BAKER MANOCK & JENSEN, PC

FIG GARDEN FINANCIAL CENTER 5260 NORTH PALM AVENUE, FOURTH FLOOR FRESNO, CALIFORNIA 93704-2209 TELEPHONE (559) 432-5400 TELECOPIER (559) 432-5620

Plaintiff RUIZ FOOD PRODUCTS, INC. Attorneys for

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

Case No.

RUIZ FOOD PRODUCTS, INC., a California corporation **COMPLAINT** Plaintiff, 1. Trade Dress Infringement (Common Law) 2. Trade Dress Infringement (Lanham Act) 3. California Unfair Business Practice ٧. CAMINO REAL FOODS, INC. a California corporation Jury Trial Demanded

Defendant.

For its complaint against Defendant CAMINO REAL FOODS, INC. ("Defendant"), Plaintiff RUIZ FOOD PRODUCTS, INC.. ("Ruiz" or "Plaintiff"), alleges as follows:

PARTIES

- Plaintiff is, and at all times mentioned was, a California corporation, with its 1. principal place of business located at 501 South Alta Avenue, Dinuba, CA, 93618. Plaintiff is a producer and seller of, among other things, the El Monterey brand of Mexican food products, including frozen burritos and chimichangas. Plaintiff sells its products all over the United States.
- Plaintiff is informed and believes, and on that basis alleges, that Defendant 2. is and at all times mentioned was a California corporation with its principal place of business at 2638 E. Vernon Ave., Vernon, CA 90058. Defendant produces and sells the Las Campanas line of frozen burritos and chimichangas. Plaintiff is informed and believes and therein alleges that Defendant sells its products in California (including Fresno and Stanislaus Counties, California),

FACTUAL ALLEGATIONS COMMON TO ALL COUNTS

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Robert Cross, president of Defendant, and Katie Lee, current employees of 7.

- Plaintiff is in the business of producing and selling, among other things, 3. frozen Mexican food, including burritos and chimichangas, under the El Monterey brand. Plaintiff sells its products at wholesale to stores, which sell the products at retail to customers.
- Plaintiff has continuously used the same distinctive packaging for its 4. burritos and chimichangas since at least 2004. The packaging includes a horizontal orientation for the package, consisting of an image of two burritos or chimichangas on a plate, a consistent background pattern, a color scheme to identify the various flavors, the words BURRITOS or CHIMICHANGAS in distinctive lettering on the upper right portion, including a fanciful "dot" to the "I", placement of "El Monterey" on the upper left portion, "Family Pack" on the left side (on larger packages), heating instructions on the lower left portion, and nutritional information on the right side over the product image. Examples of El Monterey packaging design are attached hereto as Exhibit "A."
- Plaintiff has expended substantial resources in advertising and promoting 5. the El Monterey products in its current packaging since 2004, including online advertising on its website.
- 6. Defendant is a competitor of Plaintiff. Defendant has copied Plaintiff's packaging design for its Las Campanas line of burritos and chimichangas. Defendant's packaging includes a horizontal orientation for the package, consisting of an image of two burritos or chimichangas on a plate, a consistent background pattern, a color scheme to identify the various flavors of burrito (identical to Plaintiff's color scheme), contains the words BURRITOS or CHIMICHANGAS in the same distinctive lettering on the upper right portion, including a fanciful "dot" to the "I", placement of "Las Campanas" on the upper left portion, "Family Pack" on the left side, heating instructions on the lower left portion, and nutritional information on the right side over the product image. Examples of Defendant's packaging design are attached hereto as Exhibit "B."

Defendant, are former employees of Plaintiff. Katie Lee worked in Plaintiff's marketing department.

