

July 22, 2024

Via email

Brad Pitt, Co-Founder God's True Cashmere LLC c/o Bryan Lourd Creative Artists Agency blourd@caa.com

God's True Cashmere LLC sathari@godstruecashmere.com

Dear Mr. Pitt and Ms. Khalsa,

I'm writing on behalf of People for the Ethical Treatment of Animals, Inc. ("PETA") to demand that God's True Cashmere LLC ("GTC") immediately cease the following false and misleading marketing claims:

- "Our 100% Italian cashmere garments are made with every element of our product cycle in mind, from the goats themselves to our suppliers and manufacturers, each piece lovingly crafted for your well-being and theirs."¹
- "Responsibly Sourced"2
- "We source our wool and recycled wool through manufacturers that hold The RESPONSIBLE WOOL STANDARD certification[.] The RWS certification provides over-site [sic] of responsibly-managed farms that produce wool (relevant to our products only where wool is listed as a fiber) that require stringent criteria for animal welfare, reduction of environmental impact, and a process to trace the production process."³
- The use of the Responsible Wool Standard (RWS) logo.⁴

Despite GTC's representations, cashmere cannot be "crafted for [goats'] well-being" or be "responsibly sourced." To produce cashmere, goats are typically forced to suffer from extreme abuse and are ultimately killed once they are no longer profitable. PETA Asia's recent exposé of twelve cashmere industry operations revealed—consistent with the findings of its prior exposé— that goats screamed in terror as workers pinned them down, twisted their sensitive legs, and ripped their hair out with sharp metal combs, leaving some with bleeding wounds and tearing off pieces of their skin. In addition, kid goats were crudely castrated without painkillers, and young goats were found dead, likely from extreme cold or hunger.⁵

PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS **FOUNDATION**

Washington 1536 16th St. N.W. Washington, DC 20036 202-483-PETA

Los Angeles 2154 W. Sunset Blvd. Los Angeles, CA 90026 323-644-PETA

Norfolk 501 Front St. Norfolk, VA 23510 757-622-PETA

PETA FOUNDATION IS AN OPERATING NAME OF THE FOUNDATION TO SUPPORT ANIMAL PROTECTION.

ENTITIES:

- PETA U.S.
- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

Sat Hari Khalsa, Co-Founder

¹ Our Story, God's True Cashmere, https://godstruecashmere.com/pages/our-story (last visited Jul. 22, 2024).

² This claim exists on all product pages. See, e.g., Navy Cashmere Shirt, God's True Cashmere, https://godstruecashmere.com/products/navy-cashmere-shirt (last visited Jul. 22, 2024).

³ Our Story, supra note 1.

⁴ *Id*.

⁵ PETA Asia Investigation Exposes Extreme Abuse of Goats for Cashmere, PETA, https://investigations.peta.org/peta-asia-exposes-cashmere-industry/?en_txn7=Home-Featured::homepage-x-post.

Moreover, experts in animal welfare have rejected or advised against combing goats. The Australian Royal Society for the Prevention of Cruelty to Animals (RSPCA) "does not support the combing of goats with a sharp-toothed comb. It is a prolonged procedure that can lead to bruising and skin injuries, and cause unnecessary and extended pain, suffering, and distress in goats." Even the "Good Cashmere Standard"—which some companies use in an attempt to further humane wash cashmere products—indicates that combing goats causes them to endure "stress and injury."

Finally, when goats are no longer profitable, they are sent to slaughterhouses. There, workers commonly hit them on the head with hammers or may even fail to stun them at all, before slitting their throats. Many goats continue to move for minutes after their throats are cut. This terrifying and violent ordeal is certainly not what consumers would consider to be "responsibly sourced" or for the benefit of "[goats'] well-being" by any reasonable consumer.

After PETA confronted GTC about its other misleading claims, the company told the organization that its cashmere suppliers are certified under the Sustainable Fibre Alliance (SFA) standard. Unlike GTC's RWS claims discussed below, SFA certification relates to cashmere production. Therefore, the fact that the brand has apparently never publicly claimed its suppliers are SFA certified raises serious doubts as to the veracity of the claim. Nevertheless, it would be deceptive to consumers⁸ if GTC were to assert that, because its suppliers are SFA certified, its products come from goats who were treated humanely, with high standards of care, or were otherwise protected from the abuse detailed above. In its 2024 complaint to the Federal Trade Commission,⁹ PETA identified in exhaustive detail that, despite the SFA's claims, the organization's current and proposed future standards do *not* ensure the well-being of cashmere goats nor do its certifications ensure strict enforcement of animal welfare standards. Unsurprisingly, PETA Asia's most recent investigation found horrific cruelty at multiple SFA certified operations, which used many of the same barbaric practices common to the global cashmere industry.¹⁰ Should GTC make any such claim in the future, PETA reserves the right to pursue legal action to have it removed alongside the other claims identified in this letter.

