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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO
UNLIMITED CIVIL JURISDICTION

16 LAURENCE VINOCUR,
17 Plaintiff,
18 v.
19 AMAZON.COM, INC.,
20 Defendant.

Case No. CGC-21-595147

**FIRST AMENDED COMPLAINT FOR
CIVIL PENALTIES AND INJUNCTIVE
RELIEF**

(Health & Safety Code §25249.5 *et seq.*)

ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco

07/05/2022
Clerk of the Court
BY: KAREN VALDES
Deputy Clerk

1 **NATURE OF THE ACTION**

2 1. This Complaint is a representative action brought by plaintiff Laurence Vinocur in
3 the public interest of the citizens of the State of California to enforce the People's right to be
4 informed of the health hazards caused by exposures to lead, a toxic chemical found in fishing
5 sinkers sold by defendants that are purchased by or shipped to citizens in California (the
6 "Products"). Some of the Products are repackaged, produced, stored, shipped and/or sold online
7 to California citizens by defendant Amazon.com, Inc. through, among other representations,
8 "Amazon Warehouse" or other iterations of Amazon.com, Inc. as the "seller" of the products.

9 2. By this Complaint, plaintiff seeks to remedy defendant's continuing failure to warn
10 consumers and businesses not covered by California's Occupational Safety Health Act, Labor
11 Code §§6300 *et seq.* about the risks of exposure to lead present in certain fishing sinkers that are
12 manufactured, distributed, and offered for sale or use throughout the State of California.
13 Individuals, consumers and businesses not covered by California's Occupational Safety Health
14 Act, Labor Code §§6300 *et seq.* who purchase, use or handle the Products are referred to
15 hereinafter as "consumers."

16 3. Lead is found in fishing sinkers that defendant manufactures, imports, distributes,
17 retails or otherwise markets or offers for sale to consumers and other citizens throughout
18 California. Defendant has actual knowledge of the Products' lead contents. Most, if not all, of the
19 sales of the Products were and continue to be offered for purchase and/or transacted through
20 amazon.com.

21 4. Under the Safe Drinking Water and Toxic Enforcement Act of 1986, codified at
22 Health & Safety Code §§25249.6 *et seq.* (Proposition 65), "[n]o person in the course of doing
23 business shall knowingly and intentionally expose any individual to a chemical known to the state
24 to cause cancer or reproductive toxicity without first giving clear and reasonable warning to such
25 individual..." Health & Safety Code §25249.6.

26 5. Pursuant to Proposition 65, on February 27, 1987, California identified and listed
27 lead as a chemical known to cause birth defects and other reproductive harm. Lead became
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1 subject to the “clear and reasonable warning” requirements of the act one year later on February
2 27, 1988. 27 Cal. Code Regs. §27001(b); Health & Safety Code §25249.8 and §25249.10(b).

3 6. Defendant manufactures, imports, distributes, and/or offers for sale or use in
4 California, without the mandated health hazard warnings, various products (hereinafter, "the
5 Products") consisting of fishing sinkers that reference the toxicant “lead” or its elemental symbol,
6 “Pb” in: (i) the product’s name; (ii) the product description or information referenced prominently
7 near the online display for the item when sold through an e-commerce platform; (iii) the search
8 “filter,” if any, used to market the products online; (iv) the immediate product packaging or
9 container; or (v) any other conspicuous manner likely to be encountered without considerable
10 effort by an online purchaser before payment. Some examples of the Products were identified in
11 the sixty-day notices of violation sent to defendant. Other examples are listed in Exhibit A to this
12 first amended complaint. Exhibit B provides a photograph of the labeling of an example of one
13 Product as well as a screen capture of the website listing on amazon.com of an example of the
14 same Products.

15 7. Defendant’s failure to warn consumers and other individuals in California of the
16 health hazards associated with exposures to lead in conjunction with defendant’s sales of the
17 Products are violations of Proposition 65 which subject defendant, to enjoinder of such conduct
18 as well as civil penalties for each violation. Health & Safety Code §25249.7(a) and (b)(1).¹

19 8. For defendant’s violations and threatened violations of Proposition 65, plaintiff
20 seeks preliminary and permanent injunctive relief to compel defendant to provide purchasers and
21 users of the Products with the required warning regarding specific health hazards associated with
22 exposures to lead. Health & Safety Code §25249.7(a).

