

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

INTERNATIONAL RIGHTS ADVOCATES,
INC., 621 Maryland Ave. NE, Washington,
D.C. 20002,

Plaintiff,

v.

LINDT & SPRUNGLI (USA) INC.,
One Fine Chocolate Place, Stratham,
NH, 03885; LINDT & SPRUNGLI
(NORTH AMERICA) INC., 4717
Grand Avenue, Suite 700, Kansas City,
MO, 64112,

Defendants.

CASE NO. 1:26-cv-2569

NOTICE OF REMOVAL

Defendants Lindt & Sprüngli (USA) Inc. and Lindt & Sprüngli (North America) Inc., through counsel and pursuant to 28 U.S.C. §§ 1332(a), 1441(a), (b), and 1446, hereby remove this action from the Superior Court of the District of Columbia to the United States District Court for the District of Columbia. The grounds for removal are as follows:

I. BACKGROUND

1. On May 8, 2026, Plaintiff International Rights Advocates, Inc. filed the complaint against Defendants in the Superior Court for the District of Columbia, under Case No. 2026-CAB-003121. A true and correct copy of the complaint is attached hereto as **Exhibit A**.

2. Plaintiff represents that service was effectuated June 22, 2026. *See Exhibits I, F*.

3. Plaintiff sets forth claims under the District of Columbia Consumer Protection Procedures Act (“CPPA”) and generally alleges that the Defendants’ advertising regarding Defendants’ cocoa supply chain deceived consumers. *See generally* Complaint.

4. Plaintiff brings this action “[o]n behalf of the general public of the District of Columbia, and in the interest of consumers,” and seeks various types of relief including a

declaratory judgment, an order enjoining Defendants' conduct, and costs and disbursements, including reasonable attorneys' fees and expert fees, and prejudgment interest. *See* Complaint, Preamble and Prayer for Relief.

5. Plaintiff is a citizen of the District of Columbia, but neither of the Defendants is a citizen of the District.

II. REMOVAL IS TIMELY

6. Notice of removal "shall be filed within 30 days after the receipt by the defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based." 28 U.S.C. § 1446(b). Because this notice was filed on July 21, 2026, Defendants timely removed this action within thirty (30) days of service.

7. No previous Notice of Removal has been filed or made with this Court for the relief sought herein.

III. THIS COURT HAS JURISDICTION UNDER 28 U.S.C. § 1332(a)

8. This Court has subject-matter jurisdiction under 28 U.S.C. § 1332(a), because this case: (i) involves citizens of different States; and (ii) the amount of controversy in this matter exceeds the sum or value of \$75,000.

A. Diversity of Citizenship Exists

9. When analyzing diversity jurisdiction, "[a] corporation is a citizen of its place or places of incorporation, as well as its principal place of business." *CostCommand, LLC v. WH Adm'rs, Inc.*, 820 F.3d 19, 21 (D.C. Cir. 2016).

10. Defendant Lindt & Sprüngli (USA) Inc. is incorporated in New York with its principal place of business in New Hampshire and Defendant Lindt & Sprüngli (North America) Inc. is incorporated in Delaware with its principal place of business in Missouri. *See* Compl. ¶ 15.

11. Plaintiff is a nonprofit organization organized under the laws of the District of Columbia, with its principal place of business in the District of Columbia.

12. Because Plaintiff is a citizen of the District of Columbia and Defendants are citizens of New York, New Hampshire, Delaware, and Missouri, the complete diversity requirement of 28

U.S.C. § 1332 is satisfied.

B. The Amount in Controversy Exceeds \$75,000.

13. The amount in controversy requirement of 28 U.S.C. § 1332 is also satisfied.

14. “[A] defendant’s notice of removal need include only a plausible allegation that the amount in controversy exceeds the jurisdictional threshold.” *Dart Cherokee Basin Operating Co., LLC v. Owens*, 574 U.S. 81, 89 (2014). “Evidence establishing the amount is required by § 1446(c)(2)(B) only when the plaintiff contests, or the court questions, the defendant’s allegation.” *Id.*; *see also* 28 U.S.C. § 1446(c)(2)(A)(ii).

15. An “action seeking an injunction to protect or vindicate . . . rights can meet the amount-in-controversy requirement.” *GEO Specialty Chems., Inc. v. Husisian*, 951 F. Supp. 2d 32, 40 (D.D.C. 2013). To determine the amount in controversy when an injunction is sought, “[t]he Court ‘may look either to the value of the right that plaintiff seeks to enforce or to protect[,] or to the cost to the defendants to remedy the alleged denial.’” *Id.* at 39 (citation omitted). “Put another way, ‘[t]he value of injunctive relief for determining the amount in controversy can be calculated as the cost to the defendant.’” *Id.* (citation omitted)

16. Plaintiff challenges Defendants’ label statements, websites, corporate policies, and other materials accessible to consumers. *See* Compl. ¶¶ 53-87. Plaintiff’s requested injunction would require Defendants to eliminate those statements. Defendants would have to formulate new material to replace the challenged statements, identify each place that the challenged statements appear, adapt the new material to replace the challenged statements, and manufacture new labels for untold numbers of products, each with required attendant costs. The cost to Defendants of complying with an injunction requiring such changes would exceed \$75,000.

17. Because the CPPA permits a successful plaintiff to recover attorney’s fees, *see* D.C. Code § 28-3905(k)(1)(B), Plaintiff’s request for attorneys’ fees (Compl. ¶ 146) is also a factor to be considered in determining the amount in controversy. *See Griffin v. Coastal Int’l Sec., Inc.*, 2007 WL 1601717, at *3 (D.D.C. Jun. 4, 2007) (recognizing that a request for attorneys’ fees may count toward the amount in controversy if they “are provided for by a . . . statute in controversy”).

Plaintiffs routinely seek fees and have received fees that far exceed \$75,000 in similar litigation. Moreover, courts in this District have awarded attorneys' fees of hundreds of thousands of dollars in cases brought under the CPPA. *See, e.g., In re InPhonic, Inc.*, 674 F. Supp. 2d 273, 290 (D.D.C. 2009) (awarding \$483,753.37 in fees and costs in action alleging, among other things, violations of the CPPA); *Beck v. Test Masters Educ. Servs., Inc.*, 73 F. Supp. 3d 12, 20 (D.D.C. 2014) (awarding \$927,707.89 in attorneys' fees and expenses and costs to plaintiffs who won summary judgment on CPPA claim).

18. The cost of complying with Plaintiff's requested injunction and Plaintiff's requested attorneys' fees combined would substantially exceed the \$75,000 amount in controversy threshold.

19. To be sure, courts in this District have applied a "non-aggregation" principle when determining the amount in controversy in CPPA actions. *See, e.g., Clean Label Project Found. v. Now Health Grp., Inc.*, 2021 WL 2809106, at *3-7 (D.D.C. Jul. 6, 2021). Courts applying that principle have determined the amount in controversy by dividing certain amounts, including the cost of compliance with the injunction sought and attorneys' fees sought to be recovered, by the number of beneficiaries of the injunction. *See, e.g., id.*, at *3-6 There is, however, no controlling authority in this Circuit adopting this principle.

20. To the contrary, under D.C. Circuit precedents, the non-aggregation principle should not be applied. Under such precedents, the amount in controversy is to be calculated from the perspective of the defendant. *See Smith v. Wash.*, 593 F.2d 1097, 1099 (D.C. Cir. 1978) (the "cost to the defendant[] to remedy the alleged" wrong is proper measure of amount in controversy). Thus, "the test for determining the amount in controversy is the pecuniary result to either party which the judgment would directly produce." *Comm. for GI Rts. v. Callaway*, 518 F.2d 466, 472 (D.C. Cir. 1975) (determining jurisdictional amount associated with potential injunction without dividing costs by number of potential beneficiaries of the injunction).

21. Consistent with D.C. Circuit precedents, the court in *In re Folgers Coffee, Mktg. Litig.*, 2021 WL 5106457, at *4 (W.D. Mo. Aug. 19, 2021), held that the non-aggregation principle

should not be applied where, like here, a single plaintiff brought suit under the D.C. CPPA “on behalf of [himself] and the general public.” *Id.* at *1, *4. The court rejected the argument that any attorneys’ fees the plaintiff could recover must be divided “among the entire general public of the District of Columbia”; “[t]hrough the very structure of the CPPA, Plaintiff is a private attorney general whom the [CPPA] has empowered to enforce consumer protection laws—not the representative of a class of individuals whose rights will be affected by this litigation. Consequently, any award of attorneys’ fees would benefit Plaintiff and his attorneys, rather than a potential class—because there is no class.” *Id.* at *4 (citation modified).

22. The reasoning in *In re Folgers* accords with the Supreme Court’s recent decision in *Trump v. CASA, Inc.*, 606 U.S. 831 (2025), in which the Court explained that there is a very real difference between injunctive relief sought through a properly certified class and injunctive relief sought outside the class context, which cannot act as “a class-action workaround.” *Id.* at 850. The same distinction pertains in the context of assessing the beneficiaries of an injunction under the CPPA; the cost of complying with an injunction sought on behalf of an individual (here, Plaintiff) rather than a class cannot be divided among “parties and nonparties alike.” *Id.* at 849-50.

23. Under the authorities discussed above, non-aggregation should not apply, and the amount in controversy exceeds the \$75,000 jurisdictional threshold.

24. In any event, the non-aggregation principle does not apply here because the attorney’s fees sought by Plaintiff (Compl. ¶ 146) is a differentiated monetary provision specifically benefitting Plaintiff and not nonparties. This is so because one of the two lawyers listed on the complaint and the lawyer that signed and filed the complaint—Terry Collingsworth—appears in this action as the Executive Director of Plaintiff, identifying Plaintiff’s address as his own and identifying his email address as tc@iradvocates.org (i.e., his email address uses Plaintiff’s email domain extension). *See* Compl. p. 47 (signature block). That, in turn, means that Plaintiff—via its Executive Director—“effectively seeks attorneys’ fees for itself” and “stands to gain a differentiated monetary benefit that is not shared with the general public it purports to represent,” a fact that is “salient to the jurisdictional amount calculation.” *Int’l Rts. Advocs. v. Mars, Inc.*, 2025

WL 819580, at *7-8 (D.D.C. Mar. 13, 2025). There is no legal or factual basis for the non-aggregation principle to apply to this differentiated monetary provision of Plaintiff's requested relief.

25. Thus, the amount in controversy element is satisfied in this case for purpose of diversity jurisdiction, and solely for that purpose.

26. For all of these reasons, this Court has jurisdiction pursuant to 28 U.S.C. § 1332(a) and this case is removable.

IV. SUPERIOR COURT OF THE DISTRICT OF COLUMBIA PLEADINGS AND NOTICE

27. Defendants have satisfied the procedural requirements set forth in § 28 U.S.C. 1446.

28. Defendants file this Notice of Removal pursuant to 28 U.S.C. §§ 1446 and 1441(a) in the United States District Court for the District of Columbia because the court where this action was commenced, the Superior Court of the District of Columbia, is within this federal judicial district and division.

29. As stated previously, Defendants timely removed. See 28 U.S.C. § 1446(b)(1).

30. Pursuant to § 28 U.S.C. 1446(a), a copy of the complaint, summons, the Superior Court Docket Report, proof of service, and all other process, pleadings, and orders served on Defendants are attached hereto as **Exhibits A-O and Q**.

31. Pursuant to 28 U.S.C. § 1446(d), Defendants will promptly serve this written Notice of Removal on Plaintiff and a copy of this Notice will be filed with the Clerk of the Superior Court of the District of Columbia. A copy of the notice that Defendants intend to file attaching the Notice is attached hereto as **Exhibit P**.

V. RESERVATION OF RIGHTS/DENIAL OF LIABILITY

32. Nothing in this Notice is intended to or should be construed as any type of express or implied admission by Defendants of any fact alleged by Plaintiff, of the validity or merits of any Plaintiff's claims and allegations, or of any liability for the same, each and all of which are

expressly denied, or as to any type of express or implied waiver or limitation of any of Defendants' rights, claims, remedies, and defenses in connection with this action, all of which are hereby expressly reserved.

33. WHEREFORE, Defendants respectfully request that the above-captioned action now pending in the Superior Court of the District of Columbia be removed to this United States District Court for the District of Columbia.

Respectfully submitted on July 21, 2026.

/s/ Dale J. Giali
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EXHIBIT A

**SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

INTERNATIONAL RIGHTS ADVOCATES, INC., 621 Maryland Ave. NE, Washington, D.C. 20002, Plaintiff, v. LINDT & SPRUNGLI (USA) INC., One Fine Chocolate Place, Stratham, NH, 03885; LINDT & SPRUNGLI (NORTH AMERICA) INC., 4717 Grand Avenue, Suite 700, Kansas City, MO, 64112, Defendants.	2026-CAB-003121 Case No. _____ COMPLAINT <u>DEMAND FOR JURY TRIAL</u>
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PREAMBLE

On behalf of the general public of the District of Columbia, and in the interest of consumers, Plaintiff International Rights Advocates brings this action against Defendants Lindt & Sprüngli (USA) Inc. and Lindt & Sprüngli (North America) Inc. (collectively, “Lindt”) concerning their false and deceptive marketing representations about the conditions under which the cocoa they use in their confectionery products are produced in Ghana and Côte d’Ivoire. For over two decades, Lindt has known that its cocoa is produced with child labor. Through initiatives such as the Lindt & Sprüngli Farming Program, Lindt has promised the public that it is working end this abusive practice in its supply chain and moving towards responsibly and sustainably sourced cocoa. But in reality, Lindt continues to profit from child labor while doing little to prevent it. Thus, consumers in the District are misled by Lindt’s representations concerning the use of child labor in its supply chain. This Complaint is on behalf of the general public of the District of Columbia, in the interest of consumers. This is not a class action, and no class certification will be sought. Plaintiff alleges

the following based upon personal knowledge, information and belief, and the investigation of Counsel:

INTRODUCTION

1. International Rights Advocates (“IRAdvocates” or “Plaintiff”) brings this suit under the District of Columbia Consumer Protection Procedures Act (“CPPA”), D.C. Code §§ 28-3901–3913, against Lindt & Sprüngli (USA) Inc. and Lindt & Sprüngli (North America) Inc. (collectively, “Lindt” or “Defendants”), based on Lindt’s deceptive advertisement regarding the use of child labor and the implementation of sustainability programs in its cocoa supply chain.

2. The use of fair and sustainable labor practices in supply chains, and in particular the elimination of illegal child labor, is of growing concern to consumers.¹ Consumers increasingly seek out products made without the use of child labor, forced labor, exploitative working conditions, other human rights abuses, and environmentally damaging practices, especially in industries notorious for such practices.

3. Cocoa farming is one such industry, with a well-publicized history of human trafficking, child slavery, environmental degradation, and other human rights violations.

4. There is no doubt that child labor and other labor abuses remain a serious and pervasive problem in Côte d’Ivoire and Ghana.² Children perform hazardous work in cocoa

¹ The concept of “sustainability” is not only about protecting the environment; it also is heavily concerned with eliminating social and economic exploitation to ensure long-term prosperity. *See* G.A. Res. 70/1, at 1 (Sept. 25, 2015), <https://docs.un.org/en/A/RES/70/1> (recognizing the “the three dimensions of sustainable development: the economic, social and environmental”). Because child labor “is an egregious form of violence that is contrary to the very concept of decent work . . . [and] harms the health, development and education of children and perpetuates the vicious cycle of poverty and deprivation,” it is an inherently unsustainable practice. *See* Off. of the Special Representative of the Sec’y-Gen. on Violence Against Child., *Seeing the Sustainable Development Goals and Voluntary National Reviews Through a Child Protection Lens*, at 16 (2022), <https://violenceagainstchildren.un.org/sites/default/files/2025-09/VNR%20Review%20-%202022.pdf>.

² *Child Labor and Forced Labor Reports: Côte d’Ivoire*, Bureau of Int’l Lab. Affs., U.S. Dep’t of Lab., <https://www.dol.gov/agencies/ilab/resources/reports/child-labor/cote-divoire> (last visited May 7, 2026); *Child Labor and Forced Labor Reports: Ghana*, Bureau of Int’l Lab. Affs., U.S. Dep’t of Lab., <https://www.dol.gov/agencies/ilab/resources/reports/child-labor/ghana> (last visited May 7, 2026).

farming, including burning and clearing fields, cutting down trees to expand cocoa plantations, spraying pesticides, using sharp tools to break pods, and transporting heavy loads of cocoa pods and water. Plaintiff has directly observed and documented children performing these hazardous activities on numerous research trips to Côte d'Ivoire and Ghana from 1999³ to the present, as illustrated in the photos below:



Child laborer, 12 years of age, uses a machete to harvest cocoa pods in Côte d'Ivoire.



A representative of IRAdvocates speaks with child laborer, approximately 13 years of age, about the working conditions on a plantation in Côte d'Ivoire. The child explains that he is very hungry.

³ Plaintiff's Executive Director, Terrence Collingsworth, did early research on child slavery with IRAdvocates' predecessor organization, International Labor Rights Forum.



Child laborers approximately aged 9–14 gather on a cocoa plantation in Côte d'Ivoire.

5. Lindt is among the world's largest and most well-known chocolate companies. It sells a variety of chocolate and confectionery products in which cocoa is a key ingredient. This Complaint will refer to Lindt's cocoa-containing products as "the Products."

6. Lindt claims to offer consumers "Indulgence rooted in responsibility."⁴ By purchasing Lindt chocolate, Lindt claims consumers can expect their purchase to "support farming communities to promote children's rights" and "contribute to the economic resilience of farming households" through the Lindt & Sprüngli Farming Program.⁵ Furthermore, Lindt represents that its Farming Program takes meaningful action to reduce the risk of child labor in its cocoa supply chain. These representations are false and misleading to consumers.

⁴ *Indulgence Rooted in Responsibility*, Lindt & Sprüngli, <https://www.lindt-spruengli.com/sustainability> (last visited May 7, 2026).

⁵ *The Lindt & Sprüngli Farming Program*, Lindt & Sprüngli Farming Program, <https://www.farming-program.com/en/> (last visited May 7, 2026).

7. Lindt makes these representations through public advertisements and publicly available plans, reports, and internal codes.

8. Lindt's representations deceive consumers into believing that Lindt is taking meaningful action to address and prevent child labor in its supply chain, while no such actions are occurring.

9. Lindt also perpetuates misleading claims about its sustainability and labor practices through seals and certifications that it prints on some of its Products' packaging. Through these seals and certifications, Lindt postures itself as a benevolent actor fighting against child labor. In reality, Lindt continues to profit enormously from child labor while taking no meaningful action to rid the practice from its supply chain.

10. Consumers who wish to purchase more ethical and sustainable alternatives rely on product packaging, marketing, advertising, and company reports to make informed decisions about what to purchase.

11. Consumers seeking to buy ethically and sustainably sourced products are misled into believing that Lindt is committed to—and making progress towards—eradicating child labor from its supply chain.

12. This is a consumer-protection case concerning Lindt's deceptive claims about sources of the cocoa used in its Products. This case is brought by IRAdvocates, a nonprofit, public interest organization dedicated to holding corporations accountable for human rights abuses in the global supply chain and informing the public, including consumers, about the realities of these abuses.

13. IRAdvocates alleges that Lindt’s advertising—which indicates that the company is committed to eradicating child labor from its supply chains and is making great progress in doing so—is false and misleading to District consumers.

PARTIES

14. Plaintiff IRAdvocates is a 501(c)(3) nonprofit organization based in Washington, D.C., that is dedicated to exposing human rights violations in global supply chains and seeking accountability from multinational companies responsible for those violations. IRAdvocates promotes its mission by litigating cases, conducting research, and educating the general public, including consumers, about such abuses and the failures of multinational companies to live up to their promises relating to humane treatment of people in their supply chains. Often, as in this case, IRAdvocates’ goal is to influence companies like Lindt to honor and implement the policies and codes of conduct that they have already promised consumers they are applying throughout their supply chains.

15. Defendants each are wholly owned subsidiaries of the Swiss corporation Chocoladefabriken Lindt & Sprüngli AG. Defendant Lindt & Sprüngli (USA) Inc. is incorporated in New York with headquarters in New Hampshire. Defendant Lindt & Sprüngli (North America) Inc. is incorporated in Delaware with headquarters in Missouri. Together, Defendants are among the most prominent chocolate manufacturers and distributors in the United States.

16. As a dominant player in the global cocoa industry, Lindt sources, processes, and trades cocoa from major cocoa-producing regions, including Ghana and Côte d’Ivoire. Lindt advertises and sells premium chocolate Products nationwide, including in the District of Columbia.

STATUTORY FRAMEWORK

17. This action is brought under the District of Columbia Consumer Protection Procedures Act (“CPPA”), D.C. Code §§ 28-3901–13.

18. The CPPA makes it a violation for “any person” to, *inter alia*:

“[R]epresent that goods or services have a source, sponsorship, approval, certification, accessories, characteristics, ingredients, uses, benefits, or quantities that they do not have”;

“[R]epresent that goods or services are of a particular standard, quality, grade, style or model, if in fact they are of another”;

“[M]isrepresent as to a material fact which has a tendency to mislead”;

“[F]ail to state a material fact if such failure tends to mislead”;

“[U]se innuendo or ambiguity as to a material fact, which has a tendency to mislead”; or

“[A]dvertise or offer goods or services without the intent to sell them or without the intent to sell them as advertised or offered”;

D.C. Code §§ 28-3904(a), (d), (e), (f), (f-1), (h).

19. While the CPPA enumerates a number of specific unlawful trade practices, *see* D.C. Code § 28-3904, the enumeration is not exclusive. A main purpose of the CPPA is to “assure that a just mechanism exists to remedy all improper trade practices.” D.C. Code § 28-3901(b)(1); *see also, e.g., Dist. Cablevision Ltd. P’ship v. Bassin*, 828 A.2d 714, 722–23 (D.C. 2003); *Osbourne v. Capital City Mortg. Corp.*, 727 A.2d 322, 325–26 (D.C. 1999); *Atwater v. D.C. Dep’t of Consumer & Reg. Affairs*, 566 A.2d 462, 465 (D.C. 1989).

20. A violation may occur regardless of “whether or not any consumer is in fact misled, deceived, or damaged thereby.” D.C. Code § 28-3904.

