

SUMMONS (CITACION JUDICIAL)

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**

ETSY, INC.; and DOES 1-250, inclusive

**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

PAUL WOZNIAK

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:

(El nombre y dirección de la corte es): San Francisco County Superior Court

400 McAllister Street,
San Francisco, CA 94102

CASE NUMBER:
(Número del Caso):

CGC-21-594665

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Clifford A. Chanler (SBN: 135534) CHANLER, LLC, 72 Huckleberry Hill Road, New Canaan, CT 06840

DATE: 09/16/2021 Clerk, by JACKIE LAPREVOTTE, Deputy
(Fecha) (Secretario) (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).



NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):
3. ☒ on behalf of (specify):

under: <input checked="" type="checkbox"/> CCP 416.10 (corporation)	<input type="checkbox"/> CCP 416.60 (minor)
<input type="checkbox"/> CCP 416.20 (defunct corporation)	<input type="checkbox"/> CCP 416.70 (conservatee)
<input type="checkbox"/> CCP 416.40 (association or partnership)	<input type="checkbox"/> CCP 416.90 (authorized person)
<input type="checkbox"/> other (specify):	
4. ☐ by personal delivery on (date):

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Clifford A. Chanler, State Bar No. 135534, c/o CHANLER, LLC 72 Huckleberry Hill Road New Canaan, CT 06840 TELEPHONE NO.: (203) 594-9246 FAX NO.: (203) 594-9247 ATTORNEY FOR (Name): Plaintiff, Paul Wozniak		FOR COURT USE ONLY ELECTRONICALLY FILED Superior Court of California, County of San Francisco 09/07/2021 Clerk of the Court BY: JACKIE LAPREVOTTE Deputy Clerk	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Francisco STREET ADDRESS: 400 McAllister Street MAILING ADDRESS: CITY AND ZIP CODE: San Francisco, CA 94102 BRANCH NAME: Civic Center Courthouse		CASE NUMBER: CGC-21-594665 JUDGE: DEPT:	
CASE NAME: Wozniak v. Etsy, Inc., et al.			
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)		Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	

Items 1–6 below must be completed (see instructions on page 2).

1. Check **one** box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input checked="" type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☐ punitive
4. Number of causes of action (specify): One (1)
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: September 7, 2021
 Clifford A. Chanler

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

- Auto (22)—Personal Injury/Property Damage/Wrongful Death
- Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

- Asbestos (04)
 - Asbestos Property Damage
 - Asbestos Personal Injury/Wrongful Death
- Product Liability (*not asbestos or toxic/environmental*) (24)
- Medical Malpractice (45)
 - Medical Malpractice—Physicians & Surgeons
 - Other Professional Health Care Malpractice
- Other PI/PD/WD (23)
 - Premises Liability (e.g., slip and fall)
 - Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
 - Intentional Infliction of Emotional Distress
 - Negligent Infliction of Emotional Distress
- Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

- Business Tort/Unfair Business Practice (07)
- Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
- Defamation (e.g., slander, libel) (13)
- Fraud (16)
- Intellectual Property (19)
- Professional Negligence (25)
 - Legal Malpractice
 - Other Professional Malpractice (*not medical or legal*)
- Other Non-PI/PD/WD Tort (35)

Employment

- Wrongful Termination (36)
- Other Employment (15)

Contract

- Breach of Contract/Warranty (06)
- Breach of Rental/Lease
 - Contract (*not unlawful detainer or wrongful eviction*)
- Contract/Warranty Breach—Seller
 - Plaintiff (*not fraud or negligence*)
- Negligent Breach of Contract/Warranty
- Other Breach of Contract/Warranty
- Collections (e.g., money owed, open book accounts) (09)
- Collection Case—Seller Plaintiff
- Other Promissory Note/Collections Case
- Insurance Coverage (*not provisionally complex*) (18)
- Auto Subrogation
- Other Coverage
- Other Contract (37)
- Contractual Fraud
- Other Contract Dispute

Real Property

- Eminent Domain/Inverse Condemnation (14)
- Wrongful Eviction (33)
- Other Real Property (e.g., quiet title) (26)
 - Writ of Possession of Real Property
 - Mortgage Foreclosure
 - Quiet Title
 - Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

- Commercial (31)
- Residential (32)
- Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

- Asset Forfeiture (05)
- Petition Re: Arbitration Award (11)
- Writ of Mandate (02)
 - Writ—Administrative Mandamus
 - Writ—Mandamus on Limited Court Case Matter
 - Writ—Other Limited Court Case Review
- Other Judicial Review (39)
 - Review of Health Officer Order
 - Notice of Appeal—Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

- Antitrust/Trade Regulation (03)
- Construction Defect (10)
- Claims Involving Mass Tort (40)
- Securities Litigation (28)
- Environmental/Toxic Tort (30)
- Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