23 9. Pursuant to Health & Safety Code §25249.7(b), plaintiff also seeks civil penalties
24 against defendant for their violations of Proposition 65, some of which are ongoing.

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27 ¹ Claims released in one or more settlement agreements reached between plaintiff and upstream suppliers of lead-based
28 fishing sinkers, which were sold directly by the settling entity on amazon.com, are excluded from the cause of action
alleged herein. This exclusion, however, does not apply to the sale of Products by third-parties (i.e., non-settling
entities) on amazon.com.

1 **PARTIES**

2 10. Plaintiff Laurence Vinocur is a citizen of the State of California who is dedicated to
3 protecting the health of California citizens through the elimination or reduction of toxic exposures
4 from consumer and industrial products, and he brings this action in the public interest pursuant to
5 Health & Safety Code §25249.7(d).

6 11. Defendant Amazon.Com, Inc. (Amazon) is a person in the course of doing business
7 within the meaning of Health & Safety Code §§25249.6 and 25249.11.

8 12. Amazon imports, distributes, sells, facilitates, and/or offers the Products for sale or
9 use in the State of California, or implies by its conduct that it imports, distributes, facilitates for
10 sale, sells, and/or offers the Products for sale or use in the State of California. Amazon has offered
11 (and, in many instances, continues to offer) for sale Products supplied to it by entities that are not
12 subject to enforcement under Proposition 65 because: (i) they have fewer than ten employees
13 during all relevant periods; or (ii) do not have an agent for process of service in California.
14 Further, in some instances, the Products are shipped to California consumers, either directly (or
15 indirectly through an Amazon fulfilment center in the United States) by exporters located in
16 foreign countries without offices in the United States, after purchase at amazon.com.

17 13. Amazon may be referred to hereinafter as the “defendant.”

18 **VENUE AND JURISDICTION**

19 14. Venue is proper in the Superior Court for the County of San Francisco pursuant to
20 Code of Civil Procedure §§393, 395, and 395.5, because this Court is a court of competent
21 jurisdiction, because plaintiff seeks civil penalties against defendant, one or more instances of
22 wrongful conduct occurred, and continue to occur, in this county, and/or defendant conducted, and
23 continue to conduct business in San Francisco.

24 15. The California Superior Court has jurisdiction over this action pursuant to
25 California Constitution Article VI, section 10, which grants the Superior Court “original
26 jurisdiction in all causes except those given by statute to other trial courts.” The statute under
27 which this action is brought does not specify any other basis of subject matter jurisdiction.
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16. The California Superior Court has jurisdiction over defendant based on plaintiff's information and good faith belief that defendant is a person, firm, corporation has a principal office or association that is a citizen of the State of California, has sufficient minimum contacts in the State of California, and/or otherwise purposefully avails itself of the California market. defendant's purposeful availment renders the exercise of personal jurisdiction (specific, limited or both) by California courts consistent with traditional notions of fair play and substantial justice.

FIRST CAUSE OF ACTION

(Violation of Proposition 65)

17. Plaintiff realleges and incorporates by reference, as if fully set forth herein, Paragraphs 1 through 16, inclusive.

18. In enacting Proposition 65, in the preamble to the Safe Drinking Water and Toxic Enforcement Act of 1986, the People of California expressly declared their right “[t]o be informed about exposures to chemicals that cause cancer, birth defects, or other reproductive harm.”

19. Proposition 65 states, “[n]o person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the state to cause cancer or reproductive toxicity without first giving clear and reasonable warning to such individual...”
Health & Safety Code §25249.6.