- 8. Defendant is not affiliated with Plaintiff, and has no authority, license or permission to produce or use packaging nearly identical to Plaintiff's.
- 9. On or about September 3, 2009 Plaintiff demanded that Defendant cease and desist from using the packaging that is nearly identical to Plaintiff's in selling their Las Campanas products. A true and correct copy of Plaintiff's cease and desist letter is attached hereto as Exhibit "C."
- 10. After assuring Plaintiff on September 15, 2009 that Defendant's packaging would be modified to avoid resemblance to Plaintiff's, on September 28, 2009, Plaintiff discovered Las Campanas products were on store shelves in the same packaging that is nearly identical to Plaintiff's. Photographs of Defendant's products on store shelves are attached hereto as Exhibit "D."
- 11. It is obvious that potential consumers will be confused by the almost identical packaging of the frozen Mexican food of two different brands, El Monterey and Las Campanas, and that Defendant deliberately chose their packaging to trade on the goodwill of Plaintiff.

JURISDICTION AND VENUE

- 12. This Court has federal question jurisdiction over the subject matter of this action pursuant to 15 U.S.C. § 1121(a) (actions arising under the U.S. Trademark Act), 28 U.S.C. § 1331 (actions arising from laws of the United States), 28 U.S.C. § 1338(a) (acts of Congress relating to trademarks), and 28 U.S.C. §1338(b) (actions involving claims of unfair competition joined with related trademark law claim).
- 13. Defendant is subject to the specific personal jurisdiction of this Court because it transacts business within this district by advertising, selling and shipping its products into this district.
 - 14. Venue in this district is proper pursuant to 28 U.S.C. § 1391(b) and (c).

Defendant is a corporation that is subject to the jurisdiction of this court. Defendants' tortious activities harm the reputation and intellectual property of Plaintiff, an organization with an office in this district.

FIRST COUNT

Trade Dress Infringement

(Common Law)

- 15. Plaintiff refers to and incorporates by this reference all of the allegations of Paragraphs 1 through 14 as if fully set forth herein.
- 16. Plaintiff owns all rights, title and interest in and to its distinctive packaging design for its frozen Mexican food sold under the El Monterey brand.
- 17. Defendant had constructive and actual notice of Plaintiff's use of the distinctive El Monterey packaging design in connection to frozen Mexican food.
- 18. Defendant, without the consent of Plaintiff is unlawfully using and misappropriating Plaintiff's El Monterey packaging design .
- 19. Defendant is using Plaintiff's El Monterey packaging design to sell its own line of frozen Mexican food.
- 20. On or about September 3, 2009, Plaintiff gave written notice to Defendant to cease and desist regarding the use of Plaintiff's El Monterey packaging design, but Plaintiff continued to use the packaging design publicly in selling its Las Campanas line of frozen Mexican food.
- 21. Defendant is confusing potential customers by using the El Monterey packaging design in advertising and selling its Las Campanas line of frozen Mexican food, including online advertising. Potential customers looking for El Monterey burritos and chimichangas manufactured by Plaintiff will be drawn to Defendant's Las Campanas products because the packaging is almost identical to Plaintiff's and the two brands are displayed in the same location in stores. As a direct and proximate result of the confusion, deception and/or mistake caused by Defendant's use of the El Monterey packaging design, Defendant has made, and

is making, profits in an amount according to proof. Alternatively, Defendant's actions destroy the origin-identifying function of the El Monterey packaging design.

- 22. Defendant is using Plaintiff's El Monterey packaging design with the intention of causing confusion, mistake or deception. The goodwill of Plaintiff's business under its El Monterey packaging design is of great value to Plaintiff, and Plaintiff will suffer irreparable harm should infringement be allowed to continue to the detriment of its trade dress, reputation, and goodwill.
- 23. The foregoing acts of infringement have been and continue to be deliberate, willful and wanton, making this an exceptional case within the meaning of 15 U.S.C. §1117.
- 24. Unless enjoined by this Court from so doing, Defendant will continue to engage in acts of infringement of the sort complained herein, to the irreparable damage and injury of Plaintiff.
- 25. Plaintiff is entitled to a temporary, preliminary and permanent injunctive relief against Defendant, as well as all other remedies available under common law and the Lanham Act, including, but not limited to, compensatory damages, treble damages, punitive damages, disgorgement of profits, and costs and attorneys fees.

