to bioaccumulation and toxicity.<sup>59</sup>

8 120. “Exposure to contaminants in consumer products can occur from direct or  
9 indirect contact[, including] from applying cosmetics or other personal care products to the  
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14 <sup>56</sup> LeadFreeNYC, *Cosmetics & Religious Powders*,  
<https://www.nyc.gov/content/leadfree/pages/cosmetics-religious-powders> (last accessed April  
15 29, 2026).

16 <sup>57</sup> Akhtar, Asma, et al., *Human Exposure to Toxic Elements Through Facial Cosmetic*  
*Products: Dermal Risk Assessment*, REGULATORY TOXICOLOGY AND PHARMACOLOGY, June  
17 2022, <https://www.sciencedirect.com/science/article/abs/pii/S0273230022000320> (last  
18 accessed April 29, 2026); see also Abed, M. S., et al., *Heavy Metals in Cosmetics and Tattoos:*  
*A Review of Historical Background, Health Impact, and Regulatory Limits*, JOURNAL OF  
19 HAZARDOUS MATERIALS ADVANCES, Feb. 2024,  
20 <https://doi.org/10.1016/j.hazadv.2023.100390> (last accessed April 29, 2026); CDC, *Skin*  
*Exposures and Effects* (Mar. 4, 2026) [https://www.cdc.gov/niosh/skin-](https://www.cdc.gov/niosh/skin-exposure/about/index.html#:~:text=Dermal%20Absorption,of%20reported%20occupational%20skin%20disease)  
21 [exposure/about/index.html#:~:text=Dermal%20Absorption,of%20reported%20occupational](https://www.cdc.gov/niosh/skin-exposure/about/index.html#:~:text=Dermal%20Absorption,of%20reported%20occupational%20skin%20disease)  
22 [%20skin%20disease](https://www.cdc.gov/niosh/skin-exposure/about/index.html#:~:text=Dermal%20Absorption,of%20reported%20occupational%20skin%20disease) (last accessed April 29, 2026) (“Chemicals can enter the body through  
the skin and injure individual organs or groups or organs.”).

23 <sup>58</sup> Arshad, H., et al., *Evaluation of Heavy Metals in Cosmetic Products and Their Health Risk*  
*Assessment*, SAUDI PHARMACEUTICAL JOURNAL, May 29, 2020,  
24 <https://doi.org/10.1016/j.jsps.2020.05.006> (last accessed April 29, 2026).

<sup>59</sup> Witkowska, D., et al., *Heavy Metals and Human Health: Possible Exposure Pathways and*  
*the Competition for Protein Binding Sites*, MOLECULES, Oct. 7, 2021,  
<https://doi.org/10.3390/molecules26196060> (last accessed April 29, 2026).

1 skin, or unintentional direct contact could occur from contact with laundry detergent or surface  
2 cleaner while in use.”<sup>60</sup>

3 121. In 2023, Washington passed the Toxic-Free Cosmetics Act (“TFCA”). Wash.  
4 Rev. Code Chapter 70A.560. The TFCA “prevents the sale and distribution of cosmetic  
5 products containing certain chemicals [including lead] that are linked to harmful impacts.”<sup>61</sup>  
6 Cosmetic products include makeup, perfume, shampoo, hair gel, body wash, deodorant, hand  
7 lotion, and shaving cream.<sup>62</sup>

8 122. Washington enacted the TFCA because:

9 (1) The legislature finds that certain chemicals used in cosmetic  
10 products are linked to harmful impacts on health, such as cancer,  
11 birth defects, damage to the reproductive system, organ system  
12 toxicity, and endocrine disruption. Many of these chemicals have  
13 been identified by the state of Washington as high priority  
14 chemicals of concern.

15 (2) In order to ensure the safety of cosmetic products and protect  
16 Washington residents from toxic exposures, the legislature intends  
17 to prohibit use of toxic chemicals found in cosmetic and personal  
18 care products and join other jurisdictions in creating a safer global  
19 standard for cosmetic products and bringing more sustainable,  
20 safer ingredients to the marketplace.<sup>63</sup>

21 <sup>60</sup> United States Environmental Protection Agency, *Exposure Assessment Tools by Routes –*  
22 *Dermal*, Aug. 21, 2025, <https://www.epa.gov/expobox/exposure-assessment-tools-routes-dermal>  
23 (last accessed Apr. 29, 2026).

24 <sup>61</sup> Washington Department of Ecology, *Toxic-Free Cosmetics Act Guide: Restrictions for*  
*Cosmetic Industry & Sellers*, at 4, Apr. 2024,  
[https://web.archive.org/web/20250314195216/https://apps.ecology.wa.gov/publications/docu-  
ments/2404019.pdf](https://web.archive.org/web/20250314195216/https://apps.ecology.wa.gov/publications/documents/2404019.pdf) (last accessed April 30, 2026).

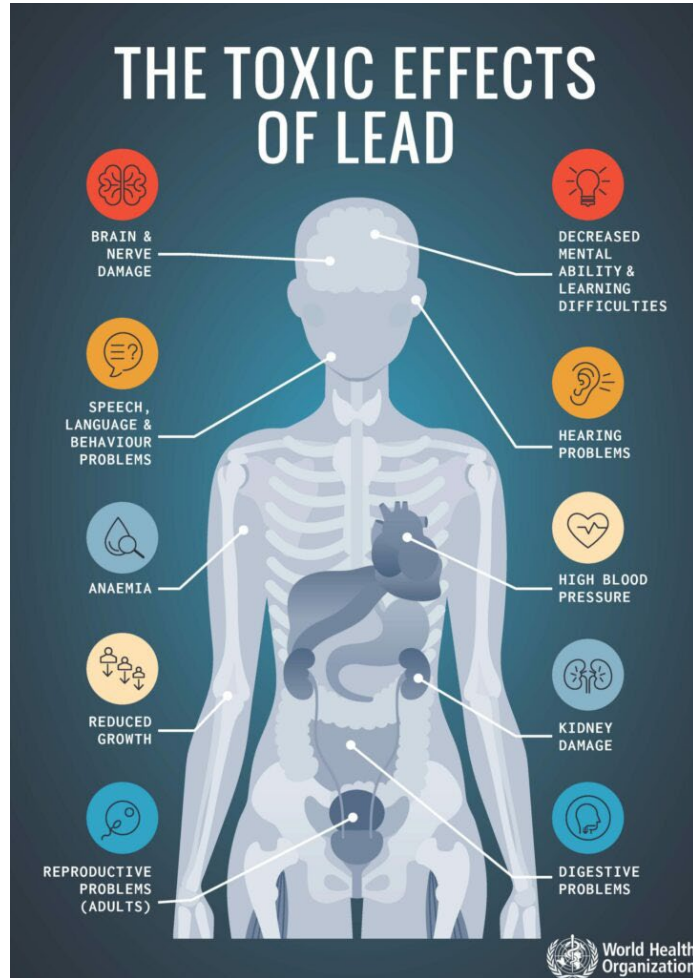
<sup>62</sup> *Id.* at 6.

<sup>63</sup> Wash. Rev. Code Chapter 70A.560.005, *Cosmetic Products – Toxic Chemicals: Finding -*  
*Intent*, <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.560.005> (last accessed April 29,  
2026); *see also* Toxic-Free Future, *Implementation of the Toxic-Free Cosmetics Act*,  
<https://toxicfreefuture.org/washington-state/implementation-of-the-toxic-free-cosmetics-act/>  
(last accessed April 29, 2026) (“chemicals linked to cancer and developmental and  
reproductive harm are put into cosmetic products and personal care products.”).



1 notable given that paint is not a product intended to be put directly into the body or  
2 bloodstream.

3 127. Exposure to lead can cause cancer, neuropathy and brain damage, hypertension,  
4 decreased renal function, increased blood pressure, and gastrointestinal and cardiovascular  
5 effects. It can also cause reduced fetal growth or lower birth weights.<sup>68</sup>



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21 128. The EPA has found that “[l]ead can harm almost every organ and system in  
22 your body . . . . Lead is especially dangerous to children six years old and younger. Their

23 <sup>68</sup> Geneva Environment Network, *Environmental and Health Impacts of Lead*, Oct. 17, 2024,  
24 <https://www.genevaenvironmentnetwork.org/resources/updates/lead-poisoning-prevention/>  
(last accessed April 29, 2026).

1 growing bodies absorb more lead than adults, and their brains and nervous systems are more  
2 sensitive to the effects of lead.”<sup>69</sup>

3 129. “Babies and children may have higher exposure because they often put their  
4 hands, toys and other objects, which can have lead dust or soil on them, into their mouths. In  
5 children, exposure to lead can cause: anemia, damage to the brain and nervous system,  
6 decreased ability to pay attention, hearing and speech problems, hyperactivity, learning and  
7 behavior problems, lower IQ, slowed growth and developmental effects, and  
8 underperformance in school.”<sup>70</sup>

9 130. Lead can also be transmitted from pregnant women to their babies during  
10 pregnancy because “[l]ead can accumulate in our bodies over time... During pregnancy, lead  
11 is released from the mother’s bones... and can pass from the mother exposing the fetus or the  
12 breastfeeding infant to lead.”<sup>71</sup> This can result in “miscarriage, stillbirth, premature birth, and  
13 low birth weight infants.”<sup>72</sup>

14 131. Lead is also harmful to adult health, and exposure to lead in adults is associated  
15 with increased blood pressure, increased risk of hypertension, reduced fetal growth in pregnant  
16 women, damage to reproductive organs, cognitive decline, heart disease, and worsened kidney  
17 function.<sup>73</sup>

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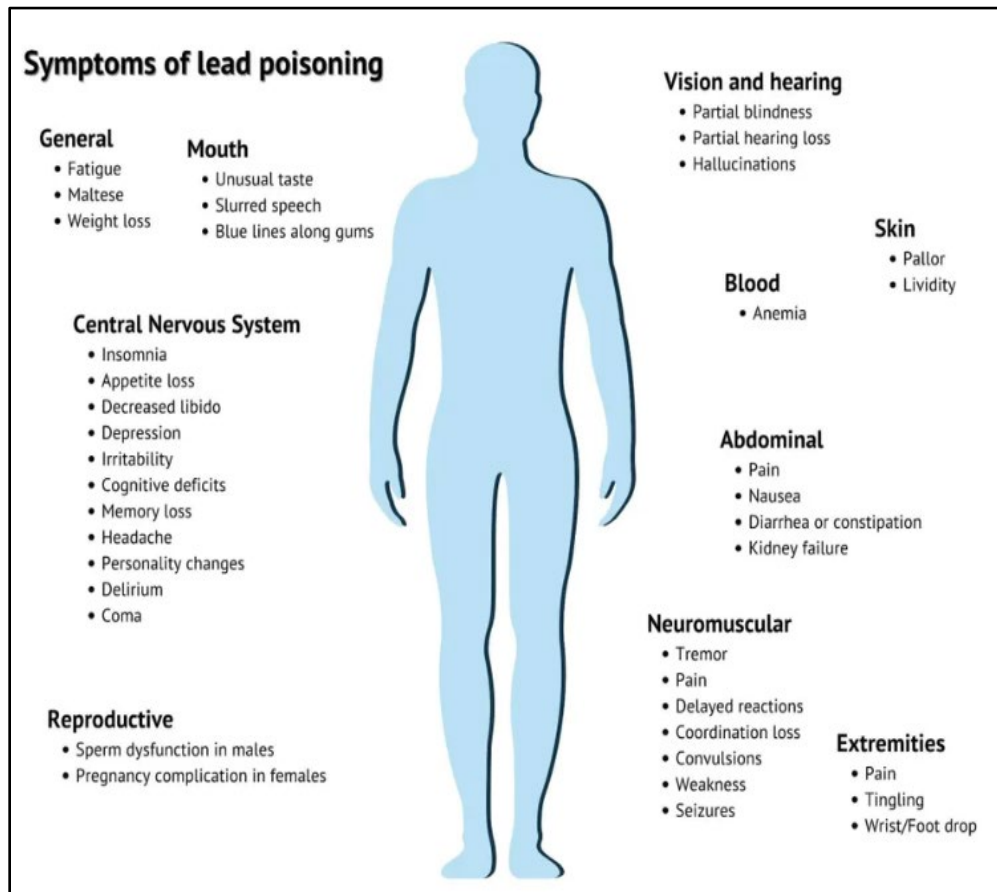
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19 <sup>69</sup> EPA, *Learn About Lead*, Apr. 24, 2026, <https://www.epa.gov/lead/learn-about-lead> (last  
accessed April 29, 2026).

20 <sup>70</sup> *Id.*

21 <sup>71</sup> EPA, *Learn About Lead*, [https://19january2021snapshot.epa.gov/lead/learn-about-  
lead\\_.html](https://19january2021snapshot.epa.gov/lead/learn-about-lead_.html) (last accessed April 29, 2026).

22 <sup>72</sup> T. Bhasin, et al., *Unveiling the Health Ramifications of Lead Poisoning: A Narrative Review*,  
CUREUS, Oct. 9, 2023, <https://pmc.ncbi.nlm.nih.gov/articles/PMC10631288/> (last accessed  
23 April 29, 2026).

24 <sup>73</sup> U.S. Department of Health and Human Services, National Toxicology Program, *National  
Toxicology Program Monograph: Health Effects of Low-Level Lead*, June 2012,



132. Because exposure to lead builds up in the human body over time, it can disrupt neurological, skeletal, reproductive, hematopoietic, renal, and cardiovascular systems.<sup>74</sup>

[https://ntp.niehs.nih.gov/sites/default/files/ntp/ohat/lead/final/monographhealtheffects/lowlevellead\\_newissn\\_508.pdf](https://ntp.niehs.nih.gov/sites/default/files/ntp/ohat/lead/final/monographhealtheffects/lowlevellead_newissn_508.pdf) (last accessed April 29, 2026); A. Spivey, *The Weight of Lead: Effects Add Up in Adults*, ENVIRONMENTAL HEALTH PERSPECTIVES, Jan. 2007, <https://pmc.ncbi.nlm.nih.gov/articles/PMC1797860/> (last accessed April 29, 2026); *Lead vs. Lead-Free Solder: Which is Better for PCB Manufacturing?* WEVOLVER, Jan. 31, 2023, <https://www.wevolver.com/article/lead-free-solder-vs-lead-solder> (last accessed April 29, 2026).

<sup>74</sup> Collin, M. Samuel, et al., *Bioaccumulation of Lead (Pb) and Its Effects on Human: A Review*, JOURNAL OF HAZARDOUS MATERIAL ADVANCES, Aug. 2022, <https://www.sciencedirect.com/science/article/pii/S277241662200050X> (last accessed April 29, 2026).

1 133. Even “[r]epeated low-level exposure [to lead] over a prolonged period” can  
2 result in clinical symptoms including “[p]ersistent vomiting, encephalopathy, lethargy,  
3 delirium and coma[.]”<sup>75</sup>

4 134. Despite Defendant’s Misrepresentations, partial misrepresentations,  
5 Omissions, and point-of-sale webpages that communicate the Sunscreen Products are properly  
6 and safely manufactured and do not contain or risk containing high levels of heavy metals,  
7 laboratory tests show Defendant sold Sunscreen Products containing undisclosed lead levels  
8 as high as 2,728.58 ppb in a product meant for infants and 1,350.9 ppb in a product intended  
9 for children.

### 10 C. Negative Health Effects of Cadmium

11 135. Cadmium is linked to neurotoxicity, cancer, and kidney, bone, and heart  
12 damage. Scientists have reported a “tripling of risk for learning disabilities and special  
13 education among children with higher cadmium exposures, at levels common among U.S.  
14 children[.]”<sup>76</sup>

15 136. Cadmium, like lead, “displays a troubling ability to cause harm at low levels of  
16 exposure.”<sup>77</sup> The U.S. Department of Health and Human Services has determined that  
17 cadmium and cadmium compounds are known human carcinogens, and the EPA has likewise  
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21 <sup>75</sup> Taanvi Bhasin, et al., *Unveiling the Health Ramifications of Lead Poisoning: A Narrative*  
22 *Review*, CUREUS, Oct. 9, 2023, <https://www.cureus.com/articles/184381-unveiling-the-health-ramifications-of-lead-poisoning-a-narrative-review#!/> (last accessed April 29, 2026).

23 <sup>76</sup> HBBF Report, *supra*, at 14.

24 <sup>77</sup> *Id.*

1 determined that cadmium is a probable human carcinogen.<sup>78</sup> Compounding such concerns is  
2 the fact that cadmium has a prolonged half-life as it “sequester[s] in [human] tissue.”<sup>79</sup>

3 137. The EPA has set a maximum contaminant level for cadmium in drinking water  
4 of 5 ppb (*see* 40 C.F.R. §141.62); the FDA has set a maximum level in bottled water to 5 ppb;  
5 and the WHO set a maximum cadmium level in drinking water to 3 ppb.<sup>80</sup>

6 138. Despite Amazon’s Misrepresentations, partial misrepresentations, Omissions,  
7 and point-of-sale webpages that communicates the Sunscreen Products are properly and safely  
8 manufactured and do not contain or risk containing detectable levels of heavy metals,  
9 laboratory tests show Amazon sold Sunscreen Products containing undisclosed cadmium  
10 levels as high as 1,235.4 ppb in a product meant for infants, and 429.7 ppb in a product  
11 intended for children.

## 12 **VI. Sunscreen Products Sold by Amazon Can Be Manufactured Without Heavy** 13 **Metals**

14 139. It is possible to manufacture sunscreen products with non-detectable levels of  
15 heavy metals, including cadmium and lead.

16 140. In fact, testing by LSM found that Unseen Sunscreen, a sunscreen product  
17 manufactured by Supergoop! had non-detectable levels of cadmium or lead.<sup>81</sup>

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20 <sup>78</sup> *See* CDC, Agency for Toxic Substances and Disease Registry, *Public Health Statement for*  
21 *Cadmium*, <https://www.cdc.gov/TSP/PHS/PHS.aspx?phsid=46&toxid=15> (last accessed  
22 April 29, 2026).

23 <sup>79</sup> Genuis S.J., et al., *Toxic Element Contamination of Natural Health Products and*  
24 *Pharmaceutical Preparations*, PLOS ONE, Nov. 2012,  
<https://doi.org/10.1371/journal.pone.0049676> (last accessed April 30, 2026).