GTC additionally makes false and misleading claims concerning the company's and its products' connection to the RWS certification. The brand claims that its "wool and recycled wool" are sourced through "manufacturers that hold the [RWS] certification" and "[RWS] certification provides over-site [sic] of responsibly-managed farms...that require stringent criteria for animal welfare." The company also uses the RWS logo, notably detached from the other RWS claims, on its "Our Story" page.

The brand's representations that RWS certification or its standards are significant to GTC's products are likely to mislead consumers. As you are aware, RWS is a certification created by Textile Exchange that pertains exclusively to sheep wool products and sheep farmers, and RWS does not certify any cashmere producers, suppliers, or cashmere products. GTC states that "RWS certification...[is] relevant to [its] products only where wool is listed as a fiber." But according to the company's website, only three

2

⁶ RSPCA Knowledgebase, *What Are the Animal Welfare Issues Associated with Cashmere Production?* (Oct. 8, 2019), https://kb.rspca.org.au/knowledge-base/what-are-the-animal-welfare-issues-associated-with-cashmere-production/#what-is-the-rspcas-view.

⁷ See ABTF, THE GOOD CASHMERE STANDARD 6.0.3 ("Goats should have their fibre removed with hand shears or electric clippers in preference to combing."), https://thegoodcashmerestandard.org/wp-content/uploads/2022/03/The-Good-Cashmere-Standard-by-AbTF_v1.2_EN.pdf.

⁸ Any other representation or implication that GTC or its products are SFA certified would be false and misleading, including the use of the SFA logo.

⁹ Complaint to the FTC concerning the Sustainable Fibre Alliance, PETA (Jan. 10, 2024), https://www.peta.org/wp-content/uploads/2024/01/Sustainable-Fibre-Alliance-FTC-Complaint_redacted_Redacted.pdf.

¹⁰ PETA Asia Investigation Exposes Extreme Abuse of Goats for Cashmere, supra note 5.

products—two blankets and one pillow—contain 3% wool.¹¹ Moreover, GTC claims that it sources recycled wool but the material is not listed in any product description on the company's website. Despite wool being virtually nonexistent in the brand's advertised products, GTC makes broad statements about RWS certification on its "Our Story" webpage intended to provide overarching information about the company. Consumers may reasonably assume that these claims, including welfare claims, apply to all or most of GTC's products, which are almost exclusively made from cashmere goats. Based on the company's claims there is no evidence that the goats from whom the company's cashmere is taken are subject to any animal welfare standards whatsoever.

Furthermore, the separate use of the RWS logo implies that the company and/or its products are RWS certified, which is completely false. ¹² Not only is GTC not certified, but RWS certification is only available to products that contain at least 5% certified wool ¹³ and, as noted above, none of the company's listed products meet this requirement. Additionally, even *if* any GTC products contained recycled wool, this material is explicitly ineligible for certification. ¹⁴ The inclusion of the logo similarly represents that GTC has *some* legitimate basis to use it, which is also apparently untrue. According to Textile Exchange, any use of the RWS logo must be by certified organizations or placed on specific product labels or claims, and claims about RWS must be approved and only use specific language. ¹⁵ The company's claims do not comply with these requirements. GTC's many violations of Textile Exchange's standards further indicate that, at best, the company has little to no meaningful understanding of RWS certification, its standards, or its applicability. ¹⁶ If GTC takes the position that it is knowledgeable about the certification, this would imply that the inclusion of the logo and claims are designed to deceive consumers. In either scenario, consumers are likely to be misled by the company's broad self-association with the RWS certification scheme and logo.

The website's statement that "RWS certification provides over-site [sic] of responsibly-managed farms¹⁷ that produce wool [] that require stringent criteria for animal welfare," is also likely to mislead consumers by suggesting that the apparently minuscule amount of wool in GTC's products comes from sheep who were afforded high standards of care. Like cashmere, there is no such thing as humane, cruelty-free, or "responsible" wool. PETA has released 14 exposés of 117 wool operations on four continents that have revealed industry-wide horrific abuse of sheep who are beaten, stomped on, kicked, mutilated, thrown, and sometimes even skinned alive.

