

FORM JUS 1500 PRIVATE ENFORCEMENT FILING - Health and Safety Code section 25249.7(e) and (f)
(03-01)

REPORT OF CIVIL COMPLAINT FILING

☐ Original Filing

☒ Supplemental Filing

☐ Corrected Filing

Please print or type required information

PARTIES TO THE ACTION	PLAINTIFF(S) SARAH HALE, an individual		
	DEFENDANT(S) Supplemental filing for First Amended Complaint filed 09/17/2026 (11 C.C.R. § 3002). The First Amended Complaint names 77 defendants and DOES 1 through 100, inclusive, listed in full on Attachment A (following page). It adds a Second Cause of Action for exposure to Bisphenol A (BPA) to the original Bisphenol S (BPS) claim, adds the defendants noticed under AG Nos. 2025-04225, 2025-04421 and 2025-04499, and no longer names Blue Ocean R&E Alliance LLC d/b/a One2Go Thai Kitchen. 60-Day Notices: AG Nos. 2025-03609 (amended 10/17/2025, AG No. 2025-04303), 2025-03688 (amended 10/17/2025, AG No. 2025-04304), 2025-04201, 2025-04225, 2025-04421, and 2025-04499.		
CASE INFO	COURT DOCKET NUMBER CGC-26-640604	COURT NAME Superior Court of California, County of San Francisco	
	SHORT CASE NAME Hale v. Levain Larchmont LA, LLC, et al.		
REPORT INFO	TYPE OF CLAIM (Check All That Apply) ☐ Proposition 65 Unlawful Discharge ☒ Proposition 65 Failure to Warn ☐ B&P Code section 17200 ☐ Other		RELIEF SOUGHT (Check All That Apply) ☒ Warning ☐ Discharge Ban ☒ Civil Penalty Also: injunctive relief; fees under CCP § 1021.5
	Chemicals: Bisphenol S (BPS) and Bisphenol A (BPA), reproductive toxicity. Product: thermal paper receipts.		

COPY OF COMPLAINT MUST BE ATTACHED

FILER INFO	NAME OF CONTACT Francis J. Flynn, Jr. (SBN 304712)		
	ORGANIZATION Law Office of Francis J. Flynn, Jr. (Attorneys for Plaintiff Sarah Hale)		TELEPHONE NUMBER (314) 662-2836
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	CITY Los Angeles	STATE CA	ZIP 90036

FILING INSTRUCTIONS: This form can be completed online and printed. If electronic filing is not available, mail the completed form with a copy of the complaint to the attention of the Prop 65 Coordinator at the address shown above. If you need additional space to complete this form please use an attachment.

ATTACHMENT A TO FORM JUS 1500 (SUPPLEMENTAL FILING)

Hale v. Levain Larchmont LA, LLC, et al., San Francisco Superior Court Case No. CGC-26-640604
DEFENDANT(S) named in the First Amended Complaint filed September 17, 2026

