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22 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
23 **IN AND FOR THE COUNTY OF MARICOPA**

24 STATE OF ARIZONA, *ex rel.* KRISTIN K.
25 MAYES, ATTORNEY GENERAL

26 Plaintiff,

27 v.

28 L'ORÉAL USA, INC., L'ORÉAL USA
PRODUCTS, INC., L'ORÉAL S.A., AND
SOFTSHEEN-CARSON LLC.

Defendants.

Case No.:

COMPLAINT

JURY TRIAL DEMANDED

1 Plaintiff, the State of Arizona, *ex rel.* Kristin K. Mayes, the Attorney General brings
2 this action against Defendants L'Oréal USA, Inc., L'Oréal USA Products, Inc., L'Oréal S.A.,
3 and SoftSheen-Carson LLC (collectively, "Defendants"). Through the conduct alleged herein,
4 Defendants violated the Arizona Consumer Fraud Act, A.R.S. § 44-1521, *et seq.* In support
5 of its Complaint, the State alleges as follows:

6 **INTRODUCTION**

7 1. For decades, Defendants have marketed and sold toxic chemical hair relaxers to
8 women and girls of African descent while concealing the devastating carcinogenic risks
9 associated with those products. In doing so, Defendants shirked duties set forth in the law and
10 exploited centuries of social pressures and discriminatory beauty standards affecting people
11 of African descent, all while prioritizing profit over consumer safety.

12 2. Defendants have marketed and sold chemical hair relaxer products in Arizona
13 under numerous brand names, including, but not limited to, Dark and Lovely, Optimum, and
14 Mizani (collectively referred to herein as "Chemical Hair Relaxer Products").

15 3. Defendants have marketed these products to women and young girls of African
16 descent as a safe and desirable means of conforming naturally textured hair to prevailing
17 beauty standards, and have marketed these products to salons as products to be used for the
18 same purpose.

19 4. Defendants have done so, even though the use of chemical hair relaxers
20 significantly increases the risk of developing uterine and ovarian cancer.

21 5. Defendants have failed, and continue to fail, to disclose the material health risks
22 associated with the use of Chemical Hair Relaxer Products and provide warnings necessary
23 to prevent consumer deception, demonstrating a callous disregard for the health of Arizona
24 consumers, particularly women of African descent.

25 6. The State brings this action to enforce the law, halt Defendants' unlawful
26 conduct, require truthful and non-misleading disclosures, obtain restitution or require
27 disgorgement, and impose statutory penalties sufficient to deter future violations of Arizona
28 law.

1
2 **PARTIES**

3 **I. PLAINTIFF**

4 7. The State of Arizona *ex rel.* Kristin K. Mayes, the Attorney General of Arizona
5 (the “State”), is authorized to bring this action pursuant to the Arizona Consumer Fraud Act,
6 A.R.S. §§ 44-1521 to 44-1534, to obtain injunctive relief to permanently enjoin and prevent
7 the unlawful acts and practices alleged in this Complaint, and to obtain other relief, including
8 restitution, disgorgement of profits, gains, gross receipts, or other benefits, civil penalties, and
9 costs and attorneys’ fees.

10 **II. DEFENDANTS**

11 8. Defendant L’Oréal USA, Inc. is a Delaware corporation with its principal place
12 of business and headquarters located at 575 Fifth Avenue, New York, New York 10017.

13 9. Defendant L’Oréal USA Products, Inc. is a Delaware corporation with its
14 principal place of business and headquarters located at 10 Hudson Yards 347, 10th Avenue
15 New York, New York 10001.

16 10. Defendant SoftSheen-Carson, LLC is a limited liability company organized in
17 the State of New York with its principal place of business and headquarters located at 80 State
18 Street, Albany, New York 12207.

19 11. Defendant L’Oréal S.A. is a Société Anonyme, with its principal place of
20 business and headquarters located at 41 Rue Martre, 92117 Clichy, Hauts-de-Seine, France.

21 12. Defendant L’Oréal S.A. is liable to Plaintiff under the facts alleged in this
22 complaint by virtue of its own acts and omissions, as well as for the acts and omissions of its
23 agents, joint venturers, and alter ego subsidiaries, Defendants L’Oréal USA, Inc., L’Oréal
24 USA Products, Inc., and SoftSheen-Carson, LLC (hereinafter, collectively, “the L’Oréal USA
25 entities”).

26 13. According to public filings and statements contained in documents such as
27 L’Oréal’s 2022 Universal Registration Document, the domestic hair products manufactured,
28 marketed, or sold by the L’Oréal USA entities are controlled or co-managed by Defendant

1 L'Oréal S.A. The L'Oréal USA entities are wholly owned subsidiaries of L'Oréal S.A.¹

2 14. Upon information and belief, L'Oréal S.A. commingles leadership and
3 personnel with the L'Oréal USA entities. For instance, L'Oréal USA, Inc.'s current C.E.O.,
4 David Greenberg, is currently serving on L'Oréal S.A.'s Executive Committee. Moreover,
5 Jean-Paul Agon, the current Chair of L'Oréal S.A.'s Board of Directors, is the former C.E.O.
6 of L'Oréal USA, Inc.

7 15. The L'Oréal USA entities and L'Oréal S.A. exchange documents, share
8 marketing, and are jointly responsible for and closely interconnected to the sale of L'Oréal
9 hair relaxer products. This interconnection is demonstrated by, among other things, L'Oréal
10 S.A.'s global communications operations through which it makes affirmative public
11 statements about Chemical Hair Relaxer Products sold in the United States, blurring the
12 distinctions among the Defendants and presenting them as a unified enterprise to consumers.