21. The CPPA “establishes an enforceable right to truthful information from merchants about consumer goods and services that are or would be purchased, leased, or received in the District of Columbia.” *Id.* § 28-3901(c). It “shall be construed and applied liberally to promote its purpose.” *Id.*

22. Under the statute, a “merchant” is defined as “a person, whether organized or operating for profit or for a nonprofit purpose, who in the ordinary course of business does or would sell, lease (to), or transfer, either directly or indirectly, consumer goods or services, or a person who in the ordinary course of business does or would supply the goods or services which are or would be the subject matter of a trade practice.” *Id.* § 28-3901(a)(3)(A).

23. Defendants Lindt & Sprüngli (USA) Inc. and Lindt & Sprüngli (North America) Inc. are “merchants” because they are corporations that operate for profit by directly selling consumer goods and services to the public in Washington, D.C.

24. Plaintiff IRAdvocates is a nonprofit, public-interest organization statutorily empowered pursuant to D.C. Code § 28-3905(k)(1)(D) to represent the interests of District of Columbia consumers.

25. Per D.C. Code § 28-3905(k)(1)(D)(i), a public interest organization may act on behalf of the general public and bring any action that an individual consumer would be entitled to bring:

[A] public interest organization may, on behalf of the interests of a consumer or a class of consumers, bring an action seeking relief from the use by any person of a trade practice in violation of a law of the District if the consumer or class could bring an action under subparagraph (A) of this paragraph for relief from such use by such person of such trade practice.

Subparagraph (A) provides: “A consumer may bring an action seeking relief from the use of a trade practice in violation of a law of the District,” and pursuant to D.C. Code § 28-3901(c), placing false and misleading advertising into the D.C. marketplace is a trade practice in violation of the CPPA.

26. A “public interest organization” under the CPPA is defined as “a nonprofit organization that is organized and operating, in whole or in part, for the purpose of promoting the interests or rights of consumers.” *Id.* § 28-3901(a)(15).

27. IRAdvocates is a 501(c)(3) nonprofit organization that is organized and operating for the purpose of advocating for human rights and transparency in corporate supply chains—an issue that matters deeply to many consumers. IRAdvocates’ operations include combatting consumer fraud and educating consumers about the grim conditions under which many popular goods are sourced and produced. These educational efforts empower consumers to make informed decisions about which products to buy and which companies to support. IRAdvocates, thus, is a public interest organization that may act on behalf of the general public and bring an action that an individual consumer would be entitled to bring. *See id.* §§ 28-3901(a)(15), 3905(k)(1)(D)(i).

28. A public interest organization may act on behalf of the interests of consumers, i.e., the general public of the District of Columbia, so long as the organization has “sufficient nexus to the interests involved of the consumer or class to adequately represent those interests.” *Id.* § 28-3905(k)(1)(D)(ii).

29. IRAdvocates’ work addresses a wide range of human rights issues through strategic litigation, research, policy advocacy, training, and coalition building. IRAdvocates represents consumers’ interests by raising awareness of human rights violations that are commonplace in corporate supply chains. This work includes educating consumers in the District about such exploitative corporate practices. Additionally, since 1998, IRAdvocates has been working to expose child slavery and other abuses of children in cocoa harvesting. In particular, IRAdvocates has conducted extensive research in Côte d’Ivoire and Ghana to expose that the child labor remediation programs Lindt and other cocoa companies claim are helping to eradicate child labor

are ineffective and designed to mislead consumers. IRAdvocates, thus, has a sufficient nexus to D.C. consumers' interests in knowing the truth about the source of their cocoa products and being able to make informed purchasing decisions in compliance with personal ethics.

30. Accordingly, Plaintiff has standing to challenge Lindt's misrepresentations about its Products in the District.

31. This is not a class action, nor an action brought on behalf of any specific consumer. IRAdvocates brings this action on behalf of the general public, i.e., the interests of D.C. consumers generally. No class certification will be requested.

32. This action does not seek damages. Instead, Plaintiff seeks to end the unlawful conduct directed at D.C. consumers. Remedies available under the CPPA include "[a]n injunction against the use of the unlawful trade practice," "[r]easonable attorney's fees," and "[a]ny other relief which the court determines proper." *Id.* § 28-3905(k)(2)(D), (B), (F). Plaintiff seeks injunctive relief enjoining Defendants from continuing to engage in the unlawful trade practices set forth in this Complaint. Plaintiff also seeks declaratory relief in the form of an order holding Lindt's conduct to be unlawful in violation of the CPPA and requests its attorneys' fees and costs incurred in bringing this action.

JURISDICTION AND VENUE

33. This Court has personal jurisdiction over the Parties in this case. Plaintiff consents to this Court having personal jurisdiction over it.

34. This Court has personal jurisdiction over Defendants pursuant to D.C. Code § 13-423. Lindt has sufficient minimum contacts with the District of Columbia to establish personal jurisdiction of this Court over it because Lindt purposefully avails itself of the benefits and protections of District of Columbia law.

35. Lindt markets and sells its Products to consumers within the District. D.C. consumers who purchase the Products have access to Lindt's representations about its Products through product packaging, the internet, and other forms of advertising. Lindt's deceptive schemes and acts are directed at persons residing in, located in, or doing business in the District.

36. This case arises out of Lindt's representations made in the District of Columbia, to residents of the District, and with the intent that residents would act upon those representations and purchase the Products within the District. The beneficiaries of this action are D.C. consumers.

37. This Court has subject-matter jurisdiction over this action pursuant to the CPPA, D.C. Code § 28-3901–13.

38. Venue is proper in this Court because the events giving rise to this action take place in the District of Columbia. Lindt markets and sells the Products in the District. Lindt's misleading representations are targeted at and accessible to D.C. consumers who purchase the Products in the District.

BACKGROUND

39. Lindt sources the majority of its cocoa from West Africa—100% of its consumer grade cocoa beans are sourced from Ghana, and it sources cocoa butter from Côte d'Ivoire.⁶ Ghana and Côte d'Ivoire are among the world's largest exporters of cocoa beans.⁷ Together, the two countries produce nearly half of the world's cocoa supply.⁸

⁶ *Where Do Our Cocoa Beans Come From?*, Lindt USA, <https://lindtusa.zendesk.com/hc/en-us/articles/19229492339868-Where-do-our-cocoa-beans-come-from> (last visited May 7, 2026); *Our Cocoa Bean Origins*, Lindt and Sprüngli Farming Program, <https://www.farming-program.com/en/farming-program/our-cocoa-bean-origins> (last visited May 7, 2026) (Côte d'Ivoire tab).

⁷ *FAOSTAT: Crops and Livestock Products*, Food & Agric. Org. of the United Nations, <https://www.fao.org/faostat/en/#data/QCL> (last visited May 7, 2026) (filter Countries = Select All, Elements = Production Quantity, Items = Cocoa beans, and Years = 2024; then click Show Data, and sort table by values descending).

⁸ *See id.*

40. According to the U.S. Department of Labor, children working in the Ivorian and Ghanaian cocoa industries are subjected to the worst forms of child labor, as defined by International Labour Organization (“ILO”) Convention No. 182.⁹ ILO Convention No. 182 defines the worst forms of child labor as, inter alia, “[a]ll forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict” and “[w]ork which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.”¹⁰

41. Practices amongst the worst forms of child labor include forced child labor (work performed by children under threat or menace of penalty), burning and clearing fields, cutting down trees to expand cocoa plantations, spraying pesticides, using sharp tools such as machetes to cut down and open pods, and transporting heavy loads of cocoa pods and water.¹¹ These practices are endemic to the cocoa sectors in Côte d’Ivoire and Ghana.¹²

42. Lindt is aware of the sordid history of the cocoa sector’s reliance on exploited child labor. The pervasiveness of child labor and forced child labor in West Africa has been subject to increasing scrutiny since the late 1990s. In 2001, the ILO released a report that confirmed the trafficking of children from neighboring countries to Côte d’Ivoire to work in the agricultural

⁹ U.S. Dep’t of Lab., Côte d’Ivoire: 2024 Findings on the Worst Forms of Child Labor 1 (2025), https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2024/C%C3%B4te-dIvoire.pdf; U.S. Dep’t of Lab., Ghana: 2024 Findings on the Worst Forms of Child Labor 1 (2025); https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2024/Ghana.pdf.

¹⁰ Convention (No. 182) Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, arts. 3(a), (d), June 17, 1999, T.I.A.S. No. 13045, 2133 U.N.T.S. 161.

¹¹ U.S. Dep’t of Lab., Côte d’Ivoire: 2024 Findings on the Worst Forms of Child Labor, *supra* note 9, at 1; U.S. Dep’t of Lab., Ghana: 2024 Findings on the Worst Forms of Child Labor, *supra* note 9, at 1.

¹² U.S. Dep’t of Lab., Côte d’Ivoire 2024 Findings, *supra* note 9, at 1; U.S. Dep’t of Lab., Ghana 2024 Findings, *supra* note 9, at 1.

sector.¹³ A 2002 U.S. Department of Labor-funded study estimated that more than 200,000 Ivorian children were performing hazardous work on cocoa farms—100,000 of whom were younger than age 15.¹⁴ The study also estimated that 38,700 Ghanaian children were involved in clearing fields with machetes, 18,000 of whom were younger than age 15.¹⁵ Drawing on this study, the U.S. Department of State reported in 2004 that 5,000 to 10,000 children may have been trafficked to work in the Ivorian cocoa sector, and that there were approximately 109,000 child laborers in Côte d’Ivoire on cocoa farms engaged in the worst forms of child labor.¹⁶

43. Further studies funded by the U.S. Department of Labor revealed child labor and the worst forms of child labor to be occurring on cocoa farms in Côte d’Ivoire and Ghana at a much greater magnitude.¹⁷ The most recent data was collected in the 2018–19 growing season by the National Opinion Research Center (“NORC”) at the University of Chicago.

¹³ Int’l Lab. Org., Combating Trafficking in Children for Labour Exploitation in West and Central Africa 10 tbl.2, 12 (2001), <https://www.ilo.org/publications/combating-trafficking-children-labour-exploitation-west-and-central-africa>.

¹⁴ See Int’l Inst. of Tropical Agric., Child Labor in the Cocoa Sector of West Africa: A Synthesis of Findings in Cameroon, Côte d’Ivoire, Ghana, and Nigeria 15 tbl.4 (2002), <https://www.cocoainitiative.org/knowledge-hub/resources/child-labor-cocoa-sector-west-africa>.

¹⁵ See *id.*

¹⁶ U.S. Dep’t of State, Country Reports on Human Rights Practices for 2004, at 176 (2005), <https://www.govinfo.gov/content/pkg/CPRT-109JPRT99700/pdf/CPRT-109JPRT99700.pdf>.

¹⁷ See, e.g., Payson Ctr. for Int’l Dev., Tulane Univ. Sch. of Pub. Health, First Annual Report: Oversight of Public and Private Initiatives to Eliminate the Worst Forms of Child Labor in the Cocoa Sector in Côte d’Ivoire and Ghana (2007), https://www.dol.gov/sites/dolgov/files/ILAB/research_file_attachment/FINAL%20FIRST%20ANNUAL%20REPORT.pdf; Payson Ctr. for Int’l Dev., Tulane Univ. Sch. of Pub. Health, Second Annual Report: Oversight of Public and Private Initiatives to Eliminate the Worst Forms of Child Labor in the Cocoa Sector in Côte d’Ivoire and Ghana (2008), https://www.dol.gov/sites/dolgov/files/ILAB/research_file_attachment/FINAL%20Second%20Annual%20Report.pdf; Payson Ctr. for Int’l Dev., Tulane Univ. Sch. of Pub. Health, Third Annual Report: Oversight of Public and Private Initiatives to Eliminate the Worst Forms of Child Labor in the Cocoa Sector in Côte d’Ivoire and Ghana (2009), https://www.dol.gov/sites/dolgov/files/ILAB/research_file_attachment/Third%20Annual%20Report.pdf; Payson Ctr. for Int’l Dev., Tulane Univ. Sch. of Pub. Health, Final Report: Survey Research on Child Labor in West African Cocoa Growing Areas (2015), https://www.dol.gov/sites/dolgov/files/ILAB/research_file_attachment/Tulane%20University%20-%20Survey%20Research%20Cocoa%20Sector%20-%2030%20July%202015.pdf.

44. The NORC study concluded that 1.56 million child laborers were involved in cocoa production and harvesting in Côte d'Ivoire and Ghana during the 2018–19 growing season.¹⁸ Of these 1.56 million children, 790,000 worked in Côte d'Ivoire and 770,000 worked in Ghana.¹⁹ The World Cocoa Foundation—of which Lindt is a member—has recognized the deeply troubling nature of these numbers.²⁰

45. NORC also found that about 1.48 million child laborers were engaged in hazardous labor in Côte d'Ivoire and Ghana during the 2018–19 growing season.²¹ The most common types of hazardous labor included the use of sharp tools (1.2 million children), carrying heavy loads (990,000 children), and agrochemical exposure (840,000 children).²² Other forms of hazardous labor surveyed include land clearing (650,000 children), working at night (80,000 children), and working long hours (22,800 children).²³

46. Between the 2008–09 and 2018–19 growing seasons, the prevalence rate²⁴ of child labor in cocoa increased from 31% to 45%—14 percentage points.²⁵ The prevalence rate of hazardous child labor in cocoa increased from 30% to 43%—13 percentage points—in that same period.²⁶ Thus, the study concluded that “despite the efforts made by the governments, Industry, and other key stakeholders in combating child labor and hazardous child labor during the past 10 years, the child labor and hazardous child labor prevalence rates did not go down.”²⁷

¹⁸ Nat'l Op. Rsch. Ctr., Assessing Progress in Reducing Child Labor in Cocoa Production in Cocoa Growing Areas of Côte d'Ivoire and Ghana 10 (2020), https://www.norc.org/content/dam/norc-org/pdfs/NORC%202020%20Cocoa%20Report_English.pdf.

¹⁹ *Id.*

²⁰ *Empowering Communities*, World Cocoa Found. (Oct. 19, 2020), archived at <https://web.archive.org/web/20230704115508/https://www.worldcocoafoundation.org/focus-areas/empowered-communities/>.

²¹ Nat'l Op. Rsch. Ctr., *supra* note 18, at 10.

²² *Id.* at 48 tbl.6.

²³ *Id.*

²⁴ The prevalence rate is defined as the “proportion of children age 5-17 in child labor” who are involved “in cocoa production among agricultural households in cocoa growing areas of Côte d'Ivoire and Ghana.” *Id.* at 12.

²⁵ *Id.*

²⁶ *Id.*

²⁷ *Id.*

47. Additionally, the U.S. Department of Labor has described the harrowing conditions of human trafficking and forced child labor within the Ivorian cocoa industry:

Some children are sold by their parents to traffickers, some are kidnapped, and others migrate willingly but fall victim to traffickers who sell them to recruiters or farmers, where they end up in conditions of bonded labor. Some farmers buy the children and refuse to let them leave the farm until the debt of their purchase has been worked off. The children are frequently not paid for their work; some of their wages are paid to the recruiter or trafficker. These children are held against their will on isolated farms, are locked in their living quarters at night, and are threatened and beaten if they attempt to escape. They are punished by their employers with physical abuse. They are forced to work long hours, including overtime, and are required to work even when they are sick. Some children are denied sufficient food by their traffickers and employers. Some children are forced to perform dangerous tasks, including carrying heavy loads, using machetes and sharp tools, and applying pesticides and fertilizers.²⁸

48. The world's major chocolate companies have been promising to fix the problem for more than two decades despite child labor in the cocoa industry only worsening over time.

49. In 1999, labor rights and consumer groups facilitated the introduction of legislation that would ban the importation of cocoa harvested by child labor. Facing mandatory consequences for use of child labor, the cocoa industry staunchly opposed and successfully lobbied against this bill by agreeing to the Harkin-Engel Protocol.

50. The 2001 Harkin-Engel Protocol was a voluntary initiative that gave the companies who signed it until 2005 to phase out the worst forms of child labor in their supply chains in Côte d'Ivoire and Ghana. Though the Protocol was aimed at eliminating the worst forms of child labor in the cocoa sector, what instead ensued was years of corporate public relations campaigns through which major chocolate companies promised consumers they were sourcing cocoa more sustainably and working towards eradicating child labor, while in reality no such progress was being made.

²⁸ *List of Goods Produced by Child Labor or Forced Labor*, Bur. of Int'l Lab. Affs., U.S. Dep't of Lab., <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods-print> (last visited May 7, 2026).

51. Though Lindt was not among the original signatories of the Harkin-Engel Protocol, Lindt aligned with the industry's sustainability trend beginning in 2008 when it launched the Lindt & Sprüngli Farming Program in order to "create decent and resilient livelihoods for cocoa farmers and their families, and encourage more sustainable farming practices."²⁹ Lindt claims the Farming Program "aim[s] to achieve this by facilitating higher productivity of farms, diversified household incomes, preservation of biodiversity and natural ecosystems, reduced risk of child labor, and improved infrastructure in communities."³⁰ Despite this carefully orchestrated public relations campaign that has spanned nearly two decades, Lindt has done virtually nothing to actually improve the situation for farmers and children on the ground.

52. This Complaint describes how Lindt continues to mislead the public by falsely representing that it is (1) committed to responsibly and sustainably sourcing cocoa, and (2) taking meaningful action fight child labor in its cocoa supply chain. In reality, Lindt continues to profit immensely off of the child labor in its supply chain while directly contributing to the extreme farmer poverty that necessitates the use of child labor in West African cocoa farming in the first place.

FACT ALLEGATIONS

I. Lindt Represents to Consumers That It Is Committed to and Making Progress in Reducing Child Labor Risks in Its Cocoa Supply Chain.

A. Lindt Advertises That It Is Committed to Respecting Human Rights, Reducing Child Labor Risks, and Improving Farmers' Livelihoods in Its Cocoa Supply Chain.

53. Lindt publicly maintains a variety of official consumer-facing policies and standards that underscore the company's purported commitment to respecting human rights and

²⁹ Lindt & Sprüngli, The Lindt & Sprüngli Farming Program: Partnering with Cocoa Farmers and their Communities 2 (2022), <https://www.lindt-spruengli.com/amfile/file/download/id/7009/file/Farming-Program-Brochure-2022-EN.pdf>.

³⁰ *Id.*

upholding corporate social responsibility throughout its supply chain. A major part of this purported commitment is a commitment to fighting the child labor that is endemic in its cocoa supply chain.

54. In its Human Rights Policy, for instance, Lindt explains that “[c]onducting business in an ethical, legal, and environmentally and socially responsible manner is an integral part of Lindt & Sprüngli’s Guiding Principles. . . . We cannot realize this commitment and contribute to a sustainable tomorrow without acting with respect for human rights in every aspect of our business.”³¹

55. Lindt claims its human rights commitment is guided by various international conventions and standards, including the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the ILO Declaration on Fundamental Principles and Rights and Work, and other core International Labour Standards, all of which reinforce the right of the child to be free from child labor.³²

56. Lindt further recognizes child labor as a human rights issue that is “particularly relevant to [its] business, industry and supply chains.”³³

57. In its Supplier Code of Conduct, Lindt says it “expect[s] [its] Suppliers to commit to respect human rights and to comply with applicable local laws and regulations [and] uphold the commitments of [its] Human Rights Policy,” and that its “goal is to work with [its] Suppliers to assure full compliance with these requirements.”³⁴

³¹ Lindt & Sprüngli, Human Rights Policy 2 (2023), <https://www.lindt-spruengli.com/amfile/file/download/id/6733/file/Human-Rights-Policy-2022-E.pdf>; *see also* Lindt & Sprüngli, Business Code of Conduct 2 (2022) (“Lindt & Sprüngli is committed to respecting human rights.”), <https://www.lindt-spruengli.com/amfile/file/download/id/6718/file/Business-Code-of-Conduct-2022.pdf>.

³² Lindt & Sprüngli, Human Rights Policy, *supra* note 31, at 2.

³³ *Id.* at 3.

³⁴ Lindt & Sprüngli, Supplier Code of Conduct and Compliance Declaration 2 (2022), <https://www.lindt-spruengli.com/amfile/file/download/id/6751/file/Supplier-Code-of-Conduct-2022-E.pdf>.

58. “Child Labor Avoidance” is a key provision of the Supplier Code of Conduct. Pursuant to the Code, “Suppliers shall not, under any circumstances, use child labor as defined by ILO and United Nations Convention and/or national law, whichever is more stringent.”³⁵

59. Lindt’s Modern Slavery Statement “provides information on the efforts, action plans and progress to identify and address the risks of modern slavery in the operations and supply chains of Lindt & Sprüngli.”³⁶ In that Statement, Lindt repeatedly emphasizes to consumers that it is committed to respecting human rights and describes how it implements that commitment throughout its supply chains.³⁷ That purportedly includes “implementing a due diligence process aimed at preventing, mitigating, or ceasing adverse human rights and environmental impacts throughout the organization and our supply chain, including all forms of modern slavery, forced labor and child labor.”³⁸

60. Lindt recognizes that the “[n]egative social impacts [of sourcing raw materials] can encompass human rights violations, low incomes for farmers, gender inequality, and poor labor conditions, including instances of child labor,” and that such issues are “particularly prevalent” in the cocoa industry.³⁹ Lindt also recognizes that “[t]he risk of child labor is particularly high in West African countries.”⁴⁰

61. In light of these facts, Lindt claims to implement a “responsible sourcing approach” to “help minimize potential negative social or environmental impacts.”⁴¹

³⁵ *Id.* at 3.

³⁶ Lindt & Sprüngli, Modern Slavery Statement 2024, at 2 (2025), <https://www.lindt-spruengli.com/amfile/file/download/id/9581/file/Modern-Slavery-Statement-2024.pdf>.

³⁷ *E.g., id.* at 2, 6, 8, 9, 10.

³⁸ *Id.* at 2.

³⁹ *Id.* at 10.

⁴⁰ *Id.* at 6.

⁴¹ *Id.* at 9, 10.

