

1 **ENTORNO LAW, LLP**  
2 Craig M. Nicholas (SBN 178444)  
3 Noam Glick (SBN 251582)  
4 Jake W. Schulte (SBN 293777)  
5 Gianna E. Tirrell (SBN 358788)  
6 225 Broadway, Suite 1900  
7 San Diego, California 92101  
8 Tel: (619) 629-0527  
9 Email: craig@entornolaw.com  
10 Email: noam@entornolaw.com  
11 Email: jake@entornolaw.com  
12 Email: gianna@entornolaw.com

13 Attorneys for Plaintiff  
14 Environmental Health Advocates, Inc.

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

16 **IN AND FOR THE COUNTY OF SAN FRANCISCO**

17 ENVIRONMENTAL HEALTH ADVOCATES,  
18 INC.,

19 Plaintiff,

20 v.

21 3CHI HOLDINGS LLC, an Indiana limited  
22 liability company; JOURNAY FINANCIAL  
23 SERVICES LLC, a Delaware limited liability  
24 company; COASTAL DISTRO LLC, a South  
25 Carolina limited liability company; and DOES 1  
26 through 100, inclusive,

27 Defendants.

Case No.:

**COMPLAINT FOR CIVIL PENALTIES  
AND INJUNCTIVE RELIEF**

(Health & Safety Code § 25249.6 et seq.)

**ELECTRONICALLY  
FILED**  
*Superior Court of California,  
County of San Francisco*

**02/27/2026**  
**Clerk of the Court**  
BY: ANGELICA SUNGA  
Deputy Clerk

**CGC-26-634446**

**I.**  
**INTRODUCTION**

1  
2           1.       This Complaint is a representative action brought by Environmental Health Advocates,  
3 Inc. (“Plaintiff”) in the public interest of the citizens of the State of California (“the People”). Plaintiff  
4 seeks to remedy Defendants’ failure to inform the People of exposure to Δ<sup>9</sup> - Tetrahydrocannabinol (also  
5 known as “Delta-9-THC" or "THC"), a known reproductive/developmental toxin. Defendants expose  
6 consumers to THC by manufacturing, importing, selling, and/or distributing THC-infused gummies  
7 including, but not limited to, 3Chi Delta-9 THC Gummies - Watermelon (“Products”). Defendants know  
8 and intend that customers will ingest Products containing THC.

9           2.       Under California’s Safe Drinking Water and Toxic Enforcement Act of 1986, California  
10 Health and Safety Code, section 25249.6 et seq. (“Proposition 65”), “[n]o person in the course of doing  
11 business shall knowingly and intentionally expose any individual to a chemical known to the state to  
12 cause cancer or reproductive toxicity without first giving clear and reasonable warning to such  
13 individual. . . .” (Health & Safety Code, § 25249.6.)

14           3.       California identified and listed THC as a chemical known to cause  
15 developmental/reproductive harm on January 3, 2020.

16           4.       Defendants failed to sufficiently warn consumers and individuals in California about  
17 potential exposure to THC in connection with Defendants’ manufacture, import, sale, or distribution of  
18 Products. This is a violation of Proposition 65.

19           5.       Plaintiff seeks injunctive relief compelling Defendants to sufficiently warn consumers  
20 in California before exposing them to THC in Products. (Health & Safety Code, § 25249.7(a).) Plaintiff  
21 also seeks civil penalties against Defendants for violations of Proposition 65 along with attorney’s fees  
22 and costs. (Health & Safety Code, § 25249.7(b).)

**II.**  
**PARTIES**

23  
24           6.       Plaintiff ENVIRONMENTAL HEALTH ADVOCATES, INC. (“Plaintiff”) is a  
25 corporation in the State of California dedicated to protecting the health of California citizens through  
26 the elimination or reduction of toxic exposure from consumer products. It brings this action in the public  
27 interest pursuant to Health and Safety Code, section 25249.7.

28 ///



1 statute upon which this action is based does not give jurisdiction to any other court. As such, this Court  
2 has jurisdiction.

