

1 Reuben Yeroushalmi (SBN 193981)
2 **YEROUSHALMI & YEROUSHALMI**
3 An Association of Independent Law Corporations
4 9100 Wilshire Boulevard, Suite 240W
5 Beverly Hills, California 90212
6 Telephone: (310) 623-1926
7 Facsimile: (310) 623-1930

8 Attorneys for Plaintiff,
9 Consumer Advocacy Group, Inc.

FILED
Superior Court of California
County of Los Angeles
09/18/2020

Sherri R. Carter, Executive Officer / Clerk of Court
By: R. Cruz Deputy

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES**

12 CONSUMER ADVOCACY GROUP, INC.,
13 in the public interest,

14 Plaintiff,

15 v.

16 TAWA SUPERMARKET, INC.
17 DBA 99 RANCH MARKET
18 DBA168 MARKET, a California
19 Corporation,
20 CHEVALIER INTERNATIONAL (USA)
21 INC., a California Corporation,
22 and DOES 1-30.

23 Defendants.

CASE NO. 19STCV15622

**FIRST AMENDED COMPLAINT FOR
PENALTY AND INJUNCTION**

Violation of Proposition 65, the Safe
Drinking Water and Toxic Enforcement
Act of 1986 (*Health & Safety Code*, §
25249.5, *et seq.*)

ACTION IS AN UNLIMITED CIVIL
CASE (exceeds \$25,000)

24 Plaintiff CONSUMER ADVOCACY GROUP, INC. alleges a cause of action against defendants
25 TAWA SUPERMARKET, INC DBA 99 RANCH MARKET DBA 168 MARKET,
26 CHEVALIER INTERNATIONAL (USA) INC., and DOES 1-30 as follows.

27 //

28 //

//

THE PARTIES

1. Plaintiff CONSUMER ADVOCACY GROUP, INC. (“Plaintiff” or “CAG”) is an organization qualified to do business in the State of California. CAG is a person within the meaning of Health and Safety Code section 25249.11, subdivision (a). CAG, acting as a private attorney general, brings this action in the public interest as defined under Health and Safety Code section 25249.7, subdivision (d).
2. Defendant TAWA SUPERMARKET, INC. DBA 99 RANCH MARKET DBA 168 MARKET (“TAWA”) is a California corporation, qualified to do business and doing business in the State of California at all relevant times herein.
3. Defendant CHEVALIER INTERNATIONAL (USA) INC. (“CHEVALIER”) is a California corporation, qualified to do business and doing business in the State of California at all relevant times herein.
4. Plaintiff is presently unaware of the true names and capacities of defendants DOES 1-30, and therefore sues these defendants by such fictitious names. Plaintiff will amend this complaint to allege their true names and capacities when ascertained. Plaintiff is informed, believes, and thereon alleges that each fictitiously named defendant is responsible in some manner for the occurrences herein alleged and the damages caused thereby.
5. At all times mentioned herein, the term “Defendants” includes TAWA, CHEVALIER, and DOES 1-30.
6. Plaintiff is informed and believes, and thereon alleges that each of the Defendants at all times mentioned herein have conducted business within the State of California.
7. Upon information and belief, at all times relevant to this action, each of the Defendants, including DOES 1-30, was an agent, servant, or employee of each of the other Defendants. In conducting the activities alleged in this Complaint, each of the Defendants was acting within the course and scope of this agency, service, or

1 employment, and was acting with the consent, permission, and authorization of each of
2 the other Defendants. All actions of each of the Defendants alleged in this Complaint
3 were ratified and approved by every other Defendant or their officers or managing agents.
4 Alternatively, each of the Defendants aided, conspired with and/or facilitated the alleged
5 wrongful conduct of each of the other Defendants.

- 6 8. Plaintiff is informed, believes, and thereon alleges that at all relevant times, each of the
7 Defendants was a person doing business within the meaning of Health and Safety Code
8 section 25249.11, subdivision (b), and that each of the Defendants had ten (10) or more
9 employees at all relevant times.

10 **JURISDICTION**

- 11 9. The Court has jurisdiction over this lawsuit pursuant to California Constitution Article
12 VI, Section 10, which grants the Superior Court original jurisdiction in all causes except
13 those given by statute to other trial courts. This Court has jurisdiction over this action
14 pursuant to Health and Safety Code section 25249.7, which allows enforcement of
15 violations of Proposition 65 in any Court of competent jurisdiction.