62. Lindt assures consumers: “Cocoa is our most important raw material, and we are committed to sourcing it responsibly.”⁴²

63. Lindt makes further assurance that it “strongly condemns all forms of child labor and systematically investigates suspected cases of child labor.”⁴³

64. A “building block” of Lindt’s “responsible sourcing approach” is the Lindt & Sprüngli Farming Program, implemented by cocoa suppliers in several countries, including Ghana and Côte d’Ivoire, “with the objective to increase the resilience of farming households, reduce the risk of child labor, and conserve biodiversity and natural ecosystems.”⁴⁴

B. Lindt Advertises the Lindt and Sprüngli Farming Program as Reducing the Risk of Child Labor and Improving Farmer Livelihoods in Its Cocoa Supply Chain.

65. In 2008, Lindt launched the Lindt & Sprüngli Farming Program in order to “address social and environmental impacts in [its] cocoa supply chain.”⁴⁵ Lindt claims that “[t]hrough the Lindt & Sprüngli Farming Program, we aim to contribute to the economic resilience of farming households, address child labor risks and support farming communities to promote children’s rights.”⁴⁶

66. Lindt advertises that “[t]he goal of our Farming Program is to create decent and resilient livelihoods for cocoa farmers and their families, and encourage more sustainable farming practices. We aim to achieve this by facilitating higher productivity of farms, diversified household

⁴² Lindt & Sprüngli, The Lindt & Sprüngli Farming Program: Partnering with Cocoa Farmers and their Communities, *supra* note 29, at 3.

⁴³ *Frequently Asked Questions*, Lindt & Sprüngli Farming Program, <https://www.farming-program.com/en/frequently-asked-questions> (last visited May 7, 2026) (under “What is the position of Lindt & Sprüngli on child labor and what does the company do to prevent it in its supply chain?”).

⁴⁴ Lindt & Sprüngli, Modern Slavery Statement 2024, *supra* note 36 at 10.

⁴⁵ *The Lindt & Sprüngli Farming Program*, *supra* note 5.

⁴⁶ *Invest in Livelihoods of Farming Families*, The Lindt & Sprüngli Farming Program, <https://www.farming-program.com/en/farming-program/invest-in-livelihoods-of-farming-families> (last visited May 7, 2026).

incomes, preservation of biodiversity and natural ecosystems, reduced risk of child labor, and improved infrastructure in communities.”⁴⁷

67. Lindt claims that it achieved sourcing 100% of its cocoa beans through the Farming Program in 2020, and has since expanded the Program to cocoa butter and cocoa powder.⁴⁸ Additionally, Lindt reports that it achieved its goal of “sourc[ing] 100% of cocoa products—beans, butter, powder, and chocolate mass—through the Lindt & Sprüngli Farming Program or other Responsible Sourcing Standards by 2025.”⁴⁹ On top of this, Lindt reports that as of 2026, “all of our cocoa volumes, including beans, butter, and powder, are now sourced as Rainforest Alliance Certified. Our Farming Program continues to advance, aiming to increase the resilience of farming households, reduce the risk of child labor, and conserve biodiversity and natural ecosystems.”⁵⁰

68. Lindt recognizes that “[c]hild labor remains a critical issue in the cocoa sector” that is “driven by a multitude of factors, including farming households’ poverty, lack of awareness and access to education, and the high labor costs of cocoa production. . . . The most common type of child labor in cocoa is hazardous work, including the use of sharp tools, the carrying of heavy loads, and exposure to agrochemicals.”⁵¹

69. Lindt advertises its Child Labor Monitoring and Remediation Systems (“CLMRS”) as its “foundational due diligence tool to address child labor risks” for families registered in the Lindt & Sprüngli Farming Program.⁵² Lindt claims that its CLMRS “aims to identify children in,

⁴⁷ Lindt & Sprüngli, *The Lindt & Sprüngli Farming Program: Partnering with Cocoa Farmers and their Communities*, *supra* note 29, at 2.

⁴⁸ *The Lindt & Sprüngli Farming Program*, *supra* note 5.

⁴⁹ Lindt & Sprüngli, *Integrated Annual Report 2025*, at 35, 62 (2026), <https://www.lindt-spruengli.com/amfile/file/download/id/10512/file/Integrated-Annual-Report-2025.pdf>.

⁵⁰ *Id.* at 6.

⁵¹ Lindt & Sprüngli, *Modern Slavery Statement 2024*, *supra* note 36, at 12.

⁵² *Invest in Livelihoods of Farming Families*, *supra* note 46.

or at risk of child labor, to provide ongoing guidance, and to support improving their situation and to follow their progress over time.”⁵³

70. Lindt defines CLMRS as follows:

A CLMRS is a means of targeting prevention, mitigation, and remediation assistance to children involved in, or at risk of, child labor, as well as to their families and communities. At Lindt & Sprüngli, the implementation of the CLMRS as part of the Farming Program is defined by its CLMRS Implementation Guidance, which we share with our suppliers. The CLMRS offers a framework for child labor risk assessments, preventive interventions for protecting children’s rights, child labor identification, child labor remediation, and activity tracking and reporting.⁵⁴

71. Lindt claims that its CLMRS Guidance, which suppliers in high-risk countries are required to follow, includes the following five steps: (1) assessing farming household and community risks, (2) implementing preventive interventions, (3) monitoring farming households, (4) providing remediation to children identified in child labor, and (5) reporting data and progress.⁵⁵

72. According to Lindt, “[s]ince the start of implementation in 2022, supplier awareness has increased through training and capacity building of field staff. Furthermore, the risk assessment required as part of the CLMRS enabled unannounced visits to target high-risk households. As a result, we have observed better identification of child labor and respective remediation actions. This demonstrates the enhanced effectiveness of the system adopted by suppliers. The more efficient and effective our identification system, the better we can work with suppliers on remediation and prevention.”⁵⁶

⁵³ *Id.*

⁵⁴ *Glossary*, Lindt & Sprüngli, <https://www.farming-program.com/en/glossary> (last visited May 1, 2026).

⁵⁵ Lindt & Sprüngli, *Modern Slavery Statement 2024*, *supra* note 36, at 13.

⁵⁶ Lindt & Sprüngli, *Sustainability Report 2023*, at 34 (2024), https://reports.lindt-spruengli.com/sustainability-report-2023/_assets/downloads/entire-lindt-sr23.pdf.

73. Lindt represents that it plays an active role in overseeing and ensuring the efficacy of the CLMRS programs implemented by its suppliers. “We support the implementation of a Child Labor Monitoring and Remediation System (CLMRS) by: overseeing our suppliers’ implementation of the CLMRS; collaborating with technical partners to help manage data quality and oversee implementation on the ground; and supporting suppliers to set-up field teams with sufficient capacity and expertise for improved identification, prevention and remediation of child labor.”⁵⁷ Lindt further claims that “[i]f the CLMRS approach is deemed unsuitable, alternative systems or strategies to address child labor are developed and implemented, according to the local context.”⁵⁸ Such representations serve to assure consumers that its CLMRS program is not merely perfunctory, as it is continuously subject to Lindt’s own rigorous supervision and continuous evaluation.

74. Lindt claims to implement CLMRS in “high-risk countries,” which include Ghana and Côte d’Ivoire.⁵⁹ Lindt reported in 2024 that it had 89,500 farming households in Ghana and Côte d’Ivoire registered in the Farming Program and covered by CLMRS.⁶⁰

75. Lindt claims that it now sources “100% of our cocoa volume from child labor risk countries as covered by a Child Labor Monitoring and Remediation System (CLMRS) or another due diligence system” and aims to maintain this through 2030.⁶¹ For farmers not covered by Lindt’s own Farming Program’s CLMRS, Lindt says it “rel[ies] on the requirements of, and verification through, the Rainforest Alliance certification.”⁶²

⁵⁷ Lindt & Sprüngli, Lindt & Sprüngli Farming Program 2026–2030, at 7 (2026) <https://www.lindt-spruengli.com/amfile/file/download/id/10509/file/Farming-Program-2026-2030.pdf>.

⁵⁸ *Id.*

⁵⁹ *Invest in Livelihoods of Farming Families*, *supra* note 46.

⁶⁰ Lindt & Sprüngli, Modern Slavery Statement 2024, *supra* note 36, at 14.

⁶¹ *Invest in Livelihoods of Farming Families*, *supra* note 46.

⁶² *Id.*

76. Rainforest Alliance certification requires complying with the organization's Sustainable Agriculture Standard Farm Requirements. The Rainforest Alliance standards themselves purport to require participating farms to have systems for monitoring and remediating child labor.⁶³

77. Moreover, recognizing that “child labor is a systemic issue [that] cannot be solved on a broader scale solely by engaging individual households and supporting individual children,” Lindt claims to “complement the CLMRS with prevention strategies at a community level, collective action and with efforts to strengthen public child protection systems. These efforts aim to address root causes of child labor, while aligning with and supporting public child protection systems.”⁶⁴

78. With respect to the root causes of child labor, Lindt recognizes that farmer poverty is a direct contributing cause. In addition to CLMRS, Lindt says that “[w]ith the Farming Program we also aim to address child labor risks by increasing the resilience of farming households.”⁶⁵

79. Indeed, “contribut[ing] to the economic resilience of farming households” is another purported aim of the Lindt & Sprüngli Farming Program: “Poverty among cocoa households is one of the underlying root causes of the cocoa sector’s challenges. At Lindt & Sprüngli, we believe that cocoa farmers deserve to earn an income that is sufficient to support a decent standard of living.”⁶⁶

80. Lindt elaborates on this point on its FAQ Page:

Cocoa farmers worldwide are essential for the sustainability and long-term success of our business. However, many cocoa farmers struggle to build

⁶³ Rainforest All., Rainforest Alliance Sustainable Agriculture Standard: Farm Requirements 50–54 (2026), <https://knowledge.rainforest-alliance.org/docs/rainforest-alliance-sustainable-agriculture-standard-farm-requirements>.

⁶⁴ *Invest in Livelihoods of Farming Families*, *supra* note 46.

⁶⁵ Lindt & Sprüngli, Modern Slavery Statement 2024, *supra* note 36, at 14.

⁶⁶ *Invest in Livelihoods of Farming Families*, *supra* note 46.

resilient livelihoods from growing cocoa. Especially in West Africa, many live below the poverty line and child labor remains a persistent challenge. These issues are complex and systemic—but we believe that bundled interventions, long-term relationships, and collective action can drive meaningful change. The Lindt & Sprüngli Farming Program strives to contribute to building resilient livelihoods for farmers, their families, and farming communities. Our goal is to improve the income situation of the farmers in our cocoa value chain, as poverty among cocoa households is one of the underlying root causes of the cocoa sector’s challenges.⁶⁷

81. Lindt prominently highlights these features of the Lindt and Sprüngli Farming Program in its advertising of its sustainability action plan for 2030. Its commitments for 2030 include aiming to “invest in our cocoa Farming Program”; “implement a Living Income Program to support cocoa farmers in West Africa”; “maintain cocoa volume from child labor risk countries as covered by a Child Labor Monitoring and Remediation System (CLMRS) or other due diligence system that is being rolled out or is implemented, with Mass Balance included”; “support program communities with a community development program designed to reduce child labor risks”; and “respect[] human rights through implementing a due diligence process aimed at preventing, mitigating, or ceasing our adverse human rights and environmental impacts throughout the organization and our supply chain.”⁶⁸

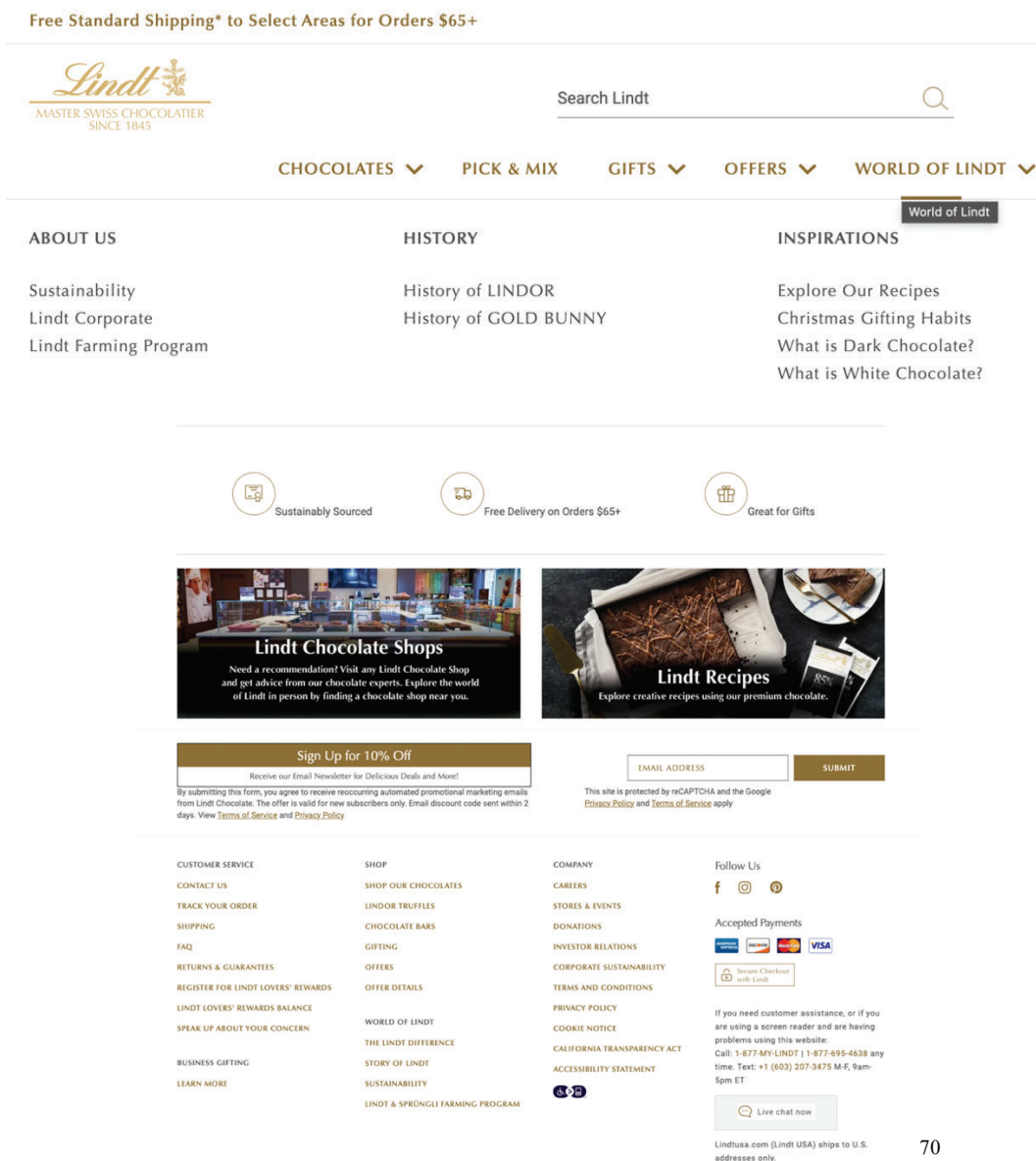
II. Lindt’s Product Packaging and Online Advertising Represents to Consumers That Its Products are Responsibly and Sustainably Sourced.

82. Lindt advertises the Lindt and Sprüngli Farming Program and its purported commitment to sustainability by placing the Farming Program seal on the physical packaging of the Products and by directing consumers to “Lindt Sustainability” on its website.

⁶⁷ *Frequently Asked Questions*, *supra* note 43 (under “To which extent is Lindt & Sprüngli engaged in improving conditions for farmers in cocoa producing countries?”).

⁶⁸ Lindt & Sprüngli, 2030 Sustainability Plan: Indulgence Rooted in Responsibility 3 (2026), <https://www.lindt-spruengli.com/amfile/file/download/id/10207/file/2030-Sustainability-Plan.pdf>.

83. On the website, consumers will find no shortage of statements expressing Lindt's commitment to "sustainably" and "responsibly" sourcing its cocoa, as well as direction to the Lindt & Sprüngli Farming Program website, where consumers can read in detail the company's claims regarding the Farming Program, RA certification, and CLMRS:



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⁶⁹ Lindt USA, <https://www.lindtusa.com/> (last visited May 7, 2026).

⁷⁰ *Id.*

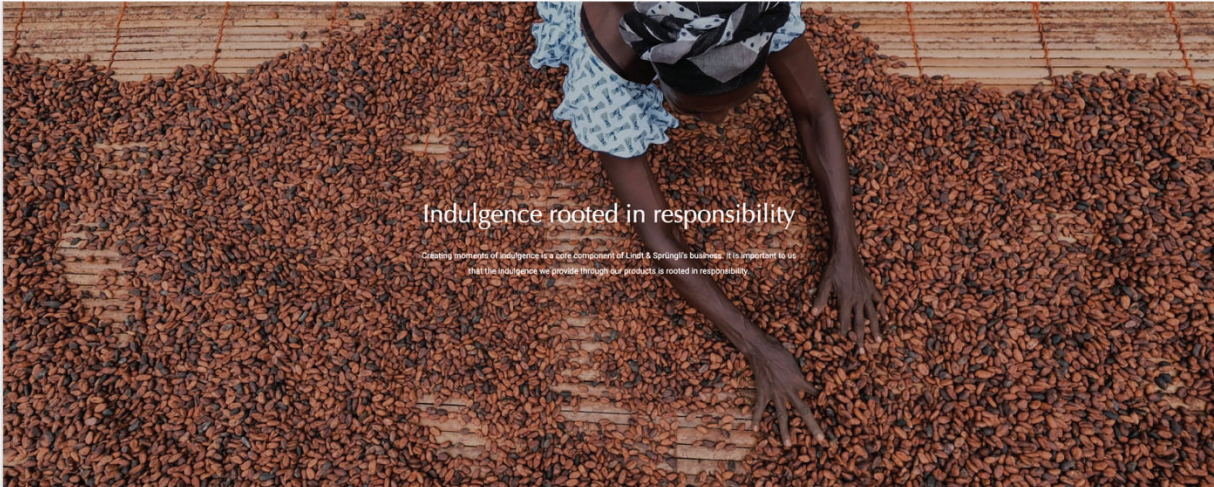
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Indulgence rooted in responsibility

Creating moments of indulgence is a core component of Lindt & Sprüngli's business. It is important to us that the indulgence we provide through our products is rooted in responsibility.

The Lindt & Sprüngli 2030 Sustainability Plan Chat

Our progress

100%
of our cocoa products were sourced through the Lindt & Sprüngli Farming Program or other Responsible Sourcing Standards*

* At Lindt & Sprüngli, Responsible Sourcing Standards refer to certifications, assessments, programs, or specifications which consider social or environmental criteria for raw and packaging materials. For more information refer to our latest Sustainability Statement.

92%
of our packaging was designed to be recyclable in 2025

100%
of our palm oil and palm kernel oil was sourced RSPO certified in 2025

Selected Actions



Lindt & Sprüngli Farming Program

Since 2008, the Lindt & Sprüngli Farming Program has been our Responsible Sourcing Standard for cocoa. It was developed to address social and environmental impacts in our cocoa supply chain. The Farming Program aims to contribute to resilient livelihoods for cocoa farmers and their families and to promote Good Farming Practices* and biodiverse landscapes. It is built on Rainforest Alliance certification and strengthened by targeted investments and activities beyond certification.

[LEARN MORE](#)



Rainforest Alliance certification

As of 2026, all our cocoa volumes are sourced as Rainforest Alliance Certified. Lindt & Sprüngli selected the Rainforest Alliance certification as one of the trusted standards for cocoa. Activities within the Farming Program are implemented in addition to the Rainforest Alliance certification.

[LEARN MORE](#)



Child Labor Monitoring System

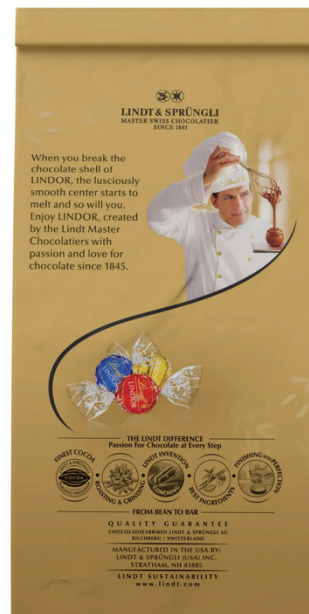
For farmers registered in the Lindt & Sprüngli Farming Program in high-risk countries, we support the implementation of a Child Labor Monitoring & Remediation System (CLMRS)* as a foundational due diligence tool to address child labor risks. For farmers not registered in the Farming Program, we rely on the requirements of, and verification through, the Rainforest Alliance certification.

[LEARN MORE](#)

⁷¹ *Indulgence Rooted in Responsibility*, Lindt USA, <https://www.lindtusa.com/our-commitment-to-sustainable-chocolate> (last visited May 7, 2026).

⁷² *Id.*

84. A wide variety of Products with such representations on their packaging are available for purchase in the District at various retailers, such as Walmart and Target. Below are just some examples of labeling that is found on Products sold in the District of Columbia:



73

⁷³ Lindt Lindor Assorted Chocolate Candy Truffles, 5.1 oz, Bag, Walmart, <https://www.walmart.com/ip/Lindt-Lindor-Assorted-Chocolate-Candy-Truffles-5-1-oz-Bag/10312255> (last visited May 7, 2026).



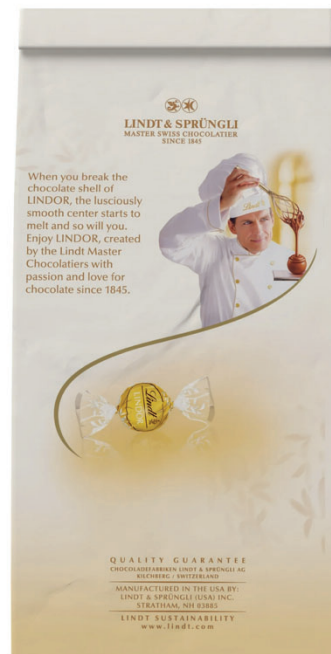
74



75

⁷⁴ Lindt LINDOR Assorted Dark Chocolate Candy Truffles, 12.7 oz. Bag, Walmart, <https://www.walmart.com/ip/Lindt-LINDOR-Assorted-Dark-Chocolate-Candy-Truffles-12-7-oz-Bag/14826709731> (last visited May 7, 2026).

⁷⁵ Lindt LINDOR White Chocolate Assorted Truffles With Allergen Info, 8.5 oz Bag, Walmart, <https://www.walmart.com/ip/Lindt-LINDOR-White-Chocolate-Assorted-Chocolate-Candy-Truffles-8-5-oz-Bag/8861467519> (last visited May 7, 2026).



