



August 22, 2017

**VIA EMAIL AND OVERNIGHT MAIL**

California Food Drug and Medical Device Task Force

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Re: Goop Inc.'s Deceptive Marketing

Dear Attorneys:

I write to inform you of the findings of a recent Truth in Advertising, Inc. (TINA.org) investigation of Goop Inc. (Goop), a New York and California-based "lifestyle" company founded by Gwyneth Paltrow in 2008 that sells a wide range of products, including supplements, natural "remedies," oils, crystals, beauty products, clothing, and accessories. TINA.org's investigation revealed that the company uses unsubstantiated, and therefore deceptive, health and disease-treatment claims to market many of its products.

Specifically, TINA.org has catalogued a sampling of more than 50 instances in which the company claims, either expressly or implicitly, that its products – or third-party products that it promotes<sup>1</sup> – can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing a number of ailments, ranging from depression, anxiety, and insomnia, to infertility, uterine prolapse, and arthritis, just to name a few. For example, according to the company:

- Goop's Carnelian crystal "treats infertility," in addition to "eas[ing] period cramps, temper[ing] PMS, regulat[ing] menstrual cycles,...and address[ing] shame around female body parts and sexual trauma."<sup>2</sup>

- Grounding (i.e., walking barefoot outdoors, or indoors using one of several Goop promoted “earthing gear” products) cures insomnia, reduces inflammation, provides relief from crippling arthritis, reduces chronic pain, speeds healing, reduces stress, and helps with depression, among other things.<sup>3</sup>
- Goop’s “[j]ade eggs can...prevent uterine prolapse,” among other things.<sup>4</sup>
- Goop’s essential oils can “help tremendously with chronic issues from anxiety and depression to migraines.”<sup>5</sup>
- Goop’s Black Rose Bar is “brilliant for treating acne, eczema, and psoriasis.”<sup>6</sup>
- Goop’s Eau De Parfum: Edition 02 – Shiso contains ingredients that improve memory, treat colds, and work as antibiotics.<sup>7</sup>
- Goop’s Aromatic Stress Treatment “can help release anxiety” and “treats the nerves (it’s been shown to help alleviate panic attacks).”<sup>8</sup>
- Products promoted at Goop’s June 2017 conference in Los Angeles can provide relief from migraines, depression, insomnia, and panic attacks.

TINA.org’s full sampling of inappropriate health claims made by Goop is available at <https://www.truthinadvertising.org/goop-database/>.

Based on this information, we contacted the company on August 11, 2017 with regard to TINA.org’s findings of inappropriate health claims and asked that the company remedy the deceptive marketing immediately.<sup>9</sup> Subsequently, on August 17, 2017, after communicating with Goop’s outside counsel, TINA.org also provided the company with a list of the URLs in TINA.org’s sampling of webpages that contain unsubstantiated health claims. As of today, August 22, 2017, the company has made only limited changes to the specific sampling of URLs provided to them last week.<sup>10</sup>

For these reasons, TINA.org urges your office to commence an investigation into the marketing claims being made by Goop and take appropriate enforcement action.

Sincerely,

Laura Smith, Esq.  
Legal Director  
Truth in Advertising, Inc.

Bonnie Patten, Esq.  
Executive Director  
Truth in Advertising, Inc.

Cc: Jennifer L. Barry, Latham & Watkins LLP, Counsel for Goop, Inc.

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<sup>1</sup> Goop promotes and links to several “affiliate” (i.e., third-party) products. As it states on its website, the company “on occasion, use[s] selective affiliate links, which means goop may earn a commission from the site linked to if you make a purchase via the link.” See <http://goop.com/editorial-policy/>. The company further states that “[i]t is part of goop’s DNA to collaborate with designers, labels, and brands we love on exclusive or other products we think are perfect for our goop audience. These e-commerce partnerships are an essential part of goop. We do receive a portion of sales for all items that are sold on goop.” *Id.*

<sup>2</sup> *The 8 Essential Crystals*, <http://goop.com/the-8-essential-crystals/>; also available at <https://www.truthinadvertising.org/wp-content/uploads/2017/08/Crystal-Harmonics-Unhighlighted-Screencap.png>.

<sup>3</sup> *Earthing: How Walking Barefoot Could Cure Your Insomnia & More*, <http://goop.com/earthing-how-walking-barefoot-could-cure-your-insomnia-more/>; also available at <https://www.truthinadvertising.org/wp-content/uploads/2017/08/Earthing-Unhighlighted-Screencap.png>. Note that the person interviewed in this Goop Q&A article, Clint Ober, has an undisclosed material connection to Earthing -- the company that sells the earthing gear being promoted in the Goop article – as an inventor whose name appears on three of its patents. See <https://www.earthing.com/patents/> and <https://www.truthinadvertising.org/wp-content/uploads/2017/08/Earthing-patents.pdf>.

<sup>4</sup> *Better Sex: Jade Eggs for Your Yoni*, <http://goop.com/better-sex-jade-eggs-for-your-yoni/>; also available at [https://www.truthinadvertising.org/wp-content/uploads/2017/08/Better-Sex\\_Jade-Eggs-for-Your-Yoni.png](https://www.truthinadvertising.org/wp-content/uploads/2017/08/Better-Sex_Jade-Eggs-for-Your-Yoni.png).

<sup>5</sup> *How Aromatherapy Can Help*, <http://goop.com/how-aromatherapy-can-help/>; also available at <https://www.truthinadvertising.org/wp-content/uploads/2017/08/How-Aromatherapy-Can-Help.png>.

<sup>6</sup> *Black Rose Bar*, <https://shop.goop.com/shop/products/black-rose-bar>; also available at <https://www.truthinadvertising.org/wp-content/uploads/2017/08/Black-Rose-Bar.png>.

<sup>7</sup> *Eau de Parfum: Edition 02 – Shiso*, <https://shop.goop.com/shop/products/eau-de-parfum-edition-02-shiso>; also available at [https://www.truthinadvertising.org/wp-content/uploads/2017/08/Eau-de-Parfum-Edition-02\\_Shiso.png](https://www.truthinadvertising.org/wp-content/uploads/2017/08/Eau-de-Parfum-Edition-02_Shiso.png).

<sup>8</sup> *Aromatic Stress Treatment*, <https://shop.goop.com/shop/products/aromatic-stress-treatment>; also available at <https://www.truthinadvertising.org/wp-content/uploads/2017/08/Aromatic-Stress-Treatment.png>.

<sup>9</sup> TINA.org’s August 11, 2017 letter to Goop is available at [https://www.truthinadvertising.org/wp-content/uploads/2017/08/8\\_11\\_17-ltr-to-Goop-from-TINA\\_Redacted.pdf](https://www.truthinadvertising.org/wp-content/uploads/2017/08/8_11_17-ltr-to-Goop-from-TINA_Redacted.pdf).

<sup>10</sup> As of August 22, 2017, only two Goop webpages that are part of TINA.org’s sampling have been edited to remove inappropriate health claims, as well as six BodyVibes webpages (BodyVibes is a website that Goop directs its readers to while also telling them that the stickers provide a number of health benefits). This means that more than 10 days after TINA.org sent a warning letter to Goop, 35 of the website examples in TINA.org’s database still contain inappropriate health claims.