<sup>80</sup> *See* Congressional Committee Report, *supra*, at 29.

<sup>81</sup> *See* Ex. 1.

1 141. Testing by Plaintiffs has identified additional sunscreen products, including  
2 products manufactured by LaRoche-Posay, Coppertone, Equate, and Up & Up, with non-  
3 detectable levels of any heavy metals, including cadmium or lead.

4 **VII. The Material Omissions Mislead and Deceive Reasonable Consumers**

5 142. Amazon does not disclose anywhere on the Product Detail Pages for the  
6 Sunscreen Products (or anywhere else) that the Sunscreen Products contain heavy metals.  
7 Those point-of-sale webpages list the ingredients of the Sunscreen Products but omit any  
8 mention of heavy metals, including cadmium or lead.

9 143. The presence of heavy metals in the Sunscreen Products is material to  
10 consumers.

11 144. Amazon's Omissions wrongfully cause reasonable consumers to believe that  
12 Amazon's Sunscreen Products do not contain heavy metals, when in fact the Sunscreen  
13 Products do contain heavy metals, including cadmium and/or lead.

14 145. Information regarding the presence of heavy metals in the Sunscreen Products  
15 is in the exclusive possession of Amazon and not readily available to consumers. Amazon  
16 chose to not disclose such information to consumers and thus actively concealed the presence  
17 of heavy metals in the Sunscreen Products.

18 146. Reasonable consumers must and do rely on Amazon to honestly report what  
19 Sunscreen Products it sells contain.

20 147. Because of Amazon's failure to disclose the presence of heavy metals on the  
21 Sunscreen Products' point-of-sale webpages, no reasonable consumer would expect, suspect,  
22 or understand that the Sunscreen Products contain heavy metals.

1 148. Amazon had a duty to ensure the Sunscreen Products were not deceptively,  
2 misleadingly, unfairly, and falsely marketed and that all material information was properly and  
3 fully disclosed.

4 149. The Omissions are material and reasonably likely to deceive reasonable  
5 consumers, such as Plaintiffs, in their purchasing decisions.

6 150. The Omissions were intended to and did, in fact, cause consumers like Plaintiffs  
7 and the other Class Members, to purchase products they would not have purchased if Amazon  
8 had disclosed that the products contained heavy metals, or for which they would not have paid  
9 a premium price, or any price at all.

10 151. As a result of the Omissions, Amazon generated substantial sales and profited  
11 from Plaintiffs' lack of information about the presence of heavy metals in the Sunscreen  
12 Products.

13 152. Plaintiffs and other reasonable consumers would not have purchased the  
14 Sunscreen Products or would have paid less for them but for the Misrepresentations, partial  
15 misrepresentations, Omissions, concealment, and other deceptive conduct.

16 153. The Sunscreen Products' point-of-sale webpages misled and deceived  
17 reasonable consumers because Amazon omitted that the Sunscreen Products contained or had  
18 a material risk of containing heavy metals, while representing the Sunscreen Products' sun  
19 protection benefits.

20 154. Based on Amazon's Misrepresentations, partial misrepresentations, and  
21 Omissions, and the overall impression given by the point-of-sale webpages, no reasonable  
22 consumer could expect or understand the Sunscreen Products contained or had a material risk  
23 of containing heavy metals such as cadmium and lead.

1 155. Amazon’s point-of-sale webpages for the Sunscreen Products contradict the  
 2 presence of heavy metals such as cadmium and lead; such communications include, for  
 3 example, (collectively, the “Misrepresentations”):<sup>82</sup>

4 a. 365 by Whole Foods Market Sport Mineral Sunscreen (SPF 30);

- 5 • “Formulated without Octinoxate, Homosalate, Oxybenzone, or PABA”
- 6 • “Non-Nano Minerals”
- 7 • “Made without: Parabens or Phthalates”
- 8 • “free from common harmful chemicals”
- 9 • “Made with vegetarian ingredients”
- 10 • “No octinoxate, homosalate, oxynbenzone, or PABA”
- 11 • “Made without parabens or phthalates”
- 12 • “our standards go beyond typical ‘clean beauty’ claims”
- 13 • “We ban 240+ ingredients commonly used in beauty and body products,  
 including parabens, phthalates, formaldehyde donors, oxybenzone,  
 PFAS and EDTA.”
- 14 • “Our experts review the latest research on beauty and body care  
 ingredients for many factors including possible impacts on the  
 environment and human health.”

15 b. Sun Bum Baby Bum Mineral Sunscreen (SPF 50);

- 16 • “gentle, plant-based skin care”
- 17 • “For sensitive skin”
- 18 • “Vegan, Cruelty, Gluten and Dye Free to meet the needs of delicate baby  
 skin”
- 19 • “specifically formulated for kids, toddlers, and babies with naturally  
 moisturizing ingredients”
- 20 • “Pediatrician and Dermatologist tested”
- 21 • “made of safe minerals to protect babies’ skin”
- 22 • “Gentle mineral-active protection”
- 23 • “Our Baby Bum collection is super gentle and uses the best ingredients  
 for delicate and sensitive skin.”
- 24 • “Thumbs up for overall safety & sensitivity.”
- “Our Baby Sunscreen formula was designed with sensitive skin in mind  
 and made without using synthetic fragrances, dyes, or parabens.”
- “Trust the Bum... It means trust us... The simple truth is, when you  
 make products to protect the ones you love, you make ‘em better.”

<sup>82</sup> See also Appendix B (excerpts from the Sunscreen Products’ Detail Pages).

1 c. Banana Boat Simply Protect Baby Sunscreen (SPF 50);

- 2
- “Simply Protect”
  - “Made without oxybenzone & parabens”
  - 3 • “Tear free”
  - 4 • “No added Oils & Fragrances”
  - 5 • For “sensitive” skin
  - 6 • “is mild enough for even the most delicate skin”
  - 7 • “Strong, broad spectrum sun protection without Oxybenzone, parabens  
or added oils and fragrances.”
  - 8 • “It is [sic] mild, tear free formula allows you to protect your baby  
without the tears!”
  - “Banana Boat baby goes on quickly and easily so your time in the sun  
with baby can be worry-free.”

9 d. Banana Boat Simply Protect Kids Sunscreen (SPF 50);

- 10
- “Simply Protect”
  - “Made without oxybenzone & parabens”
  - 11 • “Tear free”
  - 12 • “No added Oils & Fragrances”
  - 13 • For “sensitive” skin
  - 14 • “Worry-free sun protection”
  - 15 • “Our broad spectrum, water-resistant sunscreen protects your children  
from harmful UVA and UVB rays, so you can have a worry-free day of  
fun in the sun.”
  - 16 • “Strong, broad spectrum sun protection made without oxybenzone,  
parabens or added oils and fragrances.”
  - 17 • “Our mild, tear free formula allows you to protect your kids without the  
tears!”
  - “Recommended by the skin cancer foundation”
  - “worry-free sun protection”

18 e. Blue Lizard Baby Mineral Sunscreen (SPF 50);

- 19
- “Trusted by pediatricians”
  - 20 • “Protect sensitive skin”
  - 21 • “contains no harsh chemical active ingredients that might irritate  
sensitive skin”
  - 22 • “Formulated for baby’s delicate skin”
  - “vegan, paraben-free, fragrance-free formula”
  - “formulated without Oxybenzone or Octinoxate”
  - 23 • “Free from harsh chemical active sunscreen ingredients, fragrances,  
parabens, phthalates”
- 24

- “free from potentially harsh chemical sunscreen active ingredients that might irritate sensitive skin”
- “Pediatricians trust Blue Lizard Australian Sunscreen, so you can have peace of mind that your baby’s skin is protected from the sun.”
- “Designed especially for baby”
- “Our mission: to help safeguard lifelong healthy skin”
- “Our singular purpose is to help everyone safely enjoy time in the sun.”
- “We care deeply about our customers, the quality of our products, and our impact on the planet.”
- “All Blue Lizard products are free from fragrances, parabens, phthalates, and chemical active ingredients”
- “Blue Lizard mineral sunscreens are trusted by dermatologists and pediatricians to help keep your skin healthy and safe”

f. Blue Lizard Kids Mineral Sunscreen (SPF 50);

- “Trusted by pediatricians”
- “for Kids’ Sensitive Skin”
- “Protect sensitive skin”
- “contains no harsh chemical active ingredients that might irritate sensitive skin”
- “Developed for kids’ sensitive skin”
- “This specially-designed formula is also paraben-free and fragrance-free”
- “formulated without Oxybenzone or Octinoxate”
- “Free from harsh chemical active sunscreen ingredients, fragrances, parabens, phthalates”
- “Non-Comedogenic formula, Suitable for face and body!”
- “Protect little faces”
- “Made with skin-nourishing botanicals, this formula helps nourish your little one’s skin.”
- “free from potentially harsh chemical sunscreen active ingredients that might irritate sensitive skin”
- “Pediatricians trust Blue Lizard Australian Sunscreen, so you can have peace of mind that your child’s skin is protected from the sun.”
- “Powerful but gentle”
- “Trusted by pediatricians”
- “Blue Lizard mineral sunscreens are trusted by dermatologists and pediatricians to help keep your skin healthy and safe”
- “Our mission: to help safeguard lifelong healthy skin”
- “Our singular purpose is to help everyone safely enjoy time in the sun.”
- “All Blue Lizard products are free from fragrances, parabens, phthalates, and chemical active ingredients”

1 g. Coppertone Pure & Simple Baby Sunscreen (SPF 50);

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- “Pure & Simple”
  - “Hypoallergenic & Tear free”
  - “Suitable for sensitive skin”
  - “Free of Oxybenzone, Octinoxate, PABA, Parabens, Dyes, Fragrance”
  - “#1 Pediatrician Recommended Sunscreen Brand”
  - “Pure & Simple means 100% mineral sun protection”
  - “free of oxybenzone, octinoxate, PABA, parabens, dyes, fragrance”
  - “Pediatrician Recommended”
  - “Dermatologically Tested”
  - “This Coppertone sunscreen is dermatologically tested and contains no dyes or PABA”
  - “Kid-Specific”
  - “Free of oxybenzone, PABA & dyes”
  - “Each sunscreen Coppertone created follows a tradition of trusted, quality sun protection products”
  - “Mild and durable formula specifically designed for kids”
  - “dermatologist tested for your kids gentle skin”
  - “Gentle on skin”
  - “trusted SPF”

12

13 h. Coppertone Pure & Simple Kids Sunscreen (SPF 50);

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- 15
- 16
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- 20
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- “Pure & Simple”
  - “Hypoallergenic & Tear Free”
  - “Suitable for sensitive skin”
  - “Free of Oxybenzone, Octinoxate, PABA, Parabens, Dyes, Fragrance”
  - “#1 Pediatrician Recommended Sunscreen Brand”
  - “Pure & Simple means 100% mineral sun protection”
  - “free of oxybenzone, octinoxate, PABA, parabens, dyes, fragrance”
  - “hypoallergenic and gentle”
  - “Gentle protection”
  - “mild and gentle”
  - “contains 100% naturally sourced zinc oxide”
  - “Free of: Tear free sunscreen baby lotion is formulated without fragrance, oxybenzone, octinoxate, PABA, parabens, dyes and phthalates”
  - “Baby-safe”
  - “gentle on the skin”
  - “Each sunscreen Coppertone created follows a tradition of trusted, quality sun protection products”
  - “voted the most trusted sunscreen brand”
  - “Hypoallergenic & tear free formula with nourishing botanicals”

- “Free of oxybenzone, octinoxate, PABA, parabens, dyes & fragrance”
- “Keep it simple with 100% mineral sun protection”
- “For baby’s delicate skin”
- “#1 most trusted suncare brand”
- “Scientific research results, high quality standards and strict product tests are the basis for the wide range of sun protection products.”

i. Coppertone Kids Tear Free Sunscreen (SPF 50);

- “Tear Free”
- “Free of Oxybenzone, Dyes & PABA”
- “#1 pediatrician recommended sunscreen brand”
- “a gentle tear-free formula”
- “hypoallergenic and gentle on skin”
- “Gentle protection”
- “mild and gentle”
- “made with 100% naturally sourced zinc oxide”
- “Formulated without: Tear free sunscreen lotion for kids is formulated without fragrance, oxybenzone, octinoxate, PABA, parabens, dyes and phthalates”
- “Free of oxybenzone, octinoxate, PABA, parabens, dyes & fragrance”
- “Voted the most trusted sunscreen brand”
- “each sunscreen Coppertone creates follows a tradition of trusted, quality sun protection products”
- “#1 most trusted suncare brand”
- “gentle for kid’s sensitive skin”
- “For kid’s sensitive skin”
- “Keep it simple with 100% mineral sun protection”

j. Thinkbaby Baby Mineral Sunscreen (SPF 50); and

- “Free of harmful chemicals”
- “Dermatologist recommended”
- “Non-nano zinc oxide particles”
- “EWG verified”
- “Safe, Natural”
- “suitable for daily use on infants’ sensitive skin”
- “offering gentle defense against the sun’s rays”
- “Clean mineral formula”
- “The first baby mineral sunscreen to pass Whole Foods Premium Care requirements, Leaping Bunny certified sun creams contain no PABA, parabens, phthalates, BPA, oxybenzone, avobenzone, petroleum, gluten, dairy, or toxic chemicals”
- “gentle and reef-safe ingredient based clean sunscreen”

- “made to be effective for delicate and sensitive skin”
- “safe, natural”
- “100% agree our formula is gentle on baby’s skin”
- “dermatologist recommended”
- “free of harmful chemicals”
- “EWG rated”
- “perfect for extra sensitive little ones!”
- “trusted for little ones and beyond”

k. Thinkbaby Baby Sunscreen for Sensitive Skin (SPF 50).

- “dermatologist tested”
- “sensitive skin”
- “free of harmful chemicals”
- “non-nano zinc oxide particles”
- “natural”
- “for sensitive skin”
- “calming protection”
- “formulated without fragrance or harmful ingredients”
- “infused with soothing chamomile & moisturizing shea butter to help calm and nourish extra sensitive skin”
- “Dermatologist recommended as a safe and effective choice for sensitive skin”
- “CLEAN MINERAL FORMULA: Suitable for sensitive skin”
- “This children and toddler sunscreen has no BPA, vegan, never tested on animals, [and is] reef-friendly”
- “gentle”
- “clean sunscreen”
- “made to be effective for delicate and sensitive skin”
- “perfect for extra sensitive little ones!”
- “gentle on skin”
- “free of harmful chemicals”
- “dermatologist recommended”
- “Fragrance free for sensitive skin”
- “trusted for little ones and beyond”

156. The Misrepresentations and Omissions misleadingly convey to consumers that the Sunscreen Products are of a high quality and have certain characteristics they do not actually possess.

1 157. Amazon misleadingly causes consumers to believe the Sunscreen Products it  
2 sells do not contain (or have a material risk of containing) heavy metals, including cadmium  
3 and lead, due to the material Omissions, Misrepresentations and partial misrepresentations,  
4 when in fact the Sunscreen Products do contain (or have a material risk of containing) both  
5 cadmium and lead.

6 158. Whether the Sunscreen Products contain heavy metals is material information  
7 to reasonable consumers, including Plaintiffs.

8 159. Amazon wrongfully failed to disclose to reasonable consumers material  
9 information regarding the presence of (or material risk of) heavy metals in the Sunscreen  
10 Products.

11 160. Due to the point-of-sale webpages, Misrepresentations, partial  
12 misrepresentations, and Omissions, reasonable consumers, like Plaintiffs, would not suspect  
13 the presence of heavy metals in the Sunscreen Products.

14 161. Unlike Amazon, reasonable consumers are not able to independently detect the  
15 presence of heavy metals in the Sunscreen Products and are generally without the means to  
16 conduct their own scientific tests on the Sunscreen Products.

17 162. Moreover, information regarding the presence of heavy metals in the Sunscreen  
18 Products is in the exclusive possession of Amazon and not available to consumers. Amazon  
19 chose to not disclose such information to consumers and thus actively concealed the presence  
20 and risk of heavy metals in the Sunscreen Products.

21 163. Reasonable consumers must and do rely on Amazon to honestly report what  
22 Sunscreen Products sold through its platform contain.

1 164. Based on the failure to disclose the presence (or material risk) of heavy metals  
2 on the Sunscreen Products' point-of-sale webpages, no reasonable consumer would expect,  
3 suspect, or understand that the Sunscreen Products contained or had a material risk of  
4 containing heavy metals.

5 165. In light of Amazon's statements regarding the quality of the Sunscreen  
6 Products, Amazon knew or should have known the Sunscreen Products contained or had a  
7 material risk of containing heavy metals.

8 166. Amazon had a duty to ensure the Sunscreen Products it sold were not  
9 deceptively, misleadingly, unfairly, and falsely marketed and that all material information was  
10 properly and fully disclosed.

11 167. Amazon acted negligently, recklessly, unfairly, and/or intentionally with its  
12 deceptive point-of-sale webpages based on the material Misrepresentations, partial  
13 misrepresentations, and Omissions.

14 168. The Misrepresentations, partial misrepresentations, and Omissions on  
15 Amazon's point-of-sale webpages are material and reasonably likely to deceive reasonable  
16 consumers, such as Plaintiffs, in their purchasing decisions.

17 169. The Misrepresentations, partial misrepresentations, and Omissions, make the  
18 Sunscreen Products' point-of-sale webpages deceptive based on the presence or risk of  
19 significant levels heavy metals in the Sunscreen Products. Reasonable consumers, like  
20 Plaintiffs, would consider the presence or risk of heavy metals in the Sunscreen Products a  
21 material fact when considering which sunscreen products to purchase.

1 170. Amazon knew, yet failed to disclose, that the Sunscreen Products or the  
2 ingredients used in the Sunscreen Products were not sufficiently or adequately monitored or  
3 tested for heavy metals.

4 171. The Misrepresentations, partial misrepresentations, and Omissions, were  
5 misleading due to Amazon's failure to ensure the Sunscreen Products were sufficiently or  
6 adequately monitored or tested for heavy metals and to disclose the presence (or material risk)  
7 of heavy metals in the Sunscreen Products.

8 172. Amazon knew or should have known that the Sunscreen Products contained or  
9 may contain levels of heavy metals that were not disclosed on the point-of-sale webpages.