76



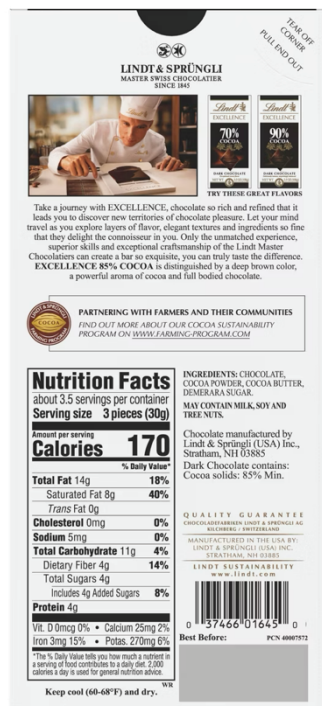
77

⁷⁶ Lindt Lindor White Chocolate Candy Truffles, 8.5 oz. Bag, Walmart, <https://www.walmart.com/ip/Lindt-Lindor-White-Chocolate-Candy-Truffles-8-5-oz-Bag/44805020> (last visited May 7, 2026).

⁷⁷ Lindt Mini Pralinés Assorted Chocolates 3.4 oz Gift Box, Walmart, <https://www.walmart.com/ip/Lindt-Mini-Pralines-Assorted-Chocolate-Candy-Pralines-3-4-oz-Box/1755382386> (last visited May 7, 2026).



78

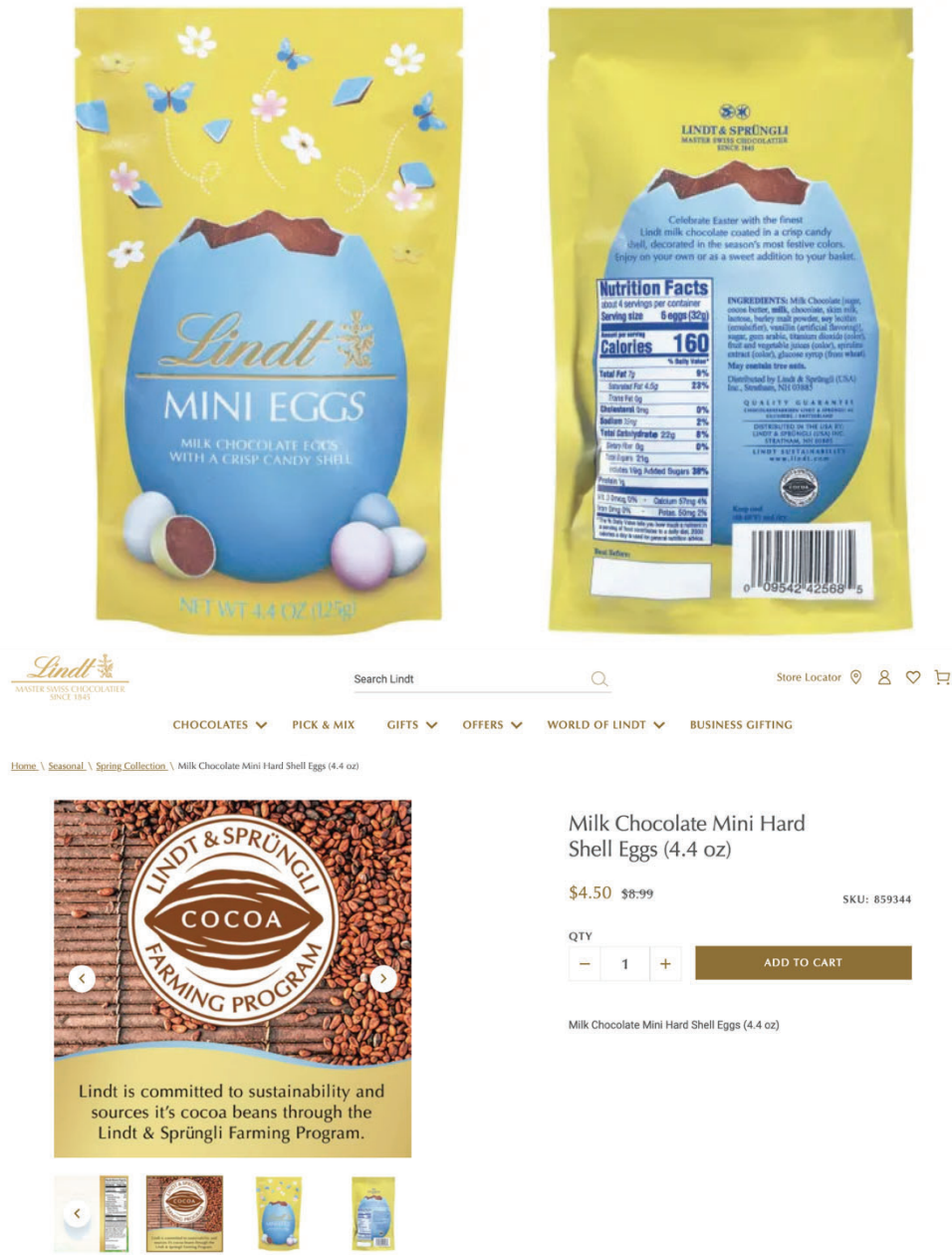


79

⁷⁸ Lindt Classic Recipe Milk Chocolate Candy Bar - 4.4 oz., Target, <https://www.target.com/p/lindt-classic-recipe-milk-chocolate-candy-bar-4-4-oz/-/A-12942861> (last visited May 7, 2026).

⁷⁹ Lindt Excellence 85% Cocoa Dark Chocolate Candy Bar - 3.5 oz., Target, <https://www.target.com/p/lindt-excellence-85-cocoa-dark-chocolate-candy-bar-3-5-oz/-/A-12945476> (last visited May 7, 2026).

85. District consumers may also purchase the Products directly from Lindt's website, as well as the websites of brands owned by Lindt, where representations regarding the Farming Program and Lindt Sustainability are prominently displayed. For example:



⁸⁰ *Milk Chocolate Mini Hard Shell Eggs (4.4 oz)*, Lindt USA, <https://www.lindtusa.com/mini-hard-shell-eggs-859344> (last visited May 7, 2026).



Search Lindt



Store Locator

CHOCOLATES PICK & MIX GIFTS OFFERS WORLD OF LINDT BUSINESS GIFTING

Home \ Seasonal \ Easter Basket Fillers \ Milk Chocolate Hazelnut Carrots 4-pk (1.9 oz)

Milk Chocolate Hazelnut
Carrots 4-pk (1.9 oz)

\$3.50 \$7.20

SKU: 58850U

QTY

- 1 +

ADD TO CART

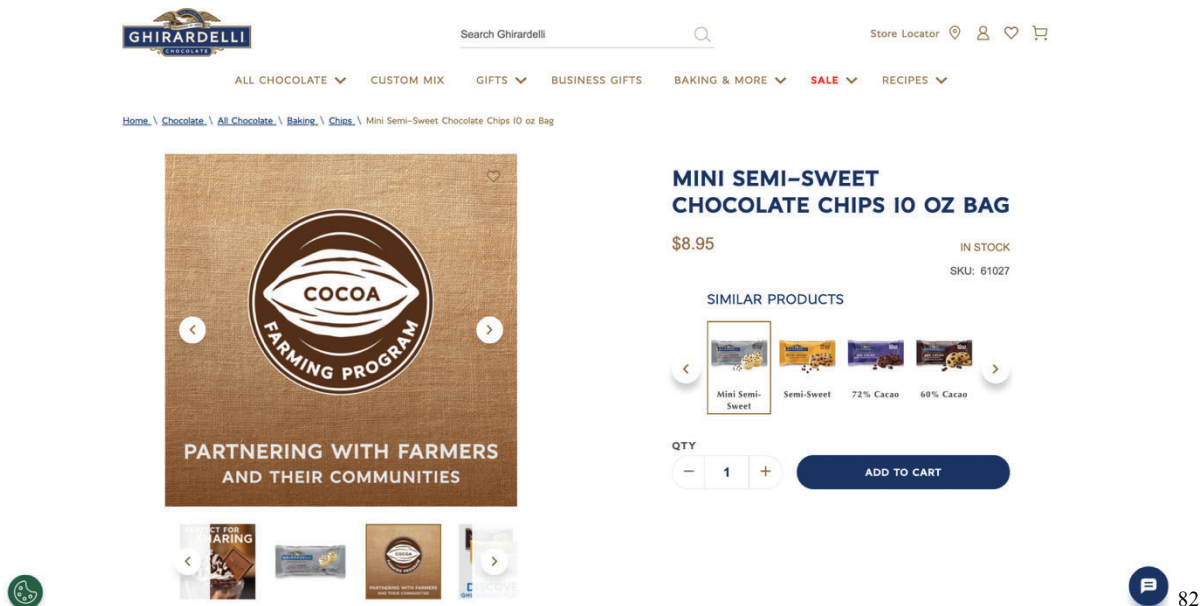
Milk Chocolate Hazelnut Carrots 4-pk (1.9 oz)



Chat 81



⁸¹ Milk Chocolate Hazelnut Carrots 4-pk (1.9 oz), Lindt USA, <https://www.lindtusa.com/chocolate-carrots-4-pk-58850u> (last visited May 7, 2026).



86. Lindt also prominently advertises the Farming Program and its commitment to sustainability on the websites of third-party retailers:



⁸² *Mini Semi-Sweet Chocolate Chips 10 oz Bag*, Ghirardelli, <https://www.ghirardelli.com/mini-semisweet-chocolate-premium-baking-chips-61027> (last visited May 7, 2026).

⁸³ *Lindt Mini Pralines Assorted Chocolates 3.4 oz Gift Box*, *supra* note 77.

Target Categories Deals Pickup & delivery What can we help you find?

Shop all Ghirardelli

Ghirardelli Milk Chocolate Candy SQUARES Assortment - 4.8oz

★★★★★ 245 3 Questions

\$7.49 (\$1.56/ounce)

Pickup Ready within 2 hours Delivery Check availability Shipping Arrives by Wed, Apr 8

Pick up at **DC New York Ave NE** Check other stores

Ready within 2 hours for pickup inside the store

Qty 1 Add to cart

Sign in to buy now

Free & easy returns
Return this item by mail or in store within 90 days for a full refund.

Eligible for registries and wish lists Sign in

Add to list

Save 5% every day
With Target Circle™ Card

About the brand

84

Lindt LINDOR Made to Melt You

Smooth Melting Chocolate Indulgence

Lindt LINDOR Truffles embody the passion and expert craftsmanship of Lindt Master Chocolatiers for a luscious and rewarding chocolate experience. Finely crafted with a premium chocolate shell, these truffles are filled with an irresistibly smooth, melting center. When you break open the chocolate shell of LINDOR, the lusciously smooth center starts to melt and so will you.

Lindt LINDOR: Make Every Moment Special

The Perfect Self Indulgence
Treat yourself to smooth, rich-tasting chocolate with Lindt LINDOR Truffles. A perfect sized candy that is easy to enjoy on its own as a midday treat or a special indulgence for yourself.

Impress Your Guests
Entertain your guests with finely crafted, gourmet Lindt LINDOR Truffles. Whether filling a candy dish or accompanying a dessert platter, these delicate truffles are perfect for celebrating.

Easy On-the-Go Treat
Keep Lindt LINDOR truffle sticks on-hand for a sweet midday snack. They are the perfect size for a much-needed pick-me-up whenever you need a moment of sweet indulgence.

Give the Gift of Lindt
Give the gift of premium chocolate with a luscious, smooth melting center with Lindt LINDOR Truffles. Each bag of individually wrapped chocolate truffles makes a perfect gift for friends and loved ones.

SUSTAINABLY SOURCED

The Lindt & Sprüngli Farming Program enables us to trace our cocoa beans right back to the farmers and to support them, their families and their communities on the ground according to their specific local needs.

85

⁸⁴ Ghirardelli Milk Chocolate Candy SQUARES Assortment - 4.8oz, Target, <https://www.target.com/p/ghirardelli-milk-chocolate-assortment-candy-squares-medium-bag-4-8oz/-/A-93440994> (last visited May 7, 2026).

⁸⁵ Lindt Lindor Assorted Chocolate Candy Truffles, 5.1 oz, Bag, *supra* note 73.

87. The seals and representations on the Products’ packaging—as well as the point-of-sale advertising on Lindt’s online store and third-party online stores—clearly communicate to consumers not only that the Products therein have been produced responsibly and sustainably, but also that Lindt as a company is committed meaningfully to improving the conditions under which its cocoa is produced.

III. Lindt’s Representations Regarding Its Commitments and Actions with Respect to Child Labor and the Responsible Sourcing of Its Products Are False and Misleading to Consumers.

A. IRAdvocates’ Investigations Have Revealed That the Lindt & Sprüngli Farming Program’s CLMRS in Fact Provide No Meaningful Monitoring or Remediation of Child Laborers.

88. In Fall 2023, IRAdvocates conducted an on-the-ground investigation into child labor practices in Ghana, accompanied by a crew from CBS News. The investigation was led by a confidential Whistleblower who, at the time, was employed by Touton SA (“Touton”), which has its own authorized Local Buying Company (“LBC”) that purchases cocoa directly from farmers on behalf of international cocoa companies, including Lindt.⁸⁶ In his role as an agent for Touton, the Whistleblower acted as an intermediary responsible for carrying out instructions for sustainability programs and CLRMS from the international cocoa companies across numerous farms.

89. Prior to working for Touton, the Whistleblower had worked in similar capacities for ECOM Agrottrade Ltd (“ECOM”) and Olam International Ltd, other major suppliers with LBCs that procure cocoa and implement sustainability programming on behalf of Lindt.⁸⁷ During his employment with ECOM, the Whistleblower served seven years as a Lindt Sustainability Officer.

⁸⁶ Lindt & Sprüngli, Lindt & Sprüngli Cocoa Supply Chain Disclosure 2 (2025), <https://www.lindt-spruengli.com/amfile/file/download/id/8805/file/Lindt-&-Spr%C3%BCngli-Cocoa-Supply-Chain-Disclosure.pdf>

⁸⁷ *Id.*

In this role, he was responsible for implementing CLRMS and other sustainability initiatives under the Lindt & Sprüngli Farming Program.

90. Relying on the Whistleblower's deep understanding of the industry, IRAdvocates and CBS News were directed to multiple plantations whose buyer-seller relationships and sustainability programming were facilitated by the very same LBCs that Lindt uses to procure its own cocoa supply, including Touton and ECOM.

91. At these plantations, IRAdvocates observed and documented the presence of children engaged in hazardous labor, including working with dangerous chemicals and machetes, in violation of Ghanaian law and international standards. In fact, IRAdvocates found that the majority of laborers on plantations were children. The children on these farms were forced to miss school and work long hours—often from dawn until dusk—on a near-daily basis, due to economic necessity.

92. The Whistleblower confirmed that such use of child labor is ubiquitous throughout the industry, including on farms that are registered as participating in the Lindt & Sprüngli Farming Program. In fact, based on his years of professional experience in implementing sustainability programs on behalf of several multinational cocoa companies, including Lindt, the Whistleblower estimated that the circumstances relating to child labor and farmer poverty on Lindt-sourcing farms were the gravest of all.

93. In Fall 2025, IRAdvocates, in partnership with the Whistleblower, conducted a follow-up investigation, which confirmed the continued prevalence of child labor on Ghanaian cocoa farms, including Lindt and Rainforest Alliance sourcing farms.

94. IRAdvocates' investigation revealed not only that child labor is prevalent on farms that source to Lindt, but also that Lindt's CLRMS is effectively unenforced—which the

Whistleblower confirmed is standard practice in the industry. Lindt's suppliers do not actually monitor farms for child labor or attempt to remediate child laborers. Nor do they provide the farmers with proper training to adhere to the sustainability requirements of the Lindt & Sprüngli Farming Program.

95. Instead, the suppliers responsible for carrying out the Lindt and Sprüngli Farming Program will perfunctorily deliver school-related items to children without explaining what the items have to do with remediation from child labor. These deliveries do not happen consistently or with any regularity.

96. IRAdvocates interviewed several children that harvest cocoa for Lindt who were documented in an internal Lindt list as being enrolled in school as a rehabilitation measure. In reality, these children are rarely able to attend school and no one from Lindt or Lindt's suppliers has ensured they are in school. The only support they received from Lindt was the delivery of backpacks, notebooks, and school kits 2–3 years prior to IRAdvocates' investigation. Neither the children nor their parents knew why they received these items, and despite Lindt's agents knowing that the children regularly perform hazardous labor on the farm, no one associated with Lindt has ever followed up to check on the status of these children.

97. Not only do Lindt's suppliers fail to carry out actual monitoring and remediation activities, but they also wholly fabricate the contents of the internal rehabilitation lists in order to meet quotas. The Whistleblower himself stated that he and his colleagues as a matter of practice fabricated rehabilitation lists on Lindt's behalf because the cocoa companies demanded large remediation numbers. According to the Whistleblower, these companies never attempted to verify if the lists were legitimate. Examples of fabrications in the rehabilitation lists include documenting

interviews with children that never took place, documenting children as receiving remediation that they never received, and documenting children who do not even exist as being rehabilitated.

98. In addition to the fraudulent rehabilitation lists, the Whistleblower confirmed it is standard practice for Lindt Sustainability Officers to falsely document in training logs that farmers received trainings on child labor.

99. These fraudulent lists and logs not only show the specific examples of deceptive claims by Lindt regarding its rehabilitation programs—it is direct evidence that the Lindt and Sprüngli Farming Program is simply in place to mislead the public for profit.

100. The investigation uncovered gross misconduct that a reasonable consumer would not expect from a company that “strongly condemns all forms of child labor and systematically investigates suspected cases of child labor.”⁸⁸

101. A reasonable consumer would not expect a company “committed to respecting human rights”⁸⁹ and “[c]onducting business in an ethical, legal, and environmentally and socially responsible manner”⁹⁰ to use widespread child labor in its cocoa supply chain.

102. A reasonable consumer especially would not expect a company claiming to implement “due diligence”⁹¹ to rely on fake child rehabilitation programs as its basis for telling the public that it implements a “responsible sourcing approach.”⁹²

103. The Lindt & Sprüngli Farming Program’s actions—and inaction—on the ground demonstrates that Lindt does not in fact “aim[] to identify children in, or at risk of child labor, to

⁸⁸ See *Frequently Asked Questions*, *supra* note 43 (under “What is the position of Lindt & Sprüngli on child labor and what does the company do to prevent it in its supply chain?”).

⁸⁹ See Lindt & Sprüngli, Business Code of Conduct, *supra* note 31, at 2.

⁹⁰ See Lindt & Sprüngli, Human Rights Policy, *supra* note 31, at 2.

⁹¹ See Lindt & Sprüngli, 2030 Sustainability Plan: Indulgence Rooted in Responsibility, *supra* note 68, at 3.

⁹² See *id.* at 10.

provide ongoing guidance, and to support improving their situation and to follow their progress over time.”⁹³

104. The Lindt & Sprüngli Farming Program’s CLRMS does not “target[] prevention, mitigation, and remediation assistance to children involved in, or at risk of, child labor, as well as to their families and communities.”⁹⁴

105. To the extent that Lindt does share with suppliers a CLRMS Implementation Guidance that “offers a framework for child labor risk assessments, preventive interventions for protecting children’s rights, child labor identification, child labor remediation, and activity tracking and reporting,” such Guidance is not being implemented.⁹⁵

106. A reasonable consumer would not expect Lindt’s CLMRS, as its “foundational due diligence tool to address child labor risks” for families registered in the Lindt & Sprüngli Farming Program, to be this poorly run and ineffectual.⁹⁶

B. IRAdvocates’ Investigations Have Revealed that Lindt’s Agents Systematically Underpay Farmers for Cocoa Through a Fraudulent Weighing Scheme.

107. In addition to uncovering Lindt’s fraudulent CLRMS, IRAdvocates’ investigation in Ghana revealed that Touton, ECOM, and Cargill—all of which purchase cocoa on Lindt’s behalf—systematically use rigged scales to weigh the farmers’ cocoa. Since farmers are paid by weight, this practice of under-weighting farmers’ cocoa further cuts farmers’ meager income.

108. In general, the scales will be set to under-weight the cocoa by between seven and ten kilos per bag. IRAdvocates confirmed during the investigation that the scale at one of Lindt’s collection centers was off by about 8 kilos.

⁹³ See *Invest in Livelihoods of Farming Families*, *supra* note 46.

⁹⁴ See *Glossary*, *supra* note 54.

⁹⁵ See *id.*

⁹⁶ See *Invest in Livelihoods of Farming Families*, *supra* note 46.

109. Additionally, an extra two kilos are often deducted under the false justification that cocoa dries and loses weight, even though this claim is not true.

110. As a result, Lindt's agents typically pay for around 62 kilos per bag of cocoa, despite each bag actually weighing around 72 kilos.

111. The Whistleblower has direct knowledge of this deceptive underpayment scheme and confirmed that it is a standard practice employed by buying agents acting on behalf of Lindt and other major chocolate companies in Ghana.

112. Ghana sets a minimum price for cocoa through its government-regulated system to protect farmers from market volatility and exploitative pricing by large buyers. The Ghana Cocoa Board ("COCOBOD"), a government agency, determines the Guaranteed Minimum Producer Price annually.⁹⁷

113. At approximately seven to ten kilos deducted per bag, Lindt fails to meet Ghana's Guaranteed Minimum Producer Price as set by COCOBOD, effectively exploiting the farmers. This systematic underpayment ensures that cocoa farmers remain trapped in poverty, making them reliant on child labor to meet production demands and sustain their livelihoods.

114. When farmers sell cocoa to Lindt, they are subjected to this deliberate underweighing scheme, losing approximately seven to ten kilograms per bag due to fraudulent weighing practices that are a consistent feature of Lindt's purchasing operations.

115. This discovery shows that Lindt is not only failing to follow through on promises to address farmers' low incomes and poverty—which are among the root causes of child labor—

⁹⁷ Note that even the minimum farmgate price set by COCOBOD keeps prices artificially low and is nowhere near enough to allow farmers to reliably keep food on the table, let alone hire adult workers. However, it is crucial to note that this is a *minimum* price. Companies like Lindt have the ability to, and do, pay farmers more through premiums. Unfortunately, the premiums currently offered are still far too low to keep farmers out of poverty and enable their children to stay out of the farms and in the schools.

but upon information and belief, is intentionally and as a matter of practice cheating the farmers it claims to be helping.