- 16 10. This Court has jurisdiction over Defendants named herein because Defendants either
17 reside or are located in this State or are foreign corporations authorized to do business in
18 California, are registered with the California Secretary of State, or who do sufficient
19 business in California, have sufficient minimum contacts with California, or otherwise
20 intentionally avail themselves of the markets within California through their manufacture,
21 distribution, promotion, marketing, or sale of their products within California to render
22 the exercise of jurisdiction by the California courts permissible under traditional notions
23 of fair play and substantial justice.

- 24 11. Venue is proper in the County of Los Angeles because one or more of the instances of
25 wrongful conduct occurred, and continues to occur, in the County of Los Angeles and/or
26
27
28

1 because Defendants conducted, and continue to conduct, business in the County of Los
2 Angeles with respect to the consumer product that is the subject of this action.

3 **BACKGROUND AND PRELIMINARY FACTS**

4 12. In 1986, California voters approved an initiative to address growing concerns about
5 exposure to toxic chemicals and declared their right “[t]o be informed about exposures to
6 chemicals that cause cancer, birth defects, or other reproductive harm.” Ballot Pamp.,
7 Proposed Law, Gen. Elec. (Nov. 4, 1986) at p. 3. The initiative, The Safe Drinking
8 Water and Toxic Enforcement Act of 1986, codified at Health and Safety Code sections
9 25249.5, *et seq.* (“Proposition 65”), helps to protect California’s drinking water sources
10 from contamination, to allow consumers to make informed choices about the products
11 they buy, and to enable persons to protect themselves from toxic chemicals as they see
12 fit.

13 13. Proposition 65 requires the Governor of California to publish a list of chemicals known to
14 the state to cause cancer, birth defects, or other reproductive harm. *Health & Safety Code*
15 § 25249.8. The list, which the Governor updates at least once a year, contains over 700
16 chemicals and chemical families. Proposition 65 imposes warning requirements and
17 other controls that apply to Proposition 65-listed chemicals.

18 14. All businesses with ten (10) or more employees that operate or sell products in California
19 must comply with Proposition 65. Under Proposition 65, businesses are: (1) prohibited
20 from knowingly discharging Proposition 65-listed chemicals into sources of drinking
21 water (*Health & Safety Code* § 25249.5), and (2) required to provide “clear and
22 reasonable” warnings before exposing a person, knowingly and intentionally, to a
23 Proposition 65-listed chemical (*Health & Safety Code* § 25249.6).

24 15. Proposition 65 provides that any person "violating or threatening to violate" the statute
25 may be enjoined in any court of competent jurisdiction. *Health & Safety Code* § 25249.7.
26 "Threaten to violate" means "to create a condition in which there is a substantial
27
28

1 probability that a violation will occur." *Health & Safety Code* § 25249.11(e).

2 Defendants are also liable for civil penalties of up to \$2,500.00 per day per violation,
3 recoverable in a civil action. *Health & Safety Code* § 25249.7(b).

4 16. Plaintiff identified certain practices of manufacturers and distributors of Dried
5 Anchovies, Dried Squid, and Dried Seaweed of exposing, knowingly and intentionally,
6 persons in California to the Proposition 65-listed chemicals of such products without first
7 providing clear and reasonable warnings of such to the exposed persons prior to the time
8 of exposure. Plaintiff later discerned that Defendants engaged in such practice.

9 17. On October 1, 1992, the Governor of California added Lead and Lead Compounds
10 ("LEAD") to the list of chemicals known to the State to cause cancer (*Cal. Code Regs.*
11 tit. 27, § 27001(b)). Pursuant to Health and Safety Code sections 25249.9 and 25249.10,
12 twenty (20) months after addition of LEAD to the list of chemicals known to the State to
13 cause cancer, LEAD became fully subject to Proposition 65 warning requirements and
14 discharge prohibitions.

15 18. On October 1, 1987, the Governor of California added Cadmium and Cadmium
16 Compounds ("CADMIUM") to the list of chemicals known to the State to cause cancer
17 (*Cal. Code Regs.* tit. 27, § 27001(b)). Pursuant to Health and Safety Code sections
18 25249.9 and 25249.10, twenty (20) months after addition of CADMIUM to the list of
19 chemicals known to the State to cause cancer, CADMIUM became fully subject to
20 Proposition 65 warning requirements and discharge prohibitions.