- Enforcement of Judgment (20)
 - Abstract of Judgment (Out of County)
 - Confession of Judgment (*non-domestic relations*)
 - Sister State Judgment
 - Administrative Agency Award (*not unpaid taxes*)
 - Petition/Certification of Entry of Judgment on Unpaid Taxes
 - Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

- RICO (27)
- Other Complaint (*not specified above*) (42)
 - Declaratory Relief Only
 - Injunctive Relief Only (*non-harassment*)
- Mechanics Lien
- Other Commercial Complaint Case (*non-tort/non-complex*)
- Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

- Partnership and Corporate Governance (21)
- Other Petition (*not specified above*) (43)
 - Civil Harassment
 - Workplace Violence
 - Elder/Dependent Adult Abuse
 - Election Contest
 - Petition for Name Change
 - Petition for Relief From Late Claim
- Other Civil Petition

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15 Attorneys for Plaintiff
16 PAUL WOZNIAK

ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco

09/07/2021
Clerk of the Court
BY: JACKIE LAPREVOTTE
Deputy Clerk

CGC-21-594665

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

16 PAUL WOZNIAK,

17 Plaintiff,

18 v.

19 ETSY, INC.; and DOES 1-250, inclusive,

20 Defendants.

Case No. _____

**COMPLAINT FOR CIVIL PENALTIES
AND INJUNCTIVE RELIEF**

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

1 **NATURE OF THE ACTION**

2 1. This complaint is a representative action brought by plaintiff Paul Wozniak in the
3 public interest of the citizens of the State of California to enforce the People's right to be informed
4 of the health hazards caused by exposures to lead, a toxic chemical found in toy figurines, solder
5 wire, fishing sinkers and ingots containing lead sold by defendants that are purchased by or
6 shipped to citizens in California (the "Products" unless otherwise noted).

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

13 3. Lead is found in toy figurines, solder wire, fishing sinkers and ingots that
14 defendants manufacture, import, distribute, retail or otherwise market or offer for sale to
15 consumers and other citizens throughout California and have actual knowledge of their lead
16 contents. Most, if not all, of the sales of the Products were and continue to be offered for purchase
17 and/or transacted through Etsy.com.

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

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

1 6. Defendants manufacture, import, distribute, and/or offer for sale or use the Products
2 without the mandated health hazard warnings in California. The Products at issue are limited to
3 toy figurines, solder wire, fishing sinkers and ingots containing lead as noted in footnote 1 below.¹
4 Products include, but are not limited, to the list of items shown in column one on Exhibit A.
5 Examples of the immediate packaging and Etsy.com website display of one of the products in each
6 of the four categories (toy figurines, solder wire, fishing sinkers and ingots) are shown in Exhibit
7 B.

8 7. Defendants' failure to warn consumers in California of the health hazards
9 associated with exposures to lead in conjunction with defendants' sales of the Products are
10 violations of Proposition 65 which subject defendants, and each of them, to enjoinder of such
11 conduct as well as civil penalties for each violation. Health & Safety Code §25249.7(a) and
12 (b)(1).

13 8. For defendants' violations of Proposition 65, plaintiff seeks preliminary and
14 permanent injunctive relief to compel defendants to provide purchasers and users of the Products
15 with the required warning regarding specific health hazards associated with exposures to lead.
16 Health & Safety Code §25249.7(a).

17 9. Pursuant to Health & Safety Code §25249.7(b), plaintiff also seeks civil penalties
18 against defendants for their violations of Proposition 65.

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26 ¹ The specific products covered by this complaint, including paragraphs 1 and 6, are limited to those items which
27 reference the toxicant "lead" in: (i) the product's name; (ii) the product description or information referenced
28 prominently near the online display for the item when sold through an e-commerce platform; (iii) the search "filter," if
any, used to market the products online; (iv) the immediate product packaging or container; or (v) in any other
conspicuous manner likely to be read by an online purchaser before payment without considerable effort to be
undertaken by the consumer.

PARTIES

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

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

12. ETSY imports, distributes, sells, facilitates, and/or offers the Products for sale or use in the State of California, or implies by its conduct that it imports, distributes, facilitates for sale, sells, and/or offers the Products for sale or use in the State of California. ETSY has offered (and, in many instances, continues to offer) for sale Products supplied to it by entities that are not subject to enforcement under Proposition 65 because: (i) they have less than ten employees during all relevant periods; and/or (ii) do not have an agent for process of service in California.

13. Defendants DOES 1-50 (MANUFACTURER DEFENDANTS) are each a person in the course of doing business within the meaning of Health & Safety Code §§25249.6 and 25249.11.

14. MANUFACTURER DEFENDANTS, and each of them, research, test, design, assemble, fabricate, and manufacture, or each implies by its conduct that it researches, tests, designs, assembles, fabricates, and manufactures one or more of the Products offered for sale or use in California. Many of the MANUFACTURER DEFENDANTS may fall outside the statutory purview of Proposition 65.

15. Defendants DOES 51-100 (EXPORTER DEFENDANTS) are each a person in the course of doing business within the meaning of Health & Safety Code §§25249.6 and 25249.11.