20. On August 8, 2020, plaintiff served a 60-Day Notices of Violation (the August 8 Notices), together with the requisite certificates of merit, on Amazon, the California Attorney General's Office, and the requisite public enforcement agencies alleging that, as a result of defendant's sales of the Products, consumers in California are being exposed to lead resulting from their reasonably foreseeable use of the Products, without them first receiving a "clear and reasonable warning" regarding the reproductive and developmental harms associated with such exposures, as required by Proposition 65. The Notice is limited to fishing sinkers containing lead that reference the toxicant "lead" in: (i) the product's name; (ii) the product description or information referenced prominently near the online display for the item; (iii) the search "filter," if any, used to market the products online; (iv) the product packaging or container; or (v) in any

1 other conspicuous manner likely to be read by the online purchaser before payment without
2 considerable effort (actual knowledge limitation).

3 21. On October 30, 2021, plaintiff served a Supplemental 60-Day Notice of Violation,
4 (the October 30 Notice), together with the requisite certificate of merit, on Amazon, the California
5 Attorney General's Office, and the requisite public enforcement agencies alleging that, as a result
6 of defendant's sales of lead-based fishing sinkers, consumers in California are being exposed to
7 the toxicant resulting from their reasonably foreseeable use of such Products, without consumers
8 first receiving a "clear and reasonable warning" regarding the reproductive toxicity associated
9 with exposures to the heavy metal, as required by Proposition 65. The October 30 Notice named
10 more exemplars of lead-based fishing sinkers and contained the actual knowledge limitation. The
11 August 8 Notices and the October 30 Notice shall be referred collectively to as the "Notices."

12 22. Defendant manufactures, imports, distributes, facilitates for sale, sells, and/or offers
13 the Products for sale or use in violation of Health & Safety Code §25249.6, and defendant's
14 violations have continued well beyond their receipt of plaintiff's Notice. As such, defendant's
15 violations are ongoing and continuous in nature and, unless enjoined will continue in the future
16 without any information or written answers that they will cease and desist until compliance is
17 ensured.

18 23. After receiving plaintiff's Notices, no public enforcement agency has commenced
19 and diligently prosecuted a cause of action against defendant under Proposition 65 to enforce the
20 alleged violations that are the subject of plaintiff's Notices.

21 24. The Products that defendant's manufactures, imports, distributes, or offers for sale
22 throughout the State of California cause exposures to lead as a result of the reasonably foreseeable
23 use of the Products. Such exposures caused by defendant and endured by consumers in California
24 who purchase, use or handle the Products are not exempt from the "clear and reasonable" warning
25 requirements of Proposition 65, yet defendant does not provide compliant warnings for the
26 reproductive toxicity of lead.

1 25. Defendant has actual knowledge that the Products they manufacture, import,
2 distribute, sell, facilitate for sale or offer for sale in California contain lead.

3 26. Lead is present in or on the Products in such a way as to expose consumers through
4 dermal contact, ingestion and/or inhalation during reasonably foreseeable use.

5 27. The normal and reasonably foreseeable use of the Products has caused, and
6 continues to cause, consumer product exposures to lead as defined by 27 California Code of
7 Regulations §25600.1(e) and other types of exposures set forth in the Notices.

8 28. Defendant knows that the normal and reasonably foreseeable use of the Products
9 exposes individuals to lead through dermal contact, ingestion and/or inhalation.

10 29. Defendant intends that exposures to lead from the reasonably foreseeable use of the
11 Products will occur by their deliberate, non-accidental participation in the manufacture,
12 importation, distribution, sale, and offering of the Products for sale or use to consumers and others
13 in California.

14 30. Defendant failed to provide a “clear and reasonable warning” to those consumers
15 and other citizens in California who have been, or who will be, exposed to lead through dermal
16 contact, ingestion and/or inhalation resulting from their use of the Products.

17 31. Contrary to the express policy and statutory prohibition of Proposition 65 enacted
18 directly by California voters, consumers exposed to lead, through dermal contact, ingestion and/or
19 inhalation as a result of their use of the Products that defendant sold without a “clear and
20 reasonable” health hazard warning, have suffered, and continue to suffer, irreparable harm for
21 which they have no plain, speedy, or adequate remedy at law.

22 32. Pursuant to Health & Safety Code §25249.7(b), as a consequence of the above-
23 described acts, defendant, and each of them, are liable for a maximum civil penalty of \$2,500 per
24 day for each violation.