13 16. Consumers seeking information regarding the L'Oréal USA entities online are
14 directed to a website owned, operated and controlled by L'Oréal S.A. That website provides
15 a Privacy Policy that identifies "L'Oréal S.A. 14 Rue Royale, Paris, 75008, France"² as the
16 relevant consumer contact entity.

17 17. Likewise, Defendant SoftSheen-Carson, LLC's website represents that it
18 operates under the common ownership of L'Oréal S.A., stating: "We receive or have access
19 to personal information from other companies and brands under common ownership with Us,
20 as well as our ultimate parent company L'Oréal S.A."³

21 18. L'Oréal S.A. owns the formulations for the Chemical Hair Relaxer Products
22 sold in the United States. L'Oréal S.A. has worked with the L'Oréal USA entities to apply for
23 approvals from the U.S. Food and Drug Administration.

24 19. L'Oréal S.A. secured the patent for Chemical Hair Relaxer Products that have
25

26 ¹ <https://www.loreal-finance.com/eng/2022-universal-registration-document/en/article/253/>
27 (last visited May 11, 2026).

28 ² <https://www.loreal.com/en/group/global-privacy-policy/> (last visited May 11, 2026).

³ <https://www.softsheen-carson.com/privacy-policy> (last visited May 11, 2026).

1 been developed, sold, and distributed by the L'Oréal USA entities.

2 20. L'Oréal S.A. is the L'Oréal entity responsible for managing the financial
3 tracking of the Chemical Hair Relaxer Products sold in the United States. Furthermore,
4 L'Oréal S.A. separately advertises L'Oréal USA entities' Chemical Hair Relaxer Products,
5 such as Dark & Lovely, on the L'Oréal S.A. website.

6 21. Upon information and belief, the L'Oréal USA entities' ability to sell the
7 referenced Chemical Hair Relaxer Products herein is through the express authorization of
8 L'Oréal S.A.

9 22. Accordingly, L'Oréal S.A. has controlled and dominated the other L'Oréal USA
10 entities to such an extent that the separate personalities of these entities no longer exist, and
11 the other L'Oréal USA entities lack an existence independent from L'Oréal S.A. Instead, they
12 have together operated and functioned as one entity. The L'Oréal USA entities have acted as
13 instrumentalities of L'Oréal S.A. As such, the corporate form has been used to improperly
14 defeat justice and/or evade tort responsibility. L'Oréal S.A. is therefore liable for the acts of
15 the L'Oréal USA entities.

16 23. Relatedly, by virtue of L'Oréal S.A.'s control and domination of the L'Oréal
17 USA entities, as well as by virtue of L'Oréal S.A.'s involvement with the L'Oréal USA
18 entities in the design, development, manufacture, testing, labeling, packaging, distribution,
19 marketing, and/or sale of Chemical Hair Relaxer Products, the L'Oréal USA entities have
20 acted as the agents and joint venturers of L'Oréal S.A. in the design, development,
21 manufacture, testing, labeling, packaging, distribution, marketing, and/or sale of Chemical
22 Hair Relaxer Products.

23 24. Defendants transact business in Arizona by marketing and selling chemical hair
24 relaxer products under multiple brand names, including but not limited to Dark & Lovely,
25 Optimum, Mizani, Bantu, Care Free Curl, Look of Radiance, Roots of Nature, and Ultra
26 Precise.

27 25. At all relevant times, the L'Oréal USA entities acted at the direction of L'Oréal
28 S.A. and in concert with L'Oréal S.A. in deceptively and unfairly advertising, marketing, and

1 selling Chemical Hair Relaxer Products

2 26. Through their conspiracy to deceptively and unfairly advertise, market, and sell
3 Chemical Hair Relaxer Products, the L'Oréal USA entities and L'Oréal S.A have targeted and
4 harmed consumers within the State of Arizona.

5 **JURISDICTION AND VENUE**

6 27. The State brings this action pursuant to the Consumer Fraud Act ("ACFA"),
7 A.R.S. § 44-1521, *et seq.*

8 28. This Court has subject matter jurisdiction pursuant to A.R.S. § 12-123 and
9 Article VI, Section 14, of the Arizona Constitution.

10 29. Venue is appropriate pursuant to A.R.S. § 12-401(17) as Maricopa County is
11 the seat of the State government and the Office of the Attorney General.

12 30. This Court has personal jurisdiction over Defendants because they: (1) transact
13 business within Arizona and have purposefully availed themselves of this forum by
14 conducting business in the State and causing harm as a direct and proximate result of their
15 actions, (2) maintain substantial contacts in Arizona, and (3) committed violations of the
16 Arizona Consumer Fraud Act within the State of Arizona. This action arises out of and relates
17 to Defendant's contacts within Arizona, which are sufficient to permit this Court to exercise
18 jurisdiction.

19 31. Defendants' sale of Chemical Hair Relaxer Products has been directed at and
20 has had the foreseeable and intended effect of harming consumers residing in Arizona. At-
21 issue transactions occurred in the State of Arizona.

22 32. Defendants purposefully and willfully availed themselves of the privilege of
23 doing business within Arizona, derived substantial financial gain from doing so, and otherwise
24 availed themselves of the benefits and protections of the laws of Arizona.

25 33. Defendants systematically targeted the Arizona market in connection with the
26 sale of their Chemical Hair Relaxer Products such that there is a strong relationship among
27 Defendants, this forum, and the litigation.

28 34. The State's claims set forth herein are not barred by any statute of limitations

pursuant to A.R.S. § 12-510.

35. Pursuant to Rule 26.2 of the Arizona Rules of Civil Procedure, this action is subject to the Tier 3 discovery limits. Upon proper application, the State will seek additional discovery beyond these limits.