116. Systematically cheating cocoa farmers out of money owed to them does not help “address child labor risks by increasing the resilience of farming households.”⁹⁸ A company that “believe[s] that cocoa farmers deserve to earn an income that is sufficient to support a decent standard of living” would not engage in such conduct.⁹⁹

117. A reasonable consumer would not expect a company that claims it “strives to contribute to building resilient livelihoods for farmers, their families, and farming communities” and that “[o]ur goal is to improve the income situation of the farmers in our cocoa value chain” would operate through buying agents that cheat impoverished farmers out of critical income they need to support their families.¹⁰⁰

C. Rainforest Alliance Certification Does Not Guarantee Responsibly or Sustainably Sourced Cocoa.

118. Lindt claims it uses 100% responsibly sourced cocoa because any cocoa not covered by the Farming Program’s CLMRS is subject to Rainforest Alliance due diligence standards.¹⁰¹ Additionally, Lindt has announced that, as of 2026, all of its cocoa is Rainforest Alliance certified, and it will start phasing out Farming Program seals on the Products and replace them with Rainforest Alliance seals.¹⁰²

119. But despite Lindt’s representations, Rainforest Alliance certification does not indicate that cocoa was sourced sustainably or responsibly. Sourcing that utilizes child labor is neither responsible nor sustainable. It is also neither responsible nor sustainable to source cocoa

⁹⁸ See Lindt & Sprüngli, Modern Slavery Statement 2024, *supra* note 36, at 14.

⁹⁹ See *Invest in Livelihoods of Farming Families*, *supra* note 46.

¹⁰⁰ *Frequently Asked Questions*, *supra* note 43 (under “To which extent is Lindt & Sprüngli engaged in improving conditions for farmers in cocoa producing countries?”).

¹⁰¹ *Invest in Livelihoods of Farming Families*, *supra* note 46.

¹⁰² *Frequently Asked Questions*, *supra* note 43 (under “Does Lindt & Sprüngli chocolate have external certification?”).

from high risk countries, such as Ghana or Côte d'Ivoire, without an effective mechanism in place to monitor or remediate child labor.

120. Rainforest Alliance certification is ineffective at preventing child labor. Only about 10% of Rainforest Alliance farms are actually evaluated for child labor each year.¹⁰³ Audits are announced ahead of time, which allows farms to temporarily cease using child labor for the duration of the audit.¹⁰⁴

121. Independent investigations by the NGO Corporate Accountability Lab in 2020 and 2021 confirmed this by identifying multiple Rainforest Alliance-certified farms utilizing child labor.¹⁰⁵ One farmer whose cooperative is Rainforest Alliance-certified explained: “They tell us that children are not supposed to work but they are the ones who help me feed the family. Children work in the plantations because the cooperatives and companies treat us so badly that we need to make children work on the plantations.”¹⁰⁶ Clearly, Rainforest Alliance certification did not improve the life of this farmer, his family, or his children.

122. Additionally, during its own investigation in 2025, IRAdvocates interviewed several children who regularly perform hazardous labor on a farm that was supposed to be in compliance with Rainforest Alliance standards. Nobody from Rainforest Alliance had ever even visited the farm, despite the farm having the certification for several years.

123. Rainforest Alliance does not even require a minimum farmgate¹⁰⁷ price to guarantee at least a certain level of income for farmers. Instead, Rainforest Alliance requires buyers

¹⁰³ Peter Whoriskey & Rachel Siegel, *Cocoa's Child Laborers*, Wash. Post (June 5, 2019), <https://www.washingtonpost.com/graphics/2019/business/hershey-nestle-mars-chocolate-child-labor-west-africa/>.

¹⁰⁴ *Id.*

¹⁰⁵ *CAL Finds Evidence of Child Labor on Rainforest Alliance Certified Farms*, Corp. Accountability Lab (Oct. 25, 2021), <https://corpaccountabilitylab.org/calblog/2021/10/25/cal-finds-evidence-of-child-labor-on-rainforest-alliance-certified-farms>.

¹⁰⁶ *Id.*

¹⁰⁷ “Farmgate price” refers to the price of an agricultural product when purchased directly from the producer.

to pay a \$70 premium on each metric ton of cocoa.¹⁰⁸ This is not enough for Ghanaian farmers to earn a living income and hire adults to work the farms instead of their children.

124. For these reasons, Lindt’s claim that Rainforest Alliance certification makes its Products sustainably or responsibly sourced is false and misleading. A reasonable consumer would not expect products with a sustainability certification to have been produced with child labor or by drastically underpaying farmers.

D. Lindt Is Not Committed to Reducing Child Labor Risk in Its Supply Chain.

125. Although it has been almost two decades since Lindt first launched the Lindt & Sprüngli Farming Program in 2008, there is little to show for it, as child labor is as prevalent as ever and shows no signs of abating.

126. Lindt claims that it has achieved 100% responsibly sourced cocoa and aims to “maintain” this through 2030.¹⁰⁹ But as this Complaint has established, a reasonable consumer would not understand cocoa sourced through the Lindt & Sprüngli Farming Program or through Rainforest Alliance to be responsible or sustainable given the widespread use of child labor on farms participating in these programs and the complete lack of meaningful oversight or remediation activities. Furthermore, so long as Lindt refuses to pay its farmers a price for their cocoa that constitutes a living income, child labor will persist in its supply chain. Yet, Lindt’s agents are not even willing to pay farmers the full amount they are entitled to receive under Ghanaian law.

127. On top of this, even the claim that 100% of Lindt’s beans are sourced either through the Lindt & Sprüngli Farming Program or another “responsible sourcing” or “due diligence”

¹⁰⁸ *Does Rainforest Alliance Certification Guarantee a Minimum Price for Certified Crops?*, Rainforest All. (June 25, 2021), <https://www.rainforest-alliance.org/business/certification/does-rainforest-alliance-certified-guarantee-minimum-price/>.

¹⁰⁹ *Invest in Livelihoods of Farming Families*, *supra* note 46.

standard is patently false.¹¹⁰ As a recently released investigatory documentary has exposed, it is standard practice in Ghana for the LBCs' purchasing clerks to mix conventional beans¹¹¹ with certified beans, while labeling them all as certified.¹¹² According to an industry insider, "On paper, Lindt's beans are 100% traceable. In reality, it's very different though. It's only around 30% of the certified beans that come from registered farms."¹¹³

128. A company that boasts about its "due diligence" and "responsible sourcing approach," yet is content to "maintain" its current approach under the above circumstances cannot be regarded as "committed" to reducing child labor risks in its supply chain in any meaningful way.

IV. Lindt's Representations Regarding Its Commitments and Actions with Respect to Child Labor and the Responsible Sourcing of Its Products Are Material to Consumers.

129. Lindt knows that consumers care about whether the products they purchase are sustainably sourced and free of labor exploitation. Lindt also knows that consumers care about the ethics of the company they purchase a product from. For this reason, Lindt and companies like it make many representations about both the sourcing of their products and their corporate values.

130. Because consumers care about their products being free of labor exploitation, representations regarding child labor, forced labor, labor conditions, and fair compensation are material to consumers.

131. Because consumers care about the ethics of the company they purchase a product from, representations regarding a company's values and intentions in carrying out those values are also material to consumers.

¹¹⁰ See *id.*; Lindt & Sprüngli, Integrated Annual Report 2025, *supra* note 49, at 35, 62.

¹¹¹ "Conventional beans" refers to cocoa beans sourced from unregistered farms that are not subject to any sustainability certification requirements. "Certified beans" refers to cocoa beans sourced from farms that are registered in a sustainability program—including the Lindt & Sprüngli Farming Program, Rainforest Alliance, and various programs run by other cocoa companies—and therefore are supposed to meet certain standards with respect to child labor and other sustainability matters.

¹¹² Reclaiming Cocoa (Staldi Productions 2025), <https://www.reclaimingcocoa.ch/>.

¹¹³ *Id.* at 22:09.

132. According to a survey by Mintel, 56% of Americans would stop purchasing from companies they believe are unethical, and 35% would do so even if there are no substitutes for the brand.¹¹⁴ Additionally, 63% “feel that ethical issues are becoming more important” with respect to spending habits.¹¹⁵

133. A joint survey by Food Marketing Institute, Grocery Manufacturers Association, and Deloitte Consulting LLP of 5,000 consumers showed that significant segments of the national consumer base prioritize “more transparency from food producers and retailers,” “accountability and transparency through the entire food supply chain,” and “fair treatment of workers.”¹¹⁶

134. A survey by OpenText found that “81 percent” of consumer respondents said that “purchasing ethically sourced and/or produced products matters,”¹¹⁷ and a study from McKinsey and NielsenIQ found that consumers are willing to pay more for an ethical product based on the product marketing and packaging.¹¹⁸

135. With respect to child labor, 77% of consumers would no longer purchase from brands they knew were using child labor, even if the consumers had often bought from these brands in the past.¹¹⁹ Fifty-five percent of consumers say they would pay more for items they know are not made with child labor.¹²⁰

¹¹⁴ *56% of Americans Stop Buying From Brands They Believe Are Unethical*, Mintel (Nov. 18, 2015), <https://www.mintel.com/press-centre/56-of-americans-stop-buying-from-brands-they-believe-are-unethical/>.

¹¹⁵ *Id.*

¹¹⁶ *Consumer Survey Shows Changing Definition of Food Safety*, Food Safety News (Feb. 4, 2016), <https://www.foodsafetynews.com/2016/02/123246/>.

¹¹⁷ Steve Banker, *Do Consumers Care About Ethical Sourcing?*, Forbes (Oct 5, 2021), <https://www.forbes.com/sites/stevebanker/2021/10/05/do-consumers-care-about-ethical-sourcing/?sh=4c6fe92c5f50>.

¹¹⁸ *Consumers Care About Sustainability—and Back It Up With Their Wallets*, McKinsey & Co. (Feb. 6, 2023), <https://www.mckinsey.com/industries/consumer-packaged-goods/our-insights/consumers-care-about-sustainability-and-back-it-up-with-their-wallets>.

¹¹⁹ *Majority (55%) of Americans Willing to Pay More for Clothing Not Made Using Child Labor*, Ipsos (July 18, 2013), <https://www.ipsos.com/en-us/majority-55-americans-willing-pay-more-clothing-not-made-using-child-labor>.

¹²⁰ *Id.*

CAUSES OF ACTION

Violations of the District of Columbia Consumers Protection Procedures Act *Against all Lindt Defendants*

136. IRAdvocates incorporates by reference all of the allegations of the preceding paragraphs of this Complaint.

137. IRAdvocates is a nonprofit, public interest organization that brings these claims on behalf of the general public and District consumers. *See* D.C. Code § 28-3905(k)(1)(D)(i).

138. Through § 28-3905(k)(1)(D)(i), the D.C. CPPA explicitly allows for public-interest organizational standing even beyond that which is afforded pursuant to § 28-3905(k)(1)(C) and allows a public interest organization to stand in the shoes of a consumer to seek relief from any violation of the CPPA.

139. Lindt is a “person” and a “merchant” that provides “goods” within the meaning of the CPPA. *See id.* § 28-3901(a), (1), (3), (7).

140. Lindt has advertised and marketed, and continues to advertise and market, its cocoa Products as being sourced from supply chains that meet certain labor conditions and standards, when in fact, investigations reveal that Lindt’s supply chains are reliant on child labor and that many of the represented monitoring, remediation, and economic empowerment programs are either nonexistent or ineffective, and that remediation documents have been falsified. Lindt has further misled consumers to believe that that it is committed to and making progress on eradicating child labor from its supply chains, when in fact that is not the case.

141. Lindt has violated the CPPA by “represent[ing] that goods . . . have a source . . . [or] . . . characteristics . . . that they do not have”; “represent[ing] that goods . . . are of a particular standard, quality, grade, style, or model, if in fact they are of another”; “misrepresent[ing] as to a material fact which has a tendency to mislead”; “fail[ing] to state a

material fact if such failure tends to mislead”; “us[ing] innuendo or ambiguity as to a material fact, which has a tendency to mislead”; and “advertis[ing] . . . goods . . . without the intent to sell them as advertised.” *See id.* § 28-3904(a), (d), (e), (f), (f-1), (h).

JURY TRIAL DEMAND

142. Plaintiff IRAdvocates hereby demands a jury trial.

PRAYER FOR RELIEF

143. *Wherefore*, Plaintiff IRAdvocates prays for judgment against Defendants Lindt & Sprüngli (USA) Inc. and Lindt & Sprüngli (North America) Inc., and requests the following relief:

144. A declaration that Defendants’ conduct is in violation of the CPPA;

145. An order enjoining Defendants’ conduct found to be in violation of the CPPA; and

146. An order granting Plaintiff IRAdvocates’ costs and disbursements, including reasonable attorneys’ fees and expert fees, and prejudgment interest at the maximum rate allowable by law.

Respectfully submitted this 8th day of May 2026,

/s/ Terrence P. Collingsworth

Terrence P. Collingsworth (D.C. Bar No. 471830)

Executive Director

INTERNATIONAL RIGHTS ADVOCATES

621 Maryland Ave. NE

Washington, D.C. 20002

(202) 543-5811

tc@iradvocates.org

Kim E. Richman (D.C. Bar No. 1022978)

RICHMAN LAW & POLICY

1 Bridge St. Suite 83

Irvington, NY 10533

(914) 693-2018

krichman@richmanlawpolicy.com

Counsel for Plaintiff

EXHIBIT B



Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

INTERNATIONAL RIGHTS ADVOCATES, INC.

Plaintiff

vs.

2026-CAB-003121

Case Number

LINDT & SPRUNGLI (USA) INC.

Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Terrence P. Collingsworth

Name of Plaintiff's Attorney

INTERNATIONAL RIGHTS ADVOCATES

Address

621 Maryland Ave. NE, Washington, D.C

(202) 543-5811

Telephone

如需翻译, 请打电话 (202) 879-4828

Veuillez appeler au (202) 879-4828 pour une traduction

Để có một bản dịch, hãy gọi (202) 879-4828

번역을 원하 시면, (202) 879-4828로 전화주세요 የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

Clerk of the Court



By

5/11/2026

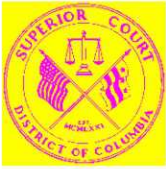
Date

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation

Vea al dorso la traducción al español



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL
Sección de Acciones Civiles
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

 Demandante
 contra

Número de Caso: _____

 Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante _____

Por: _____
 Subsecretario

Dirección _____

Fecha _____

Teléfono _____

如需翻译, 请打电话 (202) 879-4828

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Để có một bản dịch, hãy gọi (202) 879-4828

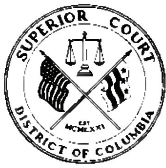
반언어를 원하시면 (202) 879-4828 로 전화하십시오

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IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE Oponerse a esta acción, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

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Vea al dorso el original en inglés
 See reverse side for English original



Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

INTERNATIONAL RIGHTS ADVOCATES, INC.

Plaintiff

vs.

2026-CAB-003121

Case Number

LINDT & SPRUNGLI (NORTH AMERICA) INC.

Defendant

SUMMONS

To the above named Defendant:

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Terrence P. Collingsworth

Name of Plaintiff's Attorney

INTERNATIONAL RIGHTS ADVOCATES

Address

621 Maryland Ave. NE, Washington, D.C

(202) 543-5811

Telephone

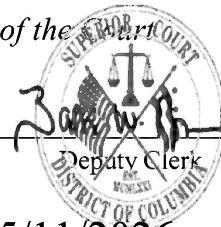
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Clerk of the Court



By

Date

5/11/2026

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 contra

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Nombre del abogado del Demandante _____

Por: _____

Dirección _____

Subsecretario

Teléfono _____

Fecha _____

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የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

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Vea al dorso el original en inglés
 See reverse side for English original

EXHIBIT C

Superior Court of the District of Columbia

CIVIL DIVISION - CIVIL ACTIONS BRANCH INFORMATION SHEET

Plaintiff(s)
VS

Defendant(s)

Case Number: _____
Date: _____

One of the defendants is being sued
in their official capacity.

Name: <i>(Please Print)</i>	Relationship to Lawsuit Attorney for Plaintiff Self (Pro Se) Other: _____
Firm Name:	
Telephone No.: DC Bar No.:	

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
Demand: \$ _____ Other: _____

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No.: _____ Judge: _____ Calendar #: _____

Case No.: _____ Judge: _____ Calendar #: _____

NATURE OF SUIT: <i>(Check One Box Only)</i>			
CONTRACT Breach of Contract Breach of Warranty Condo/Homeowner Assn. Fees Contract Enforcement Negotiable Instrument	COLLECTION/INS. SUB Debt Collection Insurance Subrogation Motion/Application for Judgment by Confession Motion/Application Regarding Arbitration Award	EMPLOYMENT DISPUTE Breach of Contract Discrimination Wage Claim Whistle Blower Wrongful Termination	
REAL PROPERTY Condo/Homeowner Assn. Foreclosure Declaratory Judgment Drug Related Nuisance Abatement	Ejectment Eminent Domain Interpleader	Other Quiet Title Specific Performance	FRIENDLY SUIT HOUSING CODE REGULATIONS QUI TAM STRUCTURED SETTLEMENTS
ADMINISTRATIVE PROCEEDINGS Administrative Search Warrant App. for Entry of Jgt. Defaulted Compensation Benefits Enter Administrative Order as Judgment Libel of Information Master Meter Petition Other	Release Mechanics Lien Request for Subpoena MALPRACTICE Medical – Other Wrongful Death APPLICATION FOR INTERNATIONAL FOREIGN JUDGMENT	AGENCY APPEAL Dangerous Animal Determination DCPS Residency Appeal Merit Personnel Act (OEA) Merit Personnel Act (OHR) Other Agency Appeal	

Information Sheet, Continued

CIVIL ASSET FORFEITURE Currency Other Real Property Vehicle		TORT Abuse of Process Assault/Battery Conversion False Arrest/Malicious Prosecution Libel/Slander/Defamation Personal Injury Toxic Mass Wrongful Death (Non-Medical Malpractice)
NAME CHANGE/VITAL RECORD AMENDMENT Birth Certificate Amendment Death Certificate Amendment Gender Amendment Name Change		
GENERAL CIVIL Accounting Deceit (Misrepresentation) Fraud Invasion of Privacy Lead Paint Legal Malpractice Motion/Application Regarding Arbitration Award Other - General Civil	Product Liability Request for Liquidation Writ of Replevin Wrongful Eviction CIVIL I/COMPLEX CIVIL Asbestos MORTGAGE FORECLOSURE Non-Residential Residential	STATUTORY CLAIM Anti – SLAPP Consumer Protection Act Exploitation of Vulnerable Adult Freedom of Information Act (FOIA) Other TAX SALE FORECLOSURE Tax Sale Annual Tax Sale Bid Off
VEHICLE Personal Injury Property Damage	TRAFFIC ADJUDICATION APPEAL REQUEST FOR FOREIGN JUDGMENT	

Terry Collingsworth

Filer/Attorney's Signature

Date

EXHIBIT D



Superior Court of the District of Columbia
Civil Division - Civil Actions Branch
500 Indiana Ave NW, Room 5000, Washington DC 20001
202-879-1133 | www.dccourts.gov

First Class Mail
U. S. Postage Paid
Washington, D.C.
Permit No. 1726

Lindt & Sprungli (USA) INC.
One Fine Chocolate Place
Stratham NH 03885

You are named in a lawsuit filed in the Superior Court of the District of Columbia. If you cannot appear at the hearing, please contact the Clerk's Office immediately for more information. If Plaintiff does not participate, the case may be dismissed. If Defendant does not participate, default or judgment may be entered.

For case information, please contact the Civil Actions Branch Clerk's Office by phone at 202-879-1133 or by live chat at <https://www.dccourts.gov/services/civil-matters/requesting-over-10k>.

To access your case information online, please visit www.dccourts.gov/services/cases-online.

Case Caption: International Rights Advocates Inc v. Lindt & Sprungli (USA) INC. et al.

To: Lindt & Sprungli (USA) INC.

Case Number: 2026-CAB-003121

NOTICE OF REMOTE INITIAL SCHEDULING CONFERENCE

Your case is scheduled for a(n) **Remote Initial Scheduling Conference** on **08/07/2026** at **9:30 AM** in **Remote Courtroom 320**.

The remote hearing will be held via Webex. To join the hearing, follow the below instructions.

To Join by Computer, Tablet, or Smartphone:

1) Copy and Paste or Type the link into a web browser and enter the Webex Meeting ID listed below.

Link: dccourts.webex.com/meet/ctb320

Meeting ID: 129 226 9879

2) Click "**Join Meeting**". You may be placed in the lobby until the courtroom clerk gives you access to the hearing.

OR To Join by Phone:

1) Call 202-860-2110 (local) or 844-992-4726 (toll-free)

Enter the Webex Meeting ID shown above followed by "##"

Resources and Contact Information:

1) For best practices on how to participate in Webex Meetings, click here www.webex.com/learn/best-practices.html.

2) For technical issues or questions, call the Information Technology Division at 202-879-1928 and select option 2.

3) For case questions, call the Civil Actions Branch at 202-879-1133.

4) To change your method of hearing participation, visit www.dccourts.gov/hearing-information for instructions and forms.

Persons with Disabilities:

If you have a disability as defined by the American Disabilities Act (ADA) and you require an accommodation, please call (202) 879-1700 or email ADACoordinator@dcsc.gov. The D.C. Courts does not provide transportation service.

Interpreting and Translation Services:

The D.C. Courts offers free language access services to people having business with the court who are deaf or who are non-English speakers. Parties to a case may request free translations of court orders and other court documents. To ask for an interpreter or translation, please contact the Clerk's Office at the telephone number at the top of the first page of this notice. For more information, visit <https://www.dccourts.gov/language-access>.

Language access is important to the D.C. Courts. You can provide feedback on language services by visiting <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access>.