25 33. As a consequence of the above-described acts, Health & Safety Code §25249.7(a)
26 also specifically authorizes the Court to grant injunctive relief against defendant.

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1 **PRAYER FOR RELIEF**

2 Wherefore, plaintiff prays for judgment against defendant as follows:

- 3 1. That the Court, pursuant to Health & Safety Code §25249.7(b), assess civil
4 penalties against defendant, and each of them, in the amount of \$2,500 per day for each violation;
- 5 2. That the Court, pursuant to Health & Safety Code §25249.7(a), preliminarily and
6 permanently enjoin defendant from manufacturing, importing, distributing, or offering the
7 Products for sale or use in California without first providing a “clear and reasonable warning”
8 regarding the harms associated with exposures to lead;
- 9 3. That the Court, pursuant to Health & Safety Code §25249.7(a), issue preliminary
10 and permanent injunctions mandating that defendant recall all Products currently in the chain of
11 commerce in California without a “clear and reasonable warning” as defined by 27 California
12 Code of Regulations §25600 *et seq.*, and refund purchasers;
- 13 4. That the Court grant plaintiff his reasonable attorneys’ fees and costs of suit; and
- 14 5. That the Court grant such other and further relief as may be just and proper.
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16 Dated: July 5, 2022

17 Respectfully submitted,

18 CHANLER, LLC

19 By: 
20 Clifford A. Chanler

21 Attorneys for Plaintiff
22 LAURENCE VINOCUR
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Exhibit A

<i>Products</i>	<i>Model#/UPC#/Item ID</i>	<i>Vendor/Supplier/Seller</i>
Fishing Worm Lead Weight Sinkers	B07C6B2QYF, B07C696DJS	RG Indoor and Outdoor Supply; Nanjing Red Girl E-Commerce Co., Ltd
VGEBY Fishing Sinkers,	B0784FSWHX, PFB9977785; B07B4FBR9T (various weight/size); B07B51CW9S (various weight/size)	Amaus; Xiang Yang You Wei Chuang Shi Ke Ji Co., Ltd
Skinny Finesse Lead Drop Shot Fishing Weights Sinkers,	B07F42TY2N, B079L1F6H6	RG Indoor and Outdoor Supply; Nanjing Red Girl E-Commerce Co., Ltd
Tackle Kits with Lead Fishing Jig Heads	B07CQXX8N3	RG Indoor and Outdoor Supply; Nanjing Red Girl E-Commerce Co., Ltd
Guyouke Fishing Kits with Lead Fishing Weights and Sinkers	B08BPHQL5J; B089FGT7SK	Guyouke; putianshi guyuke trade co.,LTD
LPATTERN Round Split Shots	B08BYNN5CJ	Liyizhou
Aezek Round Lead Fishing Split Shots	B08BL8GR52	NEOERA
AMYSports Lead Drop Weights Sinkers Kit Casting Removable Fishing Weights Saltwater Bass Round Fishing Sinkers Swivel Round Shaped Cannonball Freshwater	B096M5SQ6T	LuckyLaker; Shenzhen Shi Qishuo Technology Co., Limited
Lilureena 3pcs Pyramid Fishing Weights Sinker Bullet Weights for Saltwater Freshwater	B09D7GXB6H	Lilureena; Hefei Tuanlong Electronic Commerce Co., Ltd.
FCFKUK Fishing Sinkers Weights Worm Fishing Sinker Weight Bullet Lead Sinkers Fishing Carambola Shape Fishing Sinker	B08P4Q47S2	FCFKUK; Lishan
Proximitck Fishing Weight Triangular Lead Sinkers 20Pcs Bullet Lead Sinker Weights Kit 3/8Oz	B09C632VDJ	Proports; Hefei Kongshuo Electronic Commerce Co., Ltd.