FACTUAL ALLEGATIONS

I. THE ORIGIN OF CHEMICAL HAIR RELAXERS

36. In its natural state, afro-textured hair is characterized by coily, springing, zigzag, and s-curve curl patterns, as well as its density, fullness, texture, and feel.⁴

37. Due to practices during enslavement, the framing of afro-textured hair became a tool for subordination and degradation.

38. In 1786, the Governor of Louisiana colony, Don Esteban Miro, passed the “Tignon Law” requiring women of African descent to wear a tignon (scarf) over their hair as a way of signifying they were members of the slave class, *even if they were free*. This law signaled to Black and Brown people that their hair held a symbol of inequality and had to be altered or concealed.

39. Afro-textured hair can be straightened with the use of hair tools and non-chemical hair products. Prior to the invention of chemical hair relaxers, individuals would “press” afro-textured hair with metal hair tools such as the “hot comb.” Pressing combs or hot combs are metal hair tools that are first heated in a stove or ceramic heater, then pressed into hair strands to temporarily straighten them.⁵

40. Black inventor Garrett Augustus Morgan discovered and created a system that would chemically straighten afro-textured hair, eliminating the issue of “shrinkage,” where the curl pattern results in hair appearing to be shorter than it actually is.

41. In addition to being an inventor, Morgan was a tailor. In the early 1900s, Morgan was repairing his sewing machines and creating a way to polish the needles to stitch

⁴ Patrick Obukowcho, *Hair Relaxers: Science, Design, and Application* 14, 26 (2018).

⁵ Jaclyn Peterson, *The Price of Beauty*, CTI Charlotte Teachers Institute Curriculum (2021).

fabrics more smoothly.⁶ He applied a chemical solution to the needles and wiped the solution off with a rag and later noticed that the “curly” fibers in the rag were straightened after exposure to the chemical.⁷ Morgan turned his formula into a gel-hair product, creating the G.A. Morgan Hair Refining Cream that was marketed in 1913.

“IMPROVE YOUR APPEARANCE”

WE GUARANTEE THAT
YOU CAN TREAT YOUR OWN HAIR
saving time, money and worry and getting better results by using
THE G. A. MORGAN METHOD.

The Only Complete Line in the World, for Men, Women and Children

WOMEN
Our treatment will grow your hair and impart to it a beautiful, soft, wavy appearance, no matter how bad it looks now.
\$2.00
will bring you a complete outfit, postage prepaid, including G. A. Morgan's Hair Refiner Cream, Hair Refiner Soap, Italian Hair Oil, Hair Pressing Gloss, Hair Pressing Night Cap, Hair Lay Fine Pomade, Heavy Steel Hair Pressing Comb, \$1.00.

MEN
You can positively see given your hair in three months with our famous Hair Refiner Cream.
\$2.50
will bring a complete outfit, postage prepaid, including G. A. Morgan's Hair Refiner Cream, Hair Refiner Soap, Italian Hair Oil, Hair Pressing Gloss, Hair Pressing Night Cap, Hair Lay Fine Pomade, Heavy Steel Hair Pressing Comb, \$1.00.

AGENTS WANTED TO CANVASS
G. A. MORGAN'S HAIR PRODUCTS

HAIR REFINER CREAM	\$1.00
HAIR REFINER SOAP	.25
ITALIAN HAIR OIL	.35
HAIR GROWER	.50
HAIR PRESSING GLOSS	.50
DANDRUFF AND TETTER TREATMENT	1.00
HAIR PRESSING NIGHT CAP	1.00
BLEACHENE	.50
BLACK HAIR STAIN	.50
HAIR LAY FINE POMADE	.25

World War has been declared on short, mean, snub-nosed and bad appearing hair. A successful campaign is being conducted by General G. A. Morgan from the Main Training Camp at Cleveland, Ohio. Other camps are to be found in Drug Stores, Barber Shops and Up-to-Date Beauty Parlors throughout the world. Why not join our ranks and obtain our special treatment guaranteed to give you the long wanted and desired satisfaction? We train you free of charge in the art of treating your own and others' hair. You can't earn larger sums of money with a small investment. Write to us at once and let us advise you how to go ahead with this proposition.

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THE NEW IDEA
“SELF TREATMENT GIVES BEST RESULTS”
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Tell Your Hair Dresser To Get
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RIGHT OR LEFT-HANDED
HAIR COMB
EASY RETAINING
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AIR STRAIGHTENING
AND SOFTLY CURVED
LIGHTLY POLISHED
AND WOOD HANDLED
AND GET ONE FOR YOUR
OWN USE, PRICE . . . \$3.50
CLIP THIS COUPON IT IS WORTH
25 CENTS
On one complete outfit of our goods for either men or women
Name _____
Address _____
City _____

42. Chemical hair relaxing is highly prevalent among Black and Brown women. In some studies, up to 90% of Black women have used hair relaxers and straighteners, which is more commonplace for these women than women of any other race.⁸

43. By 2020, the global Black hair care market was estimated at \$2.5 billion, with the chemical hair relaxer market alone estimated at \$718 million in 2021, and an expectation of growth to \$854 million annually by 2028.

⁶ Patrick Obukowcho, *Hair Relaxers: Science, Design, and Application* 27 (2018).

⁷ Mary N. Oluonye, *Garrett Augustus Morgan: Businessman, Inventor, Good Citizen* 28 (2008).

⁸ Linda Villarosa, *A Relaxer Reckoning*, N.Y. TIMES, June 13, 2024, <https://www.nytimes.com/2024/06/13/briefing/hair-relaxers-health-risks.html>. For example, The Bertrand Study discussed in Section III *infra* found, out of 44,798 women, 22,728 were “moderate” users, 16,535 were “heavy” users, and 4,535 were “never/light” users—meaning over 88% of the women had used Chemical Hair Relaxer Products before. Kimberly A. Bertrand et al., *Hair relaxer use and risk of uterine cancer in the Black Women's Health Study*, 239 Env't Rsch., No. 117228 (2023) <https://pubmed.ncbi.nlm.nih.gov/37821068/>.

