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SAN FRANCISCO COUNTY
SUPERIOR COURT

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8 Attorneys for Plaintiff Environmental Research Center

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF SAN FRANCISCO**

11
12 **ENVIRONMENTAL RESEARCH CENTER,**
13 **a California non-profit corporation**

Case No. **CGC-13-532166**

14 **Plaintiff,**

**COMPLAINT FOR INJUNCTIVE
AND DECLARATORY RELIEF AND
CIVIL PENALTIES**

15 **v.**

16 **FIRST FITNESS INTERNATIONAL, INC.,**
17 **and DOES 1-100**

[Miscellaneous Civil Complaint (42)]
Proposition 65, Health & Safety Code
Section 25249.5 et seq.]

18 **Defendant.**

19 _____ /
20
21 Plaintiff Environmental Research Center hereby alleges:

22 **I**

23 **INTRODUCTION**

24 1. Plaintiff Environmental Research Center (hereinafter "Plaintiff" or "ERC") brings this
25 action as a private attorney general enforcer and in the public interest pursuant to Health & Safety
26 Code section 25249.7, subdivision (d). This complaint seeks injunctive and declaratory relief and
27 civil penalties to remedy Defendant First Fitness International, Inc. and Does 1-100 (hereinafter
28 "First Fitness")'s failure to warn consumers that they have been exposed to lead from several of First

1 Fitness' nutritional health products. Lead is a chemical known to the State of California to cause
2 cancer, birth defects and other reproductive harm. Based on the Safe Drinking Water and Toxic
3 Enforcement Act of 1986 (Health & Safety Code section 25249.5 *et seq.*) also known as
4 "Proposition 65," businesses with ten or more employees must provide a "clear and reasonable
5 warning" prior to exposing persons to these chemicals.

6 II

7 PARTIES

8 2. Plaintiff ERC is a California non-profit corporation dedicated to, among other causes,
9 helping safeguard the public from health hazards by reducing the use and misuse of hazardous and
10 toxic chemicals, facilitating a safe environment for consumers and employees and encouraging
11 corporate responsibility.

12 3. Defendant First Fitness is a business that manufactures, distributes and/or sells nutritional
13 health products that have exposed users to lead in the State of California within the relevant statute
14 of limitations period. These Covered Products are FirstFitness RejuvacCel with Glucosanol,
15 FirstFitness LipoMax Liver Cleanse, FirstFitness Renu Ultimate Colon Cleanse, FirstFitness Slim
16 'N Up! Xtreme, FirstFitness Vital Green Plus, and FirstFitness Suddenly Slim Body FX Tropical
17 Tropical Crème Weight Control Beverage Mix. First Fitness is a company subject to Proposition 65
18 as it employs ten or more persons.

19 4. Defendants Does 1-100, are named herein under fictitious names, as their true names and
20 capacities are unknown to ERC. ERC is informed and believes, and thereon alleges, that each of
21 said Does is responsible, in some actionable manner, for the events and happenings hereinafter
22 referred to, either through said Defendant's conduct, or through the conduct of its agents, servants or
23 employees, or in some other manner, causing the harms alleged by ERC in this complaint. When
24 said true names and capacities of Does are ascertained, ERC will seek leave to amend this complaint
25 to set forth the same.

26 III

27 JURISDICTION AND VENUE

28 5. This Court has jurisdiction pursuant to California Constitution Article VI, Section 10

1 because this case is a cause not given by statute to other trial courts.

2 6. The Complaint is based on allegations contained in a Notice of Violation dated August
3 5, 2011, served on the California Attorney General, other public enforcers and First Fitness. A
4 true and correct copy of the Notice of Violation is attached as Exhibit A. More than 60 days
5 have passed since the Notice of Violation was mailed and no public enforcement entity has filed
6 a complaint in this case.

7 7. This Court is the proper venue for the action because the causes of action have arisen in
8 the County of San Francisco where some of the violations of law have occurred. Furthermore, this
9 Court is the proper venue under Code of Civil Procedure section 395.5 and Health & Safety Code
10 section 25249.7.