16. EXPORTER DEFENDANTS, and each of them, ship and/or prepare for shipping one or more of the Products to be exported to a United States-based business or individual for purposes of distributing or selling one or more of the Products to California businesses or

1 consumers. Many of the EXPORTER DEFENDANTS may fall outside the statutory purview of
2 Proposition 65.

3 17. Defendants DOES 101-150 (IMPORTER DEFENDANTS) are each a person in the
4 course of doing business within the meaning of Health & Safety Code §§25249.6 and 25249.11.

5 18. IMPORTER DEFENDANTS, and each of them, import one or more of the Products
6 to be distributed or sold to California businesses or consumers including Etsy. Many of the
7 importer entities that could fall under the purview of Proposition 65, do not due to one or more
8 statutory exemptions.

9 19. Defendants DOES 151-200 (DISTRIBUTOR DEFENDANTS) are each a person in
10 the course of doing business within the meaning of Health & Safety Code §§25249.6 and
11 25249.11.

12 20. DISTRIBUTOR DEFENDANTS, and each of them, distribute, exchange, transfer,
13 process, and transport one or more of the Products to individuals or businesses, for sale or use in
14 the State of California, or each implies by its conduct that it distributes, exchanges, transfers,
15 processes, and transports one or more of the Products to individuals or businesses, for sale or use
16 in the State of California. DISTRIBUTOR DEFENDANTS include Etsy, and many distributor
17 entities that could fall under the purview of Proposition 65, but do not due to one or more statutory
18 exemptions.

19 21. Defendants DOES 201-250 (RETAILER DEFENDANTS) are each a person in the
20 course of doing business within the meaning of Health & Safety Code §§25249.6 and 25249.11.

21 22. RETAILER DEFENDANTS, and each of them, offer the Products for sale to
22 individuals in the State of California.

23 23. At this time, the true names of defendants DOES 1 through 250, inclusive, are
24 unknown to plaintiff, who, therefore, sues said defendants by their fictitious names pursuant to
25 Code of Civil Procedure §474. Plaintiff is informed and believes, and on that basis alleges, that
26 each of the fictitiously named defendants is responsible for the acts and occurrences alleged
27 herein. When ascertained, their true names shall be reflected in a further complaint.
28

24. ETSY, MANUFACTURER DEFENDANTS, EXPORTER DEFENDANTS, IMPORTER DEFENDANTS, DISTRIBUTOR DEFENDANTS, and RETAILER DEFENDANTS shall hereinafter, where appropriate, be referred to collectively hereafter as the “DEFENDANTS” and previously as “defendants.”

VENUE AND JURISDICTION

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

26. The California Superior Court has jurisdiction over this action pursuant to California Constitution Article VI, section 10, which grants the Superior Court “original jurisdiction in all causes except those given by statute to other trial courts.” The statute under which this action is brought does not specify any other basis of subject matter jurisdiction.

27. The California Superior Court has jurisdiction over DEFENDANTS based on plaintiff's information and good faith belief that DEFENDANTS are each 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. DEFENDANTS' 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.

1 **FIRST CAUSE OF ACTION**

2 **(Violation of Proposition 65 - Against All Defendants)**

3 28. Plaintiff realleges and incorporates by reference, as if fully set forth herein,
4 Paragraphs 1 through 27, inclusive.

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

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

12 31. On June 15, 2021, plaintiff served 60-Day Notices of Violation (the Notices),
13 together with the requisite certificates of merit, on ETSY, the California Attorney General’s
14 Office, and the requisite public enforcement agencies alleging that, as a result of DEFENDANTS’
15 sales of toy figurines, solder wire, fishing sinkers and ingots containing lead, consumers in the
16 State of California are being exposed to lead resulting from their reasonably foreseeable use of
17 such Products, without them first receiving a “clear and reasonable warning” regarding the
18 reproductive and developmental harms associated with such exposures as required by Proposition
19 65.

20 32. DEFENDANTS manufacture, import, distribute, facilitate for sale, or offers the
21 Products for sale or use in violation of Health & Safety Code §25249.6, and DEFENDANTS’
22 violations have continued well beyond their receipt of plaintiff’s Notices. As such,
23 DEFENDANTS’ violations are ongoing and continuous in nature and, unless enjoined will
24 continue in the future.

25 33. After receiving plaintiff’s Notices, no public enforcement agency has commenced
26 and diligently prosecuted a cause of action against DEFENDANTS under Proposition 65 to
27 enforce the alleged violations that are the subject of plaintiff’s Notices.
28

1 34. The Products that DEFENDANTS manufacture, import, distribute or offer for sale
2 in California cause exposures to lead as a result of the reasonably foreseeable use of the Products.
3 Such exposures caused by DEFENDANTS and endured by consumers in California are not
4 exempt from the “clear and reasonable” warning requirements of Proposition 65, yet
5 DEFENDANTS do not provide compliant warnings for the reproductive toxicity of lead.