II. THE NATURE OF CHEMICAL HAIR RELAXER PRODUCTS

44. Chemical Hair Relaxer Products are a class of products. These highly alkaline, hydroxide-based chemical hair relaxers break and reform the disulfide bonds in keratin—the structural protein that gives hair its shape—in a process referred to as lanthionization.

45. Chemical Hair Relaxer Products are applied to the hair shaft and left in place for a cooking interval, during which time the chemical hair relaxer alters the hair’s texture as the highly alkaline product purposefully breaks and reforms the disulfide bonds that form the hair’s keratin structure.⁹

46. The effect of this protein restructuring is to straighten and smooth the spiral-shaped keratin molecules, allowing the hair shaft to loosen and straighten. After a period of weeks or months, depending on the hair’s natural growth rate, the treated portion of the hair grows away from the scalp as new growth sprouts from the roots. Maintaining the relaxed hairstyle requires ongoing application of Chemical Hair Relaxer Products to the new growth—a process referred to as “re-touches”—resulting in users relaxing their new growth every four to eight weeks on average.

47. The highly alkaline chemistry that enables Chemical Hair Relaxer Products to break and reform disulfide bonds is corrosive to the skin. Repeated scalp exposure causes chemical burns, scalp irritation, lesions, hair loss, and alopecia, and compromises the skin’s protective barrier.

48. The dermis on the scalp and forehead, as compared to other areas of the body such as the forearms, palms, and abdomen, is more permeable to percutaneous absorption. Once absorbed, the chemical constituents of Chemical Hair Relaxer Products enter the bloodstream through blood vessels located directly below the dermis and circulate systemically.

49. Children and adolescents are particularly vulnerable to the risks of Chemical

⁹ A South African study tested 39 chemical hair relaxer brands and found a median pH level of 12.36. See Sishi VNB et al., *The pH of lye and no-lye hair relaxers, including those advertised for children, is at levels that are corrosive to the skin*. S Afr Med J. 2019 Nov 27;109(12):941-946.

1 Hair Relaxer Products due to thinner skin, higher surface-area-to-body-weight ratios, and
2 developing biological systems. Many users of Chemical Hair Relaxer Products begin use in
3 childhood or adolescence and continue use over many years.

4 50. Chemical hair relaxer products have been found to contain categories of
5 chemicals that are toxic, or that lead to the formation and release of toxic compounds when
6 applied to the scalp under labeled, customary and/or foreseeable use. These include EDCs
7 such as phthalates, parabens, cyclosiloxanes, diethanolamine, and benzophenones, and
8 chemicals classified by federal and international agencies as known or probable human
9 carcinogens, such as ethylene oxide, 1,4-dioxane, formaldehyde, and heavy metals.

10 51. Endocrine Disrupting Chemicals (“EDCs”) interfere with the body’s hormonal
11 systems by mimicking, blocking, or altering natural hormone signaling. Exposure to EDCs
12 has been associated with reproductive harms, abnormal cell proliferation, and increased risk
13 of hormone-related disease as early as 1962.¹⁰

14 52. EDCs and carcinogens (like formaldehyde, 1,4-dioxane, heavy metals, and
15 ethylene oxide) act in an additive manner in chemical hair relaxer products, to increase the
16 risk of cancer.¹¹

17 53. California’s Proposition 65, enacted in 1986, is a “right-to-know” law requiring
18 businesses to warn Californians about significant exposures to chemicals that cause cancer,
19 birth defects, or reproductive harm.

20 54. Several categories of chemicals found in chemical hair relaxer products have
21 long been listed under California's Proposition 65.

22 55. For example, 1,4-dioxane was added to California's Proposition 65 list as a
23 carcinogen on January 1, 1988.¹² Formaldehyde was added to the California Proposition 65
24

25 ¹⁰ Jennifer S. Pierce, Evaluation of dermal exposure to phthalates and parabens resulting
26 from the use of hair relaxers, 35 Int’l J. of Env’t Health Rsch. (2024),
<https://doi.org/10.1080/09603123.2024.240283>.

27 ¹¹ R. Modica, et al., *Endocrine-disrupting chemicals (EDCs) and cancer: New perspectives*
28 *on an old relationship*, 46(4) J. Endocrinol Invest. 667 (2023).

¹² State of California OEHHA, *1,4-Dioxane*, <https://oehha.ca.gov/proposition-65/chemicals/14-dioxane> (last visited May 13, 2026).

list as a carcinogen on January 1, 1988.¹³ Ethylene oxide was officially added to California's Proposition 65 list as a carcinogen on July 1, 1987, and listed for reproductive toxicity (specifically female reproductive toxicity) on February 27, 1987.¹⁴

56. Additionally, the International Agency for Research on Cancer (“IARC”) has classified 1,4-dioxane as “possibly carcinogenic to humans” in 1999.¹⁵ IARC officially classified formaldehyde as “probably carcinogenic” in 1987 and 1995 before upgrading the classification to a Group 1 “known to be a human carcinogen” in 2004.¹⁶ IARC classified ethylene oxide as Group 1, “carcinogenic to humans,” in 1994.¹⁷

III. CHEMICAL HAIR RELAXER PRODUCT USE IS ASSOCIATED WITH A SIGNIFICANT INCREASED RISK OF CANCER

57. Significant and robust epidemiological studies establish the increased risk of uterine and ovarian cancer amongst women who use chemical hair relaxers three or more times per year.