SECOND COUNT

Trade Dress Infringement

(Lanham Act 15 U.S.C. §1125(a))

- 26. Plaintiff refers to and incorporates by this reference all of the allegations of Paragraphs 1 through 25 as if fully set forth herein.
- 27. Plaintiff owns all rights, title and interest in and to its distinctive packaging design for its frozen Mexican food sold under the El Monterey brand.
- 28. Defendant had constructive and actual notice of Plaintiff's use of the distinctive El Monterey packaging design in connection to frozen Mexican food.
- 29. Defendant, without the consent of Plaintiff is unlawfully using and misappropriating Plaintiff's El Monterey packaging design.

- 30. Defendant is using Plaintiff's El Monterey packaging design to sell its own line of frozen Mexican food.
- 31. On or about September 3, 2009, Plaintiff gave written notice to Defendant to cease and desist regarding the use of Plaintiff's El Monterey packaging design, but Plaintiff continued to use the packaging design publicly in selling its Las Campanas line of frozen Mexican food.
- packaging design in advertising and selling its Las Campanas line of frozen Mexican food, including online advertising. Potential customers looking for El Monterey burritos and chimichangas manufactured by Plaintiff will be drawn to Defendant's Las Campanas products because the packaging is almost identical to Plaintiff's and the two brands are displayed in the same location in stores. As a direct and proximate result of the confusion, deception and/or mistake caused by Defendant's use of the El Monterey packaging design, Defendant has made, and is making, profits in an amount according to proof. Alternatively, Defendant's actions destroy the origin-identifying function of the El Monterey packaging design.
- 33. Defendant is using Plaintiff's El Monterey packaging design with the intention of causing confusion, mistake or deception. The goodwill of Plaintiff's business under its El Monterey packaging design is of great value to Plaintiff, and Plaintiff will suffer irreparable harm should infringement be allowed to continue to the detriment of its trade dress, reputation, and goodwill.
- 34. The foregoing acts of infringement have been and continue to be deliberate, willful and wanton, making this an exceptional case within the meaning of 15 U.S.C. §1117.
- 35. Unless enjoined by this Court from so doing, Defendant will continue to engage in acts of infringement of the sort complained herein, to the irreparable damage and injury of Plaintiff.
- 36. Plaintiff is entitled to a temporary, preliminary and permanent injunctive relief against Defendant, as well as all other remedies available under the Lanham Act, including, but not limited to, compensatory damages, treble damages, punitive damages, disgorgement of

THIRD CAUSE OF ACTION

Unfair Business Practice

(Common Law and California Business and Professions Code §17200 et seq.)

- 37. Plaintiff refers to and incorporates by this reference all of the allegations of Paragraphs 1 through 36 as if fully set forth herein.
- 38. Defendant's use of Plaintiff's El Monterey packaging design in connection with frozen Mexican food in California and other places, including use on the internet and in stores, is likely to deceive customers and prospective customers into believing that Defendants' products and services are those of Plaintiff's in violation of California Business and Professions Code §17200.
- 39. Defendant's actions are likely to deceive the customers and potential customers into believing that Defendant has an affiliation, connection, or association with Plaintiff when it does not, in violation of California Business and Professions Code §17200.
- 40. Unless enjoined by this Court from so doing, Defendant will continue to engage in acts of false representation and designation of the sort complained herein, to the irreparable damage and injury of Plaintiff.
- 41. Plaintiff is entitled to a temporary, preliminary and permanent injunctive relief against Defendant, as well as all other remedies available under law, including, but not limited to, compensatory damages, disgorgement of profits, and costs and attorney's fees.