11 IV

12 STATUTORY BACKGROUND

13 A. Proposition 65

14 8. The Safe Drinking Water and Toxic Enforcement Act of 1986 is an initiative statute
15 passed as "Proposition 65" by an overwhelming majority vote of the people in November of 1986.

16 9. The warning requirement of Proposition 65 is contained in Health & Safety Code section
17 25249.6, which provides:

18 No person in the course of doing business shall knowingly and intentionally expose
19 any individual to a chemical known to the state to cause cancer or reproductive
20 toxicity without first giving clear and reasonable warning to such individual, except
as provided in Section 25249.10.

21 10. Implementing regulations for Proposition 65 define expose as "to cause to ingest,
22 inhale, contact via body surfaces or otherwise come into contact with a listed chemical." An
23 individual may come into contact with a listed chemical through water, air, food, consumer products
24 and any other environmental exposure as well as occupational exposures." (Cal. Code Regs., tit. 27,
25 § 25102, subd. (i).)

26 11. In this case, the exposures at issue are caused by consumer products. Implementing
27 regulations for Proposition 65 define a consumer product exposure as " an exposure which results
28 from a person's acquisition, purchase, storage, consumption, or other reasonably foreseeable use of

1 a consumer good, or any exposure that results from receiving a consumer service.” (Cal. Code
2 Regs., tit. 27, § 25602, subd. (b).)

3 12. Whenever a clear and reasonable warning is required under Health & Safety Code
4 section 25249.6, the “method employed to transmit the warning must be reasonably calculated
5 considering the alternative methods available under the circumstances, to make the warning
6 message available prior to exposure.” (Cal. Code Regs., tit. 27, § 25601.) The warning requirement
7 may be satisfied by a warning that appears on a product’s label or other labeling, shelf labeling,
8 signs, a system of signs, public advertising identifying the system and toll-free information services,
9 or any other, system, that provides clear and reasonable warnings. (Cal. Code Regs., tit. 27, §
10 25603.1, subd. (a)-(d).)

11 13. Proposition 65 establishes a procedure by which the State is to develop a list of
12 chemicals “known to the State to cause cancer or reproductive toxicity.” (Health & Safety Code,
13 § 25249.8.) There is no duty to provide a clear and reasonable warning until 12-months after the
14 chemical was published on the State list. (Health & Safety Code, § 25249.10, subd. (b).) Lead
15 was listed as a chemical known to the State of California to cause developmental toxicity in the
16 fetus and male and female reproductive toxicity on February 27, 1987. Lead was listed as a
17 chemical known to the State of California to cause cancer on October 1, 1992. (Cal. Code Regs., tit.
18 27, § 27001.)

19 14. The Maximum Allowable Dose Level for lead as a chemical known to cause
20 developmental toxicity is 0.5 micrograms per day. (Cal. Code Regs., tit. 27, § 25805.) The No
21 Significant Risk Level for lead as a carcinogen is 15 micrograms per day. (Cal. Code Regs., tit.
22 27, § 25705.)

23 15. Proposition 65 may be enforced by any person in the public interest who provides
24 notice sixty days before filing suit to both the violator and designated law enforcement officials.
25 The failure of law enforcement officials to file a timely complaint enables a citizen suit to be filed
26 pursuant to Health & Safety Code section 25249.7, subdivisions (c) and (d).

27 16. Proposition 65 provides that any person “violating or threatening to violate” Proposition
28 65 may be enjoined in any court of competent jurisdiction. (Health & Safety Code, § 25249.7,

1 subd. (a).) To “threaten to violate” means “to create a condition in which there is a substantial
2 probability that a violation will occur.” (Health & Safety Code, § 25249.11, subd. (e).)
3 Furthermore, violators are subject to a civil penalty of up to \$2,500 per day for each violation.
4 (Health & Safety Code, § 25249.7, subd. (b)(1).

5
6 V

7 **STATEMENT OF FACTS**

8 17. First Fitness has manufactured, distributed and/or sold the Covered Products
9 containing lead to the State of California. Consumers have been ingesting these products for
10 many years, without any knowledge of their exposure to lead, a very dangerous chemical.