58. Beginning in 1995, Boston University conducted the Black Women’s Health Study (“BWHS”), which enrolled more than 59,000 self-reported Black and African-American Women ages 21–69.¹⁸ The BWHS’s goal was to assess risk factors for cancers and major illnesses in Black women that often go unstudied due to racial disparities in healthcare.¹⁹ Participants completed the initial questionnaire in 1995 and continue to provide health updates every two to three years.

¹³ State of California OEHHA, *Formaldehyde (gas)*, <https://oehha.ca.gov/proposition-65/chemicals/formaldehyde-gas> (last visited May 13, 2026).

¹⁴ State of California OEHHA, *Ethylene Oxide*, <https://oehha.ca.gov/proposition-65/chemicals/ethylene-oxide> (last visited May 13, 2026).

¹⁵ IARC, *List of Classifications: Agents classified by the IARC Monographs, Volumes 1-141*, <https://monographs.iarc.who.int/list-of-classifications> (last visited May 13, 2026).

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ The Black Women’s Health Study, <https://www.bu.edu/bwhs/> (last visited May 11, 2026).

¹⁹ *Id.*

1 59. From 2003–2009, the NIEHS, the National Institutes of Health (“NIH”), and
2 the U.S. Department of Health and Human Services conducted the “Sister Study,” which
3 enrolled 50,884 U.S. women aged 35–74 who had a sister with breast cancer.²⁰ Researchers
4 developed the Sister Study “to investigate the environmental and genetic risk factors for breast
5 cancer.”²¹ Participants provided annual health updates and a detailed follow-up every two to
6 three years to document changes.²²

7 60. The Sister Study’s and BWHS’s high retention rate of 85% and 80%,
8 respectively, has led numerous publications to rely on their data, including several studies on
9 Chemical Hair Relaxer Products.

10 61. In 2021, Alexandra White, the head of the NIEHS Environment and Cancer
11 Epidemiology group, led a study to evaluate the potential link between hair products and
12 ovarian cancer (hereinafter the “White Study”).²³ The study used data from the Sister Study,
13 as participants’ follow-up reports included information on their demographics, reproductive
14 history, and personal care product use.²⁴ After excluding Sister Study participants with a
15 history of ovarian cancer or bilateral oophorectomy, the White Study reviewed data of 40,559
16 Sister Study participants.²⁵

17 62. The White Study found frequent use of chemical hair relaxers was associated
18 with two times increase in risk of ovarian cancer.²⁶ Researchers also highlighted some of the
19
20
21

22 ²⁰ The Sister Study, <https://sisterstudy.niehs.nih.gov/English/index1.htm> (last visited May
23 11, 2026).

24 ²¹ *Id.*

25 ²² *Id.*

26 ²³ Alexandra J White et al., *Use of hair products in relation to ovarian cancer risk*, 42(9)
Carcinogenesis 1189 (2021), <https://doi.org/10.1093/jnci/djaf280>.

27 ²⁴ *Id.*

28 ²⁵ *Id.*

²⁶ *Id.*

harmful categories of chemicals found in chemical hair relaxers, including formaldehyde, parabens, phthalates, metals, and their known endocrine disrupting properties.²⁷

63. In October 2022, Che-Jung Chang and a robust group of researchers released a study (hereinafter the “Chang Study”) commissioned by the NIH, which included 33,497 U.S. women who participated in the Sister Study.²⁸ In reviewing the Sister Study participants’ hair product usage and updates on uterine cancer diagnosis, the Chang Study found among the women who frequently used chemical hair straighteners or relaxers there was a **doubling of the risk of developing uterine cancer**.²⁹

64. The Chang Study also supports prior research establishing an increased risk of hormone-related cancer in women who have used chemical hair relaxer products.³⁰ The authors noted Black women’s higher use of chemical hair relaxer products, even starting at a younger age, and the products’ large number of endocrine disrupting chemicals (EDCs).³¹ Importantly, the authors note that heating during the straightening process can enhance absorption of these EDCs into the skin.³²

65. In 2023, Kimberly A. Bertrand and other researchers at the Boston University’s Black Women’s Health Study found that long-term use of chemical hair relaxers was associated with an increased risk of uterine cancer among postmenopausal women

²⁷ *Id.*

²⁸ Che-Jung Chang et al., *Use of Straighteners and Other Hair Products and Incident Uterine Cancer*, 114 J. of the Nat’l Cancer Inst. 1636 (2022), <https://pubmed.ncbi.nlm.nih.gov/36245087>.

²⁹ *Id.*

³⁰ *Id.*

³¹ EDCs are exogenous chemicals, or mixtures of chemicals, that interfere with any aspect of hormone action. ENDOCRINE SOCIETY, *Endocrine-Disrupting Chemicals: An Endocrine Society Position Statement*, (Apr. 22, 2025), <https://www.endocrine.org/advocacy/position-statements/endocrine-disrupting-chemicals>.

