

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Lisa Cristia, individually and on behalf of all
others similarly situated,

Plaintiff,

- against -

Trader Joe's Company,

Defendant

1:22-cv-01788

Class Action Complaint

Jury Trial Demanded

Plaintiff alleges upon information and belief, except for allegations pertaining to Plaintiff, which are based on personal knowledge:

1. Trader Joe's Company ("Defendant") manufactures, labels, markets, and sells juice represented as "Cold Pressed" under its Trader Joe's brand ("Product").



2. The relevant front label representations include “Cold Pressed Juice,” the type or flavor, i.e., “Green,” “Perishable, Keep Refrigerated” and “Trader Joe’s.”

3. Consumers are familiar with the term “fresh squeezed juice” and understand this refers to juice that is unprocessed, in its raw state and not subjected to any form of thermal or other form of preservation.

4. “Fresh squeezed juice” typically refers to citrus juices because these are extracted from citrus fruits by squeezing.

5. In contrast, juice from non-citrus fruits is obtained through the application of physical pressure to extract the liquids.

6. The term, “cold press,” refers to various pressing methods such as the Rack and Frame Hydraulic Press, Horizontal Piston Press, Bladder Press, Belt Press, and Screw Press.

7. These methods do not involve the introduction of cold temperatures.

8. The word, “cold,” is used to distinguish juices made through being pressed as opposed to being made from a centrifugal juice machine, similar to a blender.

9. Many consumers believe that juice made through a centrifugal machine causes an increase in temperature, which does not occur when juice is made through a pressing method.

10. Like “fresh squeezed juice,” consumers understand “cold pressed juice” refers to juice which was extracted from fruits and vegetables and not processed or subjected to any form of preservation beyond being “squeezed” or “pressed.”

11. Defendant sells the Product in the produce section of its stores, in proximity to fresh fruit and vegetable products, which gives consumers the impression it is freshly made, and reinforces the statement of “cold pressed juice.”



12. However, the Product has more in common with juices sold in standard refrigerator cases, because it is not freshly made or only cold pressed.



13. This is disclosed through the fine print on the side of the Product, which states:

We source fresh vegetables and fruits and extract the juices through a hydraulic press. We then use a cold water pressure method called HPP (high pressure processing) to maintain the safety of the juice and the quality of flavor.



14. “High pressure processing” or “HPP” is applied to the juice after it is extracted from the fruits and vegetables.

15. The use of HPP means describing the juice as “cold pressed” is misleading because it was processed after being extracted.

16. Other juice products sold by Defendant inform customers of subsequent processing steps they are subjected to.

17. For instance, the front labels of Defendant's apple juice is described as made from "100% Freshly Pressed Apples," but also prominently informs consumers it is "Flash Pasteurized," while its orange juice states, "Pasteurized."



18. Defendant makes other representations and omissions with respect to the Product which are false and misleading.

19. Reasonable consumers must and do rely on a company to honestly and lawfully market and describe the components, attributes, and features of a product, relative to itself and other comparable products or alternatives.

20. The value of the Product that Plaintiff purchased was materially less than its value as represented by Defendant.

21. Defendant sold more of the Product and at higher prices than it would have in the absence of this misconduct, resulting in additional profits at the expense of consumers.

22. Had Plaintiff and proposed class members known the truth, they would not have

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