<i>Products</i>	<i>Model#/UPC#/Item ID</i>	<i>Vendor/Supplier/Seller</i>
Alwonder 10PCS/Pack Pyramid Sinkers Kit, 4 Sizes, Surf Fishing Weights Sinker Fishing Lead Weights Sinker No Roll Sinker for Freshwater Saltwater	B092V5ZG4Z	Adventure Infinite US; ShijiazhuangKesenzhengTiYu YongpinXiaoShouCO.LTD
5 Pack Soft Lead for Fishing, Soft Lead Sheet, Fishing Lead Roll, Fishing Tape Lead, Lead Strips Fishing Sinkers Weights Tackle Accessories Supplies	B097R8WF9D	Inhe j; Jiujianghenghechangdianzishang wuyouxiangongsi
Fishing Sinkers Weights Shot Sinker Lead Sinkers for Worm Deep Saltwater Bottom Fishing Rig, 28Pcs Waterdrop Shape Fishing Weights	B095YG569S	Xiqueen
50Pcs Fishing Sinkers Weights Kit Worm Fishing Sinker Weight Bullet Lead Sinkers Fishing Set	B07R8DXS2M	FCFKUK; Lishan
30/40pcs Fishing Bullet Weights Kit Worm Fishing Sinker Weights for Bass Fishing Pitching and Flipping, Fishing Bullet Weights,Sinker Fishing Weights Sinkers Worm Weights	B09DKLK758	Fishinghobby; Hefei tuanzhou e-commerce Co., Ltd
SXYL Split Shot Fishing Weights Sinkers Kit, 280pcs Round Split Shot Sinker Removable Fishing Weights Egg Sinkers 10 Sizes	B08XLVXHBD	Sxyl; Shaoxing Yinglu Electronic Commerce Co.,Ltd
Removable Split Shot Sinker Kit Pure Lead Sinkers Weights Fishing Tackle (5 Size/1 Box)	B08WKL79R1	BoNinja
Isenwill 100Pcs Fishing Weights & Sinkers, Upgrade Round Split Shot Sinker, Removable Split Shot Sinker Weights, Fishing Lead Egg Sinkers 5 Sizes, 0.017 oz, 0.028 oz, 0.035 oz, 0.053 oz, 0.07 oz	B095XS1JRJ	Isenwill Direct
S & J's Tackle Box 1/8 oz Hand Poured Round Split Shots, 100 Per pack	B00IOSBEVO	S & J's Tackle Box

<i>Products</i>	<i>Model#/UPC#/Item ID</i>	<i>Vendor/Supplier/Seller</i>
Milepetus 110-Pieces Removable Split Shot Sinker Kit, 0.5g, 0.6g 0.8g 1g 1.2g 1.5g 2g Pure Lead Sinkers Split Shot Weights Fishing Tackle	B08W3WTMJG	Milepetus Sports & Outdoors
Split Shot Fishing Weights Fishing Weights Saltwater, 100Pcs Round Removable Fishing Sinker Lead Fishing Weights Small Fishing Weights Sinkers	B095HP9FVX	Uponu
FREGITO 100pcs Fishing Weight Sinkers Kit, 5 Sizes Lead Weights Round Split Shot Sinker Removable Fishing Weights Sinkers	B09F388QKT6	Lilureena; Hefei Tuanlong Electronic Commerce Co., Ltd.
KINBOM 102pcs Fishing Weights Sinkers Kit Removable Reusable Fishing Split Shot Fishing Weights Drop Shot Fishing Tackle Round Split Shot Sinkers 6 Sizes	B096VMG285	chuangshoushike
Dr.Fish 5 Pack Pyramid Fishing Sinkers, Lead Fishing Weights for Surf Fishing, Catfish (various sizes)	B08NJVD2JC B08NJVKKZZ B08NJVW4L B08NJVJSXL B08NJVJJWP B08NJV84KS B08NJVYZD7	Dr. Fish
Poisson Bullet Sinker Burr-Free Built-in Tube Lead Worm Fishing Sinker Weight	B08Y66BZSS B08Y65YGNJ B08Y67VBW3 B08Y6B9Q4Y B08Y663TWY B08VNQ5MS6 B09M9JHN42	TK Store Tokyo
Joyiii Fishing Weights Sinkers 100pcs Lead Split Shot Fishing Line Sinkers 5 Sizes Removable Egg Lead Assortment	B097Y4XB6F	Joyiii

