

CASE MANAGEMENT CONFERENCE SET

ENDORSED  
FILED  
Superior Court of California  
County of San Francisco

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APR 24 2009 - 9:00 AM

NOV 24 2008

DEPARTMENT 212

GORDON PARK-LI, Clerk  
BY: DEBORAH STEPPE  
Deputy Clerk

5 DAVID WILLIAMS, SBN 144479  
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NO SUMMONS ISSUED

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,

CASE NO. CGC - 08 - 482241

15 Plaintiff,

COMPLAINT FOR INJUNCTIVE RELIEF  
AND CIVIL PENALTIES

16 v.

17 TSA STORES, INC.,

TOXIC TORT/ENVIRONMENTAL

18 Defendant.  
19 \_\_\_\_\_ /

20 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION alleges as follows:

21 INTRODUCTION

22 1. This Complaint seeks civil penalties and an injunction to remedy the continuing  
23 failure of defendant TSA STORES, INC. (hereinafter "Defendant"), to give clear and reasonable  
24 warnings to those residents of California, who handle and use exercise mats made from leaded-  
25 plastic, (hereinafter referred to as "leaded-plastic exercise mats"), that handling and use of these  
26 products causes those residents to be exposed to lead and lead compounds, lead acetate, lead  
27 phosphate, and lead subacetate (hereinafter, collectively, "lead"). The types of products to which  
28 this Complaint pertains are those types listed in the Product List appended to the Proposition 65

1 60-Day Notice Letter that is attached to and incorporated by reference into this Complaint.  
2 Lead is known to the State of California to cause cancer, birth defects and male and female  
3 reproductive toxicity. Defendant distributes, and/or markets leaded-plastic exercise mats. These  
4 products cause exposures to lead and lead compounds, which are chemicals known to the State of  
5 California to cause cancer, birth defects and other reproductive harm.

6 2. Defendant markets, and/or distributes leaded-plastic exercise mats. Defendant  
7 intends that residents of California handle and use leaded-plastic exercise mats that Defendant  
8 markets, and/or distributes. When these products are handled and used in their normally  
9 intended manner, they expose people to lead. In spite of knowing that residents of California  
10 were and are being exposed to these chemicals when they handle and use leaded-plastic exercise  
11 mats, Defendant did not and does not provide clear and reasonable warnings that these products  
12 cause exposure to chemicals known to cause cancer, birth defects and other reproductive harm.

13 3. Plaintiff seeks injunctive relief pursuant to Health & Safety Code Section 25249.7  
14 to compel Defendant to bring its business practices into compliance with section 25249.5 et seq.  
15 by providing a clear and reasonable warning to each individual who has been and who in the  
16 future may be exposed to the above mentioned toxic chemicals from the use of Defendant's  
17 products. Plaintiff seeks an order that defendant identify and locate each individual person who  
18 in the past has purchased leaded-plastic exercise mats and to provide to each such purchaser a  
19 clear and reasonable warning that the leaded-plastic exercise mats will cause exposures to  
20 chemicals known to cause birth defects.

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

#### 24 PARTIES

25 5. Plaintiff MATEEL ENVIRONMENTAL JUSTICE FOUNDATION ("Mateel")  
26 is a non-profit organization dedicated to, among other causes, the protection of the environment,  
27 promotion of human health, environmental education, and consumer rights. Mateel is based in  
28 Eureka, California, and is incorporated under the laws of the State of California. Mateel is a

1 "person" pursuant to Health & Safety Code Section 25118. Mateel brings this enforcement  
2 action in the public interest pursuant to Health & Safety Code §25249.7(d). Residents of  
3 California are regularly exposed to lead and lead compounds from leaded-plastic exercise mats  
4 manufactured, distributed or marketed by Defendants and are so exposed without a clear and  
5 reasonable Proposition 65 warning.

6         6. Defendant is a person doing business within the meaning of Health & Safety Code  
7 Section 25249.11. Defendant is a businesses that distributes, and/or markets leaded-plastic  
8 exercise mats in California, including the City and County of San Francisco. Distribution and/or  
9 marketing of these products in the City and County of San Francisco and/or to people who live in  
10 San Francisco, causes people to be exposed to lead and lead compounds while they are physically  
11 present in the City and County of San Francisco.