³² *Id.*

1 (hereinafter the “Bertrand Study”).³³ Women who used relaxers had a 60% higher risk of
2 uterine cancer than those who never used hair relaxers.³⁴ Women who heavily used hair
3 relaxers had a 64% higher risk of uterine cancer, and those with twenty or more years of usage
4 had a 71% higher risk.³⁵

5 66. The researchers recognized the EDCs frequently found in chemical hair
6 relaxers, such as phthalates, parabens, formaldehyde, and metals.³⁶ Researchers, consistent
7 with scientists around the world, noted how these categories of chemicals interfere with
8 hormone function and promote cancer development.³⁷

9 67. In 2025, Jared P. Bailey and researchers from the Sister Study found that the
10 use of chemical hair relaxers was associated with non-reproductive but hormonal cancers,
11 such as thyroid and pancreatic cancer.³⁸

12 68. The study utilized data from the Sister Study focusing on the participants’
13 reported frequency of chemical hair relaxer product use and self-reported development of
14 various cancers, including melanoma, thyroid, lung, non-Hodgkin lymphoma, leukemia,
15 pancreatic, colorectal, and kidney.³⁹

16 69. The researchers found there was an increased risk of thyroid, non-Hodgkin
17 lymphoma, and pancreatic cancer among the women who used chemical hair relaxers.⁴⁰
18 Specifically, there was a 71% increased risk of thyroid cancer, and a 166% increased risk of
19

20 ³³ Kimberly A. Bertrand et al., *Hair relaxer use and risk of uterine cancer in the Black*
21 *Women's Health Study*, 239 Env’t Rsch., No. 117228 (2023)
<https://pubmed.ncbi.nlm.nih.gov/37821068/>.

22 ³⁴ *Id.*

23 ³⁵ *Id.*

24 ³⁶ *Id.*

25 ³⁷ *Id.*

26 ³⁸ Jared T. Bailey et al., *Use of hair straighteners and chemical relaxers and incidence of*
27 *non-reproductive cancers*, J. of the Nat’l Cancer Inst. 1 (2025),
<https://doi.org/10.1093/jnci/djaf280>.

28 ³⁹ *Id.*

⁴⁰ *Id.*

1 pancreatic cancer.⁴¹ With these findings, the authors noted how these cancers are hormone-
2 sensitive and thus influenced by hormone-related mechanisms.⁴²

3 70. Defendants had actual knowledge of the Sister Study, the White Study, the
4 Chang Study, and the Bertrand Study at the time of publication of each respective study.

5 71. Despite Defendants' knowledge, Defendants did not disclose this information
6 to Arizona consumers and continued to advertise, market, and sell their Chemical Hair
7 Relaxer Products to consumers in the State of Arizona.

8 **IV. DEFENDANTS' MISLEADING MARKETING AND OMISSIONS**

9 72. Starting as early as the 1970s, Defendants have advertised and sold Chemical
10 Hair Relaxer Products to Black and Brown women within Arizona, and to hair salons serving
11 the same, by relying on historical Eurocentric beauty standards described above.

12 73. Defendants engaged in a marketing scheme premised heavily upon branding
13 and slogans reinforcing straight hair as the quintessential standard of beauty and
14 professionalism, as exemplified in the following advertisements:

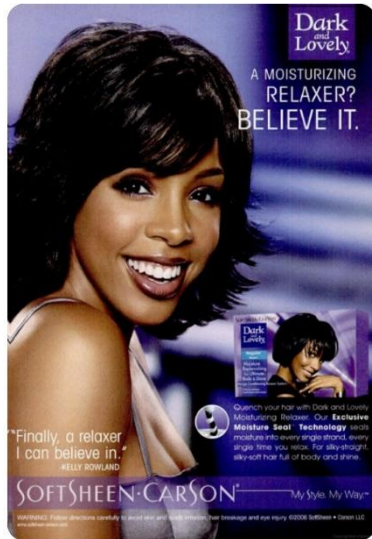


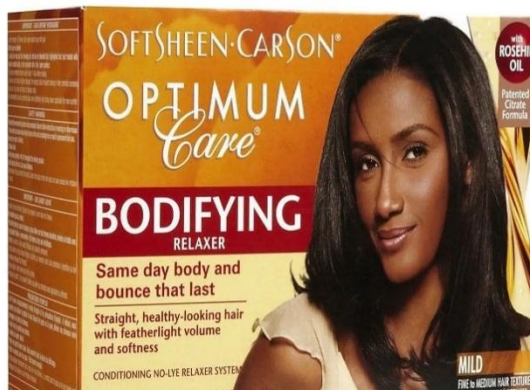
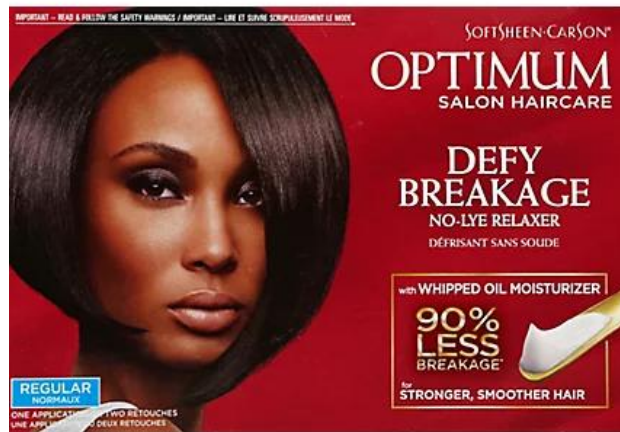
41 *Id.*

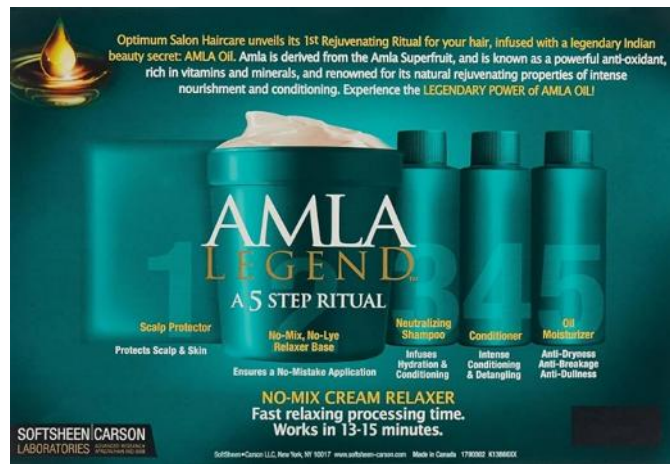
42 *Id.*

74. Throughout the course of their marketing efforts in Arizona, including in advertisements and product packaging, Defendants have further created the false and misleading impression that Chemical Hair Relaxer Products are safe and beneficial to the user.