6 35. DEFENDANTS have actual knowledge that the Products they manufacture, import,
7 distribute, sell, facilitate for sale or offer for sale in California contain lead.

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

10 37. The normal and reasonably foreseeable use of the Products has caused, and
11 continues to cause, consumer product exposures to lead, as defined by 27 California Code of
12 Regulations §25600.1(e).

13 38. DEFENDANTS know that the normal and reasonably foreseeable use of the
14 Products exposes individuals to lead through inhalation, dermal contact and/or ingestion.

15 39. DEFENDANTS intend that exposures to lead from the reasonably foreseeable use
16 of the Products will occur by their deliberate, non-accidental participation in the manufacture,
17 importation, distribution, sale, and offering of the Products for sale or use to consumers and others
18 in California.

19 40. DEFENDANTS failed to provide a “clear and reasonable warning” to those citizens
20 in California who have been, or who will be, exposed to lead through inhalation, dermal contact
21 and/or ingestion resulting from their use of the Products.

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

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

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

PRAYER FOR RELIEF

Wherefore, plaintiff prays for judgment against DEFENDANTS as follows:

1. That the Court, pursuant to Health & Safety Code §25249.7(b), assess civil penalties against DEFENDANTS, and each of them, in the amount of \$2,500 per day for each violation;

2. That the Court, pursuant to Health & Safety Code §25249.7(a), preliminarily and permanently enjoin DEFENDANTS from manufacturing, importing, distributing, or offering the Products for sale or use in California without first providing a “clear and reasonable warning” regarding the harms associated with exposures to lead;

3. That the Court, pursuant to Health & Safety Code §25249.7(a), issue preliminary and permanent injunctions mandating that DEFENDANTS recall all Products currently in the chain of commerce in California without a “clear and reasonable warning” as defined by 27 California Code of Regulations §§25600 *et seq.*;


1 4. That the Court grant plaintiff his reasonable attorneys' fees and costs of suit; and

2 5. That the Court grant such other and further relief as may be just and proper.

3
4 Dated: September 3, 2021

Respectfully submitted,

5 CHANLER, LLC

6 
7 By: _____
8 Clifford A. Chanler

9
10
11 STEVEN Y. CHEN, APLC

12 
13 By: _____
14 Steven Y. Chen

15 Attorneys for Plaintiff
16 PAUL WOZNIAK

Exhibit A

Lead-Based Toy Figurines

<i>Products</i>	<i>Vendor/Supplier/Seller/Manufacturer</i>
Toy Soldiers Lot of 3 Unmarked Miniature Lead Army Fighter War Military	KathysVintageItems
3 Lead Toy Soldiers	MojosCollectibles
Antique Toy Lead Figure Lamb or Sheep,	SheSellsPurple
Eaglemoss Lead Soldier Figurines from WWII, Model 1 <i>as Illustrated</i>	InvaluableFinds
Eaglemoss Lead Soldier Figurines from WWII, Model 19	InvaluableFinds
WWII Die Cast Lead Toy Military Soldier with Horn	Everythingbystess
Antique Toy Lead Figure Farm Animal Cow Figurine	SheSellsPurple
Antique Toy Lead Figures Three Bears	SheSellsPurple
Six Piece Manoil Cow Set, 3 Cows and 3 Fence Pieces, 14.5 oz. Decorative Set, Contains Lead	Britabean
Eaglemoss Lead Soldier Figurines from WWII, Model 28	InvaluableFinds
Eaglemoss Lead Soldier Figurines from WWII, Model 27	InvaluableFinds
Eaglemoss Lead Soldier Figurines from WWII, Model 18	InvaluableFinds
1930s Barclay Lead Toy Soldiers Doughboys	Littleboxesvintage
Vintage Lead Figure, Lead Soldier, Vintage Lead Soldier, for Collection, Lead officer Figure, Metal WWI Officer	Prestigiousantiques
Set of 6 Lead French Knights Toy Soldiers, Vintage Lead Knights, for Painting	Prestigiousantiques
Vintage Dolls House Lead Kennel & Dog	Mooreminiatures
Bull in A China Shop – Vintage Lead/Die Cast Bull – 1950's Cast Toy	VintageWantsNotNeeds
Lassie Come Home – Vintage Lead/Die Cast Collie Sheep Dog – 1950's Cast Toy	VintageWantsNotNeeds
Barclay Manoil #789 Soldier with Anti-Aircraft Gun – Toy Soldier – Lead Case Soldier with Gun	TrueBlueTreasure

<i>Products</i>	<i>Vendor/Supplier/Seller/Manufacturer</i>
Miniature Lead Soldier, French?	Lacystuff
Miniature Lot of Lead Pig and Piglets Farm Animals, Itty Bitty Lead Animals	Barbarasveryvintage
Vintage Britains Lead Rabbits	Greenbanks
Cutest Little Lead Penguin(s)	Janefavoritethings
Lot of 12 Toy Lead Knights	Ghostofthetime
Vintage John Hill & Co. Lead Cow Toy	Sarahscarriagehouse
Vintage Miniature lead cast black & white sheepdog in lovely play worn condition	WhereTheGoodStuffIs

