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CLERK OF
THE SUPERIOR COURT
By Shabira Iyamu, DeputyCASE NUMBER:
RG21094630

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8 Attorneys for Plaintiff,

9 CONSUMER ADVOCACY GROUP, INC.

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**11 **COUNTY OF ALAMEDA**12 CONSUMER ADVOCACY GROUP, INC.,
13 in the public interest,

14 Plaintiff,

15 v.

16 WHOLE FOODS MARKET CALIFORNIA,
17 INC., a California Corporation;
18 MRS. GOOCH'S NATURAL FOOD
19 MARKETS, INC. DBA WHOLE FOODS
20 MARKET, a California Corporation;
21 and DOES 1-20,

22 Defendants.

CASE NO.

COMPLAINT FOR PENALTY AND
INJUNCTIONViolation 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)23 Plaintiff CONSUMER ADVOCACY GROUP, INC. alleges two causes of action
24 against defendants WHOLE FOODS MARKET CALIFORNIA, INC., MRS. GOOCH'S
25 NATURAL FOOD MARKETS, INC. DBA WHOLE FOODS MARKET, and DOES 1-20 as
26 follows:
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VEROUSHALMI
&
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*An Independent
Association of Law
CorporationsCOMPLAINT FOR VIOLATION OF PROPOSITION 65, THE SAFE DRINKING WATER AND TOXIC
ENFORCEMENT ACT OF 1986 (HEALTH AND SAFETY CODE § 25249.5, ET SEQ.)

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 WHOLE FOODS MARKET CALIFORNIA, INC. ("WHOLE FOODS") is a California Corporation, qualified to do business and doing business in the State of California at all relevant times herein.
3. Defendant MRS. GOOCH'S NATURAL FOOD MARKETS, INC DBA WHOLE FOODS MARKET ("MRS. GOOCH'S") 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 1-20, 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 WHOLE FOODS, MRS. GOOCH'S and DOES 1-20.
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 1-20, was an agent, servant, or employee of each of the other Defendants and Defendants WHOLE FOODS and MRS GOOCH'S are a joint enterprise. In conducting the activities alleged in this Complaint, each of the Defendants was acting within the course and scope of this agency, service, or employment, and was

1 acting with the consent, permission, and authorization of each of the other Defendants.
2 All actions of each of the Defendants alleged in this Complaint were ratified and
3 approved by every other Defendant or their officers or managing agents. Alternatively,
4 each of the Defendants aided, conspired with and/or facilitated the alleged wrongful
5 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
21 manufacture, distribution, promotion, marketing, or sale of their products within
22 California to render the exercise of jurisdiction by the California courts permissible
23 under traditional notions of fair play and substantial justice.
- 24 11. Venue is proper in the County of Alameda because one or more of the instances of
25 wrongful conduct occurred, and continues to occur, in the County of Alameda and/or
26 because Defendants conducted, and continue to conduct, business in the County of
27 Alameda with respect to the consumer product that is the subject of this action.

BACKGROUND AND PRELIMINARY FACTS

12. In 1986, California voters approved an initiative to address growing concerns about exposure to toxic chemicals and declared their right “[t]o be informed about exposures to chemicals that cause cancer, birth defects, or other reproductive harm.” Ballot Pamp., Proposed Law, Gen. Elec. (Nov. 4, 1986) at p. 3. The initiative, The Safe Drinking Water and Toxic Enforcement Act of 1986, codified at Health and Safety Code Sections 25249.5, *et seq.* (“Proposition 65”), helps to protect California’s drinking water sources from contamination, to allow consumers to make informed choices about the products they buy, and to enable persons to protect themselves from toxic chemicals as they see fit.
13. Proposition 65 requires the Governor of California to publish a list of chemicals known to the state to cause cancer, birth defects, or other reproductive harm. *Health & Safety Code* § 25249.8. The list, which the Governor updates at least once a year, contains over 700 chemicals and chemical families. Proposition 65 imposes warning requirements and other controls that apply to Proposition 65-listed chemicals.
14. All businesses with ten (10) or more employees that operate or sell products in California must comply with Proposition 65. Under Proposition 65, businesses are: (1) prohibited from knowingly discharging Proposition 65-listed chemicals into sources of drinking water (*Health & Safety Code* § 25249.5), and (2) required to provide “clear and reasonable” warnings before exposing a person, knowingly and intentionally, to a Proposition 65-listed chemical (*Health & Safety Code* § 25249.6).
15. Proposition 65 provides that any person “violating or threatening to violate” the statute may be enjoined in any court of competent jurisdiction. *Health & Safety Code* § 25249.7. “Threaten to violate” means “to create a condition in which there is a substantial probability that a violation will occur.” *Health & Safety Code* § 25249.11(e). Defendants are also liable for civil penalties of up to \$2,500.00 per day per violation, recoverable in a civil action. *Health & Safety Code* § 25249.7(b).