PRAYER

WHEREFORE, Plaintiff RUIZ FOOD PRODUCTS, INC., prays for judgment in its favor against Defendant CAMINO REAL FOODS, INC., as follows:

1. That the Court enter a temporary restraining order pending a preliminary injunction hearing that enjoins Defendant, Defendant's officers, agents, employees, distributors, sellers, advertisers, assigns, representatives, and all persons and entities in active participation and

combination with it, from:

- (A) using packaging design that is confusingly similar to Plaintiff's El Monterey packaging design in connection with frozen Mexican food to label, package, advertise, promote, market, sell or distribute its products; (B) using Plaintiff's El Monterey packaging design in connection with frozen Mexican food in any business transaction; and (C) falsely representing that Defendant has any affiliation with Plaintiff
- 2. That the Court enter a preliminary injunction that enjoins Defendant, Defendant's officers, agents, employees, distributors, sellers, advertisers, assigns, representatives, and all persons and entities in active participation and combination with it, from the activities listed in paragraphs 1(A)-(C) above pending resolution at trial.
- 3. That the Court enter a permanent injunction that enjoins Defendant, Defendant's officers, agents, employees, distributors, sellers, advertisers, assigns, representatives, and all persons and entities in active participation and combination with it, from the activities listed in paragraphs 1(A)-(C) above pending resolution at trial.
- 4. That the Court enter judgment that Defendant has committed trade dress infringement pursuant to common law and/or 15 U.S.C. § 1125(a) and unfair business practice pursuant to California Business and Professional Code §17200.
- 5. That the Court enter an order requiring Defendant to show cause, if any, why they should not be enjoined from further use of Plaintiff's El Monterey packaging design in connection with frozen Mexican food during the pendency of this action.
- 6. That Defendant be required to deliver up for destruction any and all packaging, advertising, and other items in the possession, custody or control of Defendant which if advertised, displayed, or transmitted by Defendant would violate the injunction herein granted.
- 7. For profits derived from infringement and unfair competition related to Plaintiff's El Monterey packaging design;
- 8. For three times the amount of Plaintiff's actual damages caused by

 Defendant's willful and intentional infringement and use of Plaintiff's El Monterey packaging

- 1	
1	design.
2	9. For punitive or exemplary damages according to proof.
3	10. For reasonable attorneys fees and cost of suit as provided by law; and
4	11. For other such legal and/or equitable relief as the Court may deem proper
5	
6	DATED: October, 2009.
7	BAKER MANOCK & JENSEN, PC
8	1, 7
9	By John G. Michael
10	Attorneys for Plaintiff RUIZ FOOD PRODUCTS, INC.
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8 Servings

BEEF & BEAN

NET WT 32-0Z (2 LBS)

BEEF & BEAN

BURRITOS BEEF & BEAN 8

8 Servings

EXHIBIT A

sgniv192 8

BURRITOS BEEF & BEAN RED CHILL

PREVIOUSLY HANDLED FROZEN FOR YOUR PROTECTION
SPREEZE OR KEEP REFRIGERATED SERVING SUGGESTIO

BEEF & BEAN RED CHILI

ASCENATION ASSESSED AS A TOTAL ASSESSED AS A TOTAL AS A

BURRITOS BEEF & BEAN RED CHILL 8

O grams Trans Fat

8 Servings

MONTEREY

NET WT 32 OZ (2 LBS)

Para second della sgnivies 8

PREVIOUSLY HANDLED FROZEN FOR YOUR PROTECTION REPREZE OR KEEP REFRIGERATED SERVING SUGGESTION

MICROWAVEABLE

NET WT 32 OZ (2 LBS)

BORRATOS BEEF & BEAN CREEN CHILD

BEEF & BEAN GREEN

O grams Trans Fat

BURRITO BEEF & BEAN GREEN CHILL

8 Servings

9

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PREVIOUSLY HANDLED FROZEN FOR YOUR PROTECTION REFRIEZE OR KEEP REFRIGERATED SERVING SUGGESTION

NET WT 32 OZ (2 LBS)

BEWA & CHEESE STATES

MICROWAVEABLE

BEAN & CHEESE

BURRITOS
BEAN & CHEESE &

Ograms Trans Fat

E Servinge

ELMONTEREY

4

8 Servings

BURREY, RICE & BEAUS

RICE & BEANS

0g Trans Fat 240 Calories / 7g Fat ser naa

Great New Flavor!