1. LEVAIN LARCHMONT LA, LLC
 2. LEVAIN BAKERY NEWPORT BEACH, LLC
 3. LEVAIN BAKERY CALIFORNIA 2, LLC
 4. MAYBOURNE BEVERLY HILLS OPERATOR LLC
 5. DOORDASH, INC.
 6. GORJANA & GRIFFIN, INC.
 7. OUTERKNOWN, LLC
 8. ALLSAINTS USA LIMITED d/b/a ALLSAINTS
 9. ANINE BING CORPORATION d/b/a ANINE BING
 10. GIORGIO ARMANI CORPORATION d/b/a GIORGIO ARMANI
 11. JO MALONE INC. d/b/a JO MALONE LONDON
 12. KIEHL'S LLC d/b/a KIEHL'S
 13. YVES SAINT LAURENT AMERICA, INC. d/b/a SAINT LAURENT
 14. STELLA McCARTNEY AMERICA, INC. d/b/a STELLA McCARTNEY
 15. ALICE + OLIVIA, LLC d/b/a ALICE + OLIVIA
 16. BA&SH AMERICA CORP. d/b/a BA&SH
 17. JOE & THE JUICE US HOLDINGS INC. d/b/a JOE & THE JUICE
 18. QUAY EYEWEAR, INC. d/b/a QUAY
 19. ROWAN INC. d/b/a ROWAN
 20. ARTEAST, LLC d/b/a ZADIG & VOLTAIRE
 21. FEDEX CORPORATION d/b/a FEDEX
 22. FEDERAL EXPRESS CORPORATION d/b/a FEDEX
 23. BALMAIN (USA) LLC d/b/a BALMAIN
 24. H & M HENNES & MAURITZ L.P. d/b/a COS
 25. GIVENCHY CORPORATION d/b/a GIVENCHY
 26. GGR EAST COAST, LLC d/b/a GIANVITO ROSSI
 27. JP BOUTIQUE, INC. d/b/a JAYDEN P BOUTIQUE and/or JAYDEN P
 28. WILDLAND & LILO, LLC d/b/a WILDLAND
 29. NESPRESSO USA, INC. d/b/a NESPRESSO
 30. OLUKAI, LLC d/b/a OLUKAI
 31. OLUKAI RETAIL, LLC d/b/a OLUKAI
 32. PAIGE, LLC d/b/a PAIGE
 33. CROCS RETAIL, LLC d/b/a CROCS
 34. CROCS, INC. d/b/a CROCS
 35. FERRAGAMO USA, INC. d/b/a FERRAGAMO
 36. PERRY ELLIS INTERNATIONAL, INC. d/b/a PERRY ELLIS
 37. RHONE, INC. d/b/a RHONE
 38. SOLARIS EYEWEAR, LLC d/b/a SOLARIS
 39. VINCE, LLC d/b/a VINCE
 40. VINCE HOLDING CORP. d/b/a VINCE
 41. ALEXANDER McQUEEN TRADING AMERICA, INC. d/b/a ALEXANDER McQUEEN
 42. BURGER LOUNGE OF AMERICA, LLC d/b/a BURGER LOUNGE
 43. CAROLINA HERRERA, LTD. d/b/a CH CAROLINA HERRERA
 44. DIESEL U.S.A., INC. d/b/a DIESEL
 45. JOHN VARVATOS ENTERPRISES, INC. d/b/a JOHN VARVATOS
 46. JV ASSET HOLDCO, LLC d/b/a JOHN VARVATOS
 47. APP GROUP, INC. d/b/a MACKAGE
 48. MARGIELA USA, INC. d/b/a MAISON MARGIELA
 49. RICCO'S MICHELAGUAS
 50. WILSON SPORTING GOODS CO. d/b/a WILSON
 51. ZIMMERMANN (USA), INC. d/b/a ZIMMERMANN
 52. TOM FORD RETAIL LLC d/b/a TOM FORD
 53. PAUL SMITH, INC. d/b/a PAUL SMITH
 54. MCM PRODUCTS USA, INC. d/b/a MCM
 55. LONGCHAMP USA, INC. d/b/a LONGCHAMP
 56. LANVIN, INC. d/b/a LANVIN
 57. GANNI, INC. d/b/a GANNI
 58. REISS (RETAIL) LIMITED, INC. d/b/a REISS
 59. ANNE FONTAINE USA, INC. d/b/a ANNE FONTAINE
 60. AG JEANS EXPORT, INC. d/b/a AG JEANS
 61. MARNI USA CORP. d/b/a MARNI
 62. ALOHA COLLECTION, INC. d/b/a ALOHA
 63. REEF LIFESTYLE, LLC d/b/a REEF
 64. BELLE ISLE, INC. d/b/a AVEDA BELLE ISLE SALON & SPA
 65. THE ALLEY USA, INC. d/b/a THE ALLEY
 66. THE ALLEY TEA, INC. d/b/a THE ALLEY
 67. BADGERS CREATION LLC d/b/a TUTU FUN
 68. ROCKY MOUNTAIN CHOCOLATE FACTORY, INC. (d/b/a same)
 69. PAWLICIOUS SNACKS, LLC d/b/a PAWLICIOUS
 70. AURA WOOD INC d/b/a PINKLICIOUS PRESS ON NAILS
 71. DRYBAR PRODUCTS, LLC d/b/a DRYBAR
 72. LAMKONE RESTAURANTS, INC. d/b/a WAHOO'S FISH TACOS
 73. WAHOO'S FISH TACO, LLC d/b/a WAHOO'S FISH TACOS
 74. GOODS2ORDER, LLC d/b/a HEAT
 75. BEYOND YOGA, LLC d/b/a BEYOND YOGA
 76. SOCIAL INVESTMENT GROUP, INC. d/b/a EARTH BOWL
 77. RED DOT RESTAURANT GROUP, INC. d/b/a THE RED CHICKZ
- DOES 1 through 100, inclusive

