

**ENDORSED  
FILED**  
San Francisco County Superior Court

APR 18 2007

**GORDON PAHK-LI, Clerk**

BY: PARAMNATT  
Deputy Clerk

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8 Attorneys for Plaintiff,  
9 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION

**CASE MANAGEMENT CONFERENCE SET**

**SEP 21 2007 -9<sup>00</sup>AM**

**DEPARTMENT 212**

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF SAN FRANCISCO  
12 (Unlimited Jurisdiction)

13 MATEEL ENVIRONMENTAL  
14 JUSTICE FOUNDATION,

CASE NO. **CGC-07-462477**

15 Plaintiff,

COMPLAINT FOR INJUNCTIVE RELIEF  
AND CIVIL PENALTIES

16 v.

17 ABG ACCESSORIES, INC.;  
18 BURLINGTON COAT FACTORY DIRECT  
CORPORATION; BURLINGTON COAT  
19 FACTORY WAREHOUSE  
CORPORATION; BURLINGTON COAT  
20 FACTORY OF CALIFORNIA, LLC;  
DARON FASHIONS, INC.; and  
21 MERVYN'S INC.

TOXIC TORT/ENVIRONMENTAL

22 Defendants.  
23 \_\_\_\_\_/

24 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION alleges as follows:

25 INTRODUCTION

26 1. This Complaint seeks civil penalties and an injunction to remedy the continuing  
27 failure of defendants ABG ACCESSORIES, INC.; BURLINGTON COAT FACTORY DIRECT  
28

1 CORPORATION; BURLINGTON COAT FACTORY WAREHOUSE CORPORATION;  
2 BURLINGTON COAT FACTORY OF CALIFORNIA, LLC; DARON FASHIONS, INC.; AND  
3 MERVYN'S, INC. (hereinafter "Defendants"), to give clear and reasonable warnings to those  
4 residents of California, who handle and use clothing, such as rain jackets and jackets  
5 (collectively hereinafter "Leaded PVC Clothing") that are made with lead containing polyvinyl  
6 chloride, neoprene and other plastic (collectively "PVC"). The wearing and handling and use of  
7 these products causes those residents to be exposed to lead and lead compounds, lead acetate,  
8 lead phosphate, and lead subacetate (hereinafter, collectively, "lead"). The types of products to  
9 which this Complaint pertains are those types listed in the Product List appended to the  
10 Proposition 65 60-Day Notice Letter that is attached to and incorporated by reference into this  
11 Complaint. Lead is known to the State of California to cause cancer, birth defects and male and  
12 female reproductive toxicity. Defendants manufacture, distribute, and/or market Leaded PVC  
13 Clothing. These products cause exposures to lead and lead compounds, which are chemicals  
14 known to the State of California to cause cancer, birth defects and other reproductive harm.

15         2. Defendants are businesses that manufacture, market, and/or distribute Leaded  
16 PVC Clothing. Defendants intend that residents of California handle and use Leaded PVC  
17 Clothing that Defendants manufacture, market, and/or distribute. When these products are  
18 handled and used in their normally intended manner, they expose people to lead. In spite of  
19 knowing that residents of California were and are being exposed to these chemicals when they  
20 handle and use Leaded PVC Clothing, Defendants did not and do not provide clear and  
21 reasonable warnings that these products cause exposure to chemicals known to cause cancer,  
22 birth defects and other reproductive harm.

23         3. Plaintiff seeks injunctive relief pursuant to Health & Safety Code Section 25249.7  
24 to compel Defendants to bring their business practices into compliance with section 25249.5 et  
25 seq. by providing a clear and reasonable warning to each individual who has been and who in the  
26 future may be exposed to the above mentioned toxic chemicals from the use of Defendants'  
27 products. Plaintiff seeks an order that defendants identify and locate each individual person who  
28 in the past has purchased Leaded PVC Clothing and to provide to each such purchaser a clear

1 and reasonable warning that the Leaded PVC Clothing will cause exposures to chemicals known  
2 to cause birth defects.

3 4. In addition to injunctive relief, plaintiff seeks civil penalties to remedy the failure  
4 of Defendants to provide clear and reasonable warnings regarding exposure to chemicals known  
5 to cause cancer, birth defects and other reproductive harm.