10 173. Amazon knew or should have known that reasonable consumers, including  
11 Plaintiffs, expected Amazon to ensure the Sunscreen Products it sold were sufficiently  
12 monitored and tested for heavy metals and to disclose the presence or risk of heavy metals in  
13 the Sunscreen Products.

14 174. Further, Amazon knew or should have known that reasonable consumers paid  
15 higher prices, or paid any price at all, for the Sunscreen Products and expected the Sunscreen  
16 Products sold by Amazon were sufficiently tested and monitored for the presence of heavy  
17 metals.

18 175. The Misrepresentations, partial misrepresentations, and Omissions are material  
19 and render the Sunscreen Products' point-of-sale webpages deceptive because without full  
20 disclosure, reasonable consumers, such as Plaintiffs, believe the Sunscreen Products do not  
21 contain or have a material risk of containing heavy metals.

22 176. The Misrepresentations, partial misrepresentations, and Omissions on  
23 Amazon's point-of-sale webpages were intended to and did, in fact, cause consumers like  
24

1 Plaintiffs and the other Class Members to purchase products they would not have if the true  
 2 quality and ingredients were disclosed or for which they would not have paid a premium price,  
 3 or any price at all.

4 177. Defendant charged, and Plaintiffs and the Class Members paid, a premium price  
 5 for the Sunscreen Products, despite the availability of comparable, lesser-priced sunscreen  
 6 products sold by other retailers with no detectable levels of heavy metals:

Sunscreen Products	Price/ Ounce	Competitor Sunscreen Product	Price/ Ounce
Thinkbaby Baby Mineral Sunscreen Lotion (SPF 50)	\$3.50	Up & Up Kids' Sunscreen Spray Lotion (SPF 50)	\$0.82
Sun Bum Baby Bum Sunscreen Lotion (SPF 50)	\$3.66	Up & Up Kids' Sunscreen Lotion (SPF 50)	\$0.62
Sun Bum Baby Bum Sunscreen Spray (SPF 50)	\$3.84	Up & Up Kids' Sunscreen Spray (SPF 50)	\$0.91
Thinkbaby Baby Sunscreen for Sensitive Skin (SPF 50)	\$5.16	Coppertone Water Babies Sunscreen Lotion (SPF 50)	\$1.11
Sun Bum Baby Bum Mineral Roll-On Sunscreen (SPF 50)	\$5.50	Coppertone Kids Sunscreen Spray (SPF 50)	\$1.36
Blue Lizard Baby Mineral Sunscreen Stick (SPF 50)	\$17.48		
Blue Lizard Kids Mineral Sunscreen Stick (SPF 50)	\$17.54		
Sun Bum Baby Bum Mineral Sunscreen Stick (SPF 50)	\$28.87		

18  
 19 178. As a result of Amazon's deceptive, unfair, and misleading Misrepresentations,  
 20 partial misrepresentations, and Omissions, Amazon was able to generate substantial sales,  
 21 which allowed it to reap enormous profits from Plaintiffs and similarly situated consumers  
 22 who paid the purchase price or premium for the Sunscreen Products that were not as  
 23 advertised.

1 179. Plaintiffs and other reasonable consumers would not have purchased the  
2 Sunscreen Products or would have paid less for them but for the misrepresentations and partial  
3 misrepresentations, including the Misrepresentations and Omissions.

4 **CLASS ALLEGATIONS**

5 180. Plaintiffs bring this action individually and on behalf of the following Class  
6 pursuant to Fed. R. Civ. P. 23(a), (b)(2) and (3), and (c)(4):

7 **Nationwide Class:** All persons who, from the beginning of the  
8 applicable statute of limitations period to the present, purchased  
9 the Sunscreen Products from Amazon in the United States for  
10 household use, and not for resale (the “Class”).

11 181. Excluded from the Class are Defendant, any of Defendant’s parent companies,  
12 subsidiaries, and/or affiliates, officers, directors, legal representatives, employees, or co-  
13 conspirators, all governmental entities, and any judge, justice, or judicial officer presiding over  
14 this matter.

15 182. This action is brought and may be properly maintained as a class action. There  
16 is a well-defined community of interests in this litigation, and the Class Members are easily  
17 ascertainable.

18 183. **Numerosity:** The Class Members are so numerous that individual joinder of all  
19 members is impracticable, and the disposition of the claims of the Class Members in a single  
20 action will provide substantial benefits to the parties and Court.

21 184. **Commonality and Predominance:** There are many questions of law and fact  
22 common to the claims of Plaintiffs and the other Class Members, and those questions  
23 predominate over any questions that may affect individual Class Members. Questions of law  
24 and fact common to Plaintiffs and the Class include, but are not limited to, the following:

- 1 a. whether the Misrepresentations and partial misrepresentations and Omissions
- 2 were misleading;
- 3 b. whether the Misrepresentations and partial misrepresentations and Omissions
- 4 were unfair,
- 5 c. whether the Misrepresentations and partial misrepresentations and Omissions
- 6 were material to a reasonable consumer;
- 7 d. whether Amazon had knowledge that the Misrepresentations and partial
- 8 misrepresentations and Omissions were material, false, deceptive, and
- 9 misleading;
- 10 e. whether Amazon owed a duty to disclose;
- 11 f. whether Amazon knew or should have known that the Sunscreen Products
- 12 contained or may contain significant levels of heavy metals, including
- 13 cadmium and/or lead;
- 14 g. whether Amazon failed to disclose that the Sunscreen Products contained or
- 15 may contain detectable levels of heavy metals, including cadmium and/or lead;
- 16 h. whether Amazon had exclusive knowledge of the Omissions;
- 17 i. whether Plaintiffs could have reasonably discovered the Omissions;
- 18 j. whether Amazon violated Washington state law;
- 19 k. whether Amazon engaged in unfair trade practices;
- 20 l. whether Amazon engaged in false advertising;
- 21 m. whether Amazon made fraudulent omissions;
- 22 n. whether Amazon made fraudulent misrepresentations by omissions;
- 23
- 24

- 1 o. whether Plaintiffs and the Class Members are entitled to actual, statutory, and
- 2 punitive damages; and
- 3 p. whether Plaintiffs and the Class Members are entitled to declaratory and
- 4 injunctive relief.

5 185. Defendant engaged in a common course of conduct giving rise to the legal  
6 rights sought to be enforced by Plaintiffs individually and on behalf of all the Class Members.  
7 Identical statutory violations and business practices and harms are involved. Individual  
8 questions, if any, are not prevalent in comparison to the numerous common questions that  
9 dominate this action.

10 186. **Typicality:** Plaintiffs' claims are typical of the claims of the Class Members.  
11 Plaintiffs and the Class Members sustained damages as a result of Defendant's uniform  
12 wrongful conduct during transactions with them.

13 187. **Adequacy:** Plaintiffs will fairly and adequately represent and protect the  
14 interests of the Class and has retained counsel competent and experienced in complex litigation  
15 and class actions. Plaintiffs have no interests antagonistic to those of the Class, and there are  
16 no defenses unique to Plaintiffs. Plaintiffs and their counsel are committed to prosecuting this  
17 action vigorously on behalf of the Class Members and have the financial resources to do so.  
18 Neither Plaintiffs nor their counsel have any interest adverse to those of the Class Members.

19 188. **Risks of Prosecuting Separate Actions:** This case is appropriate for  
20 certification because prosecution of separate actions would risk either inconsistent  
21 adjudications which would establish incompatible standards of conduct for Defendant or  
22 would be dispositive of the interests of members of the Class.



1 192. Washington’s substantive laws may be constitutionally applied to the claims of  
 2 Plaintiffs and the Class under the Due Process Clause, 14<sup>th</sup> Amendment, section 1, and the Full  
 3 Faith and Credit Clause, Article IV, section 1, of the U.S. Constitution. Washington has  
 4 significant contacts and a significant aggregation of contacts with the claims asserted by  
 5 Plaintiffs and all Class Members, creating state interests such that the choice of Washington  
 6 state law is not arbitrary or unfair.

7 193. Amazon’s choice-of-law provision, which is set forth in “Conditions of Use”  
 8 that appear on Amazon’s website, provides:

9 By using any Amazon Service, you agree that applicable federal  
 10 law, and the laws of the state of Washington, without regard to  
 11 principles of conflict of laws, will govern these Conditions of Use  
 and any dispute of any sort that might arise between you and  
 Amazon.<sup>83</sup>

12 194. Amazon is headquartered in Washington, does substantial business in this State,  
 13 and the challenged conduct affects the people of Washington. Amazon’s decision to reside in  
 14 Washington, avail itself of Washington’s laws, and to engage in the challenged conduct, which  
 15 originates from and emanates out of Washington, renders the application of Washington law  
 16 constitutionally permissible.

17 195. The application of Washington laws is also appropriate under Washington’s  
 18 choice of law rules. Washington has significant contacts with the claims of Plaintiffs and the  
 19 Class Members, and Washington has a greater interest in applying its laws here than any other  
 20 interested state.

### 21 CLAIMS FOR RELIEF

22  
 23 <sup>83</sup> *Conditions of Use*, AMAZON, May 30, 2025,  
 24 [https://www.amazon.com/gp/help/customer/display.html?nodeId=GLSBYFE9MGKKQXX](https://www.amazon.com/gp/help/customer/display.html?nodeId=GLSBYFE9MGKKQXXM)  
 M (last accessed April 29, 2026).

**COUNT ONE**

**Violations of the Washington Consumer Protection Act  
(Wash. Rev. Code Ann. §19.86.010, *et seq.*) Against Defendant on Behalf of the Class**

196. Plaintiffs incorporate by reference all preceding allegations as though fully set forth herein.

197. Plaintiffs bring this Count on behalf of all Class Members.

198. The Washington Consumer Protection Act (“Washington CPA”) broadly prohibits “[u]nfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce.” WASH. REV. CODE ANN. § 19.96.010.

199. Amazon’s acts complained of herein are deceptive and unfair within the meaning of the Washington CPA. WASH. REV. CODE ANN. § 19.96.010.

200. Amazon committed the acts complained of herein in the course of “trade” or “commerce” within the meaning of the Washington CPA. WASH. REV. CODE ANN. § 19.96.010.

201. Amazon’s deceptive and unfair practices, as alleged herein, are injurious to the public interest as they have the capacity to injure other persons, including the millions of consumers who shop on Amazon.com.

202. Amazon’s Misrepresentations and partial misrepresentations, Omissions, active concealment, and other deceptive conduct described herein were directed at the consumer public at-large as they repeatedly occurred in the course of Amazon’s business and were capable of deceiving a substantial portion of the consuming public.

203. The facts concealed or not disclosed by Amazon were material facts in that Plaintiffs and the Class, and other reasonable consumers, would have considered them in deciding whether to purchase the Sunscreen Products. Had Plaintiffs and the Class Members known the Sunscreen Products did not have the quality, ingredients, standards, and suitability

1 for use as advertised by Amazon and contained (or had a material risk of containing) heavy  
2 metals, including cadmium and lead, they would not have purchased the Sunscreen Products  
3 or paid a premium price.

4 204. Amazon alone possessed the information that was material to Plaintiffs and the  
5 Class and failed to disclose such material information to consumers.

6 205. Amazon intended for Plaintiffs and the Class Members to rely on its  
7 Misrepresentations and partial misrepresentations, Omissions, active concealment, and other  
8 deceptive conduct regarding the Sunscreen Products' quality, ingredients, standards, and  
9 suitability for use when purchasing the Sunscreen Products, unaware of the undisclosed  
10 material facts.

11 206. Plaintiffs and the Class Members did in fact rely on the material  
12 Misrepresentations, partial misrepresentations, and Omissions and purchased the Sunscreen  
13 Products to their detriment. Given the materiality of the Omissions, Plaintiffs and the Class's  
14 reliance on the misrepresentations, partial misrepresentations, and Omissions were justifiable.

15 207. Plaintiffs and the Class Members purchased the Sunscreen Products that  
16 contain undisclosed levels of heavy metals, including cadmium and lead, despite the  
17 availability of other sunscreen products with non-detectable levels of heavy metals.

18 208. Amazon charged, and Plaintiffs and the Class Members paid, a premium price  
19 for the Sunscreen Products despite the availability of other sunscreen products with non-  
20 detectable levels of heavy metals.

21 209. The Misrepresentations, partial misrepresentations, Omissions, active  
22 concealment, and other deceptive conduct caused Plaintiffs and the Class Members to suffer  
23 injury in the form of actual damages when they purchased the Sunscreen Products that were  
24

1 worth less than the price paid and that they would not have purchased at all had they known  
2 the Sunscreen Products contained (or had a material risk of containing) heavy metals,  
3 including cadmium and lead.

4 210. Plaintiffs and the Class Members have been harmed, and that harm will  
5 continue unless Amazon is enjoined from further omitting the true quality, ingredients,  
6 standards, and suitability for use of the Sunscreen Products.

7 211. As a direct and proximate result of Amazon's conduct, Plaintiffs and the Class  
8 suffered actual damages by: (1) paying a premium price for Sunscreen Products they  
9 reasonably believed did not contain (or have a material risk of containing) heavy metals,  
10 including cadmium and lead; (2) purchasing Sunscreen Products they would not have  
11 purchased without Defendant's Misrepresentations and partial misrepresentations, Omissions,  
12 active concealment, and other deceptive conduct at the prices they paid; and/or (3) receiving  
13 Sunscreen Products that were worthless because they contained (or risked containing heavy  
14 metals), including cadmium and lead.

15 212. Amazon is liable to Plaintiffs and the Class for damages in amounts to be  
16 proven at trial, including attorneys' fees, costs, and treble damages, as well as any other  
17 remedies the Court may deem appropriate under WASH. REV. CODE ANN. § 19.86.090.

18 **COUNT TWO**  
19 **Fraudulent Concealment**  
20 **(Based on Washington Law)**

21 213. Plaintiffs incorporate by reference all preceding allegations as though fully set  
22 forth herein.

23 214. Plaintiffs bring this Count on behalf of all Class Members.

24 215. Amazon, as a seller of products to Plaintiffs and the Class, had a duty to disclose  
to consumers that the Sunscreen Products contained heavy metals

1           216. The facts concealed or not disclosed by Amazon were material facts in that  
2 Plaintiffs and the Class, and other reasonable consumers, would have considered them in  
3 deciding whether to purchase the Sunscreen Products. Had Plaintiffs and the Class Members  
4 known the Sunscreen Products did not have the quality, ingredients, standards, and suitability  
5 for use as advertised by Amazon and contained (or had a material risk of containing) heavy  
6 metals, including cadmium and lead, they would not have purchased the Sunscreen Products  
7 or paid a premium price.

8           217. Amazon alone possessed the information that was material to Plaintiffs and the  
9 Class and failed to disclose such material information to consumers.

10           218. Because identifying the presence of heavy metals requires expensive and  
11 sophisticated laboratory testing, reasonable consumers, such as Plaintiffs, could not learn of  
12 the inclusion of heavy metals in the Sunscreen Products unless Amazon included a proper  
13 disclosure.

14           219. Amazon misrepresented, partially misrepresented, omitted, suppressed, and  
15 concealed material facts regarding the Sunscreen Products, namely the fact that the Sunscreen  
16 Products contained heavy metals, including cadmium and lead.

17           220. As a result of Amazon's Misrepresentations and partial misrepresentations,  
18 with no disclosures as to the presence or risk of significant levels of heavy metals in the  
19 Sunscreen Products on its point-of-sale webpages, Plaintiffs did not expect the Sunscreen  
20 Products to contain heavy metals.

21           221. Amazon intended for Plaintiffs and the Class to rely on its Misrepresentations  
22 and partial misrepresentations, Omissions, active concealment, and other deceptive conduct  
23  
24

1 regarding the Sunscreen Products' quality, ingredients, standards, and suitability for use when  
2 purchasing the Sunscreen Products, unaware of the undisclosed material facts.

3 222. Plaintiffs and the Class Members did in fact rely on the material  
4 Misrepresentations, partial misrepresentations, and Omissions and purchased the Sunscreen  
5 Products to their detriment. Given the materiality of the Omissions, Plaintiffs' and the Class's  
6 reliance on the Misrepresentations, partial misrepresentations, and Omissions were justifiable.

7 223. Plaintiffs and the Class Members purchased the Sunscreen Products that  
8 contain undisclosed levels of heavy metals despite the availability of other sunscreen products  
9 with non-detectable levels of heavy metals.

10 224. Amazon charged, and Plaintiffs and the Class Members paid, a premium price  
11 for the Sunscreen Products despite the availability of other sunscreen products with non-  
12 detectable levels of heavy metals.

13 225. Amazon's Omissions and/or Misrepresentations alleged herein caused  
14 Plaintiffs and the Class Members to make their Sunscreen Product purchases. Plaintiffs were  
15 unaware of these material facts, and had Amazon communicated these material facts to  
16 consumers, Plaintiffs and the Class Members would not have purchased the Sunscreen  
17 Products, or would not have purchased the Sunscreen Products at the prices they paid.  
18 Accordingly, Plaintiffs and the Class Members have suffered injury in fact, including lost  
19 money or property, as a result of Amazon's Misrepresentations, partial misrepresentations,  
20 Omissions, and other deceptive conduct.

21 226. Accordingly, Amazon is liable to Plaintiffs and the Class Members for damages  
22 in an amount to be proven at trial, including but not limited to, benefit-of-the-bargain damages,  
23 restitution and/or diminution of value  
24

1 227. Amazon's acts were done wantonly, maliciously, oppressively, deliberately,  
2 with intent to defraud, and in reckless disregard of Plaintiffs' and other Class Members' rights,  
3 in order to enrich Amazon. Amazon's conduct warrants an assessment of punitive damages in  
4 an amount sufficient to deter such conduct in the future, which amount is to be determined  
5 according to proof.

6 **PRAYER FOR RELIEF**

7 WHEREFORE, Plaintiffs, individually and on behalf of all others similarly situated,  
8 respectfully request that the Court:

- 9 a) Certify the Class, and appoint Plaintiffs and their counsel to represent the Class;  
10 b) An order temporarily and permanently enjoining Amazon from continuing the  
11 unlawful, deceptive, fraudulent, and unfair business practices alleged herein;  
12 c) Costs, restitution, damages, including punitive damages, and disgorgement in an  
13 amount to be determined at trial;  
14 d) An order requiring Amazon to pay both pre- and post-judgment interest on any  
15 amounts awarded;  
16 e) An award of costs and attorneys' fees; and  
17 f) Award such other and further relief as this Court may deem just and proper.