<i>Products</i>	<i>Model#/UPC#/Item ID</i>	<i>Vendor/Supplier/Seller</i>
AMYSports Bullet Drop Weights Sinkers Kit Saltwater Removable Fishing Sinkers Tackle Lead Bass Fishing Sinkers Shot Casting Freshwater	B09D7MTV9C B09D7P1J2D B09D7NFYWM B09D7LQKMP B09D7P3J93 B09D7PWLJ5 B09D7N79BG	LuckyLaker
Fishing Drop Shot Weights Rig Kit Sinkers 35pcs Trokar with Lead for Bass Fishing with Tackle Box	B081TBNWYW	yufish
Skipaelf 500pcs Split Shot Fishing Weights, Round Removable Fishing Weights Sinkers with Small Box, Lead Fishing Weights Saltwater Freshwater	B09BBD86PH B09BBDDMM3 B09BBFJGL7 B09BBDZJ6C B09BBDJCZL B09BBDK9MM B09BBDMMSJ B09BBD8SLT B09BBG1H54 B09BBQLR13 B09BBD41QM	Skipaelf
ANYI 100 Pieces Fishing Weights Sinkers, Round Removable Split Shot Sinker Weights, 8 Sizes Fishing Lead Egg Weights with Tackle Box, Small Fishing Accessories Equipment Gear Stuff Lead Shot Sinkers	B09BQCG3LX	QCXM-US
Avlcoaky Fishing Weights Sinkers Streamlined Shape Weights Freshwater Saltwater Casting Drifting Bottom Fishing Accessory	B08L9C3C52	Cold Flower
FishingPepo 100pcs Fishing Weights Sinkers Kit, Round Removable Split Shot Sinker Weights, Small Fishing Lead Egg Weights, Fishing Accessories Equipment Gear Stuff Lead Shot Sinkers 5 Sizes	B099DMS8Z9 B0998ZV49C B0998YHHM1	FishingHobby

<i>Products</i>	<i>Model#/UPC#/Item ID</i>	<i>Vendor/Supplier/Seller</i>
Proximitck Fishing Weight Triangular Lead Sinkers 20Pcs Bullet Lead Sinkers Weights Kit	B09C632VDJ	Proximitck
DongciTACi Fishing Sinkers and Weights Bass Casting Sinkers Plomos para Pescar Lead Fishing Tackle Kit for Saltwater Freshwater Bottom Fishing	B08GKGDBWL B097TVHXY3	DongciTACi Outdoor
TaoTaoChong Egg Fishing Sinkers Weights Assortment Lead Oval Shape Bass Casting Worm Weights Tackle for Saltwater Freshwater Fishing	B08GBYZNTB	Taochongmaoyi
Milepetus 10Pcs Fishing Sinkers Weights Bullet Lead Sinkers Rolling Swivel with Interlock Snap Connector Inline,8g 10g 15g 20g 25g Available	B077GYLTM5 B077H18QH7 B077GY4QQW B077GZXYJM B077H1CZCQ B077GYQXQD	Milepetus Sports & Outdoors
QCQIANG 390Pcs Fishing Weights Sinkers Kit, 8 Size Round Fishing Sinkers with Multifunction Fishing Plier	B09JNRRVM3	QCQIANG-US
Mimilure 131 Pcs Removable Split Shot Sinkers Assortment Pure Lead Weights Sinkers Kit Fishing Tackle Set,7 Sizes	B08RXBTVCG	Mimilure
SF Micro Split Shot Lead Combo Removable Fly Fishing Lead Pure Lead Sinkers Weights Fishing Tackle(112Pcs/4 Size/1 Box)	B0995PS7BG	Sunshine Outdoor
10Pcs Fishing Weights Sinkers Lead Fishing Weights Assortment Drop Shot Fishing Weights Kit	B09Q96229G B09Q96LML8 B09Q96RBLT B09Q967FD7 B09Q9573QD B09Q95MD4Y B09Q955GR7 B09Q94P8PT B09Q94WZ3Y	Jiatai Fishing