21 19. On Feb. 27, 1987, the Governor of California added LEAD to the list of chemicals known
22 to the State to cause reproductive toxicity (*Cal. Code Regs.* tit. 27, § 27001(c)). LEAD is
23 known to the State to cause developmental, female, and male reproductive toxicity.
24 Pursuant to Health and Safety Code sections 25249.9 and 25249.10, twenty (20) months
25 after addition of LEAD to the list of chemicals known to the State to cause reproductive
26

1 toxicity, LEAD became fully subject to Proposition 65 warning requirements and
2 discharge prohibitions.

3 20. On May 1, 1997 the Governor of California added CADMIUM to the list of chemicals
4 known to the State to cause reproductive toxicity (*Cal. Code Regs. tit. 27, § 27001(c)*).
5 Lead is known to the State to cause developmental, and male reproductive toxicity.
6 Pursuant to Health and Safety Code sections 25249.9 and 25249.10, twenty (20) months
7 after addition of CADMIUM to the list of chemicals known to the State to cause
8 reproductive toxicity, CADMIUM became fully subject to Proposition 65 warning
9 requirements and discharge prohibitions.

10 **SATISFACTION OF PRIOR NOTICE**

11 21. On or about August 29, 2018, Plaintiff gave notice of alleged violations of Health and
12 Safety Code section 25249.6, concerning consumer products exposures, subject to a
13 private action to TAWA and to the California Attorney General, County District
14 Attorneys, and City Attorneys for each city containing a population of at least 750,000
15 people in whose jurisdictions the violations allegedly occurred, concerning the products
16 Dried Anchovies and Dried Squid.

17 22. On or about January 18, 2019 Plaintiff gave notice of alleged violations of Health and
18 Safety Code section 25249.6, concerning consumer products exposures, subject to a
19 private action to TAWA and to the California Attorney General, County District
20 Attorneys, and City Attorneys for each city containing a population of at least 750,000
21 people in whose jurisdictions the violations allegedly occurred, concerning the product
22 Dried Seaweed.

23 23. On or about December 23, 2019 Plaintiff gave notice of alleged violations of Health and
24 Safety Code section 25249.6, concerning consumer products exposures, subject to a
25 private action to CHEVALIER and to the California Attorney General, County District
26 Attorneys, and City Attorneys for each city containing a population of at least 750,000
27
28

1 people in whose jurisdictions the violations allegedly occurred, concerning the product
2 Dried Seaweed.

3 24. Before sending the notices of alleged violation, Plaintiff investigated the consumer
4 products involved, the likelihood that such products would cause users to suffer
5 significant exposures to LEAD and CADMIUM, and the corporate structure of each of
6 the Defendants.

7 25. Plaintiff's notices of alleged violation included Certificates of Merit executed by the
8 attorney for the noticing party, CAG. The Certificates of Merit stated that the attorney for
9 Plaintiff who executed the certificate had consulted with at least one person with relevant
10 and appropriate expertise who reviewed data regarding the exposures to LEAD and
11 CADMIUM, the subject Proposition 65-listed chemicals of this action. Based on that
12 information, the attorney for Plaintiff who executed the Certificates of Merit believed
13 there was a reasonable and meritorious case for this private action. The attorney for
14 Plaintiff attached to the Certificate of Merit served on the Attorney General the
15 confidential factual information sufficient to establish the basis of the Certificates of
16 Merit.

17 26. Plaintiff's notices of alleged violations also included Certificates of Service and a
18 document entitled "The Safe Drinking Water & Toxic Enforcement Act of 1986
19 (Proposition 65) A Summary." *Health & Safety Code § 25249.7(d)*.

20 27. Plaintiff is commencing this action more than sixty (60) days from the dates that Plaintiff
21 gave notices of the alleged violations to TAWA, CHEVALIER, and the public
22 prosecutors referenced in Paragraphs 21-23.

23 28. Plaintiff is informed, believes, and thereon alleges that neither the Attorney General, nor
24 any applicable district attorney or city attorney has commenced and is diligently
25 prosecuting an action against the Defendants.