12         7. Plaintiff brings this enforcement action against Defendant pursuant to Health &  
13 Safety Code Section 25249.7(d). Attached hereto and incorporated by reference is a copy of a  
14 60-day Notice letter, dated July 17, 2008, which Mateel sent to California's Attorney General.  
15 Substantively identical letters were sent to every District Attorney in the state, and to the City  
16 Attorneys of every California city with a population greater than 750,000, and to defendant.  
17 Attached to the 60-Day Notice Letter sent to defendant was a summary of Proposition 65 that  
18 was prepared by California's Office of Environmental Health Hazard Assessment. In addition,  
19 each 60-Day Notice Letter plaintiff sent was accompanied by a Certificate of Service attesting to  
20 the service of the 60-Day Notice Letter on each entity which received it. Pursuant to California  
21 Health & Safety Code Section 25249.7(d), a Certificate of Merit attesting to the reasonable and  
22 meritorious basis for the action was also sent with each 60-Day Notice Letter. Factual  
23 information sufficient to establish the basis of the Certificate of Merit was enclosed with the 60-  
24 Day Notice letter Mateel sent to the Attorney General.

25         8. Defendant employs more than ten people.  
26  
27  
28



1 Health and Safety Code Section 25249.6 et seq. This conduct includes knowingly and  
2 intentionally exposing to the above mentioned toxic chemicals, those California residents who  
3 handle and use leaded-plastic exercise mats. The normally intended use of leaded-plastic  
4 exercise mats causes exposure to lead and lead compounds, which are chemicals known to the  
5 State of California to cause cancer, birth defects and other reproductive harm. Defendant has not  
6 provided clear and reasonable warnings, within the meaning of Health & Safety Code Sections  
7 25249.6 and 25249.11.

8 16. At all times relevant to this action, Defendant knew that the leaded-plastic  
9 exercise mats it, distributed or marketed were causing exposures to lead and lead compounds.  
10 Defendant intended that residents of California handle and use leaded-plastic exercise mats in  
11 such ways as would lead to significant exposures to these chemicals.

12 17. By the above described acts, Defendant has violated Cal. Health & Safety Code  
13 § 25249.6 and is therefore subject to an injunction ordering it to stop violating Proposition 65, to  
14 provide warnings to all present and future customers and to provide warnings to its past  
15 customers who purchased defendant's products without receiving a clear and reasonable warning.

16 SECOND CAUSE OF ACTION  
17 (Claim for Civil Penalties)

18 18. Plaintiff realleges and incorporates by reference into this Second Cause of Action,  
19 as if specifically set forth herein, paragraphs 1 through 17, inclusive.

20 19. By the above described acts, Defendant is liable and should be liable pursuant to  
21 Health & Safety Code § 25249.7(b), for a civil penalty of \$2,500.00 per day for each individual  
22 exposed without proper warning to lead and lead compounds from the handling or use of  
23 Defendant's leaded-plastic exercise mats.

24 PRAYER FOR RELIEF

25 Wherefore, plaintiff prays for judgment against DEFENDANT, as follows:

26 1. Pursuant to the First Cause of Action, that Defendant be enjoined, restrained, and  
27 ordered to comply with the provisions of Section 25249.6 of the California Health & Safety  
28 Code;

1           2.       Pursuant to the Second Cause of Action, that Defendant be assessed a civil  
2 penalty in an amount equal to \$2,500.00 per day per individual exposed, in violation of Section  
3 25249.6 of the California Health & Safety Code, to lead and lead compounds as the result of  
4 Defendant's distributing or marketing of leaded-plastic exercise mats;

5           3.       That Defendant be ordered to identify and locate each individual who purchased  
6 leaded-plastic exercise mats and provide a warning to each such person that the leaded-plastic  
7 exercise mats the person purchased will expose that person to chemicals known to cause birth  
8 defects.