18  
19 **JURY TRIAL DEMANDED**

20 Plaintiffs hereby demand a trial by jury.  
21  
22  
23  
24

1 **Dated:** April 30, 2026

Respectfully submitted,

2 */s/ Brendan W. Donckers*  
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*Counsel for Plaintiffs and the Proposed Class*

**APPENDIX A: Sunscreen Products**

The Sunscreen Products include the spray, lotion, stick, and roll-on versions of the products listed below:<sup>84</sup>

- 365 by Whole Foods Market Sport Mineral Sunscreen (SPF 30)
- Sun Bum Baby Bum Mineral Sunscreen (SPF 50)
- Banana Boat Simply Protect Baby Sunscreen (SPF 50)
- Banana Boat Simply Protect Kids Sunscreen (SPF 50)
- Blue Lizard Baby Mineral Sunscreen (SPF 50)
- Blue Lizard Kids Mineral Sunscreen (SPF 50)
- Coppertone Kids Tear Free Sunscreen (SPF 50)
- Coppertone Pure & Simple Baby Sunscreen (SPF 50)
- Coppertone Pure & Simple Kids Sunscreen (SPF 50)
- Thinkbaby Baby Mineral Sunscreen (SPF 50)
- Thinkbaby Baby Sunscreen for Sensitive Skin (SPF 50)

<b>Product (Testing by Plaintiffs)</b>	<b>Cadmium</b>	<b>Lead</b>
365 by Whole Foods Market Sport Mineral Sunscreen Lotion (SPF 30)	78.5 ppb	1,705.3 ppb
Sun Bum Baby Bum Mineral Sunscreen Lotion (SPF 50)	177.7 ppb	548 ppb
Sun Bum Baby Bum Mineral Sunscreen Lotion (SPF 50) <sup>85</sup>	24.7 ppb	409.8 ppb
Sun Bum Baby Bum Mineral Roll-On Sunscreen (SPF 50) <sup>86</sup>	117.1 ppb	982.7 ppb

<sup>84</sup> Discovery may reveal additional sunscreen products by Amazon that contain cadmium, lead, arsenic, and/or mercury or other heavy metals. Plaintiffs reserve their right to amend and include any such additional products and/or heavy metals in this action.

<sup>85</sup> This testing represents results from product purchased by Plaintiff Wolf.

<sup>86</sup> This testing represents results from product purchased by Plaintiff Correia.

<b>Product (Testing by Plaintiffs)</b>	<b>Cadmium</b>	<b>Lead</b>
Banana Boat Simply Protect Baby Sunscreen Lotion (SPF 50)	10.78 ppb	455.92 ppb
Banana Boat Simply Protect Kids Sunscreen Lotion (SPF 50)	97 ppb	323.9 ppb
Blue Lizard Baby Mineral Sunscreen Stick (SPF 50)	96.5 ppb	2,728.5 ppb
Blue Lizard Kids Mineral Sunscreen Stick (SPF 50)	221.3 ppb	1,021.5 ppb
Coppertone Kids Tear Free Sunscreen Lotion (SPF 50)	12.59 ppb	264.1 ppb
Coppertone Pure & Simple Baby Sunscreen Lotion (SPF 50)	360.7 ppb	986.2 ppb
Coppertone Pure & Simple Kids Sunscreen Lotion (SPF 50)	429.7 ppb	1,350.9 ppb
Thinkbaby Baby Mineral Sunscreen Lotion (SPF 50)	613.9 ppb	658.2 ppb
Thinkbaby Baby Sunscreen for Sensitive Skin (SPF 50)	656.5 ppb	1,364.7 ppb
Thinkbaby Baby Sunscreen for Sensitive Skin (SPF 50) <sup>87</sup>	133.7 ppb	869.3 ppb

<b>Product (Testing by LSM)</b>	<b>Cadmium</b>	<b>Lead</b>
Baby Bum Sunscreen SPF 50	232.4 ppb	495.1 ppb
Blue Lizard SPF 50	266.7 ppb	666.3 ppb
Coppertone Pure & Simple Baby Sunscreen	356.10 ppb	1,017.5 ppb
ThinkBaby Clear Zinc 20% Sunscreen SPF 30	645 ppb	1,235.4 ppb
ThinkBaby Zinc Oxide Sunscreen SPF 50	575.5 ppb	1,251.1 ppb

<sup>87</sup> This testing represents results from product purchased by Plaintiff Wolf.

**APPENDIX B: PRODUCT PAGES**

**365 Whole Foods Sport Mineral Sunscreen SPF 30**



365 by Whole Foods Market, Sport Lotion Mineral Sunscreen, SPF 30, Water Resistant (80 Minutes), 6 Fl Oz

Visit the 365 by Whole Foods Market Store  
4.1 ★★★★★ (263) | Search this page  
500+ bought in past month

\$9.99 (\$1.67 / fluid ounce)

Price history

✓prime Two-Day  
FREE Returns

**Coupon:** Save 25%: Coupon available when you select **Subscribe & Save**. Shop items > | [Terms](#)

**10% off** on any 4 qualifying items Shop items >

Save up to 15% with business pricing. Sign up for a free Amazon Business account

Size: **6 Fl Oz (Pack of 1)**

<b>1.5 Fl Oz (Pack of 1)</b>	<b>6 Fl Oz (Pack of 1)</b>
\$4.38 (\$2.92 / fluid ounce) FREE Delivery Wednesday	\$9.99 (\$1.67 / fluid ounce) FREE Delivery Wednesday

Delivery Pickup

One-time purchase  
\$9.99 (\$1.67 / fluid ounce)

✓prime Two-Day  
FREE delivery **Wednesday, April 15**. Order within 1 hr 8 mins

Deliver to Krista - Minneapolis 55431

In Stock

Quantity: 1

Add to cart

Buy Now

Shipped and sold by Amazon.com  
[FREE 30-day refund/replacement](#)  
Customer service by [Amazon.com](#)

See more

Subscribe & Save

**Top highlights**

<b>Scent</b>	Fresh
<b>Product Benefits</b>	Ultra-Violet Protection
<b>Sun Protection Factor</b>	30 Sun Protection Factor (SPF)
<b>Item Weight</b>	0.38 Pounds
<b>Number of Items</b>	1

**About this item**

- Broad spectrum SPF 30 UVA/UVB protection
- Water resistant for 80 minutes
- Made with vegetarian ingredients
- No octinoxate, homosalate, oxybenzone, or PABA
- Made without parabens or phthalates
- 6 fluid ounce bottle

**Features & Specs**

<b>Scent Name</b>	Fresh
<b>Product Benefits</b>	Ultra-Violet Protection
<b>Sun Protection Factor</b>	30 Sun Protection Factor (SPF)
<b>Skin Type</b>	All
<b>Water Resistance Level</b>	Water Resistant
<b>Item Form</b>	Lotion
<b>Additional Features</b>	Vegetarian ingredients, 80-minute water resistance, free from common harmful chemicals
<b>Skin Tone</b>	All

**Product Description**

We believe what goes on your body is as important as what goes in it. That's why our beauty and body care standards go beyond typical "clean beauty" claims. We ban 240+ ingredients commonly used in beauty and body products, including parabens, phthalates, formaldehyde donors, oxybenzone, PFAS and EDTA. Our experts review the latest research on beauty and body care ingredients for many factors including possible impacts on the environment and human health. Organic claims on our body care products are required to be backed up by third-party certification. Products labeled "organic" are required to contain at least 95% organic ingredients and be certified to the USDA National Organic Standards.

### Baby Bum Mineral Sunscreen SPF 50



Sun Bum Baby Bum Mineral SPF 50 Sunscreen Stick - Hawaii 104 Act Compliant (Without Octinoxate & Oxybenzone) - UVA/UVB Face and Body Protection - Unscented for Sensitive Skin - Travel Size - 0.45 Oz

Visit the Sun Bum Store  
4.6 ★★★★★ (4,946) | Search this page  
4K+ bought in past month

\$12.99 (\$28.87 / ounce)

Price history

prime Today

FREE Returns

Savings \$5 Amazon credit when you spend \$20 Shop items >

Save up to 31% with business pricing. Sign up for a free Amazon Business account

Size: 0.45 Ounce (Pack of 1)

0.45 Ounce (Pack of 1)	0.45 Ounce (Pack of 2)
\$12.99 (\$28.87 / ounce)	\$25.98 (\$28.87 / ounce)
FREE Delivery Today 2 PM - 6 PM	FREE Delivery Overnight 7 AM - 11 AM

Delivery Pickup

One-time purchase \$12.99 (\$28.87 / ounce)

prime Today

FREE delivery Today 2 PM - 6 PM

Or \$4.99 delivery in 3 hours

Shorter shipping distance

Deliver to Krista - Minneapolis 55431

In Stock

Quantity: 1

Add to cart

Buy Now

Shipper / Seller Amazon.com  
Returns FREE 30-day refund/replacement

**Top highlights** ^

<b>Scent</b>	Unscented
<b>Product Benefits</b>	Gentle Mineral-active, Ultra-Violet Protection
<b>Sun Protection Factor</b>	15 Sun Protection Factor (SPF)
<b>Item Weight</b>	0.03 Pounds
<b>Number of Items</b>	1

**About this item**

- **BABY BUM SPF 50 SUNSCREEN FACE STICK.** Our convenient, get-out-the-door faster format is gentle mineral-active based protection. The easy roll-on face stick applies and absorbs quickly to face (and body) with a non-oily feel for UVA/UVB protection. Fit this mini size in your carry-on for your next sunny vacation.
- **GENTLE, PLANT-BASED SKIN CARE.** Our plant-based formula contains zinc oxide, coconut oil, shea butter and cocoa butter to nourish and hydrate all skin types. Vegan, Cruelty, Gluten and Dye Free to meet the needs of delicate baby skin.
- **HOW TO USE.** Chase 'em down and get their face. Swipe across forehead starting at the hairline and work your way down careful not to miss a spot. Apply 15 minutes before sun. Reapply after 80 minutes of swimming, and immediately after a towel dry.
- **FORMULATED FOR OUR RAD LITTLE KIDS.** Specifically formulated for kids, toddlers and babies with naturally moisturizing ingredients. Pediatrician and Dermatologist tested. Paraben, Sulfate, Silicone and Phthalate free.
- **TRUST THE BUM.** What does that mean? It means trust us, the ones who live on the beach and need products that work on the most intense days in the sun. The simple truth is, when you make products to protect the ones you love, you make 'em better.
- Baby Bum SPF 50 Mineral Sunscreen Face Stick is FSA/HSA eligible and meets FDA requirements for sun protection, giving you peace of mind while you protect your skin

**Features & Specs** ^

<b>Scent Name</b>	Unscented
<b>Product Benefits</b>	Gentle Mineral-active, Ultra-Violet Protection
<b>Sun Protection Factor</b>	15 Sun Protection Factor (SPF)
<b>Skin Type</b>	All
<b>Water Resistance Level</b>	Water Resistant
<b>Item Form</b>	Stick
<b>Target Use Body Part</b>	Face
<b>Color</b>	SPF 50
<b>Additional Features</b>	Octinoxate & Oxybenzone Free, Hawaii 104 Act Compliant
<b>Skin Tone</b>	Sensitive skin



**Trust The Bum<sup>®</sup>**

- Vegan**
- Cruelty Free**
- Pediatrician Tested**
- Fragrance Free**
- For Sensitive Skin**
- Gluten Free**
- Made Without Parabens**
- Hawaii Act 104 Compliant**  
Made Without Oxybenzone & Octinoxate

## Product Description

Broad spectrum, lightweight, and non-greasy, our SPF 50 sunscreen face stick is made of safe minerals to protect babies' skin from UVA/UVB rays. Water resistant (80 mins).

## Made for our rad little ones.

We make our products for our own little ones, so every detail matters. Our Baby Bum collection is super gentle and uses the best ingredients for delicate and sensitive skin.



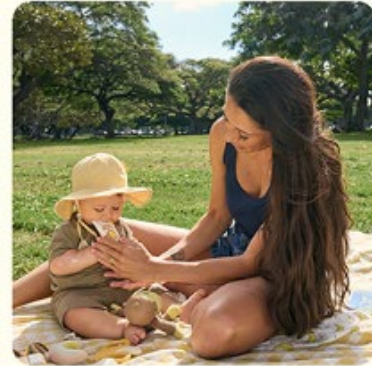
### Pediatrician Tested

Thumbs up for overall safety & sensitivity. Still important to consult with your doctor.



### Fragrance Free

Our Baby Sunscreen formula was designed with sensitive skin in mind and made without using synthetic fragrances, dyes, or parabens.



### Non-Nano Zinc

Non-nano zinc reflects UVA and UVB rays from the surface of our skin.

# Trust The Bum<sup>®</sup>

### What does that mean?

It means trust us, the ones who live on the beach and need products that work on even the most intense days in the sun. The simple truth is, when you make products to protect the ones you love, you make 'em better.

## Banana Boat Simply Protect Baby Sunscreen SPF 50



[Click to see full view](#)



### Banana Boat Suncare Banana Boat Simply Protect Mineral-based Sunscreen Lotion for Baby Spf 50+, 6 Oz

[Visit the Banana Boat Store](#)

4.3 ★★★★★ (295) | [Search this page](#)

Top highlights



Features & Specs



Measurements



[See all product specifications](#)

#### Similar item with fast delivery



Thinkkids SPF 50+ Mineral Sunscreen, 6 Fl Oz – Safe, Natural Baby Mineral Sunscreen for Children - Water Resistant Sun Cream – Broad Spectrum UVA/UVB Sun Protection – Reef Safe

6 Fl Oz (Pack of 1)

★★★★★ (6618)

\$18.89 (\$3.15/fluid ounce)



Banana Boat Suncare Banana Boat Simply Protect Mineral...  
★★★★☆ 295 ratings  
No featured offers available

Sellers on Amazon

sorted by price + delivery: low to high

Filter

New

\$16<sup>03</sup>  
(\$2.67 / fluid ounce)

FREE delivery **Tuesday, April 21.**

[Details](#)  
... [More](#)

Add to Cart

Ships from

Yes Cart Inc

Sold by

Yes Cart Inc

★★★★☆ (869 ratings)

71% positive over last 12 months

Customer service

Yes Cart Inc

New

\$16<sup>68</sup>  
(\$2.78 / fluid ounce)

FREE delivery **April 22 - 23.** [Details](#)

... [More](#)

Add to Cart

Ships from

GO SHOP INC

Sold by

GO SHOP INC

★★★★☆ (511 ratings)

67% positive over last 12 months

Customer service

GO SHOP INC

New

\$23<sup>50</sup>  
(\$3.92 / fluid ounce)

FREE delivery **Tuesday, April 21.**

[Details](#)

Or fastest delivery **April 15 - 16.**

[Details](#)

Add to Cart

Ships from

OVEEO

Sold by

OVEEO

★★★★☆ (3191 ratings)

83% positive over last 12 months

Customer service

OVEEO

**Top highlights** ^

<b>Scent</b>	Banana
<b>Brand</b>	Banana Boat
<b>Material Feature</b>	Mineral-based, No added oils or fragrances
<b>Product Benefits</b>	Ultra-Violet Protection
<b>Sun Protection Factor</b>	30 Sun Protection Factor (SPF)

**Features & Specs** ^

<b>Scent Name</b>	Banana
<b>Product Benefits</b>	Ultra-Violet Protection
<b>Sun Protection Factor</b>	30 Sun Protection Factor (SPF)
<b>Skin Type</b>	Sensitive
<b>Water Resistance Level</b>	Water Resistant
<b>Item Form</b>	Lotion
<b>Target Use Body Part</b>	Body
<b>Color</b>	Lotion
<b>Skin Tone</b>	All

**About this item**

- Helps prevent sunburn
- Mineral-based, Trae free
- Blocks UVA rays, blocks UVB rays

**Product Description**

Banana Boat simply Protect mineral-based sunscreen lotion for baby SPF 50+ water resistant sunscreen protects your baby from harmful UVA and UVB rays and is mild enough for even the most delicate skin. Strong, broad spectrum sun protection made without Oxybenzone, parabens or added oils and fragrances. It is mild, tear free formula allows you to protect your baby without the tears! Banana Boat baby goes on quickly and easily so your time in the sun with baby can be worry-free.

# Banana Boat Simply Protect Kids Sunscreen SPF 50



Click to see full view



**Banana Boat Simply Protect Mineral-Based Sunscreen Lotion for Kids, SPF 50+, Tear Free, 25% Fewer Ingredients, 6oz.**

Visit the Banana Boat Store  
4.1 ★★★★★ (80) | Search this page

Amazon's Choice

**-8%** \$11.00 (\$1.83 / fluid ounce)

Typical price: \$11.99 | Price history

Get a \$100 Amazon Gift Card instantly upon approval for the Prime Store Card. No annual fee.

Color: **Lotion**



Size: **6 Fl Oz (Pack of 1)**

**6 Fl Oz (Pack of 1)**  
\$11.00 (\$1.83 / fluid ounce)  
\$11.99

See 2 options with no featured offers

Style: **Kids**



\$11.00 (\$1.83 / fluid ounce)

\$0.99 delivery **Tuesday, April 21.** [Details](#)

Or fastest delivery **Thursday, April 16.** Order within 8 hrs 3 mins. [Details](#)

Deliver to Krista - Minneapolis 55431

**Only 17 left in stock - order soon.**

Quantity: 1

Add to cart

Buy Now

Shipped and sold by [Reputable Distributors](#)  
[30-day refund/replacement](#)  
Customer service by [Amazon](#)  
[Secure transaction](#)  
^ See less

FSA or HSA eligible [Details](#)

Add to Auto Buy

**Top highlights** ^

<b>Scent</b>	Banana
<b>Sun Protection Factor</b>	50 Sun Protection Factor (SPF)
<b>Brand</b>	Banana Boat
<b>Material Feature</b>	lightweight, non-greasy, mineral-based, no added oils or fragrances
<b>Product Benefits</b>	Hypoallergenic

**About this item**

- **WORRY-FREE SUN PROTECTION** Our broad spectrum, water-resistant sunscreen protects your children from harmful UVA and UVB rays, so you can have a worry-free day of fun in the sun.
- **25% FEWER INGREDIENTS\*** Strong, broad spectrum sun protection made without oxybenzone, parabens or added oils and fragrances. \*by number vs. Banana Boat Sport Lotion SPF 50+
- **TEAR FREE** Our mild, tear free formula allows you to protect your kids without the tears! Banana Boat Kids is non-greasy and goes on quickly and easily so your kids can get straight to the fun.
- **STAYS ON IN 7 CONDITIONS** Banana Boat Simply Protect Kids Lotion stays on through sun, pool water, ocean water, wind, sweat, sand and even 100-degree heat: We've Got You Covered.
- **RECOMMENDED BY THE SKIN CANCER FOUNDATION** Simply Protect by Banana Boat is recommended by the Skin Cancer Foundation to protect against the sun's harmful rays.