1 **FIRST CAUSE OF ACTION**

2 **(By CONSUMER ADVOCACY GROUP, INC. and against TAWA, and DOES 1-10**
3 **for Violations of Proposition 65, The Safe Drinking Water and Toxic Enforcement**
4 **Act of 1986 (*Health & Safety Code, §§ 25249.5, et seq.*))**

5 **Dried Seafood**

6 29. Plaintiff CONSUMER ADVOCACY GROUP, INC. repeats and incorporates by
7 reference paragraphs 1 through 28 of this complaint as though fully set forth herein.

8 30. Each of the Defendants is, and at all times mentioned herein was, a manufacturer,
9 distributor, promoter, or retailer of Dried Anchovies (“Anchovies”), including but not
10 limited to, “CARL’S;” “CRISPY ANCHOVY;” “DILIS;” “NET WT. 1.41 OZ (40G);”
11 “SERVING SIZE 40G;” “MANUFACTURED BY: LA CARLOTA FOOD
12 ENTERPRISE;” “PRODUCT OF THE PHILIPPINES;” “CFRR-RIV-FM-3182;” “4
13 809011 259270;” “4 809011 259263”.

14 31. Anchovies contain LEAD and CADMIUM.

15 32. Defendants knew or should have known that LEAD and CADMIUM have been identified
16 by the State of California as a chemical known to cause cancer and reproductive toxicity
17 and therefore was subject to Proposition 65 warning requirements. Defendants were also
18 informed of the presence of LEAD and CADMIUM in Anchovies within Plaintiff’s
19 notice of alleged violations further discussed above at Paragraph 21.

20 33. Plaintiff’s allegations regarding Anchovies concerns “[c]onsumer products exposure[s],”
21 which “is an exposure that results from a person’s acquisition, purchase, storage,
22 consumption, or other reasonably foreseeable use of a consumer good, or any exposure
23 that results from receiving a consumer service.” *Cal. Code Regs. tit. 27, § 25602(b)*.
24 Anchovies are consumer products, and, as mentioned herein, exposures to LEAD and
25 CADMIUM took place as a result of such normal and foreseeable consumption and use.

26 34. Plaintiff is informed, believes, and thereon alleges that between Aug. 29, 2015 and the
27 present, each of the Defendants knowingly and intentionally exposed their California
28 consumers and users of Anchovies, which Defendants manufactured, distributed, or sold
as mentioned above, to LEAD and CADMIUM, without first providing any type of clear
and reasonable warning of such to the exposed persons before the time of exposure.
Defendants have distributed and sold Anchovies in California. Defendants know and

1 intend that California consumers will use and consume Anchovies thereby exposing them
2 to LEAD and CADMIUM. Defendants thereby violated Proposition 65.

3 35. The principal routes of exposure with regard to Anchovies are and were through ingestion,
4 inhalation, and trans-dermal absorption. Persons sustain exposures primarily by eating and
5 consuming Anchovies, and additionally by handling Anchovies without wearing gloves or
6 any other personal protective equipment, or by touching bare skin or mucous membranes
7 with gloves after handling Seaweed as well as through direct and indirect hand to mouth
8 contact, hand to mucous membrane, or even breathing in particulate matter dispersed from
9 Seaweed.

10 36. Plaintiff is informed, believes, and thereon alleges that each of Defendants' violations of
11 Proposition 65 as to Anchovies have been ongoing and continuous, as Defendants
12 engaged and continue to engage in conduct which violates Health and Safety Code
13 section 25249.6, including the manufacture, distribution, promotion, and sale of
14 Anchovies, so that a separate and distinct violation of Proposition 65 occurred each and
15 every time a person was exposed to LEAD and CADMIUM by Anchovies as mentioned
16 herein.

17 37. Plaintiff is informed, believes, and thereon alleges that each violation of Proposition 65
18 mentioned herein is ever continuing. Plaintiff further alleges and believes that the
19 violations alleged herein will continue to occur into the future.

20 38. Based on the allegations herein, Defendants are liable for civil penalties of up to
21 \$2,500.00 per day per individual exposure to LEAD and CADMIUM from Anchovies,
22 pursuant to Health and Safety Code section 25249.7(b).

23 39. Plaintiff has engaged in good faith efforts to resolve the claims alleged herein prior to
24 filing this Complaint.

25 //

26 //

27 //

28 //

1 **SECOND CAUSE OF ACTION**

2 **(By CONSUMER ADVOCACY GROUP, INC. and against TAWA and DOES 11-**
3 **20 for Violations of Proposition 65, The Safe Drinking Water and Toxic**
4 **Enforcement Act of 1986 (*Health & Safety Code, §§ 25249.5, et seq.*))**

5 **Dried Seafood 2**

6 40. Plaintiff CONSUMER ADVOCACY GROUP, INC. repeats and incorporates by
7 reference paragraphs 1 through 39 of this complaint as though fully set forth herein.