6 PARTIES

7 5. Plaintiff MATEEL ENVIRONMENTAL JUSTICE FOUNDATION ("Mateel")  
8 is a non-profit organization dedicated to, among other causes, the protection of the environment,  
9 promotion of human health, environmental education, and consumer rights. Mateel is based in  
10 Eureka, California, and is incorporated under the laws of the State of California. Mateel is a  
11 "person" pursuant to Health & Safety Code Section 25118. Mateel brings this enforcement  
12 action in the public interest pursuant to Health & Safety Code §25249.7(d). Residents of  
13 California are regularly exposed to lead and lead compounds from Leaded PVC Clothing  
14 manufactured, distributed or marketed by Defendants and are so exposed without a clear and  
15 reasonable Proposition 65 warning.

16 6. Defendants are each a person doing business within the meaning of Health &  
17 Safety Code Section 25249.11. Defendants are businesses that manufacture, distribute, and/or  
18 market PVC Clothing in California, including the City and County of San Francisco.  
19 Manufacture, distribution and/or marketing of these products in the City and County of San  
20 Francisco and/or to people who live in San Francisco, causes people to be exposed to lead and  
21 lead compounds while they are physically present in the City and County of San Francisco.

22 7. Plaintiff brings this enforcement action against Defendants pursuant to Health &  
23 Safety Code Section 25249.7(d). Attached hereto and incorporated by reference is a copy of a  
24 60-day Notice letter dated January 31, 2007, which Mateel sent to California's Attorney  
25 General. Substantially identical letters were sent to every District Attorney in the state, and to the  
26 City Attorneys of every California city with a population greater than 750,000. On that same  
27 day, Mateel sent identical 60-Day Notice letters to each defendant. Attached to the 60-Day  
28 Notice Letters sent to each defendant was a summary of Proposition 65 that was prepared by

1 California's Office of Environmental Health Hazard Assessment. In addition, each 60-Day  
2 Notice Letter plaintiff sent was accompanied by a Certificate of Service attesting to the service  
3 of the 60-Day Notice Letter on each entity which received it. Pursuant to California Health &  
4 Safety Code Section 25249.7(d), a Certificate of Merit attesting to the reasonable and  
5 meritorious basis for the action was also sent with each 60-Day Notice Letter. Factual  
6 information sufficient to establish the basis of the Certificate of Merit was enclosed with the 60-  
7 Day Notice letter Mateel sent to the Attorney General.

8 8. Defendants are all businesses that employ more than ten people.

9 JURISDICTION

10 9. The Court has jurisdiction over this action pursuant to California Health & Safety  
11 Code Section 25249.7. California Constitution Article VI, Section 10 grants the Superior Court  
12 "original jurisdiction in all causes except those given by statute to other trial courts." Chapter  
13 6.6 of the Health & Safety Code, which contains the statutes under which this action is brought,  
14 does not grant jurisdiction to any other trial court.

15 10. This Court also has jurisdiction over Defendants because they are businesses that  
16 have sufficient minimum contacts in California and within the City and County of San Francisco.  
17 Defendants intentionally availed themselves of the California and San Francisco County markets  
18 for Leaded PVC Clothing. It is thus consistent with traditional notions of fair play and  
19 substantial justice for the San Francisco Superior Court to exercise jurisdiction over them.

20 11. Venue is proper in this Court because Defendants market their products in and  
21 around San Francisco and thus cause people to be exposed to lead and lead compounds while  
22 those people are physically present in San Francisco. Liability for Plaintiff's causes of action, or  
23 some parts thereof, has accordingly arisen in San Francisco during the times relevant to this  
24 Complaint and Plaintiff seeks civil penalties and forfeitures imposed by statutes.

25 FIRST CAUSE OF ACTION  
26 (Claim for Injunctive Relief)

27 12. Plaintiff realleges and incorporates by reference into this First Cause of Action, as  
28 if specifically set forth herein, paragraphs 1 through 11, inclusive.



1 to Health & Safety Code § 25249.7(b), for a civil penalty of \$2,500.00 per day for each  
2 individual exposed without proper warning to lead and lead compounds from the handling or use  
3 of Defendants' Leaded PVC Clothing.