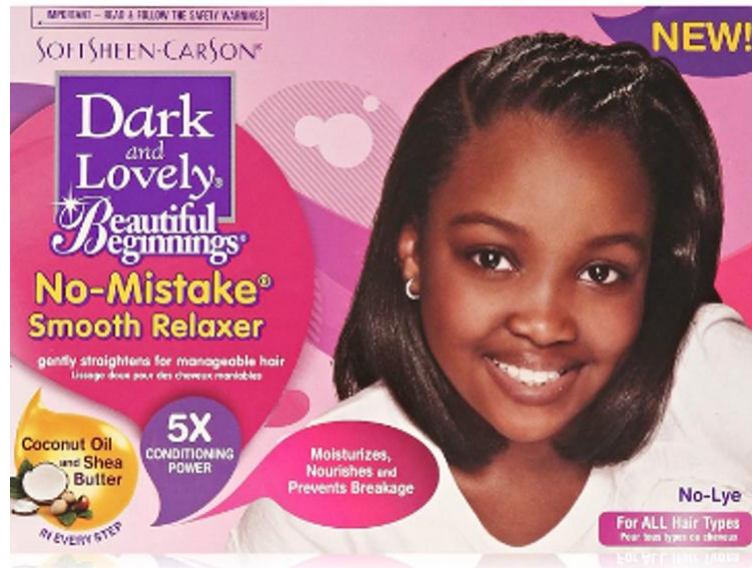
75. Specifically, Defendants have represented that their products are healthy, natural, nourishing, moisturizing, strengthening, and gentle, as exemplified below:







76. Further, Defendants have specifically marketed their Chemical Hair Relaxer Products to children, including through their Dark and Lovely Beautiful Beginnings line. Defendants used specific marketing language with these Chemical Hair Relaxer Products in order to reassure parents that these products were safe, such as emphasizing natural ingredients and healthy benefits.





77. Defendants publicly claim that safety is their “number one duty” toward their customers, and that “each ingredient has been meticulously selected and thoroughly vetted” to ensure safety.⁴³

78. Defendants’ advertisements, product packaging, marketing materials, and corporate communications, considered as a whole, falsely and deceptively create the net impression that Chemical Hair Relaxer Products are safe and beneficial for use by Arizona consumers, including children.

79. Defendants knew of the toxicity of their Chemical Hair Relaxer Products and of the significant health risks associated with their use, including that the scalp is particularly vulnerable to chemical absorption both because of the nature of the scalp and because of the nature of Chemical Hair Relaxer Products. The hazardous nature of the category of chemicals identified in Chemical Hair Relaxer Products, as described in Section IV, has been documented for decades in published scientific, toxicological and other literature, IARC monographs, California Proposition 65 listings, standard cosmetic safety references, and safety data sheets routinely available to manufacturers, distributors, and sellers of cosmetic products.

80. As the manufacturers, distributors, and sellers of their Chemical Hair Relaxer Products, Defendants had specialized access to and knowledge of the composition of their products, the chemical and toxicological profile of those categories of chemicals, and the

⁴³L’Oréal Groupe, *The Quality and Safety of Our Products Are Our Priority*, <https://www.loreal.com/en/commitments-and-responsibilities/for-our-products/product-quality-and-safety/> (last visited May 11, 2026).

1 long-term health risks associated with repeated and prolonged use of products containing
2 those categories of chemicals, knowledge that was not equally available to Arizona
3 consumers.

4 81. The peer-reviewed epidemiological studies described in Section III, of which
5 Defendants are aware, further confirmed the risks and harms of Defendants' Chemical Hair
6 Relaxer Products.

7 82. At all relevant times, Defendants deceptively and unfairly concealed and
8 omitted from Arizonans, including both individuals and hair salons, through their advertising
9 and product packaging, that their Chemical Hair Relaxer Products can increase the risk of
10 uterine and ovarian cancer.

11 83. Even after the publication of the White Study (2021), the Chang Study (2022),
12 the Bertrand Study (2023), and the additional studies described in Section III, Defendants
13 continued to market their Chemical Hair Relaxer Products to Arizona consumers as healthy,
14 nourishing, gentle, and safe, and continued not to disclose the hazards herein.

15 **CLAIMS FOR RELIEF**

16 **COUNT ONE**

17 **VIOLATION OF THE ARIZONA CONSUMER FRAUD ACT**

18 **A.R.S. §§ 44-1521 – 1534**

19 **(Deceptive Acts and Practices)**

20 84. The State realleges and incorporates by reference the allegations in paragraphs
21 1 - 83 of this Complaint as though fully set forth herein.

22 85. The conduct alleged herein constitutes deception, deceptive or unfair acts or
23 practices, fraud, false pretenses, false promises, and/or misrepresentations in connection with
24 the sale or advertisement of merchandise in violation of the Consumer Fraud Act,
25 A.R.S. § 44-1522(A).

26 86. Defendants are "persons" within the meaning of the ACFA, which is defined to
27 include domestic and foreign corporations, companies, business entities, or associations and
28 any agent, employee, salesman, partner, officer, director, member, stockholder, associate, or
trustee thereof. A.R.S. § 44-1521(6).

1 87. Defendants' Chemical Hair Relaxer Products are "merchandise" under the
2 ACFA, which is defined to include "objects, wares, [and] goods...." A.R.S. § 44-1521(5) that
3 were advertised and sold in the State of Arizona.