8 41. Each of the Defendants is, and at all times mentioned herein was, a manufacturer,
9 distributor, promoter, or retailer of Dried Squid (“Squid”), defined as “CARL’S;”
10 “CRISPY SQUID;” “PUSIT;” “NET WT. 1.41 OZ (40G);” “SERVING SIZE 40G;”
11 “MANUFACTURED BY: LA CARLOTA FOOD ENTERPRISE;” “PRODUCT OF
12 THE PHILIPPINES;” “CFFR-RIV-FM-3182;” “4 809011 259089;” “4 809011 259256”

13 42. Squid contains LEAD and CADMIUM.

14 43. Defendants knew or should have known that LEAD and CADMIUM have been identified
15 by the State of California as a chemical known to cause cancer and reproductive toxicity
16 and therefore was subject to Proposition 65 warning requirements. Defendants were also
17 informed of the presence of LEAD and CADMIUM in Squid within Plaintiff’s notice of
18 alleged violations further discussed above at Paragraph 21.

19 44. Plaintiff’s allegations regarding Squid concerns “[c]onsumer products exposure[s],”
20 which “is an exposure that results from a person’s acquisition, purchase, storage,
21 consumption, or other reasonably foreseeable use of a consumer good, or any exposure
22 that results from receiving a consumer service.” *Cal. Code Regs. tit. 27, § 25602(b).*

23 Squid is a consumer products, and, as mentioned herein, exposures to LEAD and
24 CADMIUM took place as a result of such normal and foreseeable consumption and use.

25 45. Plaintiff is informed, believes, and thereon alleges that between August 29, 2015 and the
26 present, each of the Defendants knowingly and intentionally exposed California
27 consumers and users of Squid, which Defendants manufactured, distributed, or sold as
28 mentioned above, to LEAD and CADMIUM, without first providing any type of clear
and reasonable warning of such to the exposed persons before the time of exposure.

Defendants have distributed and sold Squid in California. Defendants know and intend

1 that California consumers will use and consume Squid, thereby exposing them to LEAD
2 and CADMIUM. Defendants thereby violated Proposition 65.

3 46. The principal routes of exposure with regard Squid are and were through ingestion,
4 inhalation, and trans-dermal absorption. Persons sustain exposures primarily by eating and
5 consuming Squid, and additionally by handling Squid without wearing gloves or any other
6 personal protective equipment, or by touching bare skin or mucous membranes with gloves
7 after handling Squid as well as through direct and indirect hand to mouth contact, hand to
8 mucous membrane, or even breathing in particulate matter dispersed from Squid.

9 47. Plaintiff is informed, believes, and thereon alleges that each of Defendants' violations of
10 Proposition 65 as to Squid have been ongoing and continuous, as Defendants engaged
11 and continue to engage in conduct which violates Health and Safety Code section
12 25249.6, including the manufacture, distribution, promotion, and sale of Squid, so that a
13 separate and distinct violation of Proposition 65 occurred each and every time a person
14 was exposed to Lead and Cadmium by Squid as mentioned herein.

15 48. Plaintiff is informed, believes, and thereon alleges that each violation of Proposition 65
16 mentioned herein is ever continuing. Plaintiff further alleges and believes that the
17 violations alleged herein will continue to occur into the future.

18 49. Based on the allegations herein, Defendants are liable for civil penalties of up to
19 \$2,500.00 per day per individual exposure to LEAD and CADMIUM from Squid,
20 pursuant to Health and Safety Code section 25249.7(b).

21 50. Plaintiff has engaged in good faith efforts to resolve the claims alleged herein prior to
22 filing this Complaint.

23 **THIRD CAUSE OF ACTION**

24 **(By CONSUMER ADVOCACY GROUP, INC. and against TAWA, CHEVALIER,
25 and DOES 21-30 for Violations of Proposition 65, The Safe Drinking Water and
26 Toxic Enforcement Act of 1986 (*Health & Safety Code*, §§ 25249.5, *et seq.*))
27 Seaweed**

28 51. Plaintiff CONSUMER ADVOCACY GROUP, INC. repeats and incorporates by
reference paragraphs 1 through 50 of this complaint as though fully set forth herein.