Plaintiff: SARAH HALE, an individual.

Filer: Francis J. Flynn, Jr. (SBN 304712), Law Office of Francis J. Flynn, Jr., 6057 Metropolitan Plz, Los Angeles, CA 90036; prop65@prop65flynnlaw.com

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Attorneys for Plaintiff
Sarah Hale

ELECTRONICALLY
FILED

Superior Court of California,
County of San Francisco

09/17/2026
Clerk of the Court
BY: JAMES FORONDA
Deputy Clerk

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN FRANCISCO**

SARAH HALE, an individual,

Plaintiff,

v.

LEVAIN LARCHMONT LA, LLC; LEVAIN
BAKERY NEWPORT BEACH, LLC;
LEVAIN BAKERY CALIFORNIA 2, LLC;
MAYBOURNE BEVERLY HILLS
OPERATOR LLC; DOORDASH, INC.;
GORJANA & GRIFFIN, INC.;
OUTERKNOWN, LLC; ALLSAINTS USA
LIMITED d/b/a ALLSAINTS; ANINE BING
CORPORATION d/b/a ANINE BING;
GIORGIO ARMANI CORPORATION d/b/a
GIORGIO ARMANI; JO MALONE INC. d/b/a
JO MALONE LONDON; KIEHL'S LLC d/b/a
KIEHL'S; YVES SAINT LAURENT
AMERICA, INC. d/b/a SAINT LAURENT;
STELLA McCARTNEY AMERICA, INC.
d/b/a STELLA McCARTNEY; ALICE +
OLIVIA, LLC d/b/a ALICE + OLIVIA;
BA&SH AMERICA CORP. d/b/a BA&SH;
JOE & THE JUICE US HOLDINGS INC. d/b/a
JOE & THE JUICE; QUAY EYEWARE, INC.
d/b/a QUAY; ROWAN INC. d/b/a ROWAN;
ARTEAST, LLC d/b/a ZADIG & VOLTAIRE;
FEDEX CORPORATION and FEDERAL
EXPRESS CORPORATION d/b/a FEDEX;
BALMAIN (USA) LLC d/b/a BALMAIN; H &
M HENNES & MAURITZ L.P. d/b/a COS;
GIVENCHY CORPORATION d/b/a

Case No.: CGC-26-640604

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

(Health & Safety Code § 25249.6 et seq.)