Lead-Based Solder Wire

<i>Products</i>	<i>Vendor/Supplier/Seller/Manufacturer</i>
CANFIELD Solder 50/50 for Stained Glass Panels Supplies One Pound Lead Tin Wire,	HandworksStudio
CHOICE solder 50/50 for Stained Glass Panels Supplies One Pound Lead Tin Wire,	HandworksStudio
Quemetco, Inc. One Pound Coils of 50/50 Tin/Lead 1/8" Wire Solder, <i>as Illustrated</i>	PortlandPandemonium
Amerway 60/40 Sapphire Solder Wire,	SunMoonStainedGlass
Eagle Solder 60/40 Wire Solder,	GlassLadyDesigns
Amerway 60/40 Solid Core Solder for Stained Glass 1 pound,	BiNARiGlassStudio
Amerway 50/50 Solid Core Solder for Stained Glass 1 pound	BiNARiGlassStudio
1 Lb. (16 oz) CANFIELD Quality 60/40 Solder 60 percent TIN 40 percent LEAD	GlassSupplies
16 oz Roll 50/50 Solder – 50 percent TIN (50 percent LEAD)	GlassSupplies
5 Pounds Amerway Sapphire 60/40 Solder	HarmonyGlassKen
Victory White Metal Stained Glass Solder, 60/40 16 ounce	Kebe157HouseofGlass

<i>Products</i>	<i>Vendor/Supplier/Seller/Manufacturer</i>
Kester Solder 40/60 Stearine 4 Pound 10 Ounce Partial Roll	VillageCraftShack
VWM Stained Glass 60/40 Wire Solder 1 lb. Spool .125 dia. (25-1lb Spools) Bulk 25 lb Box	AlasscoOnlineStore
VWM Stained Glass 50/50 Wire Solder 1 lb. Spool .125 dia. (25-1lb Spools) Bulk 25 lb Box	AlasscoOnlineStore
Avril Wire Solder 60/40 – 1 Lb Roll	Stainedglasswv
1 Pound 60/40 Solder, Choice Solder, 60 percent Tine % 40 Percent Lead	LittleGlassShopSply
Stained Glass Solder, Foil or Lead Came, Suncatchers. High Quality Formulated for Glass. Half Roll, Trial, Small Size.	Lindasutterer
Amerway 60/40 Solder 1LB Roll Stained Glass Supplies NOT FOR JEWELRY contains lead 60% Tin 40 Lead	GlassCraftersGlass

Lead-Based Ingots

<i>Products</i>	<i>Vendor/Supplier/Seller/Manufacturer</i>
1 Troy Ounce .999 Fine Lead Bar – No Logo, <i>as Illustrated</i>	GrimmMetals
Pure Clean Lead Ingots,	WallsTackleSupply
10 Troy Ounce .999 Fine Lead Bullion Bar – Hand Poured – Hand Stamped – GRIMM METALS	GrimmMetals
1 Troy Ounce .999 Fine Lead Bullion Bar – Hand Poured – Hand Stamped – GRIMM METALS	GrimmMetals
30 lbs. Lead Ingots Ultra Clean for Sinkers Jigs Bullets Reloading	1724ApiaryFarm
20 lbs. Lead Ingots Ultra Clean for Sinkers Jigs Bullets Reloading	1724ApiaryFarm
Lead Ingot, 99% Pure! 25 Pounds	Rocksells2U
20 lbs of Lead Ingots	TenaciousTackle
Vintage Corn on the Cob Ingot, Vintage Corn Cob Lead, Corn Cob Paper Weight, Lead Corn Weights, Weighted Tablecloth Weight	Passedloves

<i>Products</i>	<i>Vendor/Supplier/Seller/Manufacturer</i>
LEAD Ingots (10.0 LBS), Smelted From Reclaimed Bullets	BrassCasingArtwork
8 lbs Lead Ingots, for Sinkers, Lures, Jigs, Bullets, Arts and Crafts	FatismeltsCo
Fine .999 Lead Ingot, Pure Troy Ounce Alternate-Rhino Bar, Part of a Unique Collectable Series, Dimensions 1.125" X 2" Elemental Metals	NooYouProduct
Fine .999 Lead 1 Pound Bar, 1lb of Pure Lead - Collectible - Freshly Made Hand Poured, Hand Stamped, Uniquely Crafted - Dimensions 2"x3"0.5	NooYouProduct
3/16" Round U Lead Came-12ft (Rolled and Bagged)	BiNARiGlassStudio
Lead Weights (8lbs)	Byapexparacord
5 lbs Lead Ingots, for Sinkers, Lures, Jigs, Bullets, Arts and Crafts	FatismeltsCo
Lead Bar (Small)	TrailTurtles