⁻

¹¹ Elegant Neutral Tartan Cashmere Blanket, God's True Cashmere, https://godstruecashmere.com/collections/accessories/products/elegant-neutral-tartan-blanket; Bright Grampy Tartan Cashmere Blanket, God's True Cashmere, https://godstruecashmere.com/collections/accessories/products/bright-grampy-tartan-blanket; Bright Grampy Tartan Cashmere Pillow, God's True Cashmere, https://godstruecashmere.com/collections/accessories/products/bright-grampy-tartan-pillow.

¹² Find a Certified Company, Textile Exchange, https://textileexchange.org/find-certified-company/ (last visited Jul. 22, 2024); *Standards Claims Policy TE-301-V1.3*, Textile Exchange, p. 15, https://textileexchange.org/app/uploads/2022/02/TE-301-V1.3-Standards-Claims-Policy.pdf.

¹³ Standards Claims Policy TE-301-V1.3, supra note 9, at 15.

¹⁴ *Responsible Wool Standard 2.2 RAF-101a-V2.2-2021.10.01*, Textile Exchange p. 12 (B1.3.1), https://textileexchange.org/app/uploads/2020/08/RAF-101a-V2.2-Responsible-Wool-Standard.pdf. ¹⁵ *Id.*, generally.

¹⁶ It is also questionable whether GTC can provide verification that its manufacturers are RWS certified as claimed. Until recently, the company incorrectly claimed that its *cashmere* was sourced from RWS certified "suppliers" and the website language was changed only after PETA contacted GTC and notified it of its falsity. *See* an April 15, 2024, archive of GTC's "Our Story" page, https://web.archive.org/web/20240415111722/https://godstruecashmere.com/pages/our-story.

¹⁷ Textile Exchange itself does not represent that it provides oversight of "responsibly-managed farms," indicating that GTC has crafted this claim without basis.

As detailed in PETA's 2023 complaint to the Federal Trade Commission (FTC), Textile Exchange's certifications, including RWS, deceive consumers by implying that certified products are made with a higher standard of animal welfare than that which is actually required or assured by the standards. RWS certification does not ensure that farms will be independently inspected, nor does it require strict enforcement of its woefully inadequate animal welfare standards. Among other cruel conduct, outright physical abuse such as beating, kicking, and stomping; failing to provide adequate veterinary care; and mulesing do not necessarily require a producer's certification to be suspended. Other conduct that violates the standards but is explicitly allowed to occur for some time includes withholding food and water for over 24 hours; housing sheep in shelters that lack sufficient ventilation, sanitation, traction, or protection from heat and cold stress; housing sheep in shelters where there is insufficient room to lie in a normal resting posture; moving sick and injured sheep, alpaca, and goats in an inhumane manner; failing to provide sheep with access to sunlight; tail docking and castrating sheep without pain relief; killing sheep by cutting their throat without first stunning the animal; and failing to ensure that employees are aware of certification requirements. No reasonable consumer would consider these "standards" to "provide [oversight] of responsibly-managed farms" or "require stringent criteria for animal welfare."

The Federal Trade Commission Act (FTC Act) prohibits unfair methods of competition, which include false and misleading advertising. 15 U.S.C. § 45. California law similarly prohibits "unfair, deceptive, untrue or misleading advertising." Cal. Bus. & Prof. Code § 17200.

Accordingly, PETA looks forward to your confirmation by August 1, 2024, that you have removed these false and misleading claims from your website and any other marketing materials. PETA hopes to resolve this issue with you before pursuing any additional legal action, including but not limited to complaints to the FTC and the California Attorney General for apparent violations of the FTC Act and California state law respectively.

Respectfully,

Mary Maerz
Senior Counsel, PETA Foundation
marym@petaf.org |

¹⁸ Complaint to the FTC concerning Textile Exchange, https://www.peta.org/wp-content/uploads/2023/05/2023-05-12-Textile-Exchange-FTC-Complaint_Redacted.pdf (May 12, 2023) (hereinafter "FTC Complaint").

¹⁹ See *id.* at 18-22.

²⁰ Mulesing refers to removing large chunks of skin near the tail to reduce flystrike in the skin of animals who were bred to have more skin folds, thereby increasing wool production. *See Mulesing by the Wool Industry*, PETA, https://www.peta.org/issues/animals-used-for-clothing/wool-industry/mulesing/.

²¹ FTC Complaint, *supra* note 16, at 14.

²² *Id.* at 15-17.