URRITO CHICKEN, RICE & BEANS

8 Servings

NET WT 32 OZ (2 LBS)

MICROWAVEABLE

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HEROWAVEABLE

NET WT 32 0Z (2 LBS)

ELMONTEREY

CADMACHANGES SERVINGE SERVINGE





CHIMICHANGAS

SOLCHARDENO BEANS OHESES & SEE

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BURRITOS 8 Servings SVICE PICANTE

TACO PICANTE

O grams Trans Fat

BURRITOS 8 Servings TACO PICANTE

PREVIOUSLY HANDLED FROZEN FOR YOUR PROTECTION REPREEZE ON KEEP REFRIGERATED SERVING SUGGESTION NET WT 32 OZ (2 LBS)

MICROWAVEABLE

EXHIBIT 'B'

our migor or	Containe	14 I	
Amoust Per Serv	ing		
Calories 260	Cato	ries from	n Fat 60
		% Da	illy Value
Total Fat 7g			11%
Saturated F	at 1 5q		8%
Trans Fat C			
Cholesterol 5			2%
Sodium 510n			219
		10-	13%
Total Carbon	ydrate 4	iug	,
Dietary Fib	er 4g		16%
Sugars 1g			
Protein 9a			
Vitamin A 2%		√itamin (2%
Calcium 6%		ron 15%	,
"Percent Daily Val die". Your daily val depending on you	lues may be	e higher or	
	Less than		809
	Less than	20g 300mg	25g 300mg
	Less than	2,400mg	2.400/15
Total Carbohydral		3000	3753
Dietary Fitter	~	25g	30a

AVAILABBE IN SINGLE OR FAMILY PACKS



NGREDIENTS:

Filling: Water, Pinto Beans, Cheddar Cheese (Cultured Pasteurized Milk, Salt, Enzymes, Natural Color [Annatto]), Vegetable Oil (Soybean Oil, Citric Acid), Salt, Chili Pepper.

Tortilla: Flour (Bleached Wheat Flour, Niacin, Iron, Thiamine Mononitrate, Riboflavin, Folic Acid), Water, Vegetable Oil (Soybean, Canola, and/or Corn Oil), Salt, Baking Powder (Sodium Bicarbonate, Corn Starch, Sodium Aluminum Sulfate, Calcium Sulfate, Monocalcium Phosphate), Guar Gum, Dough Conditioner (Sodium Metabisulfite, Corn Starch, Microcrystalline Cellulose, Dicalcium Phosphate).

Contains: Soy, Wheat, Milk

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Amount Per Sarring			
Calories 28	0 Calo	ries fron	n Fat 90
		% Da	ity Value
Total Fat 10)g		16%
Saturated	Fat 4g		219
Trans Fa	i Oa		
Cholestero			3%
Sodium 44			189
Total Carbo		360	129
Dietary F		,0 ₁₉	23%
_			237
Sugars 2			
Protein 11g			
Vitamin A 0	% • 1	Vitamin (C 0%
Calcium 4%		ron 25%	1
Percent Daily diet. Your daily depending on y	/alces are bai	e higher or	00 0 calori lower 2 500
Total Fat	Less than	65g 29q	80g 25g
Saturated Fat Cholesterol	Less than	300mg	300mg
Sodium	Less than	2.400mg	2.400m
Total Carbehild	rate	300g 25g	375g 30g

AVAILABLE IN SINGLE OR FAMILY PACKS



NGREDIENTS:

Filling: Water, Beef, Pinto Beans, Cereal (Corn, Wheat, Rye, Oat, Rice Flours), Textured Vegetable Protein (Soy Flour, Caramel Color, Zinc Oxide, Ferrous Sulfate, Niacinamide, Calcium Pantothenate, Pyridoxine Hydrochloride [B6], Riboflavin [B2], Thiamine Mononitrate [B1], Vitamin A Palmitate, Cyanocobalamin [B12], Salt, Dehydrated Onions, Ground Chili Pepper, Jalapeno Puree (Jalapeno Peppers, Citric Acid), Garlic Powder).