- 1 16. Plaintiff identified certain practices of manufacturers and distributors of Seaweed of
2 exposing, knowingly and intentionally, persons in California to Lead and Lead
3 Compounds, Cadmium and Cadmium Compounds, Inorganic Arsenic Compounds,
4 and/or Inorganic Arsenic Oxides of such products without first providing clear and
5 reasonable warnings of such to the exposed persons prior to the time of exposure.
6 Plaintiff later discerned that Defendants engaged in such practice.
- 7 17. On October 1, 1992 the Governor of California added Lead and Lead Compounds
8 ("Lead") to the list of chemicals known to the State to cause cancer (*Cal. Code Regs.* tit.
9 27, § 27001(b)). Pursuant to Health and Safety Code Sections 25249.9 and 25249.10,
10 twenty (20) months after addition of Lead to the list of chemicals known to the State to
11 cause cancer, Lead became fully subject to Proposition 65 warning requirements and
12 discharge prohibitions.
- 13 18. On February 27, 1987, the Governor of California added Lead to the list of chemicals
14 known to the State to cause developmental and reproductive toxicity (*Cal. Code Regs.*
15 tit. 27, § 27001(c)). Lead is known to the State to cause developmental, female, and
16 male reproductive toxicity. Pursuant to Health and Safety Code Sections 25249.9 and
17 25249.10, twenty (20) months after addition of Lead to the list of chemicals known to
18 the State to cause developmental and reproductive toxicity, Lead became fully subject to
19 Proposition 65 warning requirements and discharge prohibitions.
- 20 19. On October 1, 1987 the Governor of California added Cadmium and Cadmium
21 Compounds ("Cadmium") to the list of chemicals known to the State to cause cancer
22 (*Cal. Code Regs.* tit. 27, § 27001(b)). Pursuant to Health and Safety Code Sections
23 25249.9 and 25249.10, twenty (20) months after addition of Cadmium to the list of
24 chemicals known to the State to cause cancer, Cadmium became fully subject to
25 Proposition 65 warning requirements and discharge prohibitions.
- 26 20. On May 1, 1997, the Governor of California added Cadmium to the list of chemicals
27 known to the State to cause developmental and reproductive toxicity (*Cal. Code Regs.*
28

1 tit. 27, § 27001(c)). Cadmium is known to the State to cause developmental, and male
2 reproductive toxicity. Pursuant to Health and Safety Code Sections 25249.9 and
3 25249.10, twenty (20) months after addition of Cadmium to the list of chemicals known
4 to the State to cause developmental and reproductive toxicity, Cadmium became fully
5 subject to Proposition 65 warning requirements and discharge prohibitions.

6 21. On February 27, 1987 the Governor of California added Inorganic Arsenic Compounds
7 to the list of chemicals known to the State to cause cancer (*Cal. Code Regs.* tit. 27, §
8 27001(b)). Pursuant to Health and Safety Code Sections 25249.9 and 25249.10, twenty
9 (20) months after addition of Inorganic Arsenic Compounds to the list of chemicals
10 known to the State to cause cancer, Inorganic Arsenic Compounds became fully subject
11 to Proposition 65 warning requirements and discharge prohibitions.

12 22. On May 1, 1997, the Governor of California added Inorganic Arsenic Oxides to the list
13 of chemicals known to the State to cause developmental toxicity (*Cal. Code Regs.* tit. 27,
14 § 27001(c)). Inorganic Arsenic Oxides is known to the State to cause developmental,
15 toxicity. Pursuant to Health and Safety Code Sections 25249.9 and 25249.10, twenty
16 (20) months after addition of Inorganic Arsenic Oxides to the list of chemicals known to
17 the State to cause developmental toxicity, Inorganic Arsenic Oxides became fully subject
18 to Proposition 65 warning requirements and discharge prohibitions. Inorganic Arsenic
19 Compounds and Inorganic Arsenic Oxides is hereinafter referred to as "Arsenic".