3 13. Venue is proper in San Francisco County Superior Court pursuant to Code of Civil  
4 Procedure, sections 394, 395, and 395.5. Wrongful conduct occurred and continues to occur in this  
5 County. Defendants conducted and continue to conduct business in this County as it relates to Products.

6 14. Defendants have sufficient minimum contacts in the State of California or otherwise  
7 purposefully avail themselves of the California market. Exercising jurisdiction over Defendants would  
8 be consistent with traditional notions of fair play and substantial justice.

9  
10 **IV.**  
**CAUSES OF ACTION**

11 **FIRST CAUSE OF ACTION**

12 **(Violation of Proposition 65 – Against all Defendants)**

13 15. Plaintiff incorporates by reference each and every allegation contained above.

14 16. Proposition 65 mandates that citizens be informed about exposures to chemicals that  
15 cause cancer, birth defects, and other reproductive harm.

16 17. Defendants manufactured, imported, sold, and/or distributed Products containing THC  
17 in violation of Health and Safety Code, section 25249.6 et seq. Plaintiff is informed and believes such  
18 violations have continued after receipt of the Notice (defined *infra*) and will continue to occur into the  
19 future.

20 18. In manufacturing, importing, selling, and/or distributing Products, Defendants failed to  
21 provide a clear and reasonable warning to consumers and individuals in California who may be exposed  
22 to THC through reasonably foreseeable use of the Products.

23 19. Products expose individuals to THC through direct ingestion. This exposure is a natural  
24 and foreseeable consequence of Defendants placing Products into the stream of commerce. As such,  
25 Defendants intend that consumers will ingest Products, exposing them to THC.

26 20. Defendants knew or should have known that the Products contained THC and exposed  
27 individuals to THC in the ways provided above. The Notice informed Defendants of the presence of  
28

1 THC in the Products. Likewise, media coverage concerning THC and related chemicals in consumer  
2 products provided constructive notice to Defendants.

3 21. Defendants' actions in this regard were deliberate and not accidental.

4 22. More than sixty days prior to naming each defendant in this lawsuit, Plaintiff issued a  
5 60-Day Notice of Violation ("Notice") as required by and in compliance with Proposition 65. Plaintiff  
6 provided the Notice to the various required public enforcement agencies along with a certificate of merit.  
7 The Notice alleged that Defendants violated Proposition 65 by failing to sufficiently warn consumers in  
8 California of the health hazards associated with exposures to THC contained in the Products.

9 23. The appropriate public enforcement agencies provided with the Notice failed to  
10 commence and diligently prosecute a cause of action against Defendants.

11 24. Individuals exposed to THC contained in Products through direct ingestion resulting  
12 from reasonably foreseeable use of the Products have suffered and continue to suffer irreparable harm.  
13 There is no other plain, speedy, or adequate remedy at law.

14 25. Defendants are liable for a maximum civil penalty of \$2,500 per day for each violation  
15 of Proposition 65 pursuant to Health and Safety Code, section 252497(b). Injunctive relief is also  
16 appropriate pursuant to Health and Safety Code, section 25249.7(a).

17 *[Rest of page left intentionally blank.]*  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 **PRAYER FOR RELIEF**

2 Wherefore, Plaintiff prays for judgment against Defendants as follows:

- 3 1. Civil penalties in the amount of \$2,500 per day for each violation. Plaintiff alleges that  
4 damages total a minimum of \$1,000,000;
- 5 2. A preliminary and permanent injunction against Defendants from manufacturing,  
6 importing, selling, and/or distributing Products in California without providing a clear and reasonable  
7 warning as required by Proposition 65 and related Regulations;
- 8 3. Reasonable attorney’s fees and costs of suit; and
- 9 4. Such other and further relief as may be just and proper.
- 10
- 11

12 Respectfully submitted:

13 Dated: February 27, 2026

**ENTORNO LAW, LLP**

14 By:   
15 Noam Glick

16  
17 Craig M. Nicholas  
18 Jake W. Schulte  
19 Gianna E. Tirrell

20 Attorneys for Plaintiff  
21 Environmental Health Advocates, Inc.  
22  
23  
24  
25  
26  
27  
28