

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 NATURE'S FUSIONS, LLC, a Montana  
22 limited liability company; TARGET  
23 CORPORATION, a Minnesota corporation; and  
24 DOES 1 through 100, inclusive,

25 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*

**02/24/2026**  
**Clerk of the Court**  
BY: SHENEQUA GLADNEY  
Deputy Clerk

**CGC-26-634183**

**I.**  
**INTRODUCTION**

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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 lead, a known carcinogen and  
5 reproductive/developmental toxin. Defendants expose consumers to lead by manufacturing, importing,  
6 selling, and/or distributing dietary supplements including, but not limited to, Nature’s Fusions Nutri Sea  
7 Moss Complex with Black Pepper Dietary Supplements (“Products”). Defendants know and intend that  
8 customers will ingest Products containing lead.

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 lead as a chemical known to cause cancer as early as  
15 October 1, 1992, and as a chemical known to cause developmental/reproductive toxicity on February  
16 27, 1987.

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

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

**II.**  
**PARTIES**

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





1 The Notice alleged that Defendants violated Proposition 65 by failing to sufficiently warn consumers in  
2 California of the health hazards associated with exposures to lead contained in the Products.

3 22. The appropriate public enforcement agencies provided with the Notice failed to  
4 commence and diligently prosecute a cause of action against Defendants.

5 23. Individuals exposed to lead contained in Products through direct ingestion resulting  
6 from reasonably foreseeable use of the Products have suffered and continue to suffer irreparable harm.  
7 There is no other plain, speedy, or adequate remedy at law.

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

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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 24, 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.  
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