<i>Products</i>	<i>Model#/UPC#/Item ID</i>	<i>Vendor/Supplier/Seller</i>
Lead Sheet,5 Rolls 0.6MM Fishing Soft Lead Sheet Strip Sinkers Weights Tackle Accessories Supplies New,Balance The Fishing Accessories Group	B085THQBD2	Diyeeni US
Huoutspor Lead Fishing Weights Sinkers for Bass Fishing Saltwater Freshwater Heavy Aircraft Triangle Shaped Casting Bottom Fishing Tackle	B09DV8VDV1 B09DV7ZYB7	Lingbeau
8 Pieces 3oz Bullet Weights Fishing Sinkers Kit ,Bullet Pyramid and Disc Fishing Sinker, Removable Fishing Weights Casting Sinkers Gear Tackle for Saltwater	B09SGZKBHV	Jingtong
Phuayok Fishing Weights Drop Shot Kit Fishing Sinker of Round Fishing Weights,Lead Sinker Drop Shot Rig Bass for Fishing	B09L43JTTR B09L5LVLCG B09L5KWT6 B09L5KBMPC B09L5L9C7Y B09L5KTTM9 B09L5LPGKV	wanghuaibin
Pheanto Fishing Weights, 100PCS/Box Round Split Shots Fishing Weights, Fishing Weights Sinkers 5 Sizes kit, 0.2g, 0.5g, 1g, 1.5g, 1.8g	B095YKC48Q	Pheanto Lure
HRC Fish Fishing Sinker Lead Weights 1oz - 40oz	B07NL16MLV B07NHMT158 B07NHHHFG3	HRC Fish
Atibin Bass Fishing Bullet Weights Set Saltwater Casting Fishing Weight Shot Removable Bullet Fishing Sinker Lead 1/14oz-3/4oz	B09SYM3Q8M B09SYN9VBN B09SYMRSSST B09SYN2PMQ B09SYNBLLF B09SYN3MQW B09SYNMNDJ	Atibin
ZONGR 160pcs Silver White Fishing Sinker Weights Shot Weight Sinkers Tackle Round bite	B08GM9SGDS	Dream Flowers

<i>Products</i>	<i>Model#/UPC#/Item ID</i>	<i>Vendor/Supplier/Seller</i>
Split Shot Sinkers Weights Kit - 215pcs Round Removable Fishing Sinker Weight Assortment Total 5OZ Small Egg Fishing Sinker Weight Fishing Tackle 7 Sizes with Plastic Box	B096DNCYY9	Wally Outdoor
Split Shot Fishing Weights Sinkers 205Pcs 5 Sizes Weights 0.2/0.3/0.4/0.6/0.8g Round Fishing Line Sinker Removable Egg Lead Assortment	B099NX1GDM	Joyiii
Jyongmer 65Pcs Fishing Weights Sinkers Kit, 6 Assorted Size Worm Fishing Sinker Weights, Bullet Weights Lead Sinker for Bass Fishing Saltwater, Rig Fishing (0.07 - 0.5 oz)	B09BHZMXTTP	JyongmerOnline
Beoccudo Split Shot Sinkers Fishing Weights, Large Size 15g/7g/4g Removable Round Fishing Line Weights Saltwater Freshwater	B09MK5GBLR B09MK5YSH4 B09MK59Y9H	BeerX
YEXPRESS 50 PCS Fishing Lead Sinkers Weights, 6 Sizes Weight Bullet Lead Sinkers Fishing Set for Fishing Pitching and Flipping, 1/8 1/16 3/16 1/4 3/8 1/2Ounce	B09BZCKQLT	Yexpress
30/40pcs Fishing Weights Kit Worm Fishing Sinker Weights for Bass Fishing Pitching and Flipping, Fishing Weights,Sinker Fishing Weights Sinkers Worm Weights	B09DKN7BW3 B09DPJPD5C B09DNZ53N5 B09DP9HNFQ B09DKN3J75 B09DKNJ2T6	Fishinghobby
Joyiii Fishing Weights Sinkers 205pcs Lead Split Shot Fishing Line Sinkers 5 Sizes Removable Egg Lead Assortment	B0925TT936	Joyiii