20 SATISFACTION OF PRIOR NOTICE

21 23. Plaintiff served the following notices for alleged violations of Health and Safety Code
22 Section 25249.6, concerning consumer products exposures:

- 23 a. On or about September 2, 2020, Plaintiff gave notice of alleged violations of
24 Health and Safety Code Section 25249.6, concerning consumer products
25 exposures subject to a private action to WHOLE FOODS, MRS GOOCH'S and
26 to the California Attorney General, County District Attorneys, and City
27
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1 Attorneys for each city containing a population of at least 750,000 people in
2 whose jurisdictions the violations allegedly occurred, concerning the Seaweed.

3 b. On or about October 16, 2020 Plaintiff gave notice of alleged violations of
4 Health and Safety Code Section 25249.6, concerning consumer products
5 exposures subject to a private action to WHOLE FOODS, MRS. GOOCH'S and
6 to the California Attorney General, County District Attorneys, and City
7 Attorneys for each city containing a population of at least 750,000 people in
8 whose jurisdictions the violations allegedly occurred, concerning the Seaweed.

9 24. Before sending the notice of alleged violations, Plaintiff investigated the consumer
10 products involved, the likelihood that such products would cause users to suffer
11 significant exposures to Lead, Cadmium, and Arsenic, and the corporate structure of
12 each of the Defendants.

13 25. Plaintiff's notice of alleged violation included a Certificate of Merit executed by the
14 attorney for the noticing party, CAG. The Certificate of Merit stated that the attorney for
15 Plaintiff who executed the certificate had consulted with at least one person with relevant
16 and appropriate expertise who reviewed data regarding the exposures to Lead, Cadmium,
17 and Arsenic, the subject Proposition 65-listed chemical of this action. Based on that
18 information, the attorney for Plaintiff who executed the Certificate of Merit believed
19 there was a reasonable and meritorious case for this private action. The attorney for
20 Plaintiff attached to the Certificate of Merit served on the Attorney General the
21 confidential factual information sufficient to establish the basis of the Certificate of
22 Merit.

23 26. Plaintiff's notice of alleged violations also included a Certificate of Service and a
24 document entitled "The Safe Drinking Water & Toxic Enforcement Act of 1986
25 (Proposition 65) A Summary." *Health & Safety Code* § 25249.7(d).

1 27. Plaintiff is commencing this action more than sixty (60) days from the dates that Plaintiff
2 gave notice of the alleged violations to WHOLE FOODS, MRS. GOOCH'S and the
3 public prosecutors referenced in Paragraph 23.

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

7
8 **FIRST CAUSE OF ACTION**

9 **(By CONSUMER ADVOCACY GROUP, INC. and against WHOLE FOODS,**
10 **MRS. GOOCH'S and DOES 1-10 for Violations of Proposition 65, The Safe**
11 **Drinking Water and Toxic Enforcement Act of 1986 (*Health & Safety Code*, §§**
12 **25249.5, *et seq.*))**

13 **Seaweed**

14 29. Plaintiff repeats and incorporates by reference paragraphs 1 through 28 of this complaint
15 as though fully set forth herein.

16 30. Each of the Defendants is, and at all times mentioned herein was, a manufacturer,
17 distributor, promoter, or retailer of Seaweed ("Seaweed I"), including but not limited to:

- 18 • "The Original Seasnax"; "Strangely Addictive!™"; "6 pack 30g/1.8oz (6x
19 5g/0.18oz)"; "5 g (0.18 oz) G&G"; "Vegan"; "Olive oil 100%"; "UPC 7 28028 02318
20 3"; "Product of Korea"; and
21 • "The Original Seasnax"; "Strangely Addictive!™"; "Organic Premium Roasted
22 Seaweed Snack"; "Seasnax 5 Large Sheets"; "Net Wt. 0.54oz (15g)"; "Vegan"; "Olive
23 oil 100%"; "UPC 7 28028 01220 0"; "Product of Korea;

24 31. Seaweed I contains Lead and Cadmium.

25 32. Defendants knew or should have known that Lead and Cadmium has been identified by
26 the State of California as a chemical known to cause cancer, and reproductive toxicity
27 and therefore was subject to Proposition 65 warning requirements. Defendants were also
28 informed of the presence of Lead and Cadmium in Seaweed I within Plaintiff's notice of
alleged violations further discussed above at Paragraph 23a.

