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8 Attorneys for Plaintiff,  
 9 **CITIZENS OF CALIFORNIA SAFETY CORP.**

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

12 CITIZENS OF CALIFORNIA SAFETY  
 13 CORP.,  
 14  
 15 Plaintiff,  
 16  
 17 v.  
 18  
 19 PURPLEROCK WILD FOODS OPCO, LLC,  
 20 individually and doing business as WILD  
 21 FOODS; and DOES 1-100  
 22  
 23 Defendants.

24 **CASE NO.**  
 25  
 26 **COMPLAINT FOR INJUNCTIVE  
 27 RELIEF AND DAMAGES**  
 28  
 Health & Safety Code, § 25249.5, et seq.

**Plaintiff Citizens of California Safety Corp. hereby makes the following allegations:**

**INTRODUCTION**

1. This Complaint seeks to remedy Defendants' violation of Health & Safety Code, § 25249.5, et seq. by knowingly and intentionally exposing individuals in California to chemicals known to the State to cause cancer, birth defects, or other reproductive harm without providing clear and reasonable warnings to individuals prior to their exposure.



1 **JURISDICTION AND VENUE**

2 8. The Court has jurisdiction over this lawsuit pursuant to California Constitution  
3 Article VI, Section 10, which grants the Superior Court original jurisdiction in all causes except  
4 those given by statute to other trial courts.

5 9. This Court has jurisdiction over this action pursuant to Health and Safety Code  
6 section 25249.7, which allows enforcement of violations of Proposition 65 in any Court of  
7 competent jurisdiction.

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

15 11. Venue is proper in the County of Los Angeles because one or more of the  
16 violations occurred in the County of Los Angeles.

17 **BACKGROUND FACTS**

18 12. In 1986, the People of the State of California approved an initiative to address  
19 growing concerns about exposure to toxic chemicals and declared their right “[t]o be informed  
20 about exposures to chemicals that cause cancer, birth defects, or other reproductive harm. The  
21 Safe Drinking Water and Toxic Enforcement Act of 1986, codified at Health and Safety Code  
22 sections 25249.5, et seq. (“Proposition 65”), helps to protect California’s drinking water sources  
23 from contamination, to allow consumers to make informed choices about the products they buy,  
24 and to enable persons to protect themselves from toxic chemicals as they see fit.

25 13. Proposition 65 requires the Governor of California to publish a list of chemicals  
26 known to the state to cause cancer, birth defects, or other reproductive harm. Health & Safety  
27 Code § 25249.8.