Servicios de interpretación y traducción:

Los Tribunales del Distrito de Columbia ofrecen servicios gratuitos de acceso al idioma a las personas sordas o que no hablan inglés que tienen asuntos que atender en el tribunal. Las partes de un caso pueden solicitar traducciones gratuitas de las órdenes judiciales y otros documentos del tribunal. Para solicitar un intérprete o una traducción, póngase en contacto con la Secretaría en el número de teléfono que figura en la parte superior de la primera página de este anuncio. Para más información, visite <https://www.dccourts.gov/language-access>.

El acceso al idioma es importante para los Tribunales del Distrito de Columbia. Puede dar su opinión sobre los servicios de idiomas visitando <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access>.

የቃልና የጽሑፍ ትርጓሜ አገልግሎቶች:

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Superior Court of the District of Columbia
Civil Division - Civil Actions Branch
500 Indiana Ave NW, Room 5000, Washington DC 20001
202-879-1133 | www.dccourts.gov

Case Number: 2026-CAB-003121

Case Style: International Rights Advocates Inc v. Lindt & Sprungli (USA) INC. et al.

INITIAL ORDER

Initial Hearing Date:	Initial Hearing Time:	Courtroom Location:
Friday, 08/07/2026	9:30 AM	Remote Courtroom 320
Please see attached instructions for remote participation.		
Your case is assigned to Associate Judge Edward O'Connell.		

Pursuant to D.C. Code § 11-906 and District of Columbia Superior Court Rule of Civil Procedure ("Super. Ct. Civ. R.") 40-I, it is hereby ORDERED as follows:

- 1) This case is assigned to the judge and calendar designated above. All future filings in this case shall bear the calendar number and judge's name along with the case number in the caption.
- 2) Within 60 days of the filing of the complaint, plaintiff must file proof of service on each defendant of copies of the summons, the complaint, and this Initial Order. The court will dismiss the claims against any defendant for whom such proof of service has not been filed by this deadline, unless the court extended the time for service under Rule 4.
- 3) Within 21 days of service (unless otherwise provided in Rule 12), each defendant must respond to the complaint by filing an answer or other responsive pleading. The court may enter a default and a default judgment against any defendant who does not meet this deadline, unless the court extended the deadline under Rule 55(a).
- 4) At the time stated above, all counsel and unrepresented parties shall participate in a hearing to establish a schedule and discuss the possibilities of settlement. Counsel shall discuss with their clients before the hearing whether the clients are agreeable to binding or non-binding arbitration. This order is the only notice that parties and counsel will receive concerning this hearing.
- 5) If the date or time is inconvenient for any party or counsel, the Civil Actions Branch may continue the Conference once, with the consent of all parties, to either of the two succeeding days when the calendar is called. To reschedule the hearing, a party or lawyer may call the Branch at (202) 879-1133. Any such request must be made at least seven business days before the scheduled date. No other continuance will be granted except upon motion for good cause shown.
- 6) Parties are responsible for obtaining and complying with all requirements of the General Order for Civil cases, each judge's Supplement to the General Order and the General Mediation Order. Copies of these orders are available in the Courtroom and on the Court's website <http://www.dccourts.gov/>.

Chief Judge Milton C. Lee, Jr.

To Join by Computer, Tablet, or Smartphone:

- 1) Copy and Paste or Type the link into a web browser and enter the Webex Meeting ID listed below.

Link: [dcourts.webex.com/meet/ctb320](https://dccourts.webex.com/meet/ctb320)

Meeting ID: 129 226 9879

- 2) When you are ready, click "Join Meeting".
- 3) You will be placed in the lobby until the courtroom clerk gives you access to the hearing.

Or to Join by Phone:

- 1) Call 202-860-2110 (local) or 844-992-4726 (toll-free)
- 2) Enter the Webex Meeting ID listed above followed by "##"

Resources and Contact Information:

- 1) For best practices on how to participate in Webex Meetings, click here <https://www.webex.com/learn/best-practices.html>.
- 2) For technical issues or questions, call the Information Technology Division at 202-879-1928 and select option 2.
- 3) For case questions, call the Civil Actions Branch Clerk's Office at 202-879-1133.
- 4) To change your method of hearing participation, visit www.dccourts.gov/hearing-information for instructions and forms.

ACCESSIBILITY AND LANGUAGE ACCESS

Persons with Disabilities:

If you have a disability as defined by the American Disabilities Act (ADA) and you require an accommodation, please call 202-879-1700 or email ADACoordinator@dcsc.gov. The D.C. Courts does not provide transportation service.

Interpreting and Translation Services:

The D.C. Courts offers free language access services to people having business with the court who are deaf or who are non-English speakers. Parties to a case may request free translations of court orders and other court documents. To ask for an interpreter or translation, please contact the Clerk's Office listed for your case. For more information, visit <https://www.dccourts.gov/language-access>.

Servicios de interpretación y traducción:

Los Tribunales del Distrito de Columbia ofrecen servicios gratuitos de acceso al idioma a las personas sordas o que no hablan inglés que tienen asuntos que atender en el tribunal. Las partes de un caso pueden solicitar traducciones gratuitas de las órdenes judiciales y otros documentos del tribunal. Para solicitar un intérprete o una traducción, póngase en contacto con la Secretaría de su caso.

Para más información, visite <https://www.dccourts.gov/language-access>.

El acceso al idioma es importante para los Tribunales del Distrito de Columbia. Puede dar su opinión sobre los servicios de idiomas visitando <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access>.

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የቋንቋ ተደራሽነት ለዲ.ሲ. ፍርድ ቤቶች አስፈላጊ ነው። የቋንቋ አገልግሎቶች በተመለከተ አስተያየትዎን <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access> በመጎብኘት መስጠት ይችላሉ።

Tips for Attending Remote Hearings - Civil Division

Your court hearing may be held remotely. This means that you will participate by phone or by video conference instead of coming to the courthouse. Here are some tips on how to prepare.

How do I know if I have a remote hearing?

The Court will contact you to tell you that your hearing is remote. They may contact you by sending you an email, letter in the mail, or by calling you.



How do I take part in a remote hearing?

The Court will give you step-by-step instructions on how to take part in the remote hearing.

If you lose your written notice, call the Civil Actions Clerk's Office for instructions at:

 202-879-1133

Is there anything that I should do before the day of the hearing?

- Let the court know immediately if you cannot join a hearing because you do not have a phone or computer.



Civil Actions Clerk's Office: 202-879-1133

- You may want to contact an attorney for legal help.
- You can also find the list of legal services providers at www.dccourts.gov/services/represent-yourself by clicking on the link that says, "List of Legal Service Providers for Those Seeking an Attorney or Legal Advice".
- Evidence: if you want the judge to review photos or documents, ask the judge how to submit your evidence.
- Witnesses: tell the judge if you want a witness to testify at your hearing.
- Accommodations & Language Access: let the court know if you need an interpreter or other accommodation for your hearing.

Tips for the Hearing



- Join the hearing a few minutes early!
- Charge your computer or phone and make sure you have enough minutes to join the call. Find a private and quiet space. If possible, be alone in a room during the hearing. Try to limit distractions as much as possible. If others are in the room with you, ask if they can be quiet during the hearing.
- Mute your microphone when you are not talking. Mute all sounds on your phone or computer.
- Say your name before you speak so the record is clear. Be prepared to identify your role in the hearing (e.g., observer, plaintiff, defendant, witness, etc.).  is
- Speak slowly and clearly so everyone hears what you are saying.
- Pause before speaking in case there is a lag. Use a headset or headphones if you can. This will free up your hands and sound better.
- Try not to talk over anyone else. Only one person can speak at a time. If you talk while someone else is talking, the judge will not be able to hear you.
- Have all your documents for the hearing in front of you. Have a pen and paper to take notes.
- If you are not ready for your hearing or want to speak with an attorney, you can ask the judge to postpone your hearing for another date.
- If your sound or video freezes during the hearing, use the chat feature or call the Clerk's Office to let them know that you are having technical issues.

Special Tips for Video Hearings

[\(Click here for more information\)](#)



- Download the court's hearing software, WebEx, in advance and do a test run! The Court will provide you with a WebEx link in advance of the hearing.
- Set up the camera at eye level. If you are using your phone, prop it up so you can look at it without holding it.
- Look at the camera when you speak and avoid moving around on the video.
- Wear what you would normally wear to court.
- Sit in a well-lit room with no bright lights behind you.
- If possible, find a blank wall to sit in front of. Remember the judge will be able to see everything on your screen, so pick a location that is not distracting.

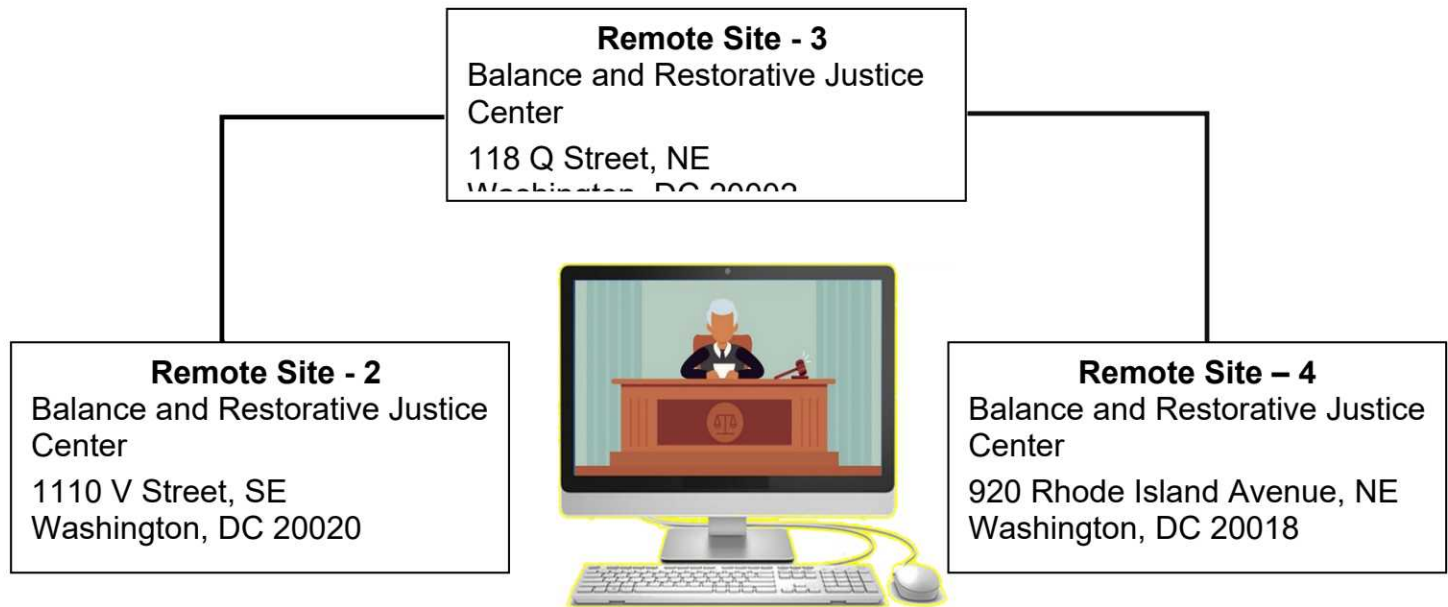


District of Columbia Courts

Tips for Using DC Courts Remote Hearing Sites

The DC Courts have **remote hearing sites** available in various locations in the community to help persons who may not have computer devices or internet service at home to participate in scheduled remote hearings. The Courts are committed to enhancing access to justice for all.

There are four remote access sites throughout the community which will operate **Monday – Friday, 8:30 am – 4:00 pm.**



If you want to use a remote site location for your hearing, call 202-879-1900 or email DCCourtsRemoteSites@dcsc.gov at least 24 hours before your hearing to reserve a remote access computer station.

If you require special accommodations such as an interpreter for your hearing, please call 202-879-1900 at least 24 hours in advance of your hearing so the Courts can make arrangements.

You should bring the following items when you come to your scheduled site location

1. Your case number and any hyperlinks provided by the Courts for your scheduled hearing.
2. Any documents you need for the hearing (evidence), including exhibits, receipts, photos, contracts, etc.
3. Materials for notetaking, including pen and paper.

*Safety and security measures are in place at the remote sites.

Contact information to schedule your remote access computer station:

Call: 202-879-1900

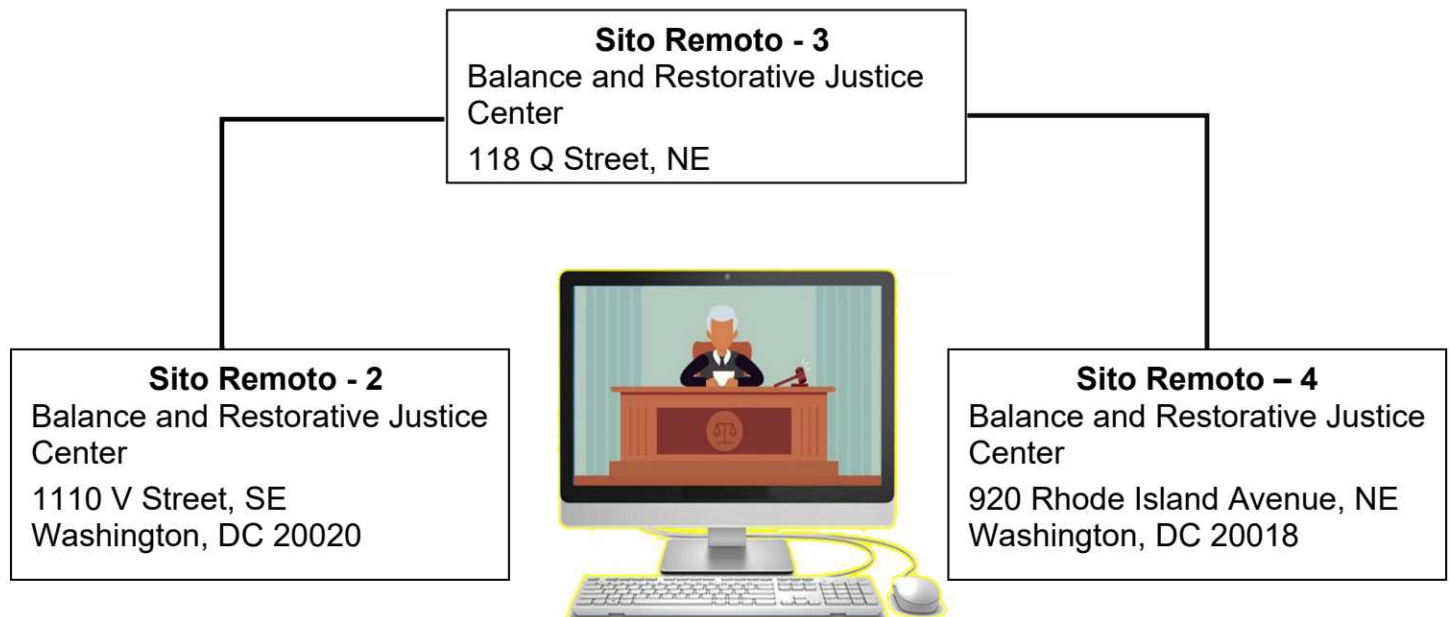
Email: DCCourtsRemoteSites@dcsc.gov



Consejos para usar los sitios de audiencia remota de los Tribunales de DC

Los Tribunales de DC disponen de **sitios de audiencia remota** en distintos centros de la comunidad para ayudar a que las personas que no tienen dispositivos informáticos o servicio de Internet en su casa puedan participar en audiencias remotas programadas. Los Tribunales honran el compromiso de mejorar el acceso de toda la población a la justicia.

En toda la comunidad hay cuatro sitios de acceso remoto que funcionarán **de Lunes a Viernes, de 8:30 am a 4:00 pm**.



Si desea usar un sitio remoto para su audiencia, llame al 202-879-1900 o envíe un mensaje de correo electrónico a DCCourtsRemoteSites@dcsc.gov al menos 24 horas antes de la audiencia, para reservar una estación de computadora de acceso remoto.

Si necesita adaptaciones especiales, como un intérprete para la audiencia, llame al 202-879-1900 al menos 24 horas antes de la audiencia para que los Tribunales puedan hacer los arreglos necesarios.

Cuando concurra al sitio programado debe llevar los siguientes artículos

1. Su número de caso y todos los hipervínculos que le hayan proporcionado los Tribunales para la audiencia programada.
2. Cualquier documento que necesite para la audiencia (prueba), incluidos documentos probatorios, recibos, fotos, contratos, etc.
3. Materiales para tomar nota, como papel y lápiz.

*Los sitios de acceso remoto cuentan con medidas de seguridad y protección.

Información de contacto para programar su estación de computadora de acceso remoto:

Teléfono: 202-879-1900

Correo electrónico: DCCourtsRemoteSites@dcsc.gov

EXHIBIT E

Superior Court of the District of Columbia

CIVIL DIVISION - CIVIL ACTIONS BRANCH

INFORMATION SHEET

2026-CAB-003121

INTERNATIONAL RIGHTS ADVOCAT

Plaintiff(s)

Case Number: _____

vs

Date: 05.08.2026LINDT & SPRUNGLI (USA) INC., LINI

Defendant(s)

☐ One of the defendants is being sued
in their official capacity.

Name: <i>(Please Print)</i> Terrence P. Collingsworth		Relationship to Lawsuit ☒ Attorney for Plaintiff ☐ Self (Pro Se) ☐ Other: _____
Firm Name:		
Telephone No.: (202) 543-5811	DC Bar No.: 471830	

TYPE OF CASE: ☐ Non-Jury ☐ 6 Person Jury ☒ 12 Person Jury
 Demand: \$ _____ Other: _____

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No.: _____ Judge: _____ Calendar #: _____

Case No.: _____ Judge: _____ Calendar #: _____

NATURE OF SUIT: <i>(Check One Box Only)</i>		
CONTRACT ☐ Breach of Contract ☐ Breach of Warranty ☐ Condo/Homeowner Assn. Fees ☐ Contract Enforcement ☐ Negotiable Instrument	COLLECTION/INS. SUB ☐ Debt Collection ☐ Insurance Subrogation ☐ Motion/Application for Judgment by Confession ☐ Motion/Application Regarding Arbitration Award	EMPLOYMENT DISPUTE ☐ Breach of Contract ☐ Discrimination ☐ Wage Claim ☐ Whistle Blower ☐ Wrongful Termination
REAL PROPERTY ☐ Condo/Homeowner Assn. Foreclosure ☐ Declaratory Judgment ☐ Drug Related Nuisance Abatement	☐ Ejectment ☐ Eminent Domain ☐ Interpleader	☐ Other ☐ Quiet Title ☐ Specific Performance
ADMINISTRATIVE PROCEEDINGS ☐ Administrative Search Warrant ☐ App. for Entry of Jgt. Defaulted Compensation Benefits ☐ Enter Administrative Order as Judgment ☐ Libel of Information ☐ Master Meter ☐ Petition Other		AGENCY APPEAL ☐ Dangerous Animal Determination ☐ DCPS Residency Appeal ☐ Merit Personnel Act (OEA) ☐ Merit Personnel Act (OHR) ☐ Other Agency Appeal
☐ Release Mechanics Lien ☐ Request for Subpoena MALPRACTICE ☐ Medical – Other ☐ Wrongful Death		☐ FRIENDLY SUIT ☐ HOUSING CODE REGULATIONS ☐ QUI TAM ☐ STRUCTURED SETTLEMENTS
☐ APPLICATION FOR INTERNATIONAL FOREIGN JUDGMENT		

Information Sheet, Continued

CIVIL ASSET FORFEITURE

- ☐ Currency
☐ Other
☐ Real Property
☐ Vehicle

NAME CHANGE/VITAL RECORD AMENDMENT

- ☐ Birth Certificate Amendment
☐ Death Certificate Amendment
☐ Gender Amendment
☐ Name Change

TORT

- ☐ Abuse of Process
☐ Assault/Battery
☐ Conversion
☐ False Arrest/Malicious Prosecution
☐ Libel/Slander/Defamation
☐ Personal Injury
☐ Toxic Mass
☐ Wrongful Death (Non-Medical Malpractice)

GENERAL CIVIL

- ☐ Accounting
☐ Deceit (Misrepresentation)
☐ Fraud
☐ Invasion of Privacy
☐ Lead Paint
☐ Legal Malpractice
☐ Motion/Application Regarding Arbitration Award
☐ Other - General Civil

- ☐ Product Liability
☐ Request for Liquidation
☐ Writ of Replevin
☐ Wrongful Eviction

CIVIL I/COMPLEX CIVIL

- ☐ Asbestos

MORTGAGE FORECLOSURE

- ☐ Non-Residential
☐ Residential

STATUTORY CLAIM

- ☐ Anti – SLAPP
☒ Consumer Protection Act
☐ Exploitation of Vulnerable Adult
☐ Freedom of Information Act (FOIA)
☐ Other

TAX SALE FORECLOSURE

- ☐ Tax Sale Annual
☐ Tax Sale Bid Off

VEHICLE

- ☐ Personal Injury
☐ Property Damage

☐ **TRAFFIC ADJUDICATION APPEAL**

☐ **REQUEST FOR FOREIGN JUDGMENT**

Terry Collingsworth

Filer/Attorney's Signature

05.08.2026

Date

EXHIBIT F

AFFIDAVIT OF SERVICE

Case: 2026-CAB-003121	Court: Superior Court of the District of Columbia - Civil Division - Civil Actions Branch
Plaintiff / Petitioner: International Rights Advocates Inc	Defendant / Respondent: Lindt & Sprungli (USA) Inc. et al
Received by: The Nason Group	For: Veritext
To be served upon: Lindt & Sprungli (USA) Inc. et al c/o CT Corporation System - Registered Agent	County:

I, Kristin Nason, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein.

Recipient Name: Laurie Willmott - CT Representative
Lindt & Sprungli (USA) Inc. et al
c/o CT Corporation System - Registered Agent

Address: 2 1/2 Beacon Street, Concord, NH 03301

Date of Service: June 22, 2026

Time of Service: 12:44 PM

Manner of Service: Authorized

Documents: Summons; Initial Order; Notice; Complaint; Information Sheet; PLAINTIFF'S REQUESTS FOR ADMISSIONS TO DEFENDANT LINDT & SPRÜNGLI (USA) INC.; PLAINTIFF'S REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANT LINDT & SPRÜNGLI (USA) INC.; PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT LINDT & SPRÜNGLI (USA) INC.