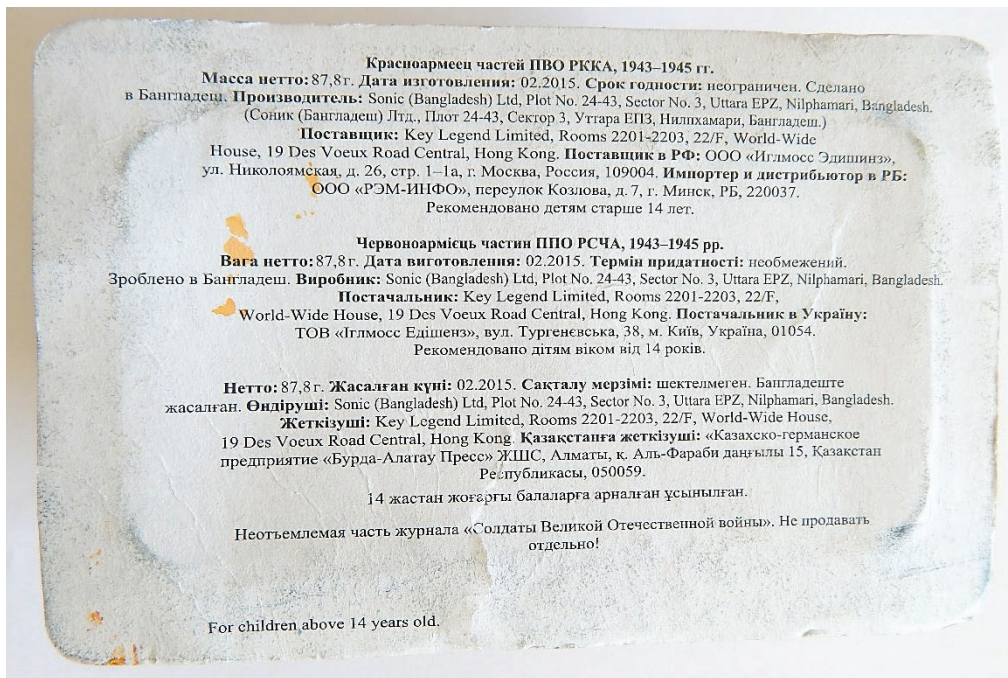
Lead-Based Fishing Weights

<i>Products</i>	<i>Vendor/Supplier/Seller/Manufacturer</i>
Fishing Lead Bank Sinker Ultra Clean Lead (various sizes).,	1724ApiaryFarm
12 Lead Fishing Weights, 0.5 oz. to 0.9 oz.,	Britabean
Pyramid Sinker Weight Surf Fishing Beach Fishing (various sizes), <i>as Illustrated</i>	BigTimeFishnJigs
Lead Deep Drop Stick Weight 1.5 in. (various sizes),	DeadweightTackleCo
Bottom Bouncer Lead Weights for Trolling for Fish, 5 Different Sizes,	KucharKrafts
16 Pack Split Shot Weights, 1/4 oz,	BBWeights
Pyramid Fishing Weights (various sizes),	BarkingRatBaits
3 Pack Sheephead/Hogfish Jib (Hog Ball) On a #2 Gamakatsu Hook	BBWeights
Fishing Cannonball Sinkers – Mix and Match – Ultra Clean Lead (various sizes)	1724ApiaryFarm

<i>Products</i>	<i>Vendor/Supplier/Seller/Manufacturer</i>
1-16 oz. Lead Cannonball Sinkers/Weights	WallsTackleSupply
1-6 oz. Broadhead Sinker/Weight	WallsTackleSupply
Split Weight Lead Sinker / Shot Sinker / Line Protector / 5x Pieces/ Size #4 1.2 grams	MicroMetalInc
1lb – 14lb Lead Deep Drop Weights 2 inch	WallsTackleSupply
Bullet Weights Brand Round Lead Split Shot Fishing Sinkers, Size #5, 10 bags, 220 pcs total	SportsTradingPost
3-20 oz Lead Flat Bank Sinkers/Weights	WallsTackleSupply
Vintage Set of 29 Lead Sinkers (various sizes)	Craftsbykrisa
Four Lead Sinkers 16 ounce 20 ounce	CCCSVintageAntiques
The Bell Drop Fishing Weight/Sinker	CoopDeDoopOutdoors
Vintage Lot of 5 Lead Fishing Weights #8	Agingfarmers
Decoy Weights 2/ 12 oz Lead Weights for Securing Decoys or Fishing Lines Large Lead Fishing Weights	Retirementpickins
The Deep Dive – Handmade Fishing Weight/Sinker (various sizes)	CoopDeDoopOutdoors
Neko Worm Weights Ned Rig Assortment Pack Bass Tournament Largemouth Fishing Jigs Custom Jigs	SherrillFishingJigs
50 Count Egg Sinkers, weights ASSORTED Sizes Made in the USA	BobNCork
25 Count finesse or round lead drop shot weights - 1/8, 3/16, 1/4 or 3/8	Dropzonefishing
18 oz Bank Sinker	RelentlessFP