4 PRAYER FOR RELIEF

5 Wherefore, plaintiff prays for judgment against DEFENDANTS, as follows:

6 1. Pursuant to the First Cause of Action, that all Defendants be enjoined, restrained,  
7 and ordered to comply with the provisions of Section 25249.6 of the California Health & Safety  
8 Code;


9 2. Pursuant to the Second Cause of Action, that Defendants be assessed a civil  
10 penalty in an amount equal to \$2,500.00 per day per individual exposed, in violation of Section  
11 25249.6 of the California Health & Safety Code, to lead and lead compounds as the result of  
12 Defendants' manufacturing, distributing or marketing of Leaded PVC Clothing;

13 3. That Defendants be ordered to identify and locate each individual who purchased  
14 Leaded PVC Clothing and provide a warning to each such person that the Leaded PVC Clothing  
15 the person purchased will expose that person to chemicals known to cause birth defects.

16 4. That, pursuant to Civil Procedure Code § 1021.5, Defendants be ordered to pay to  
17 Plaintiff the attorneys fees and costs it incurred in bringing this enforcement action.

18 5. For such other relief as this court deems just and proper.

19 Dated: April 13, 2007

20  
21 By   
22 William Verick, Esq.  
23 Attorney for Plaintiff  
24 Mateel Environmental Justice Foundation  
25  
26  
27  
28



# Klamath

ENVIRONMENTAL  
LAW CENTER

January 31, 2007

EDWARD G. WEIL  
DEPUTY ATTORNEY GENERAL  
OFFICE OF THE ATTORNEY GENERAL  
P.O. BOX 70550  
OAKLAND CA 94612-0550

Greetings:

This office and the Mateel Environmental Justice Foundation ("Mateel") give you notice that the private business on the attached Service List has been, is, will be and threatens to be in violation of Cal. Health & Safety Code § 25249.6. Both this office and Mateel are private enforcers of Proposition 65, both may be contacted at the below listed address and telephone number, and I am a responsible individual at both Mateel and this office. The above referenced violations occur when California residents come into contact with clothing, such as rain jackets and jackets (collectively hereinafter "plastic clothing and rainwear"), made from polyvinyl chloride, neoprene and other plastic ("PVC"). The PVC used to manufacture this clothing and rainwear contains lead and lead compounds ("lead"), chemicals known to cause cancer, birth defects and other reproductive harm. People are exposed to lead at work and elsewhere when they put this plastic clothing and rainwear on, when they wear it, and when they take it off. Lead in the plastic is transferred from the plastic to their hands and to other parts of their skin. This lead is then absorbed through the skin, taken into cuts and abrasions, absorbed through mucous membranes, and transferred from the skin to the mouth via oral contact either directly with the plastic, from oral contact with the lead-contaminated skin, and when lead is transferred from contaminated skin to cigarettes and food and the contaminated cigarettes and food are smoked and/or eaten. These exposures thus occur via the dermal absorption, subcutaneous, mucus membrane, ingestion and inhalation routes. The business did not and does not provide people with clear and reasonable warnings before it exposes them to lead. These violations have occurred every day since at least January 31, 2004, and will continue every day until the lead is taken out of this plastic clothing and rainwear or until clear and reasonable warnings are given. The above-referenced violations are alleged for occupational exposures as well as for consumer and environmental exposures. We do not, however, allege occupational exposure violations as to any plastic clothing or rainwear made outside of California, except as to workplaces the company itself maintains in California. Exposures constituting Proposition 65 environmental exposure violations occur both on and off the company's property and in each of California's 58 counties.

Cordially,

William Verick

## **PRODUCTS LIST**

### **ABG ACCESSORIES, INC.**

TEEN TITANS PLASTIC RAIN JACKET: SIZE: SMALL 2/3 100% VINYL; RN#36299. This product description pertains not only to the specific model of the product listed, but also for all units of all models of similar types of products.

### **BURLINGTON COAT FACTORY OF CALIFORNIA, LLC**

### **BURLINGTON COAT FACTORY DIRECT CORPORATION**

### **BURLINGTON COAT FACTORY WAREHOUSE CORPORATION**

ORANGE COUNTY CHOPPERS CHILDREN'S JACKET VEN: 5217 STYLE:F5J791CLOC  
COLOR: CHOCOLATE SIZE: 4: PROTECTION SYSTEM PS-1498 CHILD'S JACKET  
#26013BU BURNT ORANGE SIZE: 3T. UPC: 606055 772048. TEEN TITANS PLASTIC  
RAIN JACKET SIZE: SMALL 2/3 100% VINYL RN#36299 This product description pertains  
not only to the specific models of the products listed, but also for all units of all models of  
similar types of products.