11 18. For many years, First Fitness has knowingly and intentionally exposed numerous
12 persons to lead, without providing a Proposition 65 warning. Prior to ERC’s Notice of Violation,
13 First Fitness failed to provide a warning on the label of the Covered Products. First Fitness has at
14 all times relevant hereto been aware that the Covered Products contained lead and that persons using
15 these products have been exposed to the chemical. First Fitness’ website represents to the public
16 that the company’s products contain the highest quality ingredients, and possess healing and life
17 enhancing proprieties. The website claims that First Fitness collaborates with various medical and
18 health professionals in developing the company’s products. The website “pledges” that First Fitness
19 will “always offer products that meet the highest and most exacting standards of quality, purity, and
20 effectiveness.” The website further acknowledges that “each distributor and customer we reach is
21 putting their trust in our brand, our integrity, and our leadership.” First Fitness has been aware of
22 the lead in the Covered Products and has failed to disclose the presence of this chemical to the
23 public, who undoubtedly believed they have been ingesting totally healthy and pure products.

24 19. Both prior and subsequent to ERC’s Notice of Violation, First Fitness failed to provide
25 consumers of the Covered Products with a clear and reasonable warning that they have been
26 exposed to a chemical known to the State of California to cause cancer, birth defects and other
27 reproductive harm.

1 **FIRST CAUSE OF ACTION**

2 **(Violation of Section 25249.6 of the Health and Safety Code, Failure to Provide Clear**
3 **and Reasonable Warning under Proposition 65)**

4 20. ERC refers to paragraphs 1-19, inclusive, and incorporates them herein by this
5 reference.

6 21. By committing the acts alleged above, First Fitness has, in the course of doing business,
7 knowingly and intentionally exposed users of the Covered Products to lead, a chemical known to
8 the State of California to cause cancer, birth defects and other reproductive harm without first giving
9 clear and reasonable warning to such individuals, within the meaning of Health & Safety Code
10 section 25249.6.

11 22. Said violations render First Fitness liable for civil penalties up to \$2,500 per day, for
12 each violation.

13 **SECOND CAUSE OF ACTION**

14 **(Declaratory Relief)**

15 23. ERC refers to paragraphs 1-22, inclusive, and incorporates them herein by this
16 reference.

17 24. There exists an actual controversy relating to the legal rights and duties of the parties,
18 within the meaning of Code of Civil Procedure section 1060, between ERC and First Fitness
19 concerning whether First Fitness has exposed individuals to a chemical known to the State of
20 California to cause cancer, birth defects and other reproductive harm without providing clear and
21 reasonable warning.

22 **VI**

23 **PRAYER**

24 WHEREFORE ERC prays for relief as follows:

- 25 1. On the First Cause of Action, for civil penalties for each and every violation according to
26 proof;
- 27 2. On the First Cause of Action, and pursuant to Health & Safety Code section 25249.7,
28 subdivision (a), for such temporary restraining orders, preliminary and permanent injunctive orders,

1 or other orders, prohibiting First Fitness from exposing persons to lead without providing clear and
2 reasonable warning;

3 3. On the Second Cause of Action, for a declaratory judgment pursuant to Code of Civil
4 Procedure section 1060 declaring:

5 a. that First Fitness has exposed individuals to a chemical known to the State of
6 California to cause, birth defects and other reproductive harm without providing clear and
7 reasonable warning; and

8 4. On all Causes of Action, for reasonable attorneys' fees pursuant to section 1021.5 of the
9 Code of Civil Procedure or the substantial benefit theory;

10 5. For costs of suit herein; and

11 6. For such other relief as the Court may deem just and proper.