1 GIVENCHY; GGR EAST COAST, LLC d/b/a
2 GIANVITO ROSSI; JP BOUTIQUE, INC.
3 d/b/a JAYDEN P BOUTIQUE and/or JAYDEN
4 P; WILDLAND & LILO, LLC d/b/a
5 WILDLAND; NESPRESSO USA, INC. d/b/a
6 NESPRESSO; OLUKAI, LLC and OLUKAI
7 RETAIL, LLC d/b/a OLUKAI; PAIGE, LLC
8 d/b/a PAIGE; CROCS RETAIL, LLC and
9 CROCS, INC. d/b/a CROCS; FERRAGAMO
10 USA, INC. d/b/a FERRAGAMO; PERRY
11 ELLIS INTERNATIONAL, INC. d/b/a PERRY
12 ELLIS; RHONE, INC. d/b/a RHONE;
13 SOLARIS EYEWEAR, LLC d/b/a SOLARIS;
14 VINCE, LLC and VINCE HOLDING CORP.
15 d/b/a VINCE; ALEXANDER McQUEEN
16 TRADING AMERICA, INC. d/b/a
17 ALEXANDER McQUEEN; BURGER
18 LOUNGE OF AMERICA, LLC d/b/a
19 BURGER LOUNGE; CAROLINA HERRERA,
20 LTD. d/b/a CH CAROLINA HERRERA;
21 DIESEL U.S.A., INC. d/b/a DIESEL; JOHN
22 VARVATOS ENTERPRISES, INC. and JV
23 ASSET HOLDCO, LLC d/b/a JOHN
24 VARVATOS; APP GROUP, INC. d/b/a
25 MACKAGE; MARGIELA USA, INC. d/b/a
26 MAISON MARGIELA; RICCO'S
27 MICHELAGUAS; WILSON SPORTING
28 GOODS CO. d/b/a WILSON; ZIMMERMANN
(USA), INC. d/b/a ZIMMERMANN; TOM
FORD RETAIL LLC d/b/a TOM FORD; PAUL
SMITH, INC. d/b/a PAUL SMITH; MCM
PRODUCTS USA, INC. d/b/a MCM;
LONGCHAMP USA, INC. d/b/a
LONGCHAMP; LANVIN, INC. d/b/a
LANVIN; GANNI, INC. d/b/a GANNI; REISS
(RETAIL) LIMITED, INC. d/b/a REISS;
ANNE FONTAINE USA, INC. d/b/a ANNE
FONTAINE; AG JEANS EXPORT, INC. d/b/a
AG JEANS; MARNI USA CORP. d/b/a
MARNI; ALOHA COLLECTION, INC. d/b/a
ALOHA; REEF LIFESTYLE, LLC d/b/a
REEF; BELLE ISLE, INC. d/b/a AVEDA
BELLE ISLE SALON & SPA; THE ALLEY
USA, INC. and THE ALLEY TEA, INC. d/b/a
THE ALLEY; BADGERS CREATION LLC
d/b/a TUTU FUN; ROCKY MOUNTAIN
CHOCOLATE FACTORY, INC. d/b/a
ROCKY MOUNTAIN CHOCOLATE
FACTORY; PAWLICIOUS SNACKS, LLC
d/b/a PAWLICIOUS; AURA WOOD INC d/b/a
PINKLICIOUS PRESS ON NAILS; DRYBAR
PRODUCTS, LLC d/b/a DRYBAR;
LAMKONE RESTAURANTS, INC. and
WAHOO'S FISH TACO, LLC d/b/a
WAHOO'S FISH TACOS; GOODS2ORDER,

1 LLC d/b/a HEAT; BEYOND YOGA, LLC
2 d/b/a BEYOND YOGA; SOCAL
3 INVESTMENT GROUP, INC. d/b/a EARTH
4 BOWL; RED DOT RESTAURANT GROUP,
5 INC. d/b/a THE RED CHICKZ; and DOES 1
6 through 100, inclusive,

7 Defendants.

8 Plaintiff Sarah Hale, in the public interest, based on information and belief and investigation
9 of counsel, except for information based on knowledge, hereby makes the following allegations:

10 **I.**
11 **INTRODUCTION**

12 1. This First Amended Complaint is a representative action brought by Sarah Hale
13 (“Plaintiff”) in the public interest of the citizens of the State of California (“the People”). Plaintiff seeks
14 to remedy Defendants’ failure to inform the People of exposure to Bisphenol A (“BPA”) and Bisphenol
15 S (“BPS”), each a chemical known to the State of California to cause reproductive toxicity. Defendants
16 expose consumers to BPA and/or BPS by manufacturing, importing, selling, and/or distributing thermal
17 paper receipts, including the receipts identified in Paragraphs 7 through 74 below.¹

18 2. This Complaint seeks to remedy Defendants’ continuing failure to warn individuals in
19 California that they are being exposed to BPA and BPS (collectively, the “Listed Chemicals”), each a
20 chemical known to the State of California to cause reproductive harm, including birth defects. Such
21 exposures have occurred, and continue to occur, when people handle thermal paper coated with BPA
22 and/or BPS (“Thermal Paper”) that is manufactured, distributed, sold, or otherwise provided to
23 consumers by Defendants. Consumers, including pregnant women, are exposed to the Listed Chemicals
24 when they touch or handle the Thermal Paper.