Exhibit B


Lead-Based Toy Figurines









Captured at: 05/03/2021, 01:00 PM


URL: https://www.etsy.com/listing/997808790/eaglemoss-lead-soldier-figurines-from?ga_order=most_relevant&ga_search_type=all&ga_view_type=gallery&ga_search_query=lead+toy+soldiers&ref=sr_gallery-1-32&organic_search_click=1




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InvaluableFinds
83 sales ★★★★★


Eaglemoss - Lead Soldier Figurines from WWII (IOB) - Model 1


\$3.49 Only 1 available


[Add to cart](#)

 **Selling fast!** Only 1 left, and 1 person has it in their cart.

 Arrives by **May 8-13** if you order today.

Highlights 

 Vintage from before 2000

Description 

Eaglemoss LTD - Lead Toy Soldier from WWII (IOB) - Model #1. Condition is Used. Ships with USPS First Class Mail.

Comes in its original package and blister. Blister have some scuffs and stains (as it was in storage), but figurine is in excellent condition. Stands about 2 1/2" tall.

A great gift and/or addition to your personal collection.

Kindly review the pictures and feel free to ask any further questions you might have prior to buying.

Don't forget to visit our Store (InvaluableFinds) for some other listings you might enjoy.


Best of Luck!

Rate this description




Did you find the above description useful? Let Etsy know.

☒ Yes, it's useful ☐ No, it's not useful

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Shipping and return policies 

Estimated arrival
May 8-13


May 3 **May 4-6** **May 8-13**
Order placed **Order ships** **Delivered!**


Returns & exchanges
Not accepted
But please contact me if you have problems with your order.

Get shipping cost 

Ships from Miami, FL

[View shop policies](#)

Meet your sellers 




InvaluableFinds
Owner of InvaluableFinds

[Message InvaluableFinds](#)


This seller usually responds within a few hours.


15 shop reviews ★★★★★ Sort by: Recommended

 **Lucien** Apr 29, 2021


★★★★★


This is so beautiful, and I look forward to creating a perfume to place in this beautiful bottle. Thank you!

Purchased item:
 Valley of the Kings: Egyptian Art Glass Hand Blown 7" Perfume

 **JEM** Apr 26, 2021


★★★★★


Purchased item:
 Wedgwood - LUSTRE Miniature Vase - Bone China - New - R...

 **JEM** Apr 26, 2021

★★★★★


So so beautiful! Just as described!


Purchased item:
 Wedgwood PINK Jasperware Floral Swirl Miniature 3" Vase...

 **elizabeth moyet** Apr 26, 2021




★★★★★

I like the fan and the colors





Purchased item:
 Avon Mrs. Albee Award Doll Figurine President's Club 1994



Photos from reviews

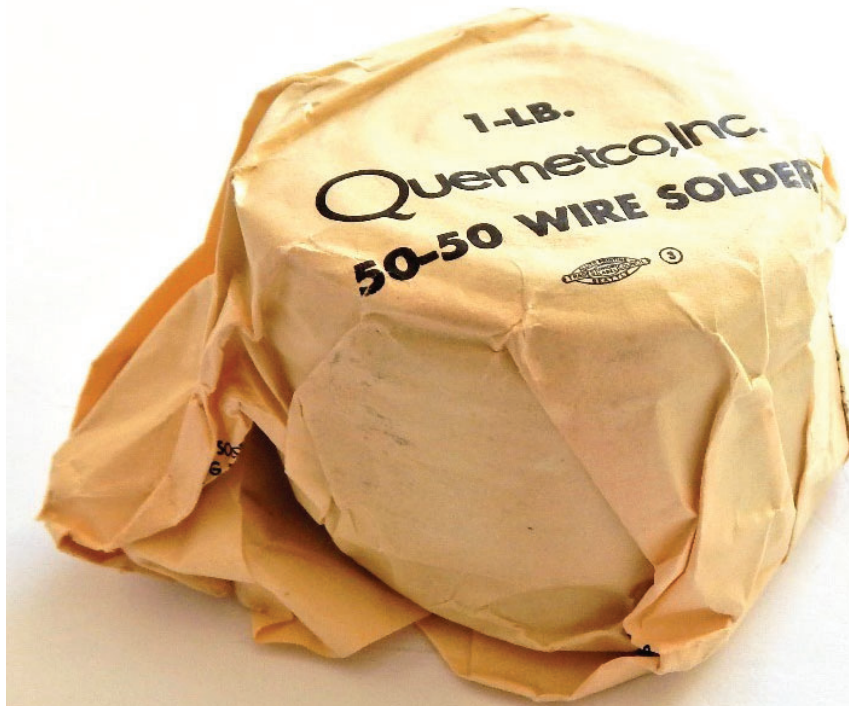
More from this shop [See more](#)

chrome-extension://nlipoenfbbikpbjfpfllcgkoblgpmj/edit-react.html

1/2

Lead-Based Solder Wire



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Item in the photo is in 1 Roll: 5 Rolls

276 shop reviews ★★★★★

Sort by: Recommended ▾



Michele Aug 24, 2019

★★★★★

If I could rate Portland Pandemonium with more than 5 stars, I would! My board game arrived quickly and just as described. Dani...