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

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

12 Dated: November 18, 2008

KLAMATH ENVIRONMENTAL LAW  
CENTER

13  
14 By 

15 William Verick  
16 Attorney for Plaintiff  
17 Mateel Environmental Justice Foundation  
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28



# Klamath

ENVIRONMENTAL  
LAW CENTER

July 17, 2008

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 TSA Stores, Inc. (The Sports Authority Stores, Inc.) 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 plastic exercise mats. These mats are made from leaded plastic (hereinafter "leaded plastic exercise mats"). Specific examples of this type of product are: BODYFIT BY SPORTS AUTHORITY WORKOUT MAT BLUE 24" X 72" SKU# 19100823 UPC CODE: 694259 000944; BODYFIT BY SPORTS AUTHORITY GYM MAT 24"X72" BLACK SKU 19100904 UPC CODE: 694259 001033; BODYFIT BY SPORTS AUTHORITY GYM MAT 36"X90" BLACK SKU 19100917 UPC CODE: 694259 001040; BODYFIT BY SPORTS AUTHORITY WORKOUT MAT BLUE 24"X72" BFMV72 19100823 UPC CODE: 694259 000944. Though specific model and UPC numbers are given as examples, this notice pertains to all similar types of leaded plastic exercise mats. The plastic these mats are made from contains lead and lead compounds ("lead"), chemicals known to cause cancer, birth defects and other reproductive harm. California residents are exposed to lead when they handle these mats while carrying them or while exercising on them. 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 lead exposures thus occur via the dermal absorption, subcutaneous, mucous membrane, ingestion and inhalation routes. TSA Stores, Inc. did not and does not provide people with clear and reasonable warnings before they expose them to lead. These violations have occurred every day since at least July 17, 2005, and will continue every day until the lead is removed from the plastic used to make these mats, 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 exercise mats made outside of California, except as to workplaces TSA Stores, Inc. itself maintains in California. Exposures constituting Proposition 65 environmental exposure violations occur both on and off TSA Stores, Inc.'s company property and in each of California's 58 counties.

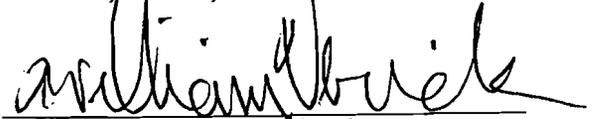
Cordially,

  
William Verick

**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: July 17, 2008

  
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 July 17, 2008, 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 July 17, 2008, at Eureka, California.

  
Nicole Frank

## SERVICE LIST

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

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CITY HALL ROOM 206  
400 VAN NESS  
SAN FRANCISCO, CA 94102

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SACRAMENTO, CA 95812-1948

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CITY OF LOS ANGELES  
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CITY OF SAN DIEGO CONSUMER &  
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708 COURT STREET  
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COUNTY OF BUTTE  
25 COUNTY CENTER DR.  
OROVILLE, CA 95965

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COUNTY OF CALAVERAS  
GOVERNMENT CENTER  
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SAN ANDREAS, CA 95249

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COLUSA, CA 95932

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450 H ST #171  
CRESCENT CITY, CA 95531

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

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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  
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825 5TH ST.  
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255 N. FORBES ST # 424  
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ATTORNEY  
COUNTY OF LASSEN  
220 SOUTH LASSEN ST. STE 8  
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BUILDING  
210 W. TEMPLE ST.  
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2222 M ST.  
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COUNTY GOVERNMENT CENTER #450  
SAN LUIS OBISPO, CA 93408

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SANTA BARBARA, CA 93101

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70 W. HEDDING ST.  
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OFFICE OF THE DISTRICT ATTORNEY  
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701 OCEAN ST. #200  
SANTA CRUZ, CA 95060

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VISALIA, CA 93291

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ATTORNEY'S OFFICE  
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VENTURA, CA 93009

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301 SECOND STREET  
WOODLAND, CA 95695

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

JOHN DOUGLAS MORTON, CEO  
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1050 W HAMPDEN AVE  
ENGLEWOOD, CO 80110