**Product Description**

Banana Boat Simply Protect Kids sunscreen offers the same durable protection you've come to expect from Banana Boat, with 25% fewer ingredients\* (\*by number vs. Banana Boat Sport Lotion SPF 50+). The mild, tear-free formula goes on quickly and easily (without the tears) so your kids can get straight to the fun. Banana Boat Simply Protect provides worry-free sun protection that stays on through 7 conditions: sun, pool water, ocean water, wind, sweat, sand and even 100-degree heat. 7 Conditions does not apply to tanning or oil products, SPF 100 lotions, lip balms, Kids FREE, and Zinc Faces. Banana Boat - We've Got You Covered.

**Features & Specs** ^

<b>Scent Name</b>	Banana
<b>Product Benefits</b>	Hypoallergenic
<b>Sun Protection Factor</b>	50 Sun Protection Factor (SPF)
<b>Skin Type</b>	Sensitive
<b>Water Resistance Level</b>	Water Resistant
<b>Item Form</b>	Lotion
<b>Target Use Body Part</b>	Body
<b>Color</b>	Lotion
<b>Additional Features</b>	Not-Applicable
<b>Skin Tone</b>	All

# Blue Lizard Baby Mineral Sunscreen SPF 50



Click to see full view

### Ask Rufus

- Is this sunscreen fragrance free?
- Can it be used on the face?
- Does it leave a white cast?
- Why you might like this
- Compare with similar



Blue Lizard BABY Mineral Sunscreen Stick with Zinc Oxide, SPF 50+, Water Resistant, UVA/UVB Protection - Easy to apply, Fragrance Free, .5 oz

Visit the BLUE LIZARD Store

4.8 ★★★★★ (4,123) | Search this page

Overall Pick

10K+ bought in past month

\$8<sup>74</sup> (\$17.48 / ounce)

Price history

You're invited to apply for Prime Visa. Get a \$175 Amazon Gift Card instantly upon approval. [Find out how](#)

prime Overnight

FREE Returns

Set name: Stick - 0.5 oz.

Stick - 0.5 oz.	Tube - 3 oz.
\$8.74 (\$17.48 / ounce)	\$9.94 (\$3.31 / fluid ounce)
FREE Delivery Overnight 7 AM - 11 AM	\$10.79 FREE Delivery Overnight 7 AM - 11 AM

### One-time purchase

\$8<sup>74</sup> (\$17.48 / ounce)

prime Overnight

FREE delivery **Overnight 7 AM - 11 AM**. Order within 5 hrs 48 mins

Shorter shipping distance

Deliver to Krista - Minneapolis 55431

In Stock

Quantity: 1

Add to cart

Buy Now

Shipped and sold by Amazon.com

FREE 30-day refund/replacement

Customer service by Amazon.com

See more

FSA or HSA eligible Details

Subscribe & Save

\$7<sup>43</sup> (\$14.86 / ounce)

**Top highlights** ^

<b>Scent</b>	Unscented
<b>Sun Protection Factor</b>	50 Sun Protection Factor (SPF)
<b>Brand</b>	BLUE LIZARD
<b>Product Benefits</b>	Non-Comedogenic, Ultra-Violet Protection
<b>Item Weight</b>	0.5 Ounces

**About this item**

- **ZINC OXIDE-ONLY SUNSCREEN** - Protect sensitive skin with Blue Lizard Baby Mineral Sunscreen Stick SPF 50. Formulated with Zinc Oxide, it contains no harsh chemical active ingredients that might irritate sensitive skin.
- **SPF 50 BROAD SPECTRUM PROTECTION** - The water-resistant formula provides broad spectrum protection from up to 98% of UVB rays.
- **FORMULATED FOR BABY'S DELICATE SKIN** - vegan, paraben-free, fragrance-free formula.
- **WATER-RESISTANT FORMULA** - This convenient sunscreen stick provides water-resistant sun protection for up to 80 minutes.
- **WE ♥ THE REEF** - The reef-friendly formula is formulated without Oxybenzone or Octinoxate to help protect fragile ecosystems.

**Features & Specs** ^

<b>Scent Name</b>	Unscented
<b>Product Benefits</b>	Non-Comedogenic, Ultra-Violet Protection
<b>Sun Protection Factor</b>	50 Sun Protection Factor (SPF)
<b>Skin Type</b>	All
<b>Water Resistance Level</b>	Water Resistant
<b>Item Form</b>	Baby Sunscreen
<b>Color</b>	White
<b>Additional Features</b>	Not-Applicable
<b>Skin Tone</b>	All

- **Easy-to-apply mineral SPF 50 stick for baby**
- **Pocket-sized for on-the-go sun protection**
- **Formulated for baby's delicate skin**
- **Trusted by pediatricians**



**Free From**

- Harsh chemical active sunscreen ingredients
- Fragrances
- Parabens
- Phthalates



1 **Product Description**

2 Protect your baby's skin from the sun's harmful rays with Blue Lizard Baby Mineral SPF 50 Sunscreen Stick. It is an easy, on-the-go SPF without the mess. This  
3 broad-spectrum UVA/UVB SPF 50 protection glides on easily, rubs in clear, and dries smooth, not sticky. Maximum water resistance (80 minutes) means more  
4 fun in the sun. Throw this sunscreen stick into your bag, backpack, or pocket for sun protection wherever baby may need it. This sunscreen stick is formulated  
5 with mineral active ingredients. It is vegan, cruelty-free, paraben-free, fragrance-free, and free from potentially harsh chemical sunscreen active ingredients  
6 that might irritate sensitive skin. Pocket-sized and TSA-friendly, this is the perfect travel companion to our sunscreen lotions. How to Use: Apply liberally to dry  
7 skin 15 minutes before sun exposure. Reapply: after 80 minutes of swimming or sweating, immediately after towel drying, or at least every 2 hours. For topical  
8 use only. Keep out of reach of children. For children under 6 months of age: Ask a doctor. Sun protection measures: Spending time in the sun increases your risk  
9 of skin cancer and early skin aging. To decrease this risk, regularly use a sunscreen with a broad spectrum SPF value of 15 or higher and other sun protection  
10 measures including: Limit time in the sun, especially from 10 a.m. to 2 p.m. Wear long-sleeved shirts, pants, hats and sunglasses. Protect the product in the  
11 container from excessive heat and direct sun. Product may stain some fabrics. We ♥ the Reef: This product is formulated without Oxybenzone or Octinoxate to  
12 help protect fragile reef ecosystems. Pediatricians trust Blue Lizard Australian Sunscreen, so you can have peace of mind that your baby's skin is protected from  
13 the sun.

6



7 **Baby Mineral**  
8 **SPF 50 Stick**

- 9 • Easy-to-apply mineral  
10 SPF 50 stick for baby
- 11 • Pocket-sized for  
12 on-the-go sun protection
- 13 • Formulated for baby's  
14 delicate skin
- 15 • Cruelty-free and vegan
- 16 • Trusted by pediatricians

17 **Designed**  
18 **especially**  
19 **for baby**

14 **Our mission: to help safeguard**  
15 **lifelong healthy skin**

16 Our singular purpose is to help everyone safely enjoy time in the sun. We care deeply  
17 about our customers, the quality of our products, and our impact on the planet.

			
Simplifying sunscreen selection by primarily focusing on SPF 50	Making sunscreens with only mineral active ingredients	All Blue Lizard products are free from fragrances, parabens, phthalates and chemical active ingredients	Offer a range of products for different life stages and needs

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## Our commitment to the environment

Blue Lizard was born in Australia, home to the Great Barrier Reef. We are deeply committed to choosing ingredients and packaging to reduce our impact on our environment while still providing the high quality sunscreens our customers expect.



No Blue Lizard products contain reef-damaging Oxybenzone or Octinoxate



All Blue Lizard products are vegan and cruelty-free



All lotion tubes contain at least 35% post-consumer recycled (PCR) content



**Blue Lizard**  
AUSTRALIAN SUNSCREEN®

Blue Lizard mineral sunscreens are trusted by dermatologists and pediatricians to help keep your skin healthy and safe while you and your family enjoy time in the sun.

# Blue Lizard Kids Mineral Sunscreen SPF 50



Click to see full view

Ask Rufus

Is this sunscreen stick hypoallergenic?

Can it be used on the face?



Blue Lizard Kids Mineral SPF 50 Sunscreen Stick, Zinc Oxide, 100% Mineral Actives, Developed for Kids' Sensitive Skin, TSA-Friendly, Vegan, Paraben-free, Fragrance-Free, 0.5 oz

Visit the BLUE LIZARD Store

4.7 ★★★★★ (6,788) | Search this page

Amazon's Choice

20K+ bought in past month

\$8.77 (\$17.54 / ounce)

Price history

Did you know? There's no annual fee for Prime Visa.

Get a \$175 Amazon Gift Card instantly upon approval. Learn more

prime Overnight

FREE Returns

Set name: Stick - 0.5 oz.

<b>Stick - 0.5 oz.</b>	<b>Tube - 3 oz.</b>
\$8.77 (\$17.54 / ounce)	\$11.49 (\$3.83 / ounce)
FREE Delivery Overnight 7 AM - 11 AM	FREE Delivery Overnight 7 AM - 11 AM

One-time purchase

\$8.77 (\$17.54 / ounce)

prime Overnight

FREE delivery Overnight 7 AM - 11 AM. Order within 5 hrs 48 mins

Shorter shipping distance

Deliver to Krista - Minneapolis 55431

In Stock

Quantity: 1

Add to cart

Buy Now

Shipped and sold by Amazon.com

FREE 30-day refund/replacement

Customer service by Amazon.com

See more

FSA or HSA eligible Details

Subscribe & Save

\$7.45 (\$14.90 / ounce)

**Top highlights** ^

<b>Scent</b>	Unscented
<b>Sun Protection Factor</b>	50 Sun Protection Factor (SPF)
<b>Brand</b>	BLUE LIZARD
<b>Material Feature</b>	Cruelty Free, Fragrance Free, Mineral Based, Vegan
<b>Product Benefits</b>	Sun Protection

**About this item**

- **ZINC OXIDE-ONLY SUNSCREEN** - Protect sensitive skin with Blue Lizard Kids Mineral Sunscreen Stick SPF 50. Formulated with Zinc Oxide, it contains no harsh chemical active ingredients that might irritate sensitive skin.
- **SPF 50 BROAD SPECTRUM PROTECTION** - The water-resistant formula provides broad spectrum protection and protects skin from up to 98% of UVB rays.
- **DEVELOPED FOR KIDS' SENSITIVE SKIN** - This specially-designed formula is also paraben-free and fragrance-free.
- **WATER-RESISTANT FORMULA** - This convenient sunscreen stick provides water-resistant sun protection for up to 80 minutes.
- **WE ♥ THE REEF** - The reef-friendly formula is formulated without Oxybenzone or Octinoxate to help protect fragile reef ecosystems.

**Features & Specs** ^

<b>Scent Name</b>	Unscented
<b>Product Benefits</b>	Sun Protection
<b>Sun Protection Factor</b>	50 Sun Protection Factor (SPF)
<b>Skin Type</b>	Sensitive
<b>Water Resistance Level</b>	Water Resistant
<b>Item Form</b>	Kids Sunscreen
<b>Color</b>	Kids
<b>Additional Features</b>	Not-Applicable
<b>Skin Tone</b>	All



1 **Product Description**

2 Protect little faces on the go with Blue Lizard Kids Mineral Sunscreen Stick. This broad-spectrum UVA/UVB SPF 50 protection glides on easily, rubs in clear,  
3 and dries smooth, not sticky. Maximum water resistance (80 minutes) means more fun in the sun. Made with skin-nourishing botanicals, this formula helps  
4 nourish your little one's skin. Throw it into your bag, backpack, or pocket for on-the-go broad-spectrum protection. This sunscreen stick is formulated with  
5 mineral active ingredients. It is vegan, cruelty-free, paraben-free, fragrance-free, and free from potentially harsh chemical sunscreen active ingredients that  
6 might irritate sensitive skin. Pocket-sized and TSA-friendly, this is the perfect travel companion to our sunscreen lotions. How to Use: Apply liberally to dry  
7 skin 15 minutes before sun exposure. Reapply: after 80 minutes of swimming or sweating, immediately after towel drying, or at least every 2 hours. For  
8 topical use only. Keep out of reach of children. For children under 6 months of age: Ask a doctor. Sun protection measures: Spending time in the sun  
9 increases your risk of skin cancer and early skin aging. To decrease this risk, regularly use a sunscreen with a broad spectrum SPF value of 15 or higher and  
10 other sun protection measures including: Limit time in the sun, especially from 10 a.m. to 2 p.m. Wear long-sleeved shirts, pants, hats and sunglasses. Protect  
11 the product in the container from excessive heat and direct sun. Product may stain some fabrics. We ♥ the Reef: This product is formulated without  
12 Oxybenzone or Octinoxate to help protect fragile reef ecosystems. Pediatricians trust Blue Lizard Australian Sunscreen, so you can have peace of mind that  
13 your child's skin is protected from the sun.

6 **Kids Mineral  
7 SPF 50 Stick**

- 8 • Powerful but gentle  
9 broad-spectrum  
10 SPF 50 for kids
- 11 • Pocket-sized and  
12 TSA-friendly
- 13 • Water resistant for  
14 80 minutes
- 15 • Cruelty-free and vegan
- 16 • Trusted by pediatricians



14 **Our mission: to help safeguard  
15 lifelong healthy skin**

16 Our singular purpose is to help everyone safely enjoy time in the sun. We care deeply  
17 about our customers, the quality of our products, and our impact on the planet.



18 Simplifying sunscreen  
19 selection by primarily  
20 focusing on SPF 50



21 Making sunscreens  
22 with only mineral  
23 active ingredients



24 All Blue Lizard  
products are free from  
fragrances, parabens,  
phthalates and chemical  
active ingredients



Offer a range  
of products for  
different life stages  
and needs

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## Our commitment to the environment

Blue Lizard was born in Australia, home to the Great Barrier Reef. We are deeply committed to choosing ingredients and packaging to reduce our impact on our environment while still providing the high quality sunscreens our customers expect.



**WE LOVE THE REEF™**

No Blue Lizard products contain reef-damaging Oxybenzone or Octinoxate



All Blue Lizard products are vegan and cruelty-free



All lotion tubes contain at least 35% post-consumer recycled (PCR) content

# Coppertone Kids Tear Free Sunscreen SPF 50



Click to see full view

Ask Rufus

Is this sunscreen tear-free?

Does it have a scent?



## Coppertone Kids SPF 50 Tear Free Lotion (8 Fluid Ounce)

Visit the Coppertone Store

4.6 ★★★★★ (485) |

Search this page

Amazon's Choice

300+ bought in past month

\$16.44 (\$2.06 / fluid ounce)

Price history

You're invited to apply for Prime Visa. Get a \$175 Amazon Gift Card instantly upon approval. [Find out how](#)

Size: 8 Fl Oz (Pack of 1)

8 Fl Oz (Pack of 1)

\$16.44 (\$2.06 / fluid ounce)

\$16.44 (\$2.06 / fluid ounce)

FREE delivery April 16 - 20.

[Details](#)

Or fastest delivery April 15 - 16.

[Details](#)

Deliver to Krista - Minneapolis 55431

In Stock

Quantity: 1

Add to cart

Buy Now

Shipped and sold by [iHerb](#)  
[30-day refund/replacement](#)

Customer service by [Amazon](#)

See more

FSA or HSA eligible [Details](#)

Add to Auto Buy

**Top highlights** ^

**Scent** Unscented

**Sun Protection (SPF) Factor** 50 Sun Protection Factor

**Brand** Coppertone

**Material Type Free** Mineral-based sunscreen

**Product Benefits** Ultra-Violet Protection

**About this item**

- Pediatrician Recommended: Body sunscreen lotion for kids from the #1 pediatrician recommended sunscreen brand (2)
- Stays on Strong: Coppertone Kids SPF 50 sunscreen for body stays on strong when kids play
- Water Resistant: Water resistant sunscreen (80 minutes) is perfect for family fun in the sun
- Dermatologically Tested: This Coppertone sunscreen is dermatologically tested and contains no dyes or PABA
- Includes one 8 fluid ounce bottle of Coppertone Kids Sunscreen Lotion, SPF 50

**Features & Specs** ^

**Scent Name** Unscented

**Product Benefits** Ultra-Violet Protection

**Sun Protection Factor** 50 Sun Protection Factor (SPF)

**Skin Type** All

**Water Resistance Level** Water Resistant

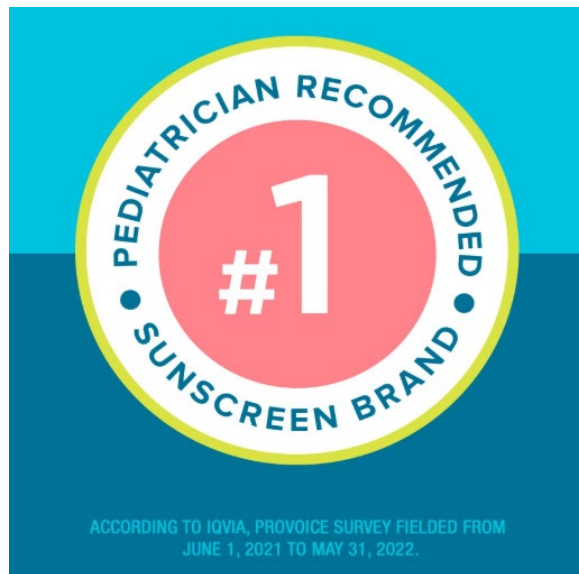
**Item Form** Lotion

**Target Use Body Part** Whole Body

**Color** Blue

**Additional Features** Kid-Specific, Pediatrician Recommended, Water Resistant, Dye-Free, PABA-Free

**Skin Tone** All



**Product Description**

Protect your child's skin from the sun's harmful UV rays with Coppertone Kids SPF 50 Sunscreen Lotion. From the #1 pediatrician recommended sunscreen brand(2), this Coppertone sunscreen for kids offers Broad Spectrum UVA/UVB protection in a dermatologically tested formula. The sunscreen lotion SPF 50 formula is water resistant (80 minutes), and stays on strong when kids play. Each sunscreen Coppertone created follows a tradition of trusted, quality sun protection products. Coppertone has been providing continuous innovation for more than 75 years, and is voted the most trusted sunscreen brand.(1) Depend on this sunscreen SPF 50 formula for any of your kids' outdoor activities, whether they're enjoying a day at the beach, playing in the backyard or participating in outdoor sports. Use and reapply Coppertone Kids sunscreen as directed. (1)Voted Most Trusted Sunscreen Brand by American Shoppers Based on the 2022 BrandSpark American Trust Study. (2)According to IQVIA, ProVoice Survey From June 1, 2021 to May 31, 2022

**STAYS ON STRONG EVEN IN WATER**

**SPF 50**

- Proven broad spectrum UVA/UVB protection
- Tear free formula
- Free of oxybenzone, PABA & dyes
- Water resistant (80 minutes)

USE AND REAPPLY AS DIRECTED

**Mild and durable formula specifically designed for kids**

Coppertone Kids SPF 50 sunscreen lotion allows kids to stay active while protecting their skin from the sun's damaging UVA and UVB rays. This #1 pediatrician recommended sunscreen brand is dermatologist tested for your kids gentle skin. The fast drying, water resistant (80 minutes), and tear free sunscreen lotion will not run into eyes and sting. Enjoy a peace of mind while your kids play in the sun.