1 33. Plaintiff's allegations regarding Seaweed I concerns "[c]onsumer products exposure[s],"
2 which "is an exposure that results from a person's acquisition, purchase, storage,
3 consumption, or other reasonably foreseeable use of a consumer good, or any exposure
4 that results from receiving a consumer service." *Cal. Code Regs.* tit. 27, § 25602(b).
5 Seaweed I is a consumer product, and, as mentioned herein, exposures to Lead and
6 Cadmium took place as a result of such normal and foreseeable consumption and use.

7 34. Plaintiff is informed, believes, and thereon alleges that between September 2, 2017 and
8 the present, each of the Defendants knowingly and intentionally exposed California
9 consumers and users of Seaweed I, which Defendants manufactured, distributed, or sold
10 as mentioned above, to Lead and Cadmium, without first providing any type of clear and
11 reasonable warning of such to the exposed persons before the time of exposure.
12 Defendants have distributed and sold Seaweed I in California. Defendants know and
13 intend that California consumers will use and consume Seaweed I, thereby exposing
14 them to Lead and Cadmium.

15 35. Further, Plaintiff is informed, believes, and thereon alleges that Defendants are selling
16 Seaweed I under a brand or trademark that is owned or licensed by the Defendants or an
17 entity affiliated thereto; have knowingly introduced Lead and Cadmium into Seaweed I
18 or knowingly caused Lead and Cadmium to be created in Seaweed I; have covered,
19 obscured or altered a warning label that has been affixed to Seaweed I by the
20 manufacturer, producer, packager, importer, supplier or distributor of Seaweed I; have
21 received a notice and warning materials for exposure from Seaweed I without
22 conspicuously posting or displaying the warning materials; and/or have actual
23 knowledge of potential exposure to Lead and Cadmium from Seaweed I. Defendants
24 thereby violated Proposition 65.

25 36. The principal routes of exposure are through dermal contact, ingestion and inhalation.
26 Persons sustain exposures by handling Seaweed I without wearing gloves or any other
27 personal protective equipment, or by touching bare skin or mucous membranes with
28

1 gloves after handling Seaweed I, as well as through direct and indirect hand to mouth
2 contact, hand to mucous membrane, or breathing in particulate matter dispersed from
3 Seaweed I.

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

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

14 39. Based on the allegations herein, Defendants are liable for civil penalties of up to
15 \$2,500.00 per day per individual exposure to Lead and Cadmium from Seaweed I,
16 pursuant to Health and Safety Code Section 25249.7(b).

17 40. Plaintiff has engaged in good faith efforts to resolve the claims alleged herein prior to
18 filing this Complaint.

19
20 **SECOND CAUSE OF ACTION**

21 **(By CONSUMER ADVOCACY GROUP, INC. and against WHOLE FOODS,**
22 **MRS. GOOCH'S and DOES 11-20 for Violations of Proposition 65, The Safe**
23 **Drinking Water and Toxic Enforcement Act of 1986 (*Health & Safety Code, §§***
24 ***25249.5, et seq.*))**

25 **Seaweed**

26 41. Plaintiff repeats and incorporates by reference paragraphs 1 through 40 of this complaint
27 as though fully set forth herein.

28 42. Each of the Defendants is, and at all times mentioned herein was, a manufacturer,
distributor, promoter, or retailer of Seaweed ("Seaweed II"), including but not limited to:

1 • “Seasnax ® Strangely Addictive!™”; “Organic Seaweed”; “Vegan”; “Raw”; “Paleo
2 Friendly”; “Certified Kosher”; “Net Wt 28g (1.0oz)”; “SS-Raw UPC 7 28028 02323 7”;
3 “Product of Korea”; and

4 • “Classic Olive”; “Family 4-Pack”; “Vegan Gluten Free”; “The Original Seasnax ®
5 Strangely Addictive!™”; “Organic Premium Roasted Seaweed Made With Extra Virgin
6 Olive Oil”; “Contains 20 large Sheets (4 Packs of 5)”; “Net Wt 2.16 oz (60g)”; “SS-
7 CLASS-4PK UPC 7 28028 01221 7”

8 43. Seaweed II contains Arsenic, Lead and Cadmium.