25 3. Under California’s Proposition 65, Health & Safety Code § 25249.5, et seq., it is
26 unlawful for businesses to knowingly and intentionally expose individuals in California to chemicals
27 known to the State to cause birth defects or other reproductive harm without first providing clear and
28

¹ See 60-Day Notices of Violation, Attorney General Nos. 2025-03609 (as amended October 17, 2025, AG No. 2025-04303), 2025-03688 (as amended October 17, 2025, AG No. 2025-04304), 2025-04201, 2025-04225, 2025-04421, and 2025-04499. Links to the relevant Attorney General records are attached hereto as Exhibit 1 and incorporated herein by reference.

1 reasonable warnings to exposed individuals. Defendants introduce Thermal Paper containing significant
2 quantities of BPA and/or BPS into the California marketplace, either directly by selling the Thermal
3 Paper or by distributing Thermal Paper as transactional documents, such as receipts from cash registers
4 and other point-of-sale devices, to California consumers.

5 4. Thermal Paper is treated with a surface coating of BPA and/or BPS. When Thermal
6 Paper is exposed to heat from a thermal printer, the BPA and/or BPS reacts with other chemicals on the
7 surface of the Thermal Paper by changing color to appear like ink on the paper. California consumers,
8 many of whom are pregnant women, are thus exposed to the Listed Chemicals when they touch or
9 otherwise handle the Thermal Paper.

10 5. Despite the fact that Defendants expose pregnant women and other individuals to the
11 Listed Chemicals, Defendants provide no warnings whatsoever about the reproductive hazards
12 associated with exposure to the Listed Chemicals. Defendants' conduct thus violates the warning
13 provision of Proposition 65. Health & Safety Code § 25249.6.

14 **II.**
15 **PARTIES**

16 6. Plaintiff SARAH HALE ("Plaintiff") is an individual residing in the State of California.
17 Plaintiff is a "person" within the meaning of Health & Safety Code § 25249.11(a) and brings this
18 enforcement action in the public interest pursuant to Health & Safety Code § 25249.7(d).

19 7. Defendants LEVAIN LARCHMONT LA, LLC, LEVAIN BAKERY NEWPORT
20 BEACH, LLC, and LEVAIN BAKERY CALIFORNIA 2, LLC (collectively, "Levain Bakery") are
21 each a person in the course of doing business within the meaning of Health & Safety Code § 25249.11.
22 LEVAIN LARCHMONT LA, LLC is a Delaware limited liability company doing business in the State
23 of California. LEVAIN BAKERY NEWPORT BEACH, LLC is a Delaware limited liability company
24 doing business in the State of California. LEVAIN BAKERY CALIFORNIA 2, LLC is a Delaware
25 limited liability company doing business in the State of California. Levain Bakery manufactures,
26 distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers
27 as receipts for the purchase of other goods or services. Laboratory testing of Thermal Paper provided to
28 consumers by Levain Bakery detected BPS at a concentration of approximately 19,000 µg/g. Plaintiff

served a 60-Day Notice of Violation on Levain Bakery and the public enforcers on or about 9/22/2025 (AG Notice No. 2025-03688, as amended October 17, 2025, AG Notice No. 2025-04304).

8. Defendant MAYBOURNE BEVERLY HILLS OPERATOR LLC (“Maybourne”) is a Delaware limited liability company that owns and operates the Maybourne Beverly Hills and is doing business in the State of California. Maybourne is a person in the course of doing business within the meaning of Health & Safety Code § 25249.11. Maybourne manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers as receipts for the purchase of other goods or services. Laboratory testing of Thermal Paper provided to consumers by Maybourne detected BPS at a concentration of approximately 28,000 µg/g and BPA at a concentration of approximately 79 µg/g. Plaintiff served a 60-Day Notice of Violation on Maybourne and the public enforcers on or about 9/17/2025 (AG Notice No. 2025-03609, as amended October 17, 2025, AG Notice No. 2025-04303).