12
13 Dated: June 17, 2013

14
15 By



16
17 Ryan Hoffman
18 Attorney for Environmental Research Center

MICHAEL FREUND

ATTORNEY AT LAW
1915 ADDISON STREET
BERKELEY, CALIFORNIA 94704-101

TEL 510/540-1992
FAX 510/540-5543
EMAIL FREUND1@AOL.COM

August 5, 2011

**NOTICE OF VIOLATIONS OF
CALIFORNIA HEALTH & SAFETY CODE SECTION 25249.5 ET SEQ.
(PROPOSITION 65)**

Dear Alleged Violator and the Appropriate Public Enforcement Agencies:

I represent Environmental Research Center ("ERC"), 5694 Mission Center Road #199, San Diego, CA 92108; Tel. (619) 309- 4194. ERC's Executive Director is Chris Heptinstall. ERC is a California non-profit corporation dedicated to, among other causes, helping safeguard the public from health hazards by bringing about a reduction in the use and misuse of hazardous and toxic chemicals, facilitating a safe environment for consumers and employees, and encouraging corporate responsibility.

ERC has identified violations of California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65"), which is codified at California Health & Safety Code §25249.5 *et seq.*, with respect to the products identified below. These violations have occurred and continue to occur because the alleged Violator identified below failed to provide required clear and reasonable warnings with these products. This letter serves as a notice of these violations to the alleged Violator and the appropriate public enforcement agencies. Pursuant to Section 25249.7(d) of the statute, ERC intends to file a private enforcement action in the public interest 60 days after effective service of this notice unless the public enforcement agencies have commenced and are diligently prosecuting an action to rectify these violations.

General Information about Proposition 65. A copy of a summary of Proposition 65, prepared by the Office of Environmental Health Hazard Assessment, is an attachment with the copy of this letter served to the alleged Violator identified below.

Alleged Violator. The name of the company covered by this notice that violated Proposition 65 (hereinafter "the Violator") is:

First Fitness International, Inc.

Consumer Products and Listed Chemicals. The products that are the subject of this notice and the chemicals in those products identified as exceeding allowable levels are:

FirstFitness RejuvacCel with Glucosanol - Lead
FirstFitness LipoMax Liver Cleanse - Lead
FirstFitness Renu Ultimate Colon Cleanse - Lead
FirstFitness Slim 'N Up! Xtreme -Lead

Exhibit A

August 5, 2011

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**FirstFitness Vital Green Plus -Lead
FirstFitness Suddenly Slim Body FX Tropical Crème Weight Control Beverage
Mix -Lead**

On February 27, 1987, the State of California officially listed lead as a chemical known to cause developmental toxicity, and male and female reproductive toxicity. On October 1, 1992, the State of California officially listed lead and lead compounds as chemicals known to cause cancer.

It should be noted that ERC may continue to investigate other products that may reveal further violations and result in subsequent notices of violations.

Route of Exposure. The consumer exposures that are the subject of this notice result from the purchase, acquisition, handling and recommended use of these products. Consequently, the primary route of exposure to these chemicals has been and continues to be through ingestion, but may have also occurred and may continue to occur through inhalation and/or dermal contact.

Approximate Time Period of Violations. Ongoing violations have occurred every day since at least August 5, 2008, as well as every day since the products were introduced into the California marketplace, and will continue every day until clear and reasonable warnings are provided to product purchasers and users or until these known toxic chemicals are either removed from or reduced to allowable levels in the products. Proposition 65 requires that a clear and reasonable warning be provided prior to exposure to the identified chemicals. The method of warning should be a warning that appears on the product label. The Violator violated Proposition 65 because it failed to provide persons handling and/or using these products with appropriate warnings that they are being exposed to these chemicals.

Consistent with the public interest goals of Proposition 65 and a desire to have these ongoing violations of California law quickly rectified, ERC is interested in seeking a constructive resolution of this matter that includes an enforceable written agreement by the Violator to: (1) reformulate the identified products so as to eliminate further exposures to the identified chemicals, or provide appropriate warnings on the labels of these products; and (2) pay an appropriate civil penalty. Such a resolution will prevent further unwarned consumer exposures to the identified chemicals, as well as an expensive and time consuming litigation.

ERC has retained me as legal counsel in connection with this matter. **Please direct all communications regarding this Notice of Violations to my attention at the law office address and telephone number indicated on the letterhead.**

Sincerely,



Michael Freund, Esq.