Purchased item:

[Richard Scarry Busytown Board Game Vin...](#)

👍 Is this review helpful?



Sara Martin Aug 24, 2018

★★★★★

These were better than expected! They added the perfect nautical touch to our store.

Purchased item:

[RESERVED FOR SARA: Vintage Lobster Pot...](#)

👍 Is this review helpful?

PortlandPandemonium

1,050 sales ★★★★★

One Pound Coils of 50/50 Tin/Lead 1/8" Wire Solder, Quemetco, Inc. Old New Stocks Great for Stained Glass, Crafting, General Metalwork

\$15.00+

Only 1 available

1 Roll

Select an option ▾

Buy it now

Add to cart



Rare find — this item is hard to come by.



Arrives by **May 21-24** if you order today.
Hooray! This item ships free to the US.

Highlights

- 🕒 Vintage from before 2000
- 🔍 Materials: Tin, Lead

Description

Here are six vintage 1 pound coils of 50/50 .125" tin/lead wire solder.

You may purchase one, or as many as you wish. Price lowers with bulk purchase.

New old stock from the Quemetco, Inc, still wrapped in original packaging (except for one loose coil).

Tin-lead solders can be used to join copper and most copper alloys. lead

Lead-Based Ingots



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GrimmMetals

565 sales ★★★★★

1 Troy Ounce .999 Fine
Lead Bar - No Logo

\$4.00

✓ In stock

Quantity

1

Buy it now

Add to cart

Arrives by **May 19-22** if you order today.
Hooray! This item ships free to the US.

Highlights

- Handmade
- Materials: Lead

145 shop reviews ★★★★★

Sort by: Recommended ▾



Buyers are raving! Multiple people gave 5-star reviews to this shop in the past 7 days.

[Christopher](#) Jun 21, 2018

★★★★★

Super FAST shipper & is better looking than photographed! I've collected almost everything .999 fine but lead that I can find & I kinda like this little bar I'd buy again for sure, next...

Purchased item:

[1 Troy Ounce .999 Fine Lead Bullion Bar - ...](#)

Is this review helpful?

[Sandra K. Robbins](#) Oct 31, 2019

★★★★★

This is fantastic! Perfect gift for my son & daughter-in-laws 10th anniversary! Great shop, fast shipping and packaged professionally. Thank you!

Purchased item:

[5 Troy Ounce .999 Fine Tin Bullion Bar - H...](#)

Description

This is one troy ounce of the finest .999 pure Lead you can find! all Lead has been tested to be at or above .999 (three nines) in purity. This is a purely hand poured and hand stamped bar. All bars are double weighed with a high precision scale and each will average between 31.105 - 35.000 grams.

*** Please note that if inhaled or ingested, lead can be toxic to humans and pets. Please handle and store this item with care and common sense. ***


Rate this description

Did you find the above description useful? Let Etsy know.

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Lead-Based Fishing Weights





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BigTimeFishnJigs
953 sales ★★★★★

Pyramid Sinker Weight Surf Fishing Beach Fishing 1, 1 1/2, 2, 2 1/2 and 3oz

\$9.95 ✓ In stock

Pyramid Sinks

3 PK 2 oz

Quantity

1

[Buy it now](#)

[Add to cart](#)

Hooray! This item ships free to the US.

Highlights

- Handmade
- Materials: lead

Description

Pyramid Sinker Weight Surf Fishing Beach Fishing 1, 1 1/2, 2, 2 1/2 and 3oz

Custom orders available so you get the package of sinkers that will work for you. Please any questions just ask.

Rate this description


Did you find the above description useful? Let Etsy know.

[Yes, it's useful](#) [No, it's not useful](#)

[Less](#)


166 shop reviews ★★★★★

Sort by: Recommended ▾


 [George](#) May 6, 2021

★★★★★


These jigs work,I have caught more trout over the 20 inch mark using the black jig heads in the past two weeks then I believe I... ⋮



Purchased item:

 [10 Pack Minnow Head Jigs Eagle Claw LIL...](#)


[Is this review helpful?](#)

 [Travis](#) Jul 13, 2017

★★★★★

I ordered 125 pieces and received 130 pieces of very nice brass. It was all decapped and polished nicely. The brass was all sized perfectly and ready for reloading. Could not be... ⋮

Purchased item:

 [223 Once Fired Federal Brass Cases Depri...](#)

[Is this review helpful?](#)

chrome-extension://mcbpbloogmgfnpjjppndjkmgjaogfoeg/fsCaptured.html

1/4