9. Defendant DOORDASH, INC. (“DoorDash”) is a corporation organized and existing under the laws of Delaware, with its principal place of business in San Francisco, California. DoorDash is a person in the course of doing business within the meaning of Health & Safety Code § 25249.11. DoorDash manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers as receipts for the purchase of other goods or services. Laboratory testing of Thermal Paper provided to consumers by DoorDash detected BPS at a concentration of approximately 18,000 µg/g. Plaintiff served a 60-Day Notice of Violation on DoorDash and the public enforcers on or about 9/22/2025 (AG Notice No. 2025-03688, as amended October 17, 2025, AG Notice No. 2025-04304).

10. Defendant GORJANA & GRIFFIN, INC. (“Gorjana”) is a California corporation with its principal place of business in Laguna Beach, California. Gorjana is a person in the course of doing business within the meaning of Health & Safety Code § 25249.11. Gorjana manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers as receipts for the purchase of other goods or services. Laboratory testing of Thermal Paper provided to consumers by Gorjana detected BPS at a concentration of approximately 14,000 µg/g and BPA at a concentration

1 of approximately 5.8 µg/g. Plaintiff served a 60-Day Notice of Violation on Gorjana and the public
2 enforcers on or about 10/10/2025 (AG Notice No. 2025-04201).

3 11. Defendant OUTERKNOWN, LLC (“Outerknown”) is a Delaware limited liability
4 company doing business in the State of California. Outerknown is a person in the course of doing
5 business within the meaning of Health & Safety Code § 25249.11. Outerknown manufactures,
6 distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers
7 as receipts for the purchase of other goods or services. Laboratory testing of Thermal Paper provided to
8 consumers by Outerknown detected BPS at a concentration of approximately 13,000 µg/g. Plaintiff
9 served a 60-Day Notice of Violation on Outerknown and the public enforcers on or about 10/10/2025
10 (AG Notice No. 2025-04201).

11 12. Defendant ALLSAINTS USA LIMITED d/b/a ALLSAINTS (“AllSaints”) is a private
12 limited company organized under the laws of England and Wales, registered to do business in the State
13 of California. AllSaints is a person in the course of doing business within the meaning of Health &
14 Safety Code § 25249.11. AllSaints manufactures, distributes, sells or otherwise makes available
15 Thermal Paper that is provided to California consumers as receipts for the purchase of goods or services,
16 including at the AllSaints location at South Coast Plaza, 3333 Bristol Street, Costa Mesa, California
17 92626, Suite 1843. Laboratory testing of Thermal Paper provided to consumers by AllSaints at that
18 location on or about September 18, 2025 detected BPS at a concentration of approximately 14,000 µg/g.
19 Plaintiff served a 60-Day Notice of Violation on AllSaints and the public enforcers on or about
20 10/14/2025 (AG Notice No. 2025-04225).

21 13. Defendant ANINE BING CORPORATION d/b/a ANINE BING (“Anine Bing”) is a
22 California corporation with its principal place of business in Los Angeles, California. Anine Bing is a
23 person in the course of doing business within the meaning of Health & Safety Code § 25249.11. Anine
24 Bing manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to
25 California consumers as receipts for the purchase of goods or services, including at the Anine Bing
26 location at South Coast Plaza, 3333 Bristol Street, Costa Mesa, California 92626, Suite 1837. Laboratory
27 testing of Thermal Paper provided to consumers by Anine Bing at that location on or about September
28 18, 2025 detected BPS at a concentration of approximately 16,000 µg/g. Plaintiff served a 60-Day