**Free of**

Coppertone Kids tear free sunscreen lotion is free of oxybenzone, PABA, and dyes.



**UVA vs UVB-know the difference**

UVB can give you sunburn while UVA can cause premature skin aging, but both can cause skin cancer.



**Gentle on skin**

Goes on smooth, rubs on easily and does not run into eyes and sting.



**Pediatrician recommended**

According to IQVIA, ProVoice Survey fielded from December 1, 2020 to November 30, 2021.

**IT'S GREAT OUTDOORS**

It's where the sun is. Where our days go from the ordinary to the extraordinary. At Coppertone, we're champions of the outdoors. Our trusted SPF empowers you and yours to boldly step outside and seize the sun. So get out there and see for yourself!

## Coppertone Pure & Simple Baby Sunscreen SPF 50



6 VIDEOS



Click to see full view



Coppertone Pure and Simple Baby Sunscreen Lotion SPF 50, Zinc Oxide Mineral Sunscreen for Babies, Hypoallergenic and Tear Free, 6 Fl Oz Bottle

Visit the Coppertone Store

4.6 ★★★★★ (4,268)

Search this page

Overall Pick

5K+ bought in past month

-27% \$8<sup>39</sup>

(\$1.40 / fluid ounce)

List Price: \$11.49

One-time purchase

\$8<sup>39</sup> (\$1.40 / fluid ounce)

prime Overnight

FREE delivery Overnight 7 AM - 11 AM. Order within 5 hrs 31 mins

Shorter shipping distance

Deliver to Krista - Minneapolis 55431

In Stock

Quantity: 1

Add to cart

Buy Now

Shipped and sold by Amazon.com

FREE 30-day refund/replacement

Customer service by Amazon.com

See more

Ask Rufus

Is this sunscreen fragrance free?

Does it leave a white residue?

**Top highlights** ^

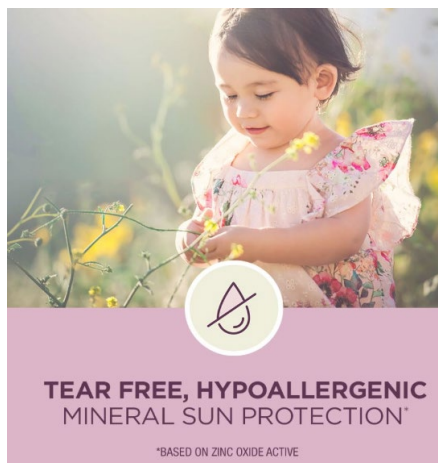
**Scent** Fragrance Free  
**Sun Protection Factor (SPF)** 50 Sun Protection Factor  
**Brand** Coppertone  
**Product Benefits** Hypoallergenic  
**Item Weight** 6 Ounces

**About this item**

- **HYPOALLERGENIC SUNSCREEN FOR BABY:** From the #1 pediatrician recommended sunscreen brand(1), this Coppertone baby sunscreen lotion is hypoallergenic and gentle
- **GENTLE PROTECTION:** This Broad Spectrum sunscreen SPF 50 formula is mild and gentle, and protects baby's skin from the sun's harmful rays with UVA/UVB protection
- **ZINC OXIDE SUN PROTECTION:** This mineral sunscreen lotion contains 100% naturally sourced zinc oxide
- **WATER RESISTANT SUNSCREEN:** Coppertone sunscreen lotion is water resistant (80 minutes) and perfect for family fun in the sun
- **FREE OF:** Tear free sunscreen baby lotion is formulated without fragrance, oxybenzone, octinoxate, PABA, parabens, dyes and phthalates
- **INCLUDES:** One 6 fluid ounce bottle of Coppertone Pure and Simple Baby Sunscreen Lotion SPF 50

**Features & Specs** ^

<b>Scent Name</b>	Fragrance Free
<b>Product Benefits</b>	Hypoallergenic
<b>Sun Protection Factor</b>	50 Sun Protection Factor (SPF)
<b>Skin Type</b>	Sensitive
<b>Water Resistance Level</b>	Water Resistant
<b>Item Form</b>	Lotion
<b>Target Use Body Part</b>	Whole Body
<b>Color</b>	White
<b>Additional Features</b>	Baby-Safe Formula with Hypoallergenic, Tear-Free, and Water-Resistant Properties
<b>Skin Tone</b>	All





### Product Description

Playing outside is a lot more fun when your little ones are protected from the sun with Coppertone Pure and Simple Baby Sunscreen Lotion. From the #1 pediatrician recommended sunscreen brand(1), this Coppertone sunscreen for babies is hypoallergenic and gentle on the skin. Coppertone Pure and Simple sunscreen SPF 50 is water-resistant (80 minutes) so it stays on strong, offering your baby sun protection that lasts. The mineral sunscreen lotion is formulated with 100% naturally sourced zinc oxide to help deliver Broad Spectrum UVA/UVB protection. This tear free and fragrance free sunscreen is formulated without oxybenzone, octinoxate, PABA, parabens, dyes and phthalates. Apply this SPF 50 sunscreen lotion to your baby's skin whenever the fun takes you outside. Each sunscreen Coppertone creates follows a tradition of trusted, quality sun protection products. Coppertone has been providing continuous innovation for more than 75 years, and is voted the most trusted sunscreen brand.(2)

(1)According to IQVIA, Provoice Survey From July 1, 2023 to June 30, 2024

(2)Voted Most Trusted Sunscreen Brand by American Shoppers Based on the 2024 BrandSpark American Trust Study.

**100% MINERAL SUN PROTECTION<sup>†</sup>**

**SPF 50**

- Hypoallergenic & tear free formula with nourishing botanicals\*
- Free of oxybenzone, octinoxate, PABA, parabens, dyes & fragrance
- Water resistant (80 minutes)

†BASED ON A ZINC OXIDE ACTIVE. \*BOTANICAL EXTRACTS. USE AND REAPPLY AS DIRECTED.

**KEEP IT SIMPLE WITH 100% MINERAL SUN PROTECTION<sup>†</sup>**

†BASED ON A ZINC OXIDE ACTIVE USE AND REAPPLY AS DIRECTED



**Free of**

Coppertone Pure & Simple Baby sunscreen is free of oxybenzone, octinoxate, PABA, parabens, phthalates, dyes, and fragrance.



**Made with zinc oxide**

100% naturally sourced zinc oxide is an active ingredient that provides broad spectrum sun protection.



**For baby's delicate skin**

Sunscreen delivers broad spectrum UVA and UVB protection that rubs on easily.



**Pediatrician recommended brand**

According to IQVIA, Provoice survey from May 1, 2019 to April 30, 2021.



**THE COPPERTONE FOR SUN**

You know those moments, when the sun's shining and you're with the people you love — laughing, playing, living. We yearn to extend and hold on to those moments...but we all need a little SPF to keep our skin protected from the sun's rays. Coppertone is there when you need just one more of what you love under the sun. Make one more memory. Have one more laugh. Get one more moment with the #1 most trusted suncare brand.

Coppertone, the one for sun.

**Coppertone®**

**For more than 75 years, Coppertone has been offering trusted, innovative sun protection for the whole family.**

Founded in 1944, Coppertone was the first sun care brand launched in the U.S. market. Scientific research results, high quality standards and strict product tests are the basis for the wide range of sun protection products.

## Coppertone Pure & Simple Kids Sunscreen SPF 50



[Click to see full view](#)



Coppertone Pure and Simple Kids Sunscreen Lotion, SPF 50 Broad Spectrum Sunscreen Lotion for Kids, 6 Fl Oz

[Visit the Coppertone Store](#)

4.4 ★★★★★ (530) |

[Search this page](#)

**Amazon's Choice**

200+ bought in past month

**-8%** \$14<sup>65</sup>

(\$2.44 / fluid ounce)

Typical price: ~~\$15.99~~

[Price history](#)

\$14<sup>65</sup> (\$2.44 / fluid ounce)

**prime**

FREE delivery **Thursday, April 16**. **Order within 23 mins**

📍 Deliver to Krista - Minneapolis 55431

**In Stock**

Quantity: 1

**Add to cart**

**Buy Now**

Ships from Amazon

Sold by [Larkin Supply](#)

[FREE 30-day refund/replacement](#)

[Gift options](#) available at checkout

See more

**Top highlights** ^

**Scent** Unscented  
**Sun Protection Factor** 50 Sun Protection Factor (SPF)  
**Brand** Coppertone  
**Product Benefits** Hypoallergenic  
**Item Weight** 6.1 Ounces

**About this item**

- **HYPOALLERGENIC SUNSCREEN FOR KIDS:** From the #1 pediatrician recommended sunscreen brand(1), this Coppertone Kids sunscreen lotion is hypoallergenic and gentle on skin
- **GENTLE PROTECTION:** This Broad Spectrum sunscreen SPF 50 formula is mild and gentle, and protects skin from the sun's harmful rays with UVA/UVB protection
- **ZINC OXIDE SUNSCREEN:** This mineral sunscreen lotion is made with 100% naturally sourced zinc oxide
- **WATER RESISTANT SUNSCREEN:** Coppertone sunscreen lotion is water resistant (80 minutes) and perfect for family fun in the sun
- **FORMULATED WITHOUT:** Tear free sunscreen lotion for kids is formulated without fragrance, oxybenzone, octinoxate, PABA, parabens, dyes and phthalates
- **INCLUDES:** One 6 fluid ounce bottle of Coppertone Pure and Simple Kids Sunscreen Lotion SPF 50

**Features & Specs** ^

<b>Scent Name</b>	Unscented
<b>Product Benefits</b>	Hypoallergenic
<b>Sun Protection Factor</b>	50 Sun Protection Factor (SPF)
<b>Skin Type</b>	All, Sensitive
<b>Water Resistance Level</b>	Water Resistant
<b>Item Form</b>	Lotion
<b>Target Use Body Part</b>	Whole Body
<b>Color</b>	White
<b>Additional Features</b>	Hypoallergenic, Tear-Free, Water Resistant, Naturally Sourced Zinc Oxide, Natural Botanicals
<b>Skin Tone</b>	All

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**Product Description**

Let the kids play outside and protect their skin with Coppertone Pure & Simple Kids Sunscreen Lotion. From the #1 pediatrician recommended sunscreen brand(2), this Coppertone sunscreen for kids is hypoallergenic. The Coppertone sunscreen lotion formula is made with 100% naturally sourced Zinc Oxide. Coppertone Pure and Simple sunscreen for kids is an SPF 50 Broad Spectrum sunscreen that is water resistant (80 minutes). This Coppertone sunscreen formula is tear free, and free of fragrance, dyes, PABA, alcohol, octinoxate and oxybenzone. This sunscreen SPF 50 bottle is perfect for family fun in the sun. Voted the most trusted sunscreen brand(1), each sunscreen Coppertone creates follows a tradition of trusted, quality sun protection products. Use and reapply Coppertone sunscreen as directed. (1)Voted most trusted sunscreen brand by American shoppers based on the 2024 BrandSpark American trust study. (2)According to IQVIA, Provoice Survey From June 1, 2021 to May 31, 2022

**100% MINERAL SUN PROTECTION<sup>†</sup>** **SPF 50**

- Hypoallergenic & tear free formula with nourishing botanicals\*
- Free of oxybenzone, octinoxate, PABA, parabens, dyes & fragrance
- Water resistant (80 minutes)

†BASED ON A ZINC OXIDE ACTIVE. \*BOTANICAL EXTRACTS. USE AND REAPPLY AS DIRECTED.

**From the #1 most trusted sunscreen brand\***

Pure & Simple Kids SPF 50 sunscreen lotion provides 100% mineral sun protection based on a zinc oxide active ingredient, the formula provides broad spectrum protection that is gentle for kid's sensitive skin. This tear free hypoallergenic sunscreen is also free of oxybenzone, octinoxate, PABA, parabens, dyes, and fragrance. \*Voted Most Trusted Sunscreen Brand by American Shoppers based on the 2021 Brandspark American Trust Study.



**Free of**

Coppertone Pure & Simple Kids sunscreen lotion is free of oxybenzone, octinoxate, PABA, parabens, phthalates, dyes, and fragrance.



**Made with zinc oxide**

100% naturally sourced zinc oxide is an active ingredient that provides broad spectrum sun protection.



**For kid's sensitive skin**

Sunscreen delivers broad spectrum UVA and UVB protection that rubs on easily.



**Pediatrician recommended brand**

According to IQVIA, Provoice Survey from May 1, 2019 to April 30, 2021.

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KEEP IT SIMPLE WITH  
**100% MINERAL**  
SUN PROTECTION†

†BASED ON A ZINC OXIDE ACTIVE  
USE AND REAPPLY AS DIRECTED

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**IT'S GREAT OUTDOORS**

It's where the sun is. Where our days go from the ordinary to the extraordinary. At Coppertone, we're champions of the outdoors. Our trusted SPF empowers you and yours to boldly step outside and seize the sun. So get out there and see for yourself!

# Thinkbaby Baby Mineral Sunscreen SPF 30



Click to see full view

Ask Rufus

- Does it leave a white cast?
- Is it fragrance free?
- Can it be used on the face?
- Why you might like this
- Compare with similar
- Ask something else



Thinkbaby SPF 50+ Baby Sunscreen, 3 Oz. – Safe, Natural Mineral Sun Cream for Babies - Water Resistant, Broad Spectrum UVA/UVB Sun Protection – Vegan Sunscreen for Kids

Visit the THINK Store  
 4.6 ★★★★★ (24,108) | Search this page  
 10K+ bought in past month

-15% \$13<sup>16</sup> (\$4.39 / ounce)  
 List Price: \$15.49 | Price history

You're invited to apply for Prime Visa. Get a \$175 Amazon Gift Card instantly upon approval. [Find out how](#)

prime Overnight

FREE Returns

Size: 3 Ounce (Pack of 1)

3 Ounce (Pack of 1)  
 \$13.16 (\$4.39 / ounce)  
~~\$15.49~~  
 FREE Delivery Overnight 7 AM - 11 AM

See 1 options with no featured offers

Delivery Pickup

One-time purchase

\$13<sup>16</sup> (\$4.39 / ounce)

prime Overnight

FREE delivery Overnight  
 7 AM - 11 AM. Order within 6 hrs 22 mins

Shorter shipping distance

Deliver to Krista - Minneapolis 55431

In Stock

Quantity: 1

Add to cart

Buy Now

Ships from Amazon  
 Sold by Thinkbaby & Thinksport  
 FREE 30-day refund/replacement  
 Customer service by Amazon

See more

Subscribe & Save

\$12<sup>50</sup> (\$4.17 / ounce)

**Top highlights**

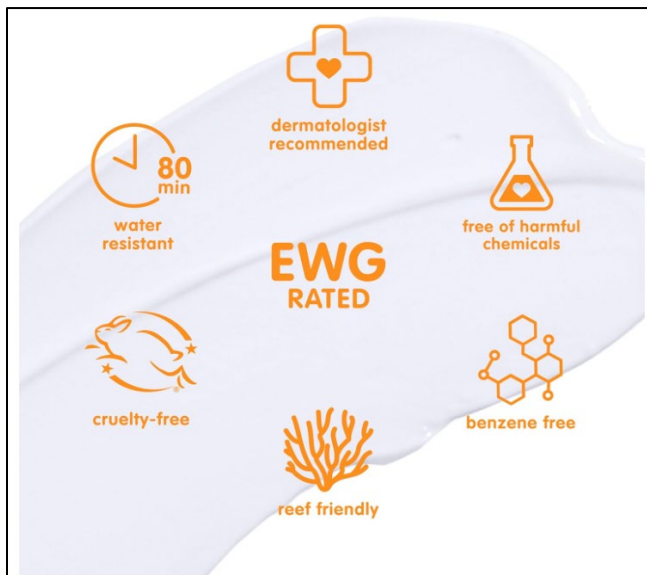
**Scent** Papaya  
**Sun Protection Factor** 50 Sun Protection Factor (SPF)  
**Product Benefits** Ultra-Violet Protection  
**Item Weight** 3 Ounces  
**Number of Items** 1

**About this item**

- **SAFE, NATURAL PROTECTION:** Thinkbaby sunscreen provides effective SPF 50+ sun protection for babies. The broad spectrum UVA & UVB kid sunscreen is suitable for daily use on infants' sensitive skin, offering gentle defense against the sun's rays
- **EASY APPLICATION:** The hydrating mineral sunscreen is quick and easy to apply to even the most active babies, and protection begins instantly. The fast absorbing kids sun lotion won't leave skin feeling oily or sticky, and has no unpleasant chemical scent.
- **CLEAN MINERAL FORMULA:** The first baby mineral sunscreen to pass Whole Foods Premium Care requirements, Leaping Bunny certified sun creams contain no PABA, parabens, phthalates, BPA, oxybenzone, avobenzone, petroleum, gluten, dairy, or toxic chemicals.
- **WATER RESISTANT:** Your baby can splash, swim and play in the water safely. Our children's and toddler sunscreen provides the highest water resistance per the FDA, offering babies continuous protection for up to 80 minutes in the pool or sea before the sunscreen should be re-applied.
- **SUNCARE BY THINK SUN:** Thinkdaily, Thinkbaby, Thinkkids & Thinksports have got your family covered with gentle and reef-safe ingredient based clean sunscreen, made to be effective for delicate and sensitive skin without sacrificing protection

**Features & Specs**

**Scent Name** Papaya  
**Product Benefits** Ultra-Violet Protection  
**Sun Protection Factor** 50 Sun Protection Factor (SPF)  
**Skin Type** Sensitive  
**Water Resistance Level** Water Resistant  
**Item Form** Lotion  
**Target Use Body Part** Body  
**Color** White  
**Additional Features** Safe, Natural, Reef-Safe, Vegan, Cruelty-Free  
**Skin Tone** Sensitive skin



Product description

**thinkbaby**

Non-nano Zinc Oxide UV filters combine with soothing Aloe Vera and Jojoba Seed Oil for advanced protection — perfect for extra sensitive little ones!