<i>Products</i>	<i>Model#/UPC#/Item ID</i>	<i>Vendor/Supplier/Seller</i>
YCDMLJC 100pcs Fishing Weights Sinkers Kit, Round Removable Split Shot Sinker Weights, Fishing Lead Egg Weights, Fishing Accessories Equipment Gear Stuff Lead Shot Sinkers	B0928Q5YND B0924H7NQT B096K9F6C3	YCDMLJC
Qunweidi 100Pcs Fishing Weights Sinkers Kit, 5 Sizes Round Split Shot Sinker, Upgrade Fishing Weights Egg Sinkers 5 Sizes, 0.007 oz, 0.017 oz, 0.035 oz, 0.05 oz, 0.07 oz	B0999BC5VQ B0999BVRQ2	USA Daily Necessities
Keadic Fishing Weights Sinkers Assortment Kit, 3g 5g 7g 10g 20g 25g 30g 40g 50g Olive Bass Casting Hollow Egg Fishing Weights with for Freshwater/Saltwater Fishing Gear	B08KVV6D4B B08KW26YJW	Keadic
FOXJIGS 100pcs Fishing Weights Sinkers, Round Split Shot Sinker Kit, Fishing Lead Egg Weights 5 Sizes, 2g, 2.5g, 3g, 4g, 5g	B08VWR2NB6	FOXJIGS
Amersumer 20 Pcs Raindrop Fishing Weights, Lead Fishing Sinkers Weights, Streamlined Shape Fishing Weights for Bottom Fishing	B08F9Z7VJT	CZWESTC

Exhibit B



amazon

All fishing lead shot

Deliver to Winnie Folsom 95630

WP's Amazon.com Customer Service Prime Video Best Sellers Browsing History Whole Foods Find a Gift Summer hobby inspiration

Sports & Outdoors Sports & Fitness Outdoor Recreation Sports Fan Shop Sports Deals Outdoor Deals

Get \$10 for your first sign-in to the Amazon app

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Roll over image to zoom in

Fishing Worm Weight Sinkers Bullet Lead Sinkers Weights Fishing Tackle Accessories Kit Size: 1/8oz 3/16oz 1/4oz 3/8oz 1/2oz 3/4oz 1oz

by Unknown

Price: **\$10.99** & **FREE Shipping** on orders over \$25.00 shipped by Amazon.

Pay **\$10.99** \$0.99 when you add a new payment method to your Amazon wallet. [Click here to add a debit card and save.](#) [Terms Apply](#)

Size:

1/8oz-20pcs

- Type: Worm Sinkers Weights
- Made of premium material, anti-corrosion, sturdy and durable
- Concave base fits worm nose tight and lead bullet sinkers suit for types of rigs
- Great for sinking bait to the strike zone of fishing water layers
- Package contains 20pcs 1/8oz weights

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Topeka Tungsten Weights (3 Ounce) ||
6 Pack of Half Ounce Weights ||
Premium Cylinder Tungsten Weights...

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Arrives: **July 13 - 16** [Details](#)

Fastest delivery: **July 7 - 8**

In stock on July 5, 2020.
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Sold by RG Indoor&Outdoor
Supply and Fulfilled by Amazon.

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Total price: **\$27.54**

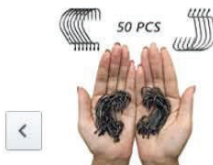
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★★★★☆ 141
\$11.49 - \$19.98



Reaction Tackle Worm/Bullet Weights/Bulk Tungsten Sinkers in Various Sizes and Colors
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Product description

Brand Name: RG

Product Name:
Fishing Worm Weight Sinkers Bullet Lead Sinker Weights
Weight: 1/8oz 3/16oz 1/4oz 3/8oz 1/2oz 3/4oz 1oz

Attention:
*Please keep out of reach of children.
*Please be careful with your fingers when you use the fishing worm weight sinkers.

Warranty:
*RG adhere to Amazon Return Policy.
*RG will take full responsibility for any quality problems within 30 days.

Product details

Size: 1/8oz-20pcs

Shipping Weight: 3.2 ounces (View shipping rates and policies)

ASIN: B07C6B2QYF

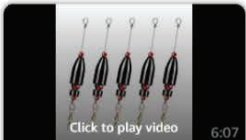
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