1 Notice of Violation on Anine Bing and the public enforcers on or about 10/14/2025 (AG Notice No.
2 2025-04225).

3 14. Defendant GIORGIO ARMANI CORPORATION d/b/a GIORGIO ARMANI
4 (“Giorgio Armani”) is a New York corporation doing business in the State of California. Giorgio Armani
5 is a person in the course of doing business within the meaning of Health & Safety Code § 25249.11.
6 Giorgio Armani manufactures, distributes, sells or otherwise makes available Thermal Paper that is
7 provided to California consumers as receipts for the purchase of goods or services, including at the
8 Giorgio Armani location at South Coast Plaza, 3333 Bristol Street, Costa Mesa, California 92626, Suite
9 2883. Laboratory testing of Thermal Paper provided to consumers by Giorgio Armani at that location
10 on or about September 18, 2025 detected BPS at a concentration of approximately 14,000 µg/g. Plaintiff
11 served a 60-Day Notice of Violation on Giorgio Armani and the public enforcers on or about 10/14/2025
12 (AG Notice No. 2025-04225).

13 15. Defendant JO MALONE INC. d/b/a JO MALONE LONDON (“Jo Malone London”) is a Delaware corporation doing business in the State of California. Jo Malone London is a person in
14 the course of doing business within the meaning of Health & Safety Code § 25249.11. Jo Malone
15 London manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to
16 California consumers as receipts for the purchase of goods or services, including at the Jo Malone
17 London location at South Coast Plaza, 3333 Bristol Street, Costa Mesa, California 92626, Suite 504.
18 Laboratory testing of Thermal Paper provided to consumers by Jo Malone London at that location on or
19 about September 18, 2025 detected BPS at a concentration of approximately 1,200 µg/g. On or about
20 10/14/2025, Plaintiff served a 60-Day Notice of Violation (AG Notice No. 2025-04225) on the public
21 enforcers and on the business identified in that Notice as “Estee Lauder, Inc. d/b/a Jo Malone London,”
22 767 Fifth Avenue, New York, New York 10153. Plaintiff is informed and believes, and on that basis
23 alleges, that JO MALONE INC. owns and/or operates the Jo Malone London business so noticed, does
24 business under that name, and received the Notice.

26 16. Defendant KIEHL’S LLC d/b/a KIEHL’S (“Kiehl’s”) is a limited liability company
27 with its principal place of business in New York, New York, doing business in the State of California.
28 Kiehl’s is a person in the course of doing business within the meaning of Health & Safety Code §

1 25249.11. Kiehl’s manufactures, distributes, sells or otherwise makes available Thermal Paper that is
2 provided to California consumers as receipts for the purchase of goods or services, including at the
3 Kiehl’s location at South Coast Plaza, 3333 Bristol Street, Costa Mesa, California 92626. Laboratory
4 testing of Thermal Paper provided to consumers by Kiehl’s at that location on or about September 18,
5 2025 detected BPS at a concentration of approximately 1,200 µg/g. Plaintiff served a 60-Day Notice of
6 Violation on Kiehl’s and the public enforcers on or about 10/14/2025 (AG Notice No. 2025-04225).

7 17. Defendant YVES SAINT LAURENT AMERICA, INC. d/b/a SAINT LAURENT
8 (“Saint Laurent”) is a Delaware corporation doing business in the State of California. Saint Laurent is a
9 person in the course of doing business within the meaning of Health & Safety Code § 25249.11. Saint
10 Laurent manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to
11 California consumers as receipts for the purchase of goods or services, including at the Saint Laurent
12 location at South Coast Plaza, 3333 Bristol Street, Costa Mesa, California 92626. Laboratory testing of
13 Thermal Paper provided to consumers by Saint Laurent at that location on or about September 18, 2025
14 detected BPS at a concentration of approximately 11,000 µg/g. Plaintiff served a 60-Day Notice of
15 Violation on Saint Laurent and the public enforcers on or about 10/14/2025 (AG Notice No. 2025-
16 04225).