Tortilla: (Bleached Wheat Flour, [Wheat Flour, Niacin, Iron, Thiamine Mononitrate, Riboflavin, Folic Acid], Water, Soybean Oil [Soybean Oil, Citric Acid], Salt, Baking Powder (Sodium Bicarbonate, Corn Starch, Sodium Aluminum Sulfate, Calcium Sulfate, Monocalcium Phosphate), Guar Gum, Dough Conditioner [Sodium Metabisulfite, Corn Starch, Microcrystalline Cellulose, Dicalcium Phosphate]).

Contains: Wheat, Soy

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Serving Size 1 Burrito (114g) Servings Per Container 1			
Amount Per Ser	ying		
Calories 270	Calo	ries from	Fat 100
		% Da	ily Value
Total Fat 11	9		17%
Saturated	Fat 4g		20%
Trans Fat	0g		
Cholesterol	10mg		3%
Sodium 480	mg		20%
Total Carbo	hydrate	35g	129
Dietary Fit			249
Sugars 3g			
Protein 9a			
Trotom og		8	
Vitamin A 4%		Vitamin C	0%
Calcium 4%		Iron 15%	
*Percent Daily Videt Your duity videpending on your	illues may l	be higher or	
Total Fat Saturated Fat	Less than		80g 25g
Cholesterol	Less than	300mg	300mg
Sediem	Loss than		
Total Carbolisds	103	300g 25g	375g

AVAILABRE IN SINGLE OR FAMILY PACKS



INGREDIENTS:

FILLING: Water, Beef, Pinto Beans, Diced Green Chile (Green Chile Peppers, Water, and Citric Acid), Cereal (Corn, Wheat, Rye, Oat, Rice Flours), Dehydrated Onion, Textured Vegetable Protein (Soy Flour, Caramel Color, Zinc Oxide, Ferrous Sulfate, Niacinamide, Calcium Pantothenate, Pyridoxine Hydrochloride {B6}, Riboflavin {B2}, Thiamine Mononitrate {B1}, Vitamin A Palmitate, Cyanocobalamin {B12}), Tomato Paste, Salt, Cumin, Jalapeno Puree (Jalapeno Peppers, Citric Acid), Black Pepper, Garlic Powder.

Tortilla: Flour (Bleached Wheat Flour, Niacin, Iron, Thiamine Mononitrate, Riboflavin, Folic Acid), Water, Vegetable Oil (Soybean, Canola, and/or Corn Oil), Salt, Baking Powder (Sodium Bicarbonate, Corn Starch, Sodium Aluminum Sulfate, Calcium Sulfate, Monocalcium Phosphate), Sodium Stearoyl Lactolate, Guar Gum, Dough Conditioner (Sodium Metabisulfite, Corn Starch, Microcrystalline Cellulose, Dicalcium Phosphate).

CONTAINS: Wheat, Soy

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- Bean & Cheese
- Beef & Bean
- Beef & Bean Green Chili
- Beef & Bean Chimichanga
- Beef, Bean & Cheese Chimichanga
- Breakfast Wraps
- · Chicken, Rice & Beans
- Pizza
- Red Hot Beef

BEEF. BEAN & CHEESE CHIMICHANGA



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OUR PRODUCTS

- Bean & Cheese
- Beef & Bean
- Beef & Bean Green Chili
- Beef & Bean Chimichanga
- Beef, Bean & Cheese Chimichanga
- Breakfast Wraps
- · Chicken, Rice & Beans
- Pizza
- Red Hot Beef