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*

August 5, 2011

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Attachments

Certificate of Merit

Certificate of Service

OEHHA Summary (to First Fitness International, Inc. and its Registered Agent for
Service of Process only)

Additional Supporting Information for Certificate of Merit (to AG only)

CERTIFICATE OF MERIT

Re: Environmental Research Center's Notice of Proposition 65 Violations by First Fitness International, Inc.

I, Michael Freund, declare:

1. This Certificate of Merit accompanies the attached 60-day notice in which it is alleged the parties identified in the notice violated California Health & Safety Code Section 25249.6 by failing to provide clear and reasonable warnings.

2. I am an attorney for the noticing party.

3. I have consulted with one or more persons with relevant and appropriate experience or expertise who have reviewed facts, studies, or other data regarding the exposure to the listed chemicals that are the subject of the notice.

4. Based on the information obtained through those consultants, and on 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 plaintiff's case can be established and that the information did not prove that the alleged Violator will be able to establish any of the affirmative defenses set forth in the statute.

5. Along with the copy of this Certificate of Merit served on the Attorney General is attached additional factual information sufficient to establish the basis for this certificate, including the information identified in California Health & Safety Code §25249.7(h)(2), i.e., (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: August 5, 2011



Michael Freund

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury under the laws of the State of California that the following is true and correct:

I am a citizen of the United States, over the age of 18 years of age, and am not a party to the within entitled action. My business address is 306 Joy Street, Fort Oglethorpe, Georgia 30742

On August 5, 2011 I served the following documents: **NOTICE OF VIOLATIONS OF CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; "THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY"** on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to the party listed below and depositing it in a US Postal Service Office for delivery by Certified Mail:

Current CEO or President
First Fitness International, Inc.
1430 Bradley Lane, Suite 196
Carrollton, TX 75007

Nigel P. Branson
First Fitness International, Inc.'s
(Registered Agent for Service of Process)
1430 Bradley Lane, Suite 196
Carrollton, TX 75007

On August 5, 2011 I served the following documents: **NOTICE OF VIOLATION, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; ADDITIONAL SUPPORTING INFORMATION FOR CERTIFICATE OF MERIT AS REQUIRED BY CALIFORNIA HEALTH & SAFETY CODE §25249.7(d)(1)** on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to the party listed below and depositing it in a US Postal Service Office for delivery by Certified Mail:

Office of the California Attorney General
Prop 65 Enforcement Reporting
1515 Clay Street, Suite 2000
Post Office Box 70550
Oakland, CA 94612-0550

On August 5, 2011 I served the following documents: **NOTICE OF VIOLATION, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT** on each of the parties on the Service List attached hereto by placing a true and correct copy thereof in a sealed envelope, addressed to each of the parties **on the Service List attached hereto**, and depositing it with the U.S. Postal Service for delivery by Priority Mail.

Executed on August 5, 2011 in Fort Oglethorpe, Georgia.



Chris Heptinstall

Service List

District Attorney, Alameda County
1225 Fallon Street, Room 900
Oakland, CA 94612

District Attorney, Alpine County
P.O. Box 248
Markleeville, CA 96120

District Attorney, Amador County
708 Court Street, #202
Jackson, CA 95642

District Attorney, Butte County
25 County Center Drive
Oroville, CA 95965

District Attorney, Calaveras County
891 Mountain Ranch Road
San Andreas, CA 95249

District Attorney, Colusa County
547 Market Street
Colusa, CA 95932

District Attorney, Contra Costa County
900 Ward Street
Martinez, CA 94553

District Attorney, Del Norte County
450 H Street, Ste. 171
Crescent City, CA 95531

District Attorney, El Dorado County
515 Main Street
Placerville, CA 95667

District Attorney, Fresno County
2220 Tulare Street, #1000
Fresno, CA 93721

District Attorney, Glenn County
Post Office Box 430
Willows, CA 95988

District Attorney, Humboldt County
825 5th Street
Eureka, CA 95501

District Attorney, Imperial County
939 West Main Street, Ste 102
El Centro, CA 92243