4 88. The Arizona Attorney General is authorized by statute to enforce the ACFA
5 whenever the Attorney General "has reasonable cause to believe that a person has engaged
6 in, is engaging in or is about to engage in any" practice that violates the Arizona Consumer
7 Fraud Act. A.R.S. § 44-1524.

8 89. Defendants, through their communications to individual consumers and salons
9 within the State of Arizona, including through their product packaging, have repeatedly
10 violated and continue to violate the ACFA by engaging in affirmatively deceptive acts and
11 practices, including misrepresenting their Chemical Hair Relaxer Products as safe, gentle,
12 natural, and/or beneficial to consumers.

13 90. Defendants, through their communications to individual consumers and salons
14 within the State of Arizona, including through their product packaging, have repeatedly
15 violated and continue to violate the ACFA by deceptively omitting material facts, including:
16 (1) omitting from their advertising and packaging that the safety of their Chemical Hair
17 Relaxer Products has not been substantiated, and (2) omitting from their advertising and
18 packaging the carcinogenic risks of their Chemical Hair Relaxer Products.

19 91. Defendants made these omissions of material fact with the intent that consumers
20 rely on these omissions when purchasing Defendants' merchandise. Defendants intentionally
21 engaged in these deceptive acts and practices.

22 92. While engaging in the acts and practices alleged in this Complaint, Defendants
23 acted willfully and knew or should have known that their conduct was of the nature prohibited
24 by A.R.S. § 44-1522, subjecting themselves to enforcement and penalties as provided in
25 A.R.S. § 44-1531(A).

26 93. Defendants committed separate and independent violations of the ACFA
27 through each and every misrepresentation and omission, including through each sale of a
28 Chemical Hair Relaxer Product in Arizona.

COUNT TWO
VIOLATION OF THE ARIZONA CONSUMER FRAUD ACT
A.R.S. §§ 44-1521 – 1534
(Unfair Practices)

94. The State realleges and incorporates by reference the allegations in paragraphs 1 - 83 of this Complaint as though fully set forth herein.

95. The ACFA prohibits the use of “unfair” acts and practices in connection with the sale or advertisement of merchandise. A.R.S. § 44-1522(A).

96. Defendants, through their actions within the State of Arizona repeatedly violated the ACFA by engaging in unfair acts and practices, including:

- a. omitting material facts relating to the risks of Chemical Hair Relaxer Products;
- b. misrepresenting that Chemical Hair Relaxer Products are safe, gentle, and natural;
- c. selling Chemical Hair Relaxer Products without substantiating the safety of these products; and
- d. selling products that have high estrogenic properties to girls and women in Arizona without warning.

97. Defendants’ conduct described herein was intentional, violated established public policy, was harmful to consumers, was not reasonably avoidable by consumers, and was not outweighed by countervailing benefit to consumers or to competition.

98. Defendants’ conduct is and was contrary to well-established public policy.

99. Defendants’ unfair acts and practices were harmful to Arizona consumers, and such harm is not outweighed by any benefit to consumers or competition.

100. Defendants’ unfair acts and practices exposed Arizona consumers to carcinogenic substances and physical harm and also deprived consumers and salons of their decision to purchase other, potentially safer products or to forego certain hair treatments altogether, thereby causing economic harm.

101. Arizona consumers could not reasonably avoid the harm caused by Defendants’

1 unfair acts and practices. Defendants have specialized and/or exclusive knowledge about the
2 nature of Chemical Hair Relaxer Products to which Arizona consumers do not have access.

3 102. There is no benefit to consumers or competition from failing to test consumer
4 products for safety or from withholding relevant safety information from consumers.

5 103. While engaging in the acts and practices alleged in this Complaint, Defendants
6 were willful and knew or should have known that their conduct was of the nature prohibited
7 by A.R.S. § 44-1522, subjecting themselves to enforcement and penalties as provided in
8 A.R.S. § 44-1531(A).

9 104. Defendants committed separate and independent violations of the ACFA
10 through each and every unfair act and practice, including through each sale of a Chemical
11 Hair Relaxer Product in Arizona.

12 **PRAYER FOR RELIEF**

13 WHEREFORE, Plaintiff prays for entry of judgment against the Defendants, jointly
14 and severally, for all the relief requested herein and to which the Plaintiff may otherwise be
15 entitled, including, without limitation, as follows:

- 16 a. A determination that Defendants have violated the Arizona Consumer Fraud Act;
17 b. Permanent injunctive relief in accordance with the Arizona Consumer Fraud Act
18 to the effect that Defendants, their affiliates, successors, transferees, assignees, and
19 the officers, directors, partners, agents, and employees thereof, and all other
20 persons acting or claiming to act on their behalf or in concert with them, be
21 enjoined and restrained from continuing to sell their Chemical Hair Relaxer
22 Products without adequate warning of their significant and potentially terminal
23 health risks;
24 c. An award of the maximum amount of statutory civil penalties available under
25 A.R.S. § 44-1531 against each Defendant for each willful violation of the Arizona
26 Consumer Fraud Act;
27 d. An award of restitution, disgorgement, and all other legal and equitable relief to
28

- 1 which Plaintiff and other Arizona consumers may be entitled;
- 2 e. An award of pre- and post-judgment interest as provided by law;
- 3 f. An award to the State of the costs incurred in connection with this action, including
- 4 reasonable attorneys' fees; and
- 5 g. Such other further relief as the case may require and the Court may deem just and
- 6 proper.

7 **JURY DEMAND**

8 Plaintiff hereby demands a trial by jury on all issues so triable.

9
10 DATED: September 10, 2026

11 Respectfully submitted,

12 

13 _____
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