1 52. Each of the Defendants is, and at all times mentioned herein was, a manufacturer,
2 distributor, promoter, or retailer of Dried Seaweed (“Seaweed”), defined as “HANHENG
3 TASTE;” “WILDNESS SUPERFINE;” “DRIED SEAWEED;” “PRODUCT OF
4 CHINA;” “NET WEIGHT: 60G(2OZ);” “DISTRIBUTED BY: ZAP EXPO CENTER
5 INC;” “6 930248 687180”.

6 53. Seaweed contains LEAD and CADMIUM.

7 54. Defendants knew or should have known that LEAD and CADMIUM have been identified
8 by the State of California as a chemical known to cause cancer and reproductive toxicity
9 and therefore was subject to Proposition 65 warning requirements. Defendants were also
10 informed of the presence of LEAD and CADMIUM in Seaweed within Plaintiff's notice
11 of alleged violations further discussed above at Paragraphs 22-23.

12 55. Plaintiff's allegations regarding Seaweed concerns “[c]onsumer products exposure[s],”
13 which “is an exposure that results from a person’s acquisition, purchase, storage,
14 consumption, or other reasonably foreseeable use of a consumer good, or any exposure
15 that results from receiving a consumer service.” *Cal. Code Regs. tit. 27, § 25602(b)*.

16 Seaweed is a consumer products, and, as mentioned herein, exposures to LEAD and
17 CADMIUM took place as a result of such normal and foreseeable consumption and use.

18 56. Plaintiff is informed, believes, and thereon alleges that between January 18, 2016 and the
19 present, each of the Defendants knowingly and intentionally exposed California
20 consumers and users of Seaweed, which Defendants manufactured, distributed, or sold as
21 mentioned above, to LEAD and CADMIUM, without first providing any type of clear
22 and reasonable warning of such to the exposed persons before the time of exposure.
23 Defendants have distributed and sold Seaweed in California. Defendants know and
24 intend that California consumers will use and consume Seaweed, thereby exposing them
25 to LEAD and CADMIUM. Defendants thereby violated Proposition 65.

26 57. The principal routes of exposure with regard to Seaweed are and were through ingestion,
27 including hand to mouth pathways, inhalation, and trans-dermal absorption. Persons
28 sustain exposures primarily by eating and consuming Seaweed, and additionally by
handling Seaweed without wearing gloves or any other personal protective equipment, or
by touching bare skin or mucous membranes with gloves after handling Seaweed as well

1 as through direct and indirect hand to mouth contact, hand to mucous membrane, or even
2 breathing in particulate matter dispersed from Seaweed.

3 58. Plaintiff is informed, believes, and thereon alleges that each of Defendants' violations of
4 Proposition 65 as to Seaweed have been ongoing and continuous, as Defendants engaged
5 and continue to engage in conduct which violates Health and Safety Code section
6 25249.6, including the manufacture, distribution, promotion, and sale of Seaweed, so that
7 a separate and distinct violation of Proposition 65 occurred each and every time a person
8 was exposed to LEAD and CADMIUM by Seaweed as mentioned herein.

9 59. Plaintiff is informed, believes, and thereon alleges that each violation of Proposition 65
10 mentioned herein is ever continuing. Plaintiff further alleges and believes that the
11 violations alleged herein will continue to occur into the future.

12 60. Based on the allegations herein, Defendants are liable for civil penalties of up to
13 \$2,500.00 per day per individual exposure to LEAD and CADMIUM from Seaweed,
14 pursuant to Health and Safety Code section 25249.7(b). Plaintiff has engaged in good
15 faith efforts to resolve the claims alleged herein prior to filing this Complaint.

16 **PRAYER FOR RELIEF**

17 Plaintiff demands against each of the Defendants as follows:

- 18 1. A permanent injunction mandating Proposition 65-compliant warnings;
- 19 2. Penalties pursuant to Health and Safety Code section 25249.7, subdivision (b);
- 20 3. Costs of suit;
- 21 4. Reasonable attorney fees and costs; and
- 22 5. Any further relief that the court may deem just and equitable.

23 Dated: September 18, 2020

YEROUSHALMI & YEROUSHALMI

24 

25 BY: _____

26 Reuben Yeroushalmi
27 Attorneys for Plaintiff,
28 Consumer Advocacy Group, Inc.