### **DARON FASHIONS, INC.**

PROTECTION SYSTEM PS-1498 CHILD'S JACKET #26013BU BURNT ORANGE SIZE: 3T  
UPC: 606055 772048 This product description pertains not only to the specific model of the  
product listed, but also for all units of all models of similar types of products.

### **MERVYN'S LLC**

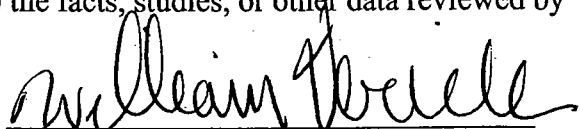
CHILDREN'S JACKET IN: ZONE ONE THREE PIECE SET "STREET BIKERS"  
BRAVE SOUL FLIGHT SQUADRON STYLE: W645156M SIZE: XXL This product  
description pertains not only to the specific model of the product listed, but also for all units of  
all models of similar types of products.



**CERTIFICATE OF MERIT**

I, William Verick, hereby declare: This Certificate of Merit accompanies the attached sixty-day notice(s) in which it is alleged the parties identified in the notices have violated Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings. I am the attorney for the noticing party. I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the exposure to the listed chemical that is the subject of the action. Based on the information obtained through those consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiffs' case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute. The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health and Safety Code section 25249.7(h)(2), i.e., (1) the identity of the person(s) consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: January 31, 2007

  
William Verick

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This notice alleges the violation of Proposition 65 with respect to occupational exposures governed by the California State Plan for Occupational Safety and Health. The State Plan incorporates the provisions of Proposition 65, as approved by Federal OSHA on June 6, 1997. This approval specifically placed certain conditions on Proposition 65, including that it does not apply to the conduct of manufacturers occurring outside the State of California. The approval also provides that an employer may use the means of compliances in the general hazard communication requirements to comply with Proposition 65. It also requires that supplemental enforcement is subject to the supervision of the California Occupational Safety and Health Administration. Accordingly, any settlement, civil complaint, or substantive court orders in this matter must be submitted to the Attorney General.

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**CERTIFICATE OF SERVICE**

I, Nicole Frank, declare:

If called, I could and would testify as follows: I am over eighteen. My business address is 424 First Street, Eureka, California, 95501. On January 31, 2007, I caused the attached 60-DAY NOTICE LETTER, or a letter identical in substance, to be served by U.S. Mail on those public enforcement agencies listed on the attached SERVICE LIST; in addition on the same date and by U.S. Mail I caused the attached 60-DAY NOTICE LETTER and PROPOSITION 65: A SUMMARY to be sent by Certified U.S. Mail to the private business entities also listed on the attached SERVICE LIST. I deposited copies of these documents in envelopes, postage pre-paid, with the U.S. Postal Service on the day on which the mail is collected. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on January 31, 2007, at Eureka, California.

  
Nicole Frank

## SERVICE LIST

EDWARD G. WEIL  
DEPUTY ATTORNEY GENERAL  
OFFICE OF THE ATTORNEY  
GENERAL  
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OAKLAND CA 94612-0550

OFFICE OF THE CITY ATTORNEY  
CITY OF OAKLAND  
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OFFICE OF THE CITY ATTORNEY  
CITY OF SAN FRANCISCO  
CITY HALL ROOM 206  
400 VAN NESS  
SAN FRANCISCO, CA 94102

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CITY OF SACRAMENTO  
980 9<sup>th</sup> Street, 10<sup>th</sup> Floor  
SACRAMENTO, CA 95814

OFFICE OF THE CITY ATTORNEY  
CITY OF SAN JOSE  
151 W. MISSION ST.  
SAN JOSE, CA 95110

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CITY OF LOS ANGELES  
200 N. MAIN ST.  
LOS ANGELES, CA 90012

OFFICE OF THE CITY ATTORNEY  
CITY OF SAN DIEGO CONSUMER &  
ENVIRONMENTAL PROTECTION  
1200 THIRD AVENUE, SUITE 700  
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OFFICE OF THE DISTRICT  
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1225 FALLON STREET ROOM 900  
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P.O. BOX 248  
MARKLEEVILLE, CA 96120

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF AMADOR  
708 COURT STREET  
JACKSON, CA 95642