17 18. Defendant STELLA McCARTNEY AMERICA, INC. d/b/a STELLA McCARTNEY
18 (“Stella McCartney”) is a Delaware corporation doing business in the State of California. Stella
19 McCartney is a person in the course of doing business within the meaning of Health & Safety Code §
20 25249.11. Stella McCartney manufactures, distributes, sells or otherwise makes available Thermal
21 Paper that is provided to California consumers as receipts for the purchase of goods or services,
22 including at the Stella McCartney location at South Coast Plaza, 3333 Bristol Street, Costa Mesa,
23 California 92626, Suite 2216. Laboratory testing of Thermal Paper provided to consumers by Stella
24 McCartney at that location on or about September 18, 2025 detected BPS at a concentration of
25 approximately 15,000 µg/g. Plaintiff served a 60-Day Notice of Violation on Stella McCartney and the
26 public enforcers on or about 10/14/2025 (AG Notice No. 2025-04225).

27 19. Defendant ALICE + OLIVIA, LLC d/b/a ALICE + OLIVIA (“Alice + Olivia”) is a
28 Delaware limited liability company with its principal place of business in New York, New York, doing

1 business in the State of California. Alice + Olivia is a person in the course of doing business within the
2 meaning of Health & Safety Code § 25249.11. Alice + Olivia manufactures, distributes, sells or
3 otherwise makes available Thermal Paper that is provided to California consumers as receipts for the
4 purchase of goods or services, including at the Alice + Olivia location at Westfield UTC, 4301 La Jolla
5 Village Drive, San Diego, California 92122. Laboratory testing of Thermal Paper provided to consumers
6 by Alice + Olivia at that location on or about September 21, 2025 detected BPS at a concentration of
7 approximately 10,000 µg/g. Plaintiff served a 60-Day Notice of Violation on Alice + Olivia and the
8 public enforcers on or about 10/14/2025 (AG Notice No. 2025-04225).

9 20. Defendant BA&SH AMERICA CORP. d/b/a BA&SH (“Ba&sh”) is a corporation with
10 its principal place of business in New York, New York, doing business in the State of California. Ba&sh
11 is a person in the course of doing business within the meaning of Health & Safety Code § 25249.11.
12 Ba&sh manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to
13 California consumers as receipts for the purchase of goods or services, including at the Ba&sh location
14 at Westfield UTC, 4305 La Jolla Village Drive, San Diego, California 92122. Laboratory testing of
15 Thermal Paper provided to consumers by Ba&sh at that location on or about September 21, 2025
16 detected BPS at a concentration of approximately 18,000 µg/g. Plaintiff served a 60-Day Notice of
17 Violation on Ba&sh and the public enforcers on or about 10/14/2025 (AG Notice No. 2025-04225).

18 21. Defendant JOE & THE JUICE US HOLDINGS INC. d/b/a JOE & THE JUICE (“Joe
19 & The Juice”) is a corporation with its principal place of business in New York, New York, doing
20 business in the State of California. Joe & The Juice is a person in the course of doing business within
21 the meaning of Health & Safety Code § 25249.11. Joe & The Juice manufactures, distributes, sells or
22 otherwise makes available Thermal Paper that is provided to California consumers as receipts for the
23 purchase of goods or services, including at the Joe & The Juice location at Westfield UTC, 4545 La
24 Jolla Village Drive, San Diego, California 92122. Laboratory testing of Thermal Paper provided to
25 consumers by Joe & The Juice at that location on or about September 21, 2025 detected BPS at a
26 concentration of approximately 630 µg/g. Plaintiff served a 60-Day Notice of Violation on Joe & The
27 Juice and the public enforcers on or about 10/14/2025 (AG Notice No. 2025-04225).

1 22. Defendant QUAY EYEWARE, INC. d/b/a QUAY (“Quay”) is a corporation with its
2 principal place of business in San Francisco, California. Quay is a person in the course of doing business
3 within the meaning of Health & Safety Code § 25249.11. Quay manufactures, distributes, sells or
4 otherwise makes available Thermal Paper that is provided to California consumers as receipts for the
5 purchase of goods or services, including at the Quay location at Westfield UTC, 4303 La Jolla Village
6 Drive, San Diego, California 92122. Laboratory testing of