9 44. Defendants knew or should have known that Arsenic, Lead and Cadmium has been
10 identified by the State of California as a chemical known to cause cancer, and
11 reproductive toxicity and therefore was subject to Proposition 65 warning requirements.
12 Defendants were also informed of the presence of Lead and Cadmium in Seaweed II
13 within Plaintiff's notice of alleged violations further discussed above at Paragraph 23b.

14 45. Plaintiff's allegations regarding Seaweed II concerns “[c]onsumer products exposure[s],”
15 which “is an exposure that results from a person's acquisition, purchase, storage,
16 consumption, or other reasonably foreseeable use of a consumer good, or any exposure
17 that results from receiving a consumer service.” *Cal. Code Regs.* tit. 27, § 25602(b).
18 Seaweed II is a consumer product, and, as mentioned herein, exposures to Arsenic, Lead
19 and Cadmium took place as a result of such normal and foreseeable consumption and
20 use.

21 46. Plaintiff is informed, believes, and thereon alleges that between October 16, 2017 and
22 the present, each of the Defendants knowingly and intentionally exposed California
23 consumers and users of Seaweed II, which Defendants manufactured, distributed, or sold
24 as mentioned above, to Arsenic, Lead and Cadmium, without first providing any type of
25 clear and reasonable warning of such to the exposed persons before the time of exposure.
26 Defendants have distributed and sold Seaweed II in California. Defendants know and
27
28

1 intend that California consumers will use and consume Seaweed II, thereby exposing
2 them to Arsenic, Lead and Cadmium.

3 47. Further, Plaintiff is informed, believes, and thereon alleges that Defendants are selling
4 Seaweed II under a brand or trademark that is owned or licensed by the Defendants or an
5 entity affiliated thereto; have knowingly introduced Arsenic, Lead and Cadmium into
6 Seaweed II or knowingly caused Arsenic, Lead and Cadmium to be created in Seaweed
7 II; have covered, obscured or altered a warning label that has been affixed to Seaweed II
8 by the manufacturer, producer, packager, importer, supplier or distributor of Seaweed II;
9 have received a notice and warning materials for exposure from Seaweed II without
10 conspicuously posting or displaying the warning materials; and/or have actual
11 knowledge of potential exposure to Arsenic, Lead and Cadmium from Seaweed II.
12 Defendants thereby violated Proposition 65.

13 48. The principal routes of exposure are through dermal contact, ingestion and inhalation.
14 Persons sustain exposures by handling Seaweed II without wearing gloves or any other
15 personal protective equipment, or by touching bare skin or mucous membranes with
16 gloves after handling Seaweed II, as well as through direct and indirect hand to mouth
17 contact, hand to mucous membrane, or breathing in particulate matter dispersed from
18 Seaweed II.

19 49. Plaintiff is informed, believes, and thereon alleges that each of Defendants' violations of
20 Proposition 65 as to Seaweed II have been ongoing and continuous, as Defendants
21 engaged and continue to engage in conduct which violates Health and Safety Code
22 Section 25249.6, including the manufacture, distribution, promotion, and sale of
23 Seaweed II, so that a separate and distinct violation of Proposition 65 occurred each and
24 every time a person was exposed to Arsenic, Lead and Cadmium by Seaweed II as
25 mentioned herein.
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1 50. Plaintiff is informed, believes, and thereon alleges that each violation of Proposition 65
2 mentioned herein is ever continuing. Plaintiff further alleges and believes that the
3 violations alleged herein will continue to occur into the future.

4 51. Based on the allegations herein, Defendants are liable for civil penalties of up to
5 \$2,500.00 per day per individual exposure to Arsenic, Lead and Cadmium from Seaweed
6 II, pursuant to Health and Safety Code Section 25249.7(b).

7 52. Plaintiff has engaged in good faith efforts to resolve the claims alleged herein prior to
8 filing this Complaint.

9
10 **PRAYER FOR RELIEF**

11 Plaintiff demands against each of the Defendants as follows:

12 53. A permanent injunction mandating Proposition 65-compliant warnings;

13 54. Penalties pursuant to Health and Safety Code Section 25249.7, subdivision (b);

14 55. Costs of suit;

15 56. Reasonable attorney fees and costs; and

16 57. Any further relief that the court may deem just and equitable.

17
18 Dated: April 6, 2021

YEROUSHALMI & YEROUSHALMI*

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21 _____
22 Reuben Yeroushalmi
23 Attorneys for Plaintiff,
24 CONSUMER ADVOCACY GROUP, INC.
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