District Attorney, Inyo County
230 W. Line Street
Bishop, CA 93514

District Attorney, Kern County
1215 Truxtun Avenue
Bakersfield, CA 93301

District Attorney, Kings County
1400 West Lacey Boulevard
Hanford, CA 93230

District Attorney, Lake County
255 N. Forbes Street
Lakeport, CA 95453

District Attorney, Lassen County
220 South Lassen Street, Ste. 8
Susanville, CA 96130

District Attorney, Los Angeles County
210 West Temple Street, Rm 345
Los Angeles, CA 90012

District Attorney, Madera County
209 West Yosemite Avenue
Madera, CA 93637

District Attorney, Marin County
3501 Civic Center, Room 130
San Rafael, CA 94903

District Attorney, Mariposa County
Post Office Box 730
Mariposa, CA 95338

District Attorney, Mendocino County
Post Office Box 1000
Ukiah, CA 95482

District Attorney, Merced County
2222 M Street
Merced, CA 95340

District Attorney, Modoc County
204 S Court Street, Room 202
Alturas, CA 96101-4020

District Attorney, Mono County
Post Office Box 617
Bridgeport, CA 93517

District Attorney, Monterey County
230 Church Street, Bldg 2
Salinas, CA 93901

District Attorney, Napa County
931 Parkway Mall
Napa, CA 94559

District Attorney, Nevada County
110 Union Street
Nevada City, CA 95959

District Attorney, Orange County
401 Civic Center Drive West
Santa Ana, CA 92701

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*

August 5, 2011

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District Attorney, Placer County
10810 Justice Center Drive, Ste 240
Roseville, CA 95678

District Attorney, Plumas County
520 Main Street, Room 404
Quincy, CA 95971

District Attorney, Riverside County
4075 Main Street, 1st Floor
Riverside, CA 92501

District Attorney, Sacramento County
901 "G" Street
Sacramento, CA 9581

District Attorney, San Benito County
419 Fourth Street, 2nd Floor
Hollister, CA 95023

District Attorney, San Bernardino County
316 N. Mountain View Avenue
San Bernardino, CA 92415-0004

District Attorney, San Diego County
330 West Broadway, Room 1300
San Diego, CA 92101

District Attorney, San Francisco County
850 Bryant Street, Room 325
San Francisco, CA 94103

District Attorney, San Joaquin County
Post Office Box 990
Stockton, CA 95201

District Attorney, San Luis Obispo County
1050 Monterey Street, Room 450
San Luis Obispo, CA 93408

District Attorney, San Mateo County
400 County Ctr., 3rd Floor
Redwood City, CA 94063

District Attorney, Santa Barbara County
1105 Santa Barbara Street
Santa Barbara, CA 93101

District Attorney, Santa Clara County
70 West Hedding Street
San Jose, CA 95110

District Attorney, Santa Cruz County
701 Ocean Street, Room 200
Santa Cruz, CA 95060

District Attorney, Shasta County
1525 Court Street, Third Floor
Redding, CA 96001-1632

District Attorney, Sierra County
PO Box 457
Downieville, CA 95936

District Attorney, Siskiyou County
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Yreka, CA 96097

District Attorney, Solano County
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Fairfield, CA 94533

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Modesto, CA 95353

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Yuba City, CA 95991

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District Attorney, Trinity County
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District Attorney, Tulare County
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Visalia, CA 93291

District Attorney, Tuolumne County
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Sonora, CA 95370

District Attorney, Ventura County
800 South Victoria Avenue
Ventura, CA 93009

District Attorney, Yolo County
301 2nd Street
Woodland, CA 95695

District Attorney, Yuba County
215 Fifth Street
Marysville, CA 95901

Los Angeles City Attorney's Office
City Hall East
200 N. Main Street, Rm 800
Los Angeles, CA 90012

San Diego City Attorney's Office
1200 3rd Avenue, Ste 1620
San Diego, CA 92101

San Francisco City Attorney's Office
City Hall, Room 234
1 Drive Carlton B Goodlett Place
San Francisco, CA 94102

San Jose City Attorney's Office
200 East Santa Clara Street
San Jose, CA 95113