Additional Comments:

K. Nason

Printed Name: Kristin Nason

Date: June 27, 2026

EXHIBIT G

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

INTERNATIONAL RIGHTS ADVOCATES,
INC.,

Plaintiff,

v.

LINDT & SPRÜNGLI (USA) INC.;
LINDT & SPRÜNGLI (NORTH
AMERICA) INC.,

Defendants.

CASE NO. 2026-CAB-003121

Hon. Edward O'Connell

Next Event: Initial Scheduling Conference

Next Date: August 7, 2026

**CONSENT MOTION TO EXTEND TIME FOR DEFENDANTS TO RESPOND TO
COMPLAINT**

Defendants Lindt & Sprüngli (USA) Inc. and Lindt & Sprüngli (North America) Inc. ("Defendants") respectfully move to extend their time to respond to the complaint until September 11, 2026. Plaintiff agrees to the requested relief as detailed below. In support of this consent motion, Defendants respectfully incorporate the attached memorandum of points and authorities.

Respectfully submitted on July 6, 2026.

/s/ Dale J. Giali
Dale J. Giali
DC Bar No. 436514
KING & SPALDING LLP
633 West Fifth St.
Suite 1600
Los Angeles, CA 90071
Tel. (213) 442-4355
Fax (213) 443-4310
dgiali@kslaw.com

*Attorneys for Defendants
Lindt & Sprüngli (USA) Inc. and
Lindt & Sprüngli (North America)
Inc.*

MEMORANDUM OF POINTS AND AUTHORITIES

1. On May 8, 2026, Plaintiff International Rights Advocates, Inc. filed the complaint in this action, which alleges that Defendants Lindt & Sprüngli (USA) Inc. and Lindt & Sprüngli (North America) Inc.’s (“Defendants”) advertising regarding its cocoa supply chain deceived consumers.

2. Plaintiff has represented that service was effectuated June 22, 2026.

3. Absent an extension, Defendants’ response to the complaint based on such service is currently due by July 13, 2026.

4. Defendants request until September 11, 2026 to respond to the complaint.

5. Good cause exists for this proposed extension. Permitting Defendants until September 11, 2026 to respond to the complaint will allow Defendants and their counsel additional time to analyze the complaint, determine how best to respond, and effectuate its response. Plaintiff consents to Defendants’ request to the extent Defendants are considering filing an Answer or a Motion to Dismiss. Defendants certify that they seek this relief in good faith and not for undue delay or any other improper purpose.

CONCLUSION

WHEREFORE, Defendants respectfully request that the Court grant this consent motion, and permit Defendants to respond to the complaint no later than September 11, 2026.

Respectfully submitted on July 6, 2026.

/s/ Dale J. Giali
Dale J. Giali
DC Bar No. 436514
KING & SPALDING LLP
633 West Fifth St.
Suite 1600
Los Angeles, CA 90071
Tel. (213) 442-4355

Fax (213) 443-4310
dgiali@kslaw.com

*Attorneys for Defendants
Lindt & Sprüngli (USA) Inc. and
Lindt & Sprüngli (North America)
Inc.*

SUPERIOR COURT RULE 12-I(a) CERTIFICATION

I hereby certify that on July 2, 2026, counsel for Defendants consulted with counsel for Plaintiff by email, and counsel for Plaintiff stated that the Plaintiff consents to the relief requested in this motion as detailed above.

Respectfully submitted on July 6, 2026.

/s/ Dale J. Giali
Dale J. Giali
DC Bar No. 436514
KING & SPALDING LLP
633 West Fifth St.
Suite 1600
Los Angeles, CA 90071
Tel. (213) 442-4355
Fax (213) 443-4310
dgiali@kslaw.com

*Attorneys for Defendants
Lindt & Sprüngli (USA) Inc. and
Lindt & Sprüngli (North America)
Inc.*

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

INTERNATIONAL RIGHTS ADVOCATES,
INC.,

Plaintiff,

v.

LINDT & SPRÜNGLI (USA) INC.;
LINDT & SPRÜNGLI (NORTH
AMERICA) INC.,

Defendants.

CASE NO. 2026-CAB-003121

Hon. Edward O’Connell

Next Event: Initial Scheduling Conference

Next Date: August 7, 2026

CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2026, a copy of the foregoing document was filed electronically and served pursuant to this Court’s ECF Filing System, upon counsel of record.

Respectfully submitted on July 6, 2026.

/s/ Dale J. Giali

Dale J. Giali

DC Bar No. 436514

KING & SPALDING LLP

633 West Fifth St.

Suite 1600

Los Angeles, CA 90071

Tel. (213) 442-4355

Fax (213) 443-4310

dgiali@kslaw.com

Attorney for Defendants

Lindt & Sprüngli (USA) Inc. and

Lindt & Sprüngli (North America)

Inc.

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

INTERNATIONAL RIGHTS ADVOCATES,
INC.,

Plaintiff,

v.

LINDT & SPRÜNGLI (USA) INC.;
LINDT & SPRÜNGLI (NORTH
AMERICA) INC.,

Defendants.

CASE NO. 2026-CAB-003121

Hon. Edward O'Connell

Next Event: Initial Scheduling Conference

Next Date: August 7, 2026

**CONSENT MOTION TO EXTEND TIME FOR DEFENDANT TO RESPOND TO
COMPLAINT**

Pending before the Court is Defendants Lindt & Sprüngli (USA) Inc. and Lindt & Sprüngli (North America) Inc.'s ("Defendants") Consent Motion to Extend Time for Defendants to Respond to the Complaint. There are no other pending matters requiring the Court's attention and Defendants show good cause for their Motion. Therefore, it is on this ___ day of July 2026, hereby

ORDERED that the Motion is GRANTED; it is further

ORDERED that Defendants shall file their response to the Complaint on or before September 11, 2026.

Hon. Edward O'Connell

COPIES TO:
Counsel of Record

EXHIBIT H

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

INTERNATIONAL RIGHTS ADVOCATES INC.,

Plaintiff,

v.

LINDT & SPRUNGLI (USA) INC., et al.,

Defendants.

2026-CAB-003121

Judge Edward A. O'Connell

Next Event: October 16, 2026

**Remote Initial Scheduling
Conference**

ORDER

Pending before the Court is Defendants' Consent Motion to Extend Time to Respond to the Complaint, filed July 6, 2026. The Court finds good cause to grant the request.

ACCORDINGLY, it is this 8th day of July 2026, hereby,

ORDERED that Defendants' Consent Motion to Extend Time to Respond to the Complaint is **GRANTED**; it is further

ORDERED that Defendants file a responsive pleading to the Complaint on or before **Friday, September 11, 2026**; it is further

ORDERED that the Remote Initial Scheduling Conference scheduled for August 7, 2026, is **CONTINUED** to **Friday, October 16, 2026, at 9:30 a.m.**, in Virtual Courtroom 320.

IT IS SO ORDERED.



Edward A. O'Connell
Associate Judge

Copies to all parties and counsel.

Instructions for Remote Hearings Before Judge O'Connell

Courtroom 320

Parties and counsel may access Virtual Courtroom 320 in the following ways:

- (1) Going to the WebEx website at <https://dccourts.webex.com/meet/ctb320>.
- (2) Downloading the WebEx Meetings app, opening the app, selecting Join Meeting, and entering <https://dccourts.webex.com/meet/ctb320>
- (3) Calling 1-844-992-4726 or 202-860-2110 and entering Meeting ID number 129 226 9879 #, then # again.

Parties having trouble connecting to their remote hearing may contact chambers at JudgeO'ConnellChambers@dcsc.gov. Staff will be monitoring the e-mail closely during hearings. **Failure to appear at a proceeding, including remote proceedings, may result in dismissal of a case or entry of default.**

PLEASE NOTE: Counsel is required to appear via WebEx video and log in so that their name appears on screen, absent extenuating circumstances that make it necessary for them to appear via telephone, or unless telephonic appearance is approved by Chambers prior to the hearing. All other parties are highly encouraged, but not required, to appear via WebEx video and identify themselves by name.

When entering the virtual courtroom (by dialing in on a phone, or signing in through the website or app), the party should not attempt to speak because another hearing may be underway. Each party should be automatically muted by the courtroom clerk when you first arrive. If you are using the WebEx website or the app, you may check in with the courtroom clerk using the "chat" function. If you are on a telephone, you should wait for your case to be called.

EXHIBIT I

AFFIDAVIT OF SERVICE

District of Columbia

Superior Court

Case Number: 2026-CAB-003121

Plaintiff:
International Rights Advocates, Inc

vs.

Defendant:
Lindt & Sprungli (USA) INC., et al

For:
VERITEXT
633 E Colonial Drive
Orlando, FL 32803



Received by VERITEXT to be served on **Lindt & Sprungli (North America) INC., 4717 Grand Ave, Ste 700, Kansas City, MO 64112.**

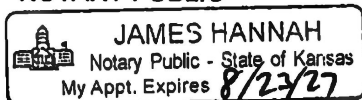
I, Scott Brady PPS25-0013 / PPS26-0384, being duly sworn, depose and say that on the **22nd day of June, 2026 at 9:37 am, I:**

served a **CORPORATION** by delivering a true copy of the **SUMMONS, CIVIL DIVISION - CIVIL ACTIONS BRANCH INFORMATION SHEET, PREAMBLE, PLAINTIFF'S REQUESTS FOR ADMISSIONS TO DEFENDANT LINDT & SPRÜNGLI (NORTH AMERICA) INC., PLAINTIFF'S REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANT LINDT & SPRÜNGLI (NORTH AMERICA) INC. and PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT LINDT & SPRÜNGLI (NORTH AMERICA) INC. to: Marie Skaff as Human Resources Manager for Lindt & Sprungli (North America) INC., at the address of: 4717 Grand Ave, Ste 700, Kansas City, MO 64112.**

I certify that I am over the age of 18 and have no interest in the above action and the foregoing statements made by me are true and correct.

Subscribed and Sworn to before me on the 23rd day of June, 2026 in the County of Johnson in the State of Kansas

NOTARY PUBLIC




Scott Brady PPS25-0013 / PPS26-0384
Process Server

VERITEXT
633 E Colonial Drive
Orlando, FL 32803
(407) 898-4200

Our Job Serial Number: POW-2026008248
Ref: 8277466



Superior Court of the District of Columbia

CIVIL DIVISION

Civil Actions Branch

500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001

Telephone: (202) 879-1133 Website: www.dccourts.gov

INTERNATIONAL RIGHTS ADVOCATES, INC.

Plaintiff

vs.

2026-CAB-003121

Case Number

LINDT & SPRUNGLI (NORTH AMERICA) INC.

Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Terrence P. Collingsworth

Name of Plaintiff's Attorney

INTERNATIONAL RIGHTS ADVOCATES

Address

621 Maryland Ave. NE, Washington, D.C

(202) 543-5811

Telephone

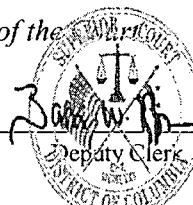
如需翻译, 请打电话 (202) 879-4828

Veuillez appeler au (202) 879-4828 pour une traduction

Đề có một bản dịch, hãy gọi (202) 879-4828

번역을 원하시면, (202) 879-4828로 전화주세요 የአግርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

Clerk of the



By

Date

5/11/2026

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation

Vea al dorso la traducción al español

EXHIBIT J



Superior Court of the District of Columbia
Civil Division - Civil Actions Branch
500 Indiana Ave NW, Room 5000, Washington DC 20001
202-879-1133 | www.dccourts.gov

First Class Mail
U. S. Postage Paid
Washington, D.C.
Permit No. 1726

Lindt & Sprungli (USA) INC.
One Fine Chocolate Place
Stratham NH 03885

You are named in a lawsuit filed in the Superior Court of the District of Columbia. If you cannot appear at the hearing, please contact the Clerk's Office immediately for more information. If Plaintiff does not participate, the case may be dismissed. If Defendant does not participate, default or judgment may be entered.

For case information, please contact the Civil Actions Branch Clerk's Office by phone at 202-879-1133 or by live chat at <https://www.dccourts.gov/services/civil-matters/requesting-over-10k>.

To access your case information online, please visit www.dccourts.gov/services/cases-online.

Case Caption: International Rights Advocates Inc v. Lindt & Sprungli (USA) INC. et al.

To: Lindt & Sprungli (USA) INC.

Case Number: 2026-CAB-003121

NOTICE OF REMOTE INITIAL SCHEDULING CONFERENCE

Your case is scheduled for a(n) **Remote Initial Scheduling Conference** on **08/07/2026** at **9:30 AM** in **Remote Courtroom 320**.

The remote hearing will be held via Webex. To join the hearing, follow the below instructions.

To Join by Computer, Tablet, or Smartphone:

1) Copy and Paste or Type the link into a web browser and enter the Webex Meeting ID listed below.

Link: dccourts.webex.com/meet/ctb320

Meeting ID: 129 226 9879

2) Click "**Join Meeting**". You may be placed in the lobby until the courtroom clerk gives you access to the hearing.

OR To Join by Phone:

1) Call 202-860-2110 (local) or 844-992-4726 (toll-free)

Enter the Webex Meeting ID shown above followed by "##"

Resources and Contact Information:

1) For best practices on how to participate in Webex Meetings, click here www.webex.com/learn/best-practices.html.

2) For technical issues or questions, call the Information Technology Division at 202-879-1928 and select option 2.

3) For case questions, call the Civil Actions Branch at 202-879-1133.

4) To change your method of hearing participation, visit www.dccourts.gov/hearing-information for instructions and forms.

Persons with Disabilities:

If you have a disability as defined by the American Disabilities Act (ADA) and you require an accommodation, please call (202) 879-1700 or email ADACoordinator@dcsc.gov. The D.C. Courts does not provide transportation service.

Interpreting and Translation Services:

The D.C. Courts offers free language access services to people having business with the court who are deaf or who are non-English speakers. Parties to a case may request free translations of court orders and other court documents. To ask for an interpreter or translation, please contact the Clerk's Office at the telephone number at the top of the first page of this notice. For more information, visit <https://www.dccourts.gov/language-access>.

Language access is important to the D.C. Courts. You can provide feedback on language services by visiting <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access>.

Servicios de interpretación y traducción:

Los Tribunales del Distrito de Columbia ofrecen servicios gratuitos de acceso al idioma a las personas sordas o que no hablan inglés que tienen asuntos que atender en el tribunal. Las partes de un caso pueden solicitar traducciones gratuitas de las órdenes judiciales y otros documentos del tribunal. Para solicitar un intérprete o una traducción, póngase en contacto con la Secretaría en el número de teléfono que figura en la parte superior de la primera página de este anuncio. Para más información, visite <https://www.dccourts.gov/language-access>.

El acceso al idioma es importante para los Tribunales del Distrito de Columbia. Puede dar su opinión sobre los servicios de idiomas visitando <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access>.

የቃልና የጽሑፍ ትርጓሜ አገልግሎቶች:

የዲ.ሲ. ፍርድ ቤቶች መስማት ለተሳናቸውና የእንግሊዝኛ ቋንቋ ተናጋሪ ላልሆኑ በፍርድ ቤቱ ጉዳይ ላላቸው ሰዎች ነጻ የቋንቋ ተደራሽነት አገልግሎቶች ያቀርባል። ተከራካሪ ወገኖች የፍርድ ቤት ትእዛዞችና ሌሎች የፍርድ ቤት ሰነዶች በነጻ እንዲተረጎሙላቸው መጠየቅ ይችላሉ። አስተርጓሚ ወይም የጽሑፍ ትርጉም ለመጠየቅ፣ እባክዎን በዚህ ደብዳቤ የመጀመሪያ ገጽ አናት ላይ በተቀመጠው ስልክ ቁጥር የፍርድ ቤቱን መዝገብ ቤት ቢሮን ያናጋግሩ። ለበለጠ መረጃ <https://www.dccourts.gov/language-access> ላይ ይጎብኙ።

የቋንቋ ተደራሽነት ለዲ.ሲ. ፍርድ ቤቶች አስፈላጊ ነው። የቋንቋ አገልግሎቶች በተመለከተ አስተያየትዎን <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access> በመጎብኘት መስጠት ይችላሉ።

EXHIBIT K



Superior Court of the District of Columbia
Civil Division - Civil Actions Branch
500 Indiana Ave NW, Room 5000, Washington DC 20001
202-879-1133 | www.dccourts.gov

First Class Mail
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Washington, D.C.
Permit No. 1726

Lindt & Sprungli (North America) INC.
4717 Grand Avenue Suite 700
Kansas City MO 64112

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Case Caption: International Rights Advocates Inc v. Lindt & Sprungli (USA) INC. et al.

To: Lindt & Sprungli (North America)

Case Number: 2026-CAB-003121

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የቃልና የጽሑፍ ትርጓሜ አገልግሎቶች:

የዲ.ሲ. ፍርድ ቤቶች መስማት ለተሳናቸውና የእንግሊዝኛ ቋንቋ ተናጋሪ ላልሆኑ በፍርድ ቤቱ ጉዳይ ላላቸው ሰዎች ነጻ የቋንቋ ተደራሽነት አገልግሎቶች ያቀርባል። ተከራካሪ ወገኖች የፍርድ ቤት ትእዛዞችና ሌሎች የፍርድ ቤት ሰነዶች በነጻ እንዲተረጎሙ መጠየቅ ይችላሉ። አስተርጓሚ ወይም የጽሑፍ ትርጉም ለመጠየቅ፣ እባክዎን በዚህ ደብዳቤ የመጀመሪያ ገጽ አናት ላይ በተቀመጠው ስልክ ቁጥር የፍርድ ቤቱን መዝገብ ቤት ቢሮን ያናጋግሩ። ለበለጠ መረጃ <https://www.dccourts.gov/language-access> ላይ ይጎብኙ።

የቋንቋ ተደራሽነት ለዲ.ሲ. ፍርድ ቤቶች አስፈላጊ ነው። የቋንቋ አገልግሎቶች በተመለከተ አስተያየትዎን <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access> በመጎብኘት መስጠት ይችላሉ።

EXHIBIT L



Superior Court of the District of Columbia
Civil Division - Civil Actions Branch
500 Indiana Ave NW, Room 5000, Washington DC 20001
202-879-1133 | www.dccourts.gov

First Class Mail
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Washington, D.C.
Permit No. 1726

Terrence P Collingsworth
International Rights Advocates
621 Maryland Ave NE
Washington DC 20002

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Case Caption: International Rights Advocates Inc v. Lindt & Sprungli (USA) INC. et al.

To: Terrence P Collingsworth

Case Number: 2026-CAB-003121

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የቃልና የጽሑፍ ትርጓሜ አገልግሎቶች:

የዲ.ሲ. ፍርድ ቤቶች መስማት ለተሳናቸውና የእንግሊዝኛ ቋንቋ ተናጋሪ ላልሆኑ በፍርድ ቤቱ ጉዳይ ላላቸው ሰዎች ነጻ የቋንቋ ተደራሽነት አገልግሎቶች ያቀርባል። ተከራካሪ ወገኖች የፍርድ ቤት ትእዛዞችና ሌሎች የፍርድ ቤት ሰነዶች በነጻ እንዲተረጎሙ መጠየቅ ይችላሉ። አስተርጓሚ ወይም የጽሑፍ ትርጉም ለመጠየቅ፣ እባክዎን በዚህ ደብዳቤ የመጀመሪያ ገጽ አናት ላይ በተቀመጠው ስልክ ቁጥር የፍርድ ቤቱን መዝገብ ቤት ቢሮን ያናጋግሩ። ለበለጠ መረጃ <https://www.dccourts.gov/language-access> ላይ ይጎብኙ።

የቋንቋ ተደራሽነት ለዲ.ሲ. ፍርድ ቤቶች አስፈላጊ ነው። የቋንቋ አገልግሎቶች በተመለከተ አስተያየትዎን <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access> በመጎብኘት መስጠት ይችላሉ።

EXHIBIT M



Superior Court of the District of Columbia
Civil Division - Civil Actions Branch
500 Indiana Ave NW, Room 5000, Washington DC 20001
202-879-1133 | www.dccourts.gov

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Permit No. 1726

Lindt & Sprungli (North America) INC.
4717 Grand Avenue Suite 700
Kansas City MO 64112

You are named in a lawsuit filed in the Superior Court of the District of Columbia. If you cannot appear at the hearing, please contact the Clerk's Office immediately for more information. If Plaintiff does not participate, the case may be dismissed. If Defendant does not participate, default or judgment may be entered.

For case information, please contact the Civil Actions Branch Clerk's Office by phone at 202-879-1133 or by live chat at <https://www.dccourts.gov/services/civil-matters/requesting-over-10k>.

To access your case information online, please visit www.dccourts.gov/services/cases-online.

Case Caption: International Rights Advocates Inc v. Lindt & Sprungli (USA) INC. et al.

To: Lindt & Sprungli (North America)

Case Number: 2026-CAB-003121

NOTICE OF REMOTE INITIAL SCHEDULING CONFERENCE

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1) Copy and Paste or Type the link into a web browser and enter the Webex Meeting ID listed below.

Link: dccourts.webex.com/meet/ctb320

Meeting ID: 129 226 9879

2) Click "**Join Meeting**". You may be placed in the lobby until the courtroom clerk gives you access to the hearing.

OR To Join by Phone:

1) Call 202-860-2110 (local) or 844-992-4726 (toll-free)

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Resources and Contact Information:

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2) For technical issues or questions, call the Information Technology Division at 202-879-1928 and select option 2.

3) For case questions, call the Civil Actions Branch at 202-879-1133.