**thinksun**  
mineral sunscreen

- 80 min water resistant
- EWG VERIFIED & RATED
- free of harmful chemicals
- dermatologist recommended
- reef friendly
- cruelty-free

<b>zinc oxide</b>	vs.	<b>clear zinc oxide</b>
<ul style="list-style-type: none"> <li>• Visible application so you never miss a spot</li> <li>• Enriched with natural oils for playful scent</li> </ul>	<ul style="list-style-type: none"> <li>• Blends easily for quick application</li> <li>• Fragrance free for sensitive skin</li> </ul>	

**thinksun**

trusted for little ones and beyond

**Explore Top Sunscreen Creams**  
Visit the Store

# Thinkbaby Baby Sensitive Skin Sunscreen SPF 50



Thinkbaby Baby Sunscreen for Sensitive Skin, 3 Fl Oz, SPF 50 Clear Zinc Oxide Baby Mineral Sunscreen, Broad Spectrum UVA/UVB Protection, Natural, Water Resistant, Reef Safe, Vegan

Visit the THINK Store  
4.7 ★★★★★ (199) | Search this page

High price  
Learn more

Deliver to Krista - Minneapolis 55431

See All Buying Options

Add to List

Top highlights

Features & Specs

Measurements

See all product specifications

### Additional Details

Small Business  
This product is from a small business brand. Support small. Learn more



Thinkbaby Baby Sunscreen for Sensitive Skin, 3 Fl Oz, SPF...

★★★★★ 199 ratings

No featured offers available

### Sellers on Amazon

New

\$15<sup>49</sup>

(\$15.49 / fluid ounce)

prime

FREE delivery **Monday, April 13.**

Order within 12 hrs 45 mins

Add to Cart

Ships from

Amazon.com

Sold by

Thinkbaby & Thinksport

★★★★★ (908 ratings)

93% positive over last 12 months

Customer service

Amazon

**Top highlights** ^

<b>Scent</b>	Chamomile
<b>Product Benefits</b>	SPF 50, broad spectrum UVA/UVB protection, water resistant for 80 minutes, soothing for sensitive skin
<b>Sun Protection Factor</b>	50 Sun Protection Factor (SPF)
<b>Item Weight</b>	0.12 Kilograms
<b>Number of Items</b>	1

**About this item**

- **CALMING PROTECTION:** Our non-nano zinc oxide mineral sunscreen is formulated without fragrance or harmful ingredients and infused with soothing chamomile & moisturizing shea butter to help calm and nourish extra sensitive skin
- **WATER RESISTANT:** This baby and kids sunscreen provides reliable, long-lasting sun protection and is water-resistant for up to 80 minutes. Dermatologist recommended as a safe and effective choice for sensitive skin
- **EASY APPLICATION:** Kids hate standing still, so this is sunscreen kids and adults can quickly and easily apply, and protection begins instantly. The fast absorbing sunscreen for kids won't leave skin feeling oily or sticky, and has no unpleasant chemical scent.
- **CLEAN MINERAL FORMULA:** Suitable for sensitive skin and active lifestyles. This children and toddler sunscreen has no BPA, vegan, never tested on animals, reef-friendly, travel-sized, and TSA-approved
- **SUNCARE BY THINK SUN:** Thinkdaily, Thinkbaby, Thinkkids & Thinksports have got your family covered with gentle and reef-safe ingredient based clean sunscreen, made to be effective for delicate and sensitive skin without sacrificing protection

**Features & Specs** ^

<b>Scent Name</b>	Chamomile
<b>Product Benefits</b>	SPF 50, broad spectrum UVA/UVB protection, water resistant for 80 minutes, soothing for sensitive skin
<b>Sun Protection Factor</b>	50 Sun Protection Factor (SPF)
<b>Skin Type</b>	Sensitive
<b>Water Resistance Level</b>	Water Resistant
<b>Item Form</b>	Liquid
<b>Skin Tone</b>	All

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Product description

**thinkbaby**

Non-nano Zinc Oxide UV filters combine with soothing Aloe Vera and Jojoba Seed Oil for advanced protection — perfect for extra sensitive little ones!

clear zinc oxide spf 50 sensitive skin

**gentle on skin, tough on rays**

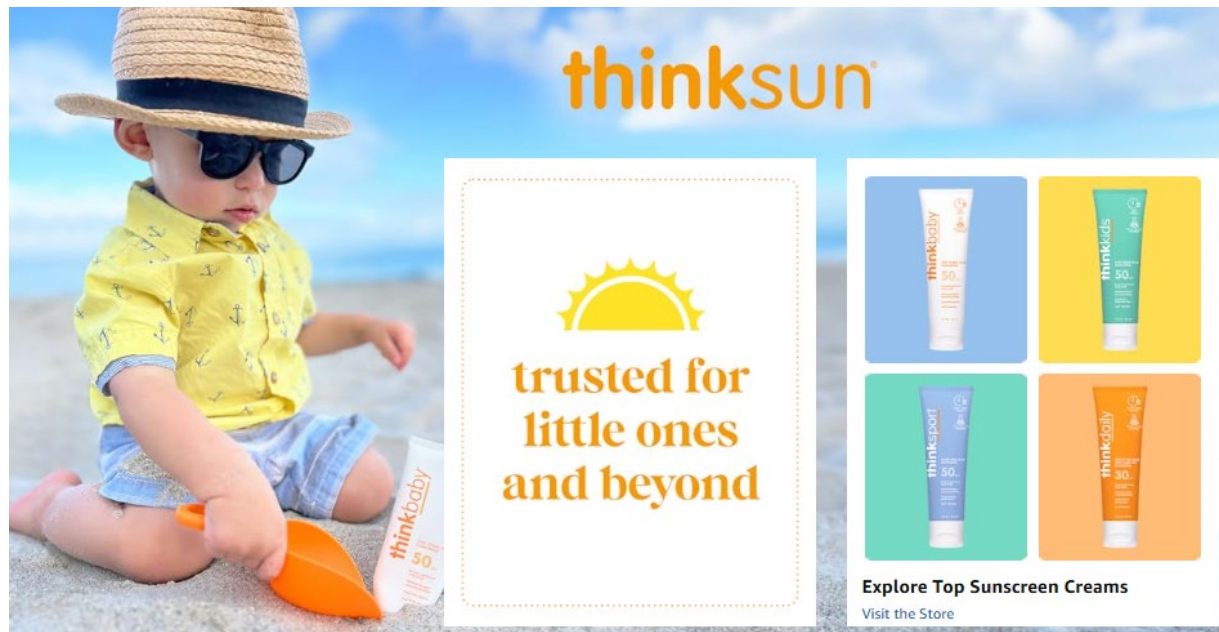
 enriched with soothing chamomile & shea butter	 non-nano mineral zinc oxide SPF 50 for complete broad-spectrum defense	 blends quickly for all skin types & tones
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**thinksun**  
mineral sunscreen

 water resistant	 EWG VERIFIED & RATED	 free of harmful chemicals	 dermatologist recommended	 reef friendly	 cruelty-free
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<p><b>zinc oxide</b></p> <ul style="list-style-type: none"> <li>• Visible application so you never miss a spot</li> <li>• Enriched with natural oils for playful scent</li> </ul>	<p>vs.</p>	<p><b>clear zinc oxide</b></p> <ul style="list-style-type: none"> <li>• Blends easily for quick application</li> <li>• Fragrance free for sensitive skin</li> </ul>
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Lead Safe Mama, LLC Comparative Chart of Toxicant (Heavy Metal) Levels Found in Popular Sunscreen Products: 2025 / 2026

Lead Safe Mama, LLC - Sunscreen Heavy Metals Comparison Chart, Lab Test Results													6 of 35 Positive for Mercury = 14.29%		29 of 35 Positive for Cadmium = 82.86%									
Full lab reports for each listed product can be found on <a href="https://LeadSafeMama.com">LeadSafeMama.com</a>													33 of 35 Positive for Lead = 94.29%		13 of 35 Positive for Arsenic = 37.14%									
All measurements noted are in PARTS PER BILLION (ppb)													Highest Levels For Noted Element				Possibly Contaminated							
Chart Last Updated: April 19, 2026 - DRAFT 2.1 (8 lab reports pending publishing)													EWG				Concerning Ingredients							
Sorted in order of Lead Level Ascending																								
Product Name													SPF #	Kids?	Country	Percent	Verified	Pb	Cd	Hg	As	Reported	Reported	Zinc Oxide: Zn
NON-DETECT for Lead, Cadmium, Mercury, & Arsenic													SPF #	Kids?	Country	Zinc	EWG	Lead	Cadmium	Mercury	Arsenic	To WA	To FDA	Titanium Dioxide: TD
1 Supergoop! Unseen Sunscreen													50	Face	USA	n/a	No	ND <5	ND <5	ND <5	ND <10	/	/	Chemical Sunscreen
2 La Roche-Posay Laboratoire Dermatologique, Face & Body — Anthelios Kids													50	Kid	/	n/a	No	ND <5	ND <5	ND <5	ND <10	/	/	Chemical Sunscreen
Lead Levels of 5 to 99 ppb													SPF #	Kids?	Country	Zinc	EWG	Lead	Cadmium	Mercury	Arsenic	To WA	To FDA	Learn more at <a href="https://LeadSafeMama.com">LeadSafeMama.com</a>
1 3 Organic Sunscreen - To Be Published													50	Family	USA	n/a	No	7.22	ND <5	ND <5	ND <10	/	/	??
2 4 Australian Sunscreen - To Be Published													50	Family	Australia	n/a	No	7.02	ND <5	ND <5	ND <10	/	/	??
5 Hawaiian Tropic Sheer Touch Sunscreen Lotion													30	Family	USA	n/a	No	8.80	ND <5	ND <5	ND <10	/	/	??
6 Banana Boat Sport — New & Improved — Family Size													50	Family	USA	n/a	No	13.18	7.44	7.43	10.41	/	/	??
7 California Baby Super Sensitive Sunscreen Lotion, SPF 30+ (No Added Fragrance)													30	Baby	/	n/a	No	76.83	ND <5	ND <5	ND <10	/	/	??
8 Aveeno Baby Continuous Protection Sensitive Skin Zinc Oxide Sunscreen SPF 50													50	Baby	/	n/a	No	81.28	6.30	ND <5	ND <10	/	/	??
Lead Levels of 100 to 299 ppb													SPF #	Kids?	Country	Zinc	EWG	Lead	Cadmium	Mercury	Arsenic	To WA	To FDA	Learn more at <a href="https://LeadSafeMama.com">LeadSafeMama.com</a>
9 Cancer Council Sensitive Sunscreen, Fragrance Free, SPF 50													50	Family	Australia	5.02%	No	118.00	9.87	ND <5	ND <10	/	/	Zinc Oxide: Zn
10 Hello Bello "Worry-Free Clean Stuff" Baby Mineral Sunscreen Lotion + Prebiotics													55	Baby	/	/	No	199.20	196.10	ND <5	486.30	/	/	Zinc Oxide: Zn
3 11 Sunscreen Stick - To Be Published													50	/	/	/	No	299.40	49.87	ND <5	ND <10	/	/	Zinc Oxide: Zn
12 Badger Baby Mineral Sunscreen Cream, 98% Organic Ingredients with Clear Zinc													40	Baby	/	/	No	297.90	343.20	7.88	14.92	/	/	Zinc Oxide: Zn
Lead Levels of 300 to 999 ppb													SPF #	Kids?	Country	Zinc	EWG	Lead	Cadmium	Mercury	Arsenic	To WA	To FDA	Learn more at <a href="https://LeadSafeMama.com">LeadSafeMama.com</a>
4 13 Sport Sunscreen - To Be Published													30	/	/	/	/	308.00	519.90	ND <5	ND <10	/	/	Zinc Oxide: Zn
14 Babo Botanicals Sensitive Baby Mineral Sunscreen Lotion													50	Baby	USA	20.00%	Verified	330.00	216.80	ND <5	138.90	/	/	Zinc Oxide: Zn
15 Stream2Sea EcoStick Sunscreen Tint, SPF 35+													35	/	/	/	Verified	341.90	77.83	ND <5	ND <10	/	/	Zinc Oxide: Zn
16 Badger Adventure Mineral Sunscreen													50	Family	USA	25.00%	No	343.70	251.80	ND <5	18.96	/	/	Zinc Oxide: Zn
17 Babo Botanicals Super Shield Mineral Sunscreen Lotion													50	Family	USA	20.00%	Verified	380.10	329.20	ND <5	51.84	/	/	Zinc Oxide: Zn
5 18 Kid Stick Sunscreen - To Be Published													50	Kid	/	/	/	457.80	202.60	ND <5	38.02	/	/	Zinc Oxide: Zn
19 Primally Pure Sun Cream, SPF 30 Lavender Mint — "Poison-Free SPF"													30	No	/	/	/	498.00	273.10	ND <5	ND <10	/	/	Zinc Oxide: Zn
20 Baby Bum Sunscreen (by Sun Bum)													50	Baby	USA	?	No	495.10	232.40	ND <5	ND <10	/	/	Zinc Oxide: Zn
21 Blue Lizard Australian Sunscreen (not from Australia)													50	Family	USA	10.00%	No	698.00	296.70	ND <5	ND <10	/	/	Zinc Oxide: Zn
22 Badger Face Mineral Sunscreen, 80% Organic Ingredients													30	Face	USA	?	Rated #1	887.00	232.60	ND <5	32.80	/	/	Zinc Oxide: Zn
23 Happy Ocean Kids Mineral Sunscreen With EcoSafe Zinc, Pediatrician Approved													45	Kid	/	/	Verified	902.00	223.30	ND <5	23.23	/	/	Zinc Oxide: Zn
24 Solara Suncare Guardian Angel Super Peptide Sunscreen Milk, SPF 50													50	No	/	/	Verified	923.80	442.10	6.31	ND <10	/	/	Zinc Oxide: Zn
25 Attitude Natural Care SPF 30 Unscented Baby Oatmeal Sensitive Natural Sunscreen													30	Baby	USA	?	Verified	944.20	220.20	ND <5	ND <10	/	/	Zinc Oxide: Zn
6 26 Family Sunscreen - To Be Published													50	Family	/	/	/	961.10	516.80	ND <5	ND <10	/	/	Zinc Oxide: Zn
Lead Levels of 1,000 ppb & Up = Possibly Illegal by Washington State TFCA													SPF #	Kids?	Country	Zinc	EWG	Lead	Cadmium	Mercury	Arsenic	Reported	Reported	Zinc Oxide: Zn
27 Coppertone Pure & Simple Baby Sunscreen - Pink Bottle, Green Cap													50	Baby	USA	24.08%	No	1,017.00	396.10	ND <5	ND <10	YES	pending	Zinc Oxide: Zn
28 Stream2Sea Every Day Mineral Sunscreen "4 Kids", SPF 45													45	Kid	/	/	Verified	1,126.20	241.10	ND <5	38.04	pending	pending	Zinc Oxide: Zn
7 29 Simple Sunscreen - To Be Published													50	/	/	/	/	1,170.10	190.80	6.77	16.77	pending	pending	Zinc Oxide: Zn
30 ThinkBaby Clear Zinc 20% Sunscreen, SPF 30													30	Baby	USA	20.00%	Verified	1,236.40	848.00	6.29	ND <10	pending	pending	Zinc Oxide: Zn
31 ThinkBaby Zinc Oxide Sunscreen (company site says EWG, not listed on EWG site)													50	Baby	USA	23.40%	No	1,251.10	575.30	ND <5	ND <10	YES	pending	Zinc Oxide: Zn
8 32 Sport Sunscreen - To Be Published													50	/	/	/	No	1,265.80	519.90	ND <5	ND <10	pending	pending	Zinc Oxide: Zn
33 Little Urchin Natural Face Sunscreen SPF 50 Clear Zinc - Made in Australia													50	Family	Australia	/	No	1,311.80	337.90	ND <5	228.60	pending	pending	Zinc Oxide: Zn
34 Earth Mama Baby Mineral Sunscreen Lotion Broad Spectrum SPF													40	Baby	USA	/	No	2,140.30	122.70	ND <5	ND <10	pending	pending	Zinc Oxide: Zn
35 Sky & Sol Face and Body Sunscreen													50	Family	USA	25.00%	No	4,612.00	621.80	ND <5	66.51	YES	pending	Zinc Oxide: Zn
36 Single Ingredient Zinc Oxide Powder for Making Your Own Sunscreen													n/a	n/a	USA	100.00%	n/a	9,474.70	506.20	ND <5	ND <10	pending	pending	Zinc Oxide: Zn
None Mainstream / Well Known Brands Highlighted in Blue																								
Not Yet Published Reports Highlighted in Yellow																	Learn More at <a href="https://LeadSafeMama.com">LeadSafeMama.com</a>							