CHICKEN, RICE & BEANS



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Amount Per Serving			
Calories 260 Ca	lories fron	Fat 80	
	% Da	illy Value	
Total Fat 9g		14%	
Saturated Fat 3 5	3	18%	
Trans Fat 0g			
Cholesterol 10mg		3%	
Sodium 440mg		18%	
Total Carbohydrate	380	13%	
Dietary Fiber 5q		20%	
		207	
Sugars 2g			
Protein 10g	_		
Vitamin A 0%	Vitamin (0%	
Calcium 4%	fron 25%		
*Percent Daily Values are tidet. Your daily values may depending on your calorier Calones	be higher or		
Total Fat Less than Saturated Fat Less than		80g 25g	
Cholesterol Less than	1 300mg	300mg	
Sodium Less than Total Curbohydrate		2 400 m	
	300a	375a	

AVAILABLE IN SINGLE OR FAMILY PACKS



INGREDIENTS:

FILLING: Water, Beef, Pinto Beans, Tomato Paste, Cereal (Corn, Wheat, Rye, Oat, Rice Flours), Dehydrated Onion, Textured Vegetable Protein (Soy Flour, Caramel Color, Zinc Oxide, Ferrous Sulfate, Niacinamide, Calcium Pantothenate, Pyridoxine Hydrochloride {B6}, Riboflavin {B2}, Thiamine Mononitrate {B1}, Vitamin A Palmitate, Cyanocobalamin {B12}), Salt, Green Jalapeno Puree (Green Jalapeno Peppers, Citric Acid), Black Pepper, Ground Red Pepper, Crushed Red Pepper, Garlic Powder, Caramel Color.

Tortilla: Bleached Enriched Flour (Wheat Flour, Niacin, Iron, Thiamine Mononitrate, Riboflavin, Folic Acid), Water, Vegetable Oil (Soybean, Canola, and/or Corn Oil), Salt, Baking Powder (Sodium Bicarbonate, Corn Starch, Sodium Aluminum Sulfate, Calcium Sulfate, Monocalcium Phosphate), Sodium Stearoyl Lactolate, Guar Gum, Dough Conditioner (Sodium Metabisulfite, Corn Starch, Microcrystalline Cellulose, Dicalcium Phosphate).

Contains: Soy, Wheat

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Calor	nes from	Fat 170
Calo		Fat 170
	W 10-	
	71 02	illy Value
		29%
at 7g		35%
9		
Omg		7%
g		23%
	39g	13%
		16%
- 3		
	Vitamin (2%
•	Iron 15%	
Jes may b	be Nigher or	
		80g
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)	300g	375g
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AVAILABEE IN SINGLE OR FAMILY PACKS



INGREDIENTS:

Filing: Water, Beef, Pinto Beans, Cereal (Yellow Corn Flour, Wheat Flour, Rye Flour, Oat Flour, Rice Flour), Textured Vegetable Protein (Soy Flour, Caramel Color, Zinc Oxide, Ferrous Sulfate, Niacinamide, Calcium Panthothenate, Pyridoxine Hydrochloride [B6], Riboflavin [B2], Thiamine Mononitrate [B1], Vitamin A Palmitate, Cyanocobalamin [B-12]), Salt, Dehydrated Onions, Jalapeno Purce (Jalapeno Peppers, Citric Acid), Chili Pepper, Spices, Garlic Powder.

Tortilla: (Bleached Wheat Flour, [Wheat Flour, Niacin, Iron, Thiamine Mononitrate, Riboflavin, Folic Acid), Water, Vegetable Oil (Soybean, Canola and/or Corn Oil), Salt, Corn Flour (Stone Ground Corn Cooked with Lime), Baking Powder (Sodium Bicarbonate, Corn Starch, Sodium Aluminum Sulfate, Calcium Sulfate, Monocalcium Phosphate), Guar Gum, Dough Conditioner (Sodium Metabisulfite, Corn Starch, Microcrystalline Cellulose, Dicalcium Phosphate).

Fried in: Animal/Vegetable Oil (Soybean and/or Beef Fat, Cottonseed Oil, [BHT, Citric Acid added to protect flavor]).

Contains: Soy, Wheat

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