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Servicios de interpretación y traducción:

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የቃልና የጽሑፍ ትርጓሜ አገልግሎቶች:

የዲ.ሲ. ፍርድ ቤቶች መስማት ለተሳናቸውና የእንግሊዝኛ ቋንቋ ተናጋሪ ላልሆኑ በፍርድ ቤቱ ጉዳይ ላላቸው ሰዎች ነጻ የቋንቋ ተደራሽነት አገልግሎቶች ያቀርባል። ተከራካሪ ወገኖች የፍርድ ቤት ትእዛዞችና ሌሎች የፍርድ ቤት ሰነዶች በነጻ እንዲተረጎሙላቸው መጠየቅ ይችላሉ። አስተርጓሚ ወይም የጽሑፍ ትርጉም ለመጠየቅ፣ እባክዎን በዚህ ደብዳቤ የመጀመሪያ ገጽ አናት ላይ በተቀመጠው ስልክ ቁጥር የፍርድ ቤቱን መዝገብ ቤት ቢሮን ያናጋግሩ። ለበለጠ መረጃ <https://www.dccourts.gov/language-access> ላይ ይጎብኙ።

የቋንቋ ተደራሽነት ለዲ.ሲ. ፍርድ ቤቶች አስፈላጊ ነው። የቋንቋ አገልግሎቶች በተመለከተ አስተያየትዎን <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access> በመጎብኘት መስጠት ይችላሉ።

EXHIBIT N



Superior Court of the District of Columbia
Civil Division - Civil Actions Branch
500 Indiana Ave NW, Room 5000, Washington DC 20001
202-879-1133 | www.dccourts.gov

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Washington, D.C.
Permit No. 1726

Lindt & Sprungli (USA) INC.
One Fine Chocolate Place
Stratham NH 03885

You are named in a lawsuit filed in the Superior Court of the District of Columbia. If you cannot appear at the hearing, please contact the Clerk's Office immediately for more information. If Plaintiff does not participate, the case may be dismissed. If Defendant does not participate, default or judgment may be entered.

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To access your case information online, please visit www.dccourts.gov/services/cases-online.

Case Caption: International Rights Advocates Inc v. Lindt & Sprungli (USA) INC. et al.

To: Lindt & Sprungli (USA) INC.

Case Number: 2026-CAB-003121

NOTICE OF REMOTE INITIAL SCHEDULING CONFERENCE

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Link: dccourts.webex.com/meet/ctb320

Meeting ID: 129 226 9879

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3) For case questions, call the Civil Actions Branch at 202-879-1133.

4) To change your method of hearing participation, visit www.dccourts.gov/hearing-information for instructions and forms.

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የቃልና የጽሑፍ ትርጓሜ አገልግሎቶች:

የዲ.ሲ. ፍርድ ቤቶች መስማት ለተሳናቸውና የእንግሊዝኛ ቋንቋ ተናጋሪ ላልሆኑ በፍርድ ቤቱ ጉዳይ ላላቸው ሰዎች ነጻ የቋንቋ ተደራሽነት አገልግሎቶች ያቀርባል። ተከራካሪ ወገኖች የፍርድ ቤት ትእዛዞችና ሌሎች የፍርድ ቤት ሰነዶች በነጻ እንዲተረጎሙላቸው መጠየቅ ይችላሉ። አስተርጓሚ ወይም የጽሑፍ ትርጉም ለመጠየቅ፣ እባክዎን በዚህ ደብዳቤ የመጀመሪያ ገጽ አናት ላይ በተቀመጠው ስልክ ቁጥር የፍርድ ቤቱን መዝገብ ቤት ቢሮን ያናጋግሩ። ለበለጠ መረጃ <https://www.dccourts.gov/language-access> ላይ ይጎብኙ።

የቋንቋ ተደራሽነት ለዲ.ሲ. ፍርድ ቤቶች አስፈላጊ ነው። የቋንቋ አገልግሎቶች በተመለከተ አስተያየትዎን <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access> በመጎብኘት መስጠት ይችላሉ።

EXHIBIT O



Superior Court of the District of Columbia
Civil Division - Civil Actions Branch
500 Indiana Ave NW, Room 5000, Washington DC 20001
202-879-1133 | www.dccourts.gov

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Permit No. 1726

Terrence P Collingsworth
International Rights Advocates
621 Maryland Ave NE
Washington DC 20002

You are named in a lawsuit filed in the Superior Court of the District of Columbia. If you cannot appear at the hearing, please contact the Clerk's Office immediately for more information. If Plaintiff does not participate, the case may be dismissed. If Defendant does not participate, default or judgment may be entered.

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To access your case information online, please visit www.dccourts.gov/services/cases-online.

Case Caption: International Rights Advocates Inc v. Lindt & Sprungli (USA) INC. et al.

To: Terrence P Collingsworth

Case Number: 2026-CAB-003121

NOTICE OF REMOTE INITIAL SCHEDULING CONFERENCE

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የዲ.ሲ. ፍርድ ቤቶች መስማት ለተሳናቸውና የእንግሊዝኛ ቋንቋ ተናጋሪ ላልሆኑ በፍርድ ቤቱ ጉዳይ ላላቸው ሰዎች ነጻ የቋንቋ ተደራሽነት አገልግሎቶች ያቀርባል። ተከራካሪ ወገኖች የፍርድ ቤት ትእዛዞችና ሌሎች የፍርድ ቤት ሰነዶች በነጻ እንዲተረጎሙላቸው መጠየቅ ይችላሉ። አስተርጓሚ ወይም የጽሑፍ ትርጉም ለመጠየቅ፣ እባክዎን በዚህ ደብዳቤ የመጀመሪያ ገጽ አናት ላይ በተቀመጠው ስልክ ቁጥር የፍርድ ቤቱን መዝገብ ቤት ቢሮን ያናጋግሩ። ለበለጠ መረጃ <https://www.dccourts.gov/language-access> ላይ ይጎብኙ።

የቋንቋ ተደራሽነት ለዲ.ሲ. ፍርድ ቤቶች አስፈላጊ ነው። የቋንቋ አገልግሎቶች በተመለከተ አስተያየትዎን <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access> በመጎብኘት መስጠት ይችላሉ።

EXHIBIT P

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

INTERNATIONAL RIGHTS ADVOCATES,
INC.,

Plaintiff,

v.

LINDT & SPRÜNGLI (USA) INC.;
LINDT & SPRÜNGLI (NORTH
AMERICA) INC.,

Defendants.

CASE NO. 2026-CAB-003121

Hon. Edward O'Connell

Next Event: Remote Initial Scheduling

Conference

Next Date: October 16, 2026

**NOTICE TO SUPERIOR COURT OF FILING OF NOTICE OF REMOVAL OF
ACTION**

TO THE CLERK OF THE ABOVE-CAPTIONED COURT:

PLEASE TAKE NOTICE that on July 21, 2026, Defendants Lindt & Sprüngli (USA) Inc. and Lindt & Sprüngli (North America) Inc., by and through their attorneys, King & Spalding LLP, filed a Notice of Removal in the United States District Court for the District of Columbia, together with true and correct copies of all process, pleadings, and orders served in the above-captioned matter.

PLEASE TAKE FURTHER NOTICE that a true and correct copy of the Notice of Removal and accompanying documents filed in the United States District Court for the District of Columbia are attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that, pursuant to 28 U.S.C. § 1446(d), the filing of the Notice of Removal and this Notice of Filing of Notice of Removal effects the removal of this action to the United States District Court for the District of Columbia.

Respectfully submitted on July 21, 2026.

/s/ Dale J. Giali
Dale J. Giali
DC Bar No. 436514
KING & SPALDING LLP
633 West Fifth St.
Suite 1600
Los Angeles, CA 90071
Tel. (213) 442-4355
Fax (213) 443-4310
dgiali@kslaw.com

*Attorneys for Defendants
Lindt & Sprüngli (USA) Inc. and
Lindt & Sprüngli (North America)
Inc.*

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

INTERNATIONAL RIGHTS ADVOCATES,
INC.,

Plaintiff,

v.

LINDT & SPRÜNGLI (USA) INC.;
LINDT & SPRÜNGLI (NORTH
AMERICA) INC.,

Defendants.

CASE NO. 2026-CAB-003121

Hon. Edward O’Connell

Next Event: Initial Scheduling Conference

Next Date: October 16, 2026

CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2026, a copy of the foregoing document was filed electronically and served pursuant to this Court’s electronic filing system, upon counsel of record.

/s/ Dale J. Giali

Dale J. Giali

DC Bar No. 436514

KING & SPALDING LLP

633 West Fifth St.

Suite 1600

Los Angeles, CA 90071

Tel. (213) 442-4355

Fax (213) 443-4310

dgiali@kslaw.com

Attorney for Defendants

Lindt & Sprüngli (USA) Inc. and

Lindt & Sprüngli (North America)

Inc.

EXHIBIT Q

Register of Actions Register of Actions

Case Summary

Case Information

Assignment Information

Party Information

Events and Orders of the Court

Financial Information

Civil Actions: 2026-CAB-003121

Case Summary

Civil Actions
Case Summary
Case No. 2026-CAB-003121
International Rights Advocates Inc v. Lindt & Sprungli (USA) INC. et al.
Location:
Civil Actions
Location
Civil Actions
Judicial Officer:
O'Connell, Edward
Judicial Officer
O'Connell, Edward
Filed on:
05/08/2026
Filed on
05/08/2026

Case Information

Case Type: Statutory Claim
Subtype: Consumer Protection Act
Case Status: 05/08/2026 Open

Assignment Information

Current Case Assignment
Case Number
2026-CAB-003121
Court
Civil Actions
Date Assigned
05/11/2026
Judicial Officer
O'Connell, Edward
Previous Case Assignments
Case Number
2026-CAB-003121
Court
Civil Actions
Date Assigned
05/08/2026
Reason
Judge Assigned

Civil Actions
Case Summary
Case No. 2026-CAB-003121

Party Information

		Lead Attorneys
		Collingsworth, Terrence P
		Retained
Plaintiff	International Rights Advocates Inc	202-543-5811(W)
	621 Maryland Avenue NE	International Rights Advocates
	Washington, DC 20002	621 Maryland Ave NE
		Washington, DC 20002
		tc@iradvocates.org
Defendant	Lindt & Sprungli (North America) INC.	
	4717 Grand Avenue, Suite 700	
	Kansas City, MO 64112	
	Lindt & Sprungli (USA) INC.	
	One Fine Chocolate Place	
	Stratham, NH 03885	

Events and Orders of the Court

05/08/2026

Documents are available. Click here to view the documents.

Complaint eFiled

Docketed on:

05/11/2026

Filed by:

Plaintiff International Rights Advocates Inc

05/11/2026

A document is available. Click here to view the document.

Initial Order [Remote]

(Judicial Officer: O'Connell, Edward)

05/11/2026

Notice

06/29/2026

A document is available. Click here to view the document.

Affidavit/Declaration of Service of Summons and Complaint

Docketed On:

06/30/2026

Filed By:

Plaintiff International Rights Advocates Inc

Served On:

Defendant Lindt & Sprungli (USA) INC.

07/06/2026

Documents are available. Click here to view the documents.

Motion to Extend Filed

(Judicial Officer: O'Connell, Edward)

Consent Motion to Extend Time for Defendant to Respond to Complaint

Docketed on:

07/07/2026

Filed by:

Defendant Lindt & Sprungli (North America) INC.;

Defendant Lindt & Sprungli (USA) INC.

07/08/2026

A document is available. Click here to view the document.

Order Filed and Entered on Docket

(Judicial Officer: O'Connell, Edward)

Granting Defendants' Consent Motion to Extend and Continuing ISC

Signed on:

07/08/2026

07/08/2026

Notice

Civil Actions
Case Summary
Case No. 2026-CAB-003121

07/17/2026

A document is available. Click here to view the document.

Affidavit/Declaration of Service of Summons and Complaint

Affidavit Of Service Lindt & Sprung North America

Docketed On:

07/21/2026

Filed By:

Plaintiff International Rights Advocates Inc

Served On:

Defendant Lindt & Sprungli (North America) INC.

10/16/2026

Documents are available. Click here to view the documents.

Remote Initial Scheduling Conference (9:30 AM) (Judicial Officer: O'Connell, Edward)

08/07/2026 Continued to 10/16/2026 - Request/Consent of Parties - International Rights Advocates Inc; Lindt & Sprungli (USA) INC.; Lindt & Sprungli (North America) INC.

Financial Information

Defendant Lindt & Sprungli (USA) INC.

Total Financial Assessment

20.00

Total Payments and Credits

20.00

Balance Due as of 07/21/2026

0.00

Plaintiff International Rights Advocates Inc

Total Financial Assessment

120.00

Total Payments and Credits

120.00

Balance Due as of 07/21/2026

0.00

□

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Version: 1.0.0.2483

□

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However, it seems JavaScript is either disabled or not supported by your browser.

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You are using a web browser which this application no longer supports.

We support the current and previous major releases of Google Chrome, Firefox, Internet Explorer, and Safari on a rolling basis. Each time a new version is released, we begin supporting that version and stop supporting the third most recent version.

Supported Browsers

Chrome for Business



Firefox



Internet Explorer



Apple Safari



Internet Explorer 9 Users

Internet Explorer 11 launched on October 17, 2013, and as a result, we've discontinued support for Internet Explorer 9.

Organizations that depend on old versions of Internet Explorer may want to consider a dual browser strategy.

Print

CIVIL COVER SHEET

JS-44 (Rev. 11/2020 DC)

I. (a) PLAINTIFFS INTERNATIONAL RIGHTS ADVOCATES, INC. (b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF <u>Washington, D.C.</u> (EXCEPT IN U.S. PLAINTIFF CASES)	DEFENDANTS LINDT & SPRÜNGLI (USA) INC.; LINDT & SPRÜNGLI (NORTH AMERICA) INC. COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT <u>Stratham, N.H.</u> (IN U.S. PLAINTIFF CASES ONLY) NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED																												
(c) ATTORNEYS (FIRMNAME, ADDRESS, AND TELEPHONE NUMBER) <table style="width: 100%;"> <tr> <td style="width: 50%;"> Terrence P. Collingsworth International Rights Advocates 621 Maryland Ave. NE Washington, D.C. 20002 Telephone: 202-543-5811 </td> <td style="width: 50%;"> Kim E. Richman Richman Law & Policy 1 Bridge Street, Suite 83 Irvington, NY 10533 Telephone: 914-693-2018 </td> </tr> </table>	Terrence P. Collingsworth International Rights Advocates 621 Maryland Ave. NE Washington, D.C. 20002 Telephone: 202-543-5811	Kim E. Richman Richman Law & Policy 1 Bridge Street, Suite 83 Irvington, NY 10533 Telephone: 914-693-2018	ATTORNEYS (IF KNOWN) Dale J. Giali, DC Bar No. 436514 KING & SPALDING LLP 633 West Fifth Street, Suite 1600, Los Angeles, CA 90071 Tel. (213) 442-4355																										
Terrence P. Collingsworth International Rights Advocates 621 Maryland Ave. NE Washington, D.C. 20002 Telephone: 202-543-5811	Kim E. Richman Richman Law & Policy 1 Bridge Street, Suite 83 Irvington, NY 10533 Telephone: 914-693-2018																												
II. BASIS OF JURISDICTION (PLACE AN x IN ONE BOX ONLY) <table style="width: 100%;"> <tr> <td>☐ 1 U.S. Government Plaintiff</td> <td>☐ 3 Federal Question (U.S. Government Not a Party)</td> </tr> <tr> <td>☐ 2 U.S. Government Defendant</td> <td>☒ 4 Diversity (Indicate Citizenship of Parties in item III)</td> </tr> </table>	☐ 1 U.S. Government Plaintiff	☐ 3 Federal Question (U.S. Government Not a Party)	☐ 2 U.S. Government Defendant	☒ 4 Diversity (Indicate Citizenship of Parties in item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN x IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) FOR DIVERSITY CASES ONLY! <table style="width: 100%;"> <thead> <tr> <th></th> <th>PTF</th> <th>DFT</th> <th></th> <th>PTF</th> <th>DFT</th> </tr> </thead> <tbody> <tr> <td>Citizen of this State</td> <td>☐ 1</td> <td>☐ 1</td> <td>Incorporated or Principal Place of Business in This State</td> <td>☒ 4</td> <td>☐ 4</td> </tr> <tr> <td>Citizen of Another State</td> <td>☐ 2</td> <td>☐ 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td>☐ 5</td> <td>☒ 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td>☐ 3</td> <td>☐ 3</td> <td>Foreign Nation</td> <td>☐ 6</td> <td>☐ 6</td> </tr> </tbody> </table>		PTF	DFT		PTF	DFT	Citizen of this State	☐ 1	☐ 1	Incorporated or Principal Place of Business in This State	☒ 4	☐ 4	Citizen of Another State	☐ 2	☐ 2	Incorporated and Principal Place of Business in Another State	☐ 5	☒ 5	Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6
☐ 1 U.S. Government Plaintiff	☐ 3 Federal Question (U.S. Government Not a Party)																												
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Citizen of Another State	☐ 2	☐ 2	Incorporated and Principal Place of Business in Another State	☐ 5	☒ 5																								
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6																								

IV. CASE ASSIGNMENT AND NATURE OF SUIT

(Place an X in one category, A-N, that best represents your Cause of Action and one in a corresponding Nature of Suit)

☐ A. Antitrust ☐ 410 Antitrust	☐ B. Personal Injury/Malpractice ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Federal Employers Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury ☐ 362 Medical Malpractice ☐ 365 Product Liability ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability ☐ 368 Asbestos Product Liability	☐ C. Administrative Agency Review ☐ 151 Medicare Act <u>Social Security</u> ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g)) <u>Other Statutes</u> ☐ 891 Agricultural Acts ☐ 893 Environmental Matters ☐ 890 Other Statutory Actions (If Administrative Agency is Involved)	☐ D. Temporary Restraining Order/Preliminary Injunction Any nature of suit from any category may be selected for this category of case assignment. *(If Antitrust, then A governs)*
☒ E. General Civil (Other) OR ☐ F. Pro Se General Civil			
<u>Real Property</u> ☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent, Lease & Ejectment ☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property <u>Personal Property</u> ☐ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability	<u>Bankruptcy</u> ☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 <u>Prisoner Petitions</u> ☐ 535 Death Penalty ☐ 540 Mandamus & Other ☐ 550 Civil Rights ☐ 555 Prison Conditions ☐ 560 Civil Detainee – Conditions of Confinement <u>Property Rights</u> ☐ 820 Copyrights ☐ 830 Patent ☐ 835 Patent – Abbreviated New Drug Application ☐ 840 Trademark ☐ 880 Defend Trade Secrets Act of 2016 (DTSA)	<u>Federal Tax Suits</u> ☐ 870 Taxes (US plaintiff or defendant) ☐ 871 IRS-Third Party 26 USC 7609 <u>Forfeiture/Penalty</u> ☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 690 Other <u>Other Statutes</u> ☐ 375 False Claims Act ☐ 376 Qui Tam (31 USC 3729(a)) ☐ 400 State Reapportionment ☐ 430 Banks & Banking ☐ 450 Commerce/ICC Rates/etc ☐ 460 Deportation ☐ 462 Naturalization Application	☐ 465 Other Immigration Actions ☐ 470 Racketeer Influenced & Corrupt Organization ☐ 480 Consumer Credit ☐ 485 Telephone Consumer Protection Act (TCPA) ☐ 490 Cable/Satellite TV ☐ 850 Securities/Commodities/Exchange ☐ 896 Arbitration ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision ☐ 950 Constitutionality of State Statutes ☒ 890 Other Statutory Actions (if not administrative agency review or Privacy Act)

☐ G. Habeas Corpus/ 2255 ☐ 530 Habeas Corpus – General ☐ 510 Motion/Vacate Sentence ☐ 463 Habeas Corpus – Alien Detainee	☐ H. Employment Discrimination ☐ 442 Civil Rights – Employment (criteria: race, gender/sex, national origin, discrimination, disability, age, religion, retaliation) *(If pro se, select this deck)*	☐ I. FOIA/Privacy Act ☐ 895 Freedom of Information Act ☐ 890 Other Statutory Actions (if Privacy Act) *(If pro se, select this deck)*	☐ J. Student Loan ☐ 152 Recovery of Defaulted Student Loan (excluding veterans)
☐ K. Labor/ERISA (non-employment) ☐ 710 Fair Labor Standards Act ☐ 720 Labor/Mgmt. Relations ☐ 740 Labor Railway Act ☐ 751 Family and Medical Leave Act ☐ 790 Other Labor Litigation ☐ 791 Empl. Ret. Inc. Security Act	☐ L. Other Civil Rights (non-employment) ☐ 441 Voting (if not Voting Rights Act) ☐ 443 Housing/Accommodations ☐ 440 Other Civil Rights ☐ 445 Americans w/Disabilities – Employment ☐ 446 Americans w/Disabilities – Other ☐ 448 Education	☐ M. Contract ☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholder's Suits ☐ 190 Other Contracts ☐ 195 Contract Product Liability ☐ 196 Franchise	☐ N. Three-Judge Court ☐ 441 Civil Rights – Voting (if Voting Rights Act)

V. ORIGIN
☐ 1 Original Proceeding
 ☒ 2 Removed from State Court
 ☐ 3 Remanded from Appellate Court
 ☐ 4 Reinstated or Reopened
 ☐ 5 Transferred from another district (specify)
 ☐ 6 Multi-district Litigation
 ☐ 7 Appeal to District Judge from Mag. Judge
 ☐ 8 Multi-district Litigation – Direct File

VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.)
Defendants have removed this case under the diversity jurisdiction statute (28 U.S.C. §§ 1332, 1441 & 1446). Plaintiff originally filed this case in D.C Superior Court under the D.C. Consumer Protection Procedures Act (D.C. Code §§ 28-3901, et seq.).

VII. REQUESTED IN COMPLAINT	☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23	DEMAND \$ JURY DEMAND:	Check YES only if demanded in complaint YES ☒ NO ☐
VIII. RELATED CASE(S) IF ANY	(See instruction)	YES ☐ NO ☒	If yes, please complete related case form

DATE: 7/21/2026	SIGNATURE OF ATTORNEY OF RECORD /s/ Dale J. Giali
-----------------	---

INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44
 Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and services of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil coversheet. These tips coincide with the Roman Numerals on the cover sheet.

- I.** COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence: Use 11001 to indicate plaintiff if resident of Washington, DC, 88888 if plaintiff is resident of United States but not Washington, DC, and 99999 if plaintiff is outside the United States.
- III.** CITIZENSHIP OF PRINCIPAL PARTIES: This section is completed only if diversity of citizenship was selected as the Basis of Jurisdiction under Section II.
- IV.** CASE ASSIGNMENT AND NATURE OF SUIT: The assignment of a judge to your case will depend on the category you select that best represents the primary cause of action found in your complaint. You may select only one category. You must also select one corresponding nature of suit found under the category of the case.
- VI.** CAUSE OF ACTION: Cite the U.S. Civil Statute under which you are filing and write a brief statement of the primary cause.
- VIII.** RELATED CASE(S), IF ANY: If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk's Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form.