**EXHIBIT 1**

Lead Safe Mama, LLC Comparative Chart of Toxicant (Heavy Metal) Levels Found in Popular Sunscreen Products: 2025 / 2026

Lead Safe Mama, LLC - Sunscreen Heavy Metals Comparison Chart, Lab Test Results													6 of 35 Positive for Mercury = 14.29%		29 of 35 Positive for Cadmium = 82.86%									
Full lab reports for each listed product can be found on <a href="https://LeadSafeMama.com">LeadSafeMama.com</a>													33 of 35 Positive for Lead = 94.29%		13 of 35 Positive for Arsenic = 37.14%									
All measurements noted are in PARTS PER BILLION (ppb)													Highest Levels For Noted Element				Possibly Contaminated							
Chart Last Updated: April 19, 2026 - DRAFT 2.1 (8 lab reports pending publishing)													EWG				Concerning Ingredients							
Sorted in order of Lead Level Ascending																								
Product Name													SPF #	Kids?	Country	Percent	Verified	Pb	Cd	Hg	As	Reported	Reported	Zinc Oxide: Zn
NON-DETECT for Lead, Cadmium, Mercury, & Arsenic													SPF #	Kids?	Country	Zinc	EWG	Lead	Cadmium	Mercury	Arsenic	To WA	To FDA	Titanium Dioxide: TD
1 Supergoop! Unseen Sunscreen													50	Face	USA	n/a	No	ND <5	ND <5	ND <5	ND <10	/	/	Chemical Sunscreen
2 La Roche-Posay Laboratoire Dermatologique, Face & Body — Anthelios Kids													50	Kid	/	n/a	No	ND <5	ND <5	ND <5	ND <10	/	/	Chemical Sunscreen
Lead Levels of 5 to 99 ppb													SPF #	Kids?	Country	Zinc	EWG	Lead	Cadmium	Mercury	Arsenic	To WA	To FDA	Learn more at <a href="https://LeadSafeMama.com">LeadSafeMama.com</a>
1 3 Organic Sunscreen - To Be Published													50	Family	USA	n/a	No	7.22	ND <5	ND <5	ND <10	/	/	??
2 4 Australian Sunscreen - To Be Published													50	Family	Australia	n/a	No	7.02	ND <5	ND <5	ND <10	/	/	??
5 Hawaiian Tropic Sheer Touch Sunscreen Lotion													30	Family	USA	n/a	No	8.80	ND <5	ND <5	ND <10	/	/	??
6 Banana Boat Sport — New & Improved — Family Size													50	Family	USA	n/a	No	13.18	7.44	7.43	10.41	/	/	??
7 California Baby Super Sensitive Sunscreen Lotion, SPF 30+ (No Added Fragrance)													30	Baby	/	n/a	No	76.83	ND <5	ND <5	ND <10	/	/	??
8 Aveeno Baby Continuous Protection Sensitive Skin Zinc Oxide Sunscreen SPF 50													50	Baby	/	n/a	No	81.28	6.30	ND <5	ND <10	/	/	??
Lead Levels of 100 to 299 ppb													SPF #	Kids?	Country	Zinc	EWG	Lead	Cadmium	Mercury	Arsenic	To WA	To FDA	Learn more at <a href="https://LeadSafeMama.com">LeadSafeMama.com</a>
9 Cancer Council Sensitive Sunscreen, Fragrance Free, SPF 50													50	Family	Australia	5.02%	No	118.00	9.87	ND <5	ND <10	/	/	Zinc Oxide: Zn
10 Hello Bello "Worry-Free Clean Stuff" Baby Mineral Sunscreen Lotion + Prebiotics													55	Baby	/	/	No	199.20	196.10	ND <5	486.30	/	/	Zinc Oxide: Zn
3 11 Sunscreen Stick - To Be Published													50	/	/	/	No	299.40	49.87	ND <5	ND <10	/	/	Zinc Oxide: Zn
12 Badger Baby Mineral Sunscreen Cream, 98% Organic Ingredients with Clear Zinc													40	Baby	/	/	No	297.90	343.20	7.88	14.92	/	/	Zinc Oxide: Zn
Lead Levels of 300 to 999 ppb													SPF #	Kids?	Country	Zinc	EWG	Lead	Cadmium	Mercury	Arsenic	To WA	To FDA	Learn more at <a href="https://LeadSafeMama.com">LeadSafeMama.com</a>
4 13 Sport Sunscreen - To Be Published													30	/	/	/	/	308.00	519.90	ND <5	ND <10	/	/	Zinc Oxide: Zn
14 Babo Botanicals Sensitive Baby Mineral Sunscreen Lotion													50	Baby	USA	20.00%	Verified	330.00	216.80	ND <5	138.90	/	/	Zinc Oxide: Zn
15 Stream2Sea EcoStick Sunscreen Tint, SPF 35+													35	/	/	/	Verified	341.90	77.83	ND <5	ND <10	/	/	Zinc Oxide: Zn
16 Badger Adventure Mineral Sunscreen													50	Family	USA	25.00%	No	343.70	251.80	ND <5	18.96	/	/	Zinc Oxide: Zn
17 Babo Botanicals Super Shield Mineral Sunscreen Lotion													50	Family	USA	20.00%	Verified	380.10	329.20	ND <5	51.84	/	/	Zinc Oxide: Zn
5 18 Kid Stick Sunscreen - To Be Published													50	Kid	/	/	/	457.80	202.60	ND <5	38.02	/	/	Zinc Oxide: Zn
19 Primally Pure Sun Cream, SPF 30 Lavender Mint — "Poison-Free SPF"													30	No	/	/	/	498.00	273.10	ND <5	ND <10	/	/	Zinc Oxide: Zn
20 Baby Bum Sunscreen (by Sun Bum)													50	Baby	USA	?	No	498.10	232.40	ND <5	ND <10	/	/	Zinc Oxide: Zn
21 Blue Lizard Australian Sunscreen (not from Australia)													50	Family	USA	10.00%	No	698.00	296.70	ND <5	ND <10	/	/	Zinc Oxide: Zn
22 Badger Face Mineral Sunscreen, 80% Organic Ingredients													30	Face	USA	?	Rated #1	887.00	232.60	ND <5	32.80	/	/	Zinc Oxide: Zn
23 Happy Ocean Kids Mineral Sunscreen With EcoSafe Zinc, Pediatrician Approved													45	Kid	/	/	Verified	902.00	223.30	ND <5	23.23	/	/	Zinc Oxide: Zn
24 Solara Suncare Guardian Angel Super Peptide Sunscreen Milk, SPF 50													50	No	/	/	Verified	923.80	442.10	6.31	ND <10	/	/	Zinc Oxide: Zn
25 Attitude Natural Care SPF 30 Unscented Baby Oatmeal Sensitive Natural Sunscreen													30	Baby	USA	?	Verified	944.20	220.20	ND <5	ND <10	/	/	Zinc Oxide: Zn
6 26 Family Sunscreen - To Be Published													50	Family	/	/	/	961.10	516.80	ND <5	ND <10	/	/	Zinc Oxide: Zn
Lead Levels of 1,000 ppb & Up = Possibly Illegal by Washington State TFCA													SPF #	Kids?	Country	Zinc	EWG	Lead	Cadmium	Mercury	Arsenic	Reported	Reported	Zinc Oxide: Zn
27 Coppertone Pure & Simple Baby Sunscreen - Pink Bottle, Green Cap													50	Baby	USA	24.08%	No	1,017.00	396.10	ND <5	ND <10	YES	pending	Zinc Oxide: Zn
28 Stream2Sea Every Day Mineral Sunscreen "4 Kids", SPF 45													45	Kid	/	/	Verified	1,126.20	241.10	ND <5	38.04	pending	pending	Zinc Oxide: Zn
7 29 Simple Sunscreen - To Be Published													50	/	/	/	/	1,170.10	190.80	6.77	16.77	pending	pending	Zinc Oxide: Zn
30 ThinkBaby Clear Zinc 20% Sunscreen, SPF 30													30	Baby	USA	20.00%	Verified	1,236.40	848.00	6.29	ND <10	pending	pending	Zinc Oxide: Zn
31 ThinkBaby Zinc Oxide Sunscreen (company site says EWG, not listed on EWG site)													50	Baby	USA	23.40%	No	1,251.10	575.30	ND <5	ND <10	YES	pending	Zinc Oxide: Zn
8 32 Sport Sunscreen - To Be Published													50	/	/	/	No	1,265.80	519.90	ND <5	ND <10	pending	pending	Zinc Oxide: Zn
33 Little Urchin Natural Face Sunscreen SPF 50 Clear Zinc - Made in Australia													50	Family	Australia	/	No	1,311.80	337.90	ND <5	228.60	pending	pending	Zinc Oxide: Zn
34 Earth Mama Baby Mineral Sunscreen Lotion Broad Spectrum SPF													40	Baby	USA	/	No	2,140.30	122.70	ND <5	ND <10	pending	pending	Zinc Oxide: Zn
35 Sky & Sol Face and Body Sunscreen													50	Family	USA	25.00%	No	4,612.00	621.80	ND <5	66.51	YES	pending	Zinc Oxide: Zn
36 Single Ingredient Zinc Oxide Powder for Making Your Own Sunscreen													n/a	n/a	USA	100.00%	n/a	9,474.70	506.20	ND <5	ND <10	pending	pending	Zinc Oxide: Zn
None Mainstream / Well Known Brands Highlighted in Blue																								
Not Yet Published Reports Highlighted in Yellow																	<a href="https://LeadSafeMama.com">Learn More at LeadSafeMama.com</a>							

## EXHIBIT 2

**Sun Bum Baby Bum Mineral Sunscreen Lotion (SPF 50)**



**Purity Laboratories, Inc.**

17387 SW 63rd St.  
Lake Oswego, OR 97035  
Phone: 503.297.3636 Fax: 503.297.3738

www.puritylabinc.com

Page 1 of 1

**For:** Lead Safe Mama, LLC  
7933 SE 15th Avenue  
Portland, Oregon, 97202  
United States  
415-609-3182

**ATTN:** Tamara Elise Rubin  
tamararubin@mac.com  
415-609-3182/

**Case Notes:** RUSH

**Case#:** 2506212

**Received Date:** 06/11/2025

**Tested Date:** 06/12/2025

**Completed Date:** 06/13/2025

**Purchase Order:**

**Product Tested:**  
**Baby Bum Mineral Sunscreen Lotion**  
**(by Sun Bum), SPF 50**



<b>Sample#:</b> 2506212-01		<b>Sample Description:</b> Bum Sunscreen 50 Lot# 2025-138	
<b>Test</b>	<b>Unit</b>	<b>Result</b>	<b>Method</b>
Arsenic -	ppb	< 10.00	ICP-MS
Cadmium -	ppb	232.4	ICP-MS
Lead -	ppb	495.1	ICP-MS
Mercury -	ppb	< 5.00	ICP-MS

Reviewed By 

Date 13 Jun 2025

## Test Report

All reported results relate only to the items tested. All reported results apply to the samples as received by Purity Laboratories, Inc.

Note: All products are sent to the lab by Lead Safe Mama, LLC (LSM) with anonymized sample description language & a LSM internal lot number for identification -- to avoid any real or perceived potential bias from the lab. Once reports are received back from the lab they are annotated by LSM staff with the actual product description detail (in blue) and a thumbnail of the product image. Reports are then published on LeadSafeMama.com

**Blue Lizard Sensitive Mineral Sunscreen Lotion (SPF 50)**



**Purity Laboratories, Inc.**

17387 SW 63rd St.  
 Lake Oswego, OR 97035  
 Phone: 503.297.3636 Fax: 503.297.3738  
[www.puritylabsinc.com](http://www.puritylabsinc.com)

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**For:** Lead Safe Mama, LLC  
 7933 SE 15th Avenue  
 Portland, Oregon, 97202  
 United States  
 415-609-3182

**Case#:** 2505469

**Received Date:** 05/23/2025

**Tested Date:** 05/29/2025

**Completed Date:** 05/30/2025



**ATTN:** Tamara Elise Rubin  
 tamararubin@mac.com  
 415-609-3182/

**Purchase Order:**  
**Product Info:**  
 Blue Lizard Australian Sunscreen  
 SPF 50 Sensitive Mineral Sunscreen

**Case Notes:**

<b>Sample#:</b> 2505469-01		<b>Sample Description:</b> Sensitive Sunscreen Lot# 2025-087	
<b>Test</b>	<b>Unit</b>	<b>Result</b>	<b>Method</b>
Arsenic -	ppb	< 10.00	ICP-MS
Cadmium -	ppb	266.7	ICP-MS
Lead -	ppb	666.3	ICP-MS
Mercury -	ppb	< 5.00	ICP-MS

Reviewed By David Sook

Date 06/02/25

## Test Report

All reported results relate only to the items tested. All reported results apply to the samples as received by Purity Laboratories, Inc.  
 Note: All products are sent to the lab by Lead Safe Mama, LLC (LSM) with anonymized sample description language & a LSM internal lot number for identification — to avoid any real or perceived potential bias from the lab. Once reports are received back from the lab they are annotated by LSM staff with the actual product description detail (in blue) and a thumbnail of the product image. Reports are then published on LeadSafeMama.com

**Thinkbaby Clear Zinc 20% Sunscreen Lotion (SPF 30)**



Purity Laboratories, Inc.

17387 SW 63rd St.  
Lake Oswego, OR 97035  
Phone: 503.297.3636 Fax: 503.297.3738

www.puritylabsinc.com

Page 1 of 1

For: Lead Safe Mama, LLC  
7933 SE 15th Avenue  
Portland, Oregon, 97202  
United States  
415-609-3182

ATTN: Tamara Elise Rubin  
tamararubin@mac.com  
415-609-3182/

Case#: 2506206

Received Date: 06/11/2025

Tested Date: 06/12/2025

Completed Date: 06/13/2025

Purchase Order:

**Product Tested:**  
**ThinkBaby Clear Zinc 20% Sunscreen,**  
**SPF 30 — "EWG Verified"**



Case Notes: RUSH

Sample#: 2506206-01		Sample Description: Baby Sunscreen Zinc 30 Lot# 2025-132	
Test	Unit	Result	Method
Arsenic -	ppb	< 10.00	ICP-MS
Cadmium -	ppb	645.0	ICP-MS
Lead -	ppb	1235.4	ICP-MS
Mercury -	ppb	5.29	ICP-MS

Reviewed By

Date

13 Jun 2025

# Test Report

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Note: All products are sent to the lab by Lead Safe Mama, LLC (LSM) with anonymized sample description language & a LSM internal lot number for identification — to avoid any real or perceived potential bias from the lab. Once reports are received back from the lab they are annotated by LSM staff with the actual product description detail (in blue) and a thumbnail of the product image. Reports are then published on LeadSafeMama.com

**Thinkbaby Sunscreen Lotion (SPF 50)**



**Purity Laboratories, Inc.**

17387 SW 63rd St.  
Lake Oswego, OR 97035  
Phone: 503.297.3636 Fax: 503.297.3738

www.puritylabsinc.com

Page 1 of 1

**For:** Lead Safe Mama, LLC  
7933 SE 15th Avenue  
Portland, Oregon, 97202  
United States  
415-609-3182

**ATTN:** Tamara Elise Rubin  
tamararubin@mac.com  
415-609-3182/

**Case#:** 2505468

**Received Date:** 05/23/2025

**Tested Date:** 05/29/2025

**Completed Date:** 05/30/2025



**Purchase Order:**  
**Product Info:**  
ThinkBaby Zinc Oxide 23.4%  
Sunscreen, SPF 50 —  
"Free of Harmful Chemicals"

**Case Notes:**

<b>Sample#:</b> 2505468-01		<b>Sample Description:</b> Baby Sunscreen Lot# 2025-096	
<b>Test</b>	<b>Unit</b>	<b>Result</b>	<b>Method</b>
Arsenic -	ppb	< 10.00	ICP-MS
Cadmium -	ppb	575.5	ICP-MS
Lead -	ppb	1251.1	ICP-MS
Mercury -	ppb	< 5.00	ICP-MS

Reviewed By David Saech

Date 06/02/25

# Test Report

All reported results relate only to the items tested. All reported results apply to the samples as received by Purity Laboratories, Inc.

Note: All products are sent to the lab by Lead Safe Mama, LLC (LSM) with anonymized sample description language & a LSM internal lot number for identification — to avoid any real or perceived potential bias from the lab. Once reports are received back from the lab they are annotated by LSM staff with the actual product description detail (in blue) and a thumbnail of the product image. Reports are then published on LeadSafeMama.com

**Coppertone Pure & Simple Baby Sunscreen Lotion (SPF 50)**



**Purity Laboratories, Inc.**

17387 SW 63rd St.  
Lake Oswego, OR 97035  
Phone: 503.297.3636 Fax: 503.297.3738

www.puritylabsinc.com

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For: Lead Safe Mama, LLC  
7933 SE 15th Avenue  
Portland, Oregon, 97202  
United States  
415-609-3182

ATTN: Tamara Elise Rubin  
tamararubin@mac.com  
415-609-3182/

Case#: 2505271

Received Date: 05/14/2025

Tested Date: 05/19/2025

Completed Date: 05/21/2025

Purchase Order:  
Product Tested:  
Coppertone Zinc Oxide Sunscreen,  
Pure & Simple Baby — SPF 50  
"#1 Pediatrician Recommended Sunscreen Brand"

**Case Notes:**

Sample#: 2505271-01		Sample Description: Baby Sunscreen Lot# 2028-080	
Test	Unit	Result	Method
Arsenic -	ppb	< 10.00	ICP-MS
Cadmium -	ppb	356.1	ICP-MS
Lead -	ppb	1017.5	ICP-MS
Mercury -	ppb	< 5.00	ICP-MS

Reviewed By David Saab

Date 05/21/25

# Test Report

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Note: All products are sent to the lab by Lead Safe Mama, LLC (LSM) with anonymized sample description language & a LSM internal lot number for identification — to avoid any real or perceived potential bias from the lab. Once reports are received back from the lab they are annotated by LSM staff with the actual product description detail (in blue) and product image. Reports are then published on LeadSafeMama.com

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Class Action Alleges Amazon Fails to Warn About 'Alarmingly High' Levels of Heavy Metals in Sunscreens](#)

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