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8 Attorneys for Plaintiff,
9 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SAN FRANCISCO
12 (Unlimited Jurisdiction)

13 MATEEL ENVIRONMENTAL
14 JUSTICE FOUNDATION,

15 Plaintiff,

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 LLC

22 Defendants.

CASE NO. CGC-07-462477

FIRST AMENDED COMPLAINT FOR
INJUNCTIVE RELIEF AND CIVIL
PENALTIES

TOXIC TORT/ENVIRONMENTAL

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

ENDORSED
FILED
San Francisco County Superior Court
MAY 01 2007
GORDON PARKER, Clerk
BY: MARYANN MORAN
Deputy Clerk

1 CORPORATION; BURLINGTON COAT FACTORY WAREHOUSE CORPORATION;
2 BURLINGTON COAT FACTORY OF CALIFORNIA, LLC; DARON FASHIONS, INC.; AND
3 MERVYN'S LLC. (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 26, 2007

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



Klamath

THE KLAMATH COMPANY
A DIVISION OF THE KLAMATH GROUP
1000 10TH STREET, EUREKA, CA 95501
(707) 268-8900

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.

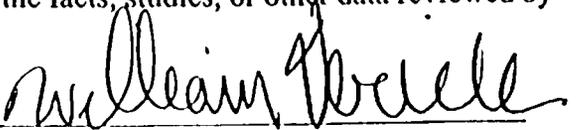
MERVYN'S LLC

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

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.

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

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CITY HALL ROOM 206
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SAN FRANCISCO, CA 94102

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CITY OF SACRAMENTO
910 P Street, 10th Floor
SACRAMENTO, CA 95814

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

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

OFFICE OF THE CITY ATTORNEY
CITY OF SAN DIEGO CONSUMER &
ENVIRONMENTAL PROTECTION
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ATTORNEY
COUNTY OF AMADOR
704 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

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COUNTY OF COLUSA
517 MARKET STREET
COLUSA, CA 95932

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P.O. BOX 670
MARTINEZ, CA 94553

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450 H ST. #171
CRESCENT CITY, CA 95531

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COUNTY OF EL DORADO
515 MAIN ST.
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ATTORNEY
COUNTY OF FRESNO
2220 TULARE ST. #1000
FRESNO, CA 93721

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COUNTY OF GLENN
P.O. BOX 430
WILLOWS, CA 95993

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825 5TH ST.
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COUNTY OF IMPERIAL
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939 W. MAIN ST
EL CENTRO, CA 92243

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COUNTY OF INYO
P.O. DRAWER D
INDEPENDENCE, CA 95326

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COUNTY OF KERN
1215 TRUXTON AVE. FLOOR 4
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ATTORNEY
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1400 W. LACEY BLVD.
HANFORD, CA 93230

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ATTORNEY
COUNTY OF LAKE
255 N. FORBES ST. # 424
LAKEPORT, CA 95453

OFFICE OF THE DISTRICT
ATTORNEY
COUNTY OF LASSEN
220 SOUTH LASSEN ST. STE B
SUSANVILLE, CA 96130

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ATTORNEY
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11000 CRIMINAL COURTS
BUILDING
210 W. TEMPLE ST.
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209 W. YOSEMITE AVE.
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SAN RAFAEL, CA 94903

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MARIPOSA, CA 95338

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MERCED, CA 95340

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COUNTY GOVERNMENT CENTER #450
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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. NESCE, 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
CO BURLINGTON COAT FACTORY
1830 ROUTE 130 N.
BURLINGTON NJ 08016

PRESIDENT OR CEO
BURLINGTON COAT FACTORY OF
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CITIGROUP CTR
NEW YORK, NY 10022-4675

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131 WEST 35TH STREET 7TH FLOOR
NEW YORK, NY 10001

AARON ROSENBERG, CEO
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