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF BUTTE  
25 COUNTY CENTER DR.  
OROVILLE, CA 95965

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF CALAVERAS  
GOVERNMENT CENTER  
891 MOUNTAIN RANCH ROAD  
SAN ANDREAS, CA 95249

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF COLUSA  
547 MARKET STREET  
COLUSA, CA 95932

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF CONTRA COSTA  
P.O. BOX 670  
MARTINEZ, CA 94553

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF DEL NORTE  
450 H ST #171  
CRESCENT CITY, CA 95531

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF EL DORADO  
515 MAIN ST.  
PLACERVILLE, CA 95667

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF FRESNO  
2220 TULARE ST #1000  
FRESNO, CA 93721

OFFICE OF THE DISTRICT  
ATTORNEY  
COUNTY OF GLENN  
P.O. BOX 430  
WILLOWS, CA 95988

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EUREKA, CA 95501

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EL CENTRO, CA 92243

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P.O. DRAWER D  
INDEPENDENCE, CA 93526

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ATTORNEY  
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BAKERSFIELD, CA 93301

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COUNTY OF LASSEN  
220 SOUTH LASSEN ST. STE 8  
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209 W. YOSEMITE AVE.  
MADERA, CA 93637

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ATTORNEY  
COUNTY OF MARIN  
HALL OF JUSTICE #183  
SAN RAFAEL, CA 94903

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MARIPOSA, CA 95338

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PO BOX 1000  
UKIAH, CA 95482

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2222 M ST.  
MERCED, CA 95340

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COUNTY GOVERNMENT CENTER #450  
SAN LUIS OBISPO, CA 93408

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HALL OF JUSTICE AND RECORDS  
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1112 SANTA BARBARA ST.  
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70 W. HEDDING ST.  
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COUNTY OF SANTA CRUZ  
701 OCEAN ST. #200  
SANTA CRUZ, CA 95060

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SHASTA  
1525 COURT ST.  
REDDING, CA 96001

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COUNTY OF SIERRA  
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COUNTY OF SOLANO  
600 UNION AVE  
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OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SONOMA  
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COUNTY OF STANISLAUS  
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MODESTO, CA 95354

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COUNTY OF SUTTER  
1160 CIVIC CENTER BLVD. #A  
YUBA CITY, CA 95993

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF TEHAMA  
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REDBLUFF, CA 96080

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF TRINITY  
P.O. BOX 310  
WEAVERVILLE, CA 96093

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF TULARE  
COURTHOUSE #224  
VISALIA, CA 93291

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF TUOLUMNE  
2 S. GREEN ST.  
SONORA, CA 95370

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VENTURA, CA 93009

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COUNTY OF YOLO  
301 SECOND STREET  
WOODLAND, CA 95695

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF YUBA  
215 5TH ST.  
MARYSVILLE, CA 95901

JOSEPH TEMPLER, CEO  
ABG ACCESSORIES, INC.  
149 HEYWARD ST  
BROOKLYN, NY 11206

MONROE G MILSTEIN, PRESIDENT  
MARK A. NESCI, CEO  
BURLINGTON COAT FACTORY  
DIRECT CORPORATION  
1830 ROUTE 130 NORTH  
BURLINGTON, NJ 08016

PRESIDENT OR CEO  
BURLINGTON COAT FACTORY  
WAREHOUSE CORPORATION  
1830 ROUTE 130  
BURLINGTON, NJ 08016

PRESIDENT OR CEO  
BURLINGTON COAT FACTORY OF  
CALIFORNIA, LLC  
C/O BURLINGTON COAT FACTORY  
1830 ROUTE 130 N.  
BURLINGTON NJ 08016

PRESIDENT OR CEO  
BURLINGTON COAT FACTORY OF  
CALIFORNIA, LLC  
153 EAST 53RD ST 39TH FLR  
CITIGROUP CTR  
NEW YORK, NY 10022-4675

AARON ROSENBERG, CEO  
DARON FASHIONS, INC.  
131 WEST 35TH STREET 7TH FLOOR  
NEW YORK, NY 1000

AARON ROSENBERG, CEO  
DARON FASHIONS, INC.  
597 WOODMERE BOULEVARD

DIANE NEAL, CEO  
MERYVYN'S LLC  
22301 FOOTHILL BLVD, MS 4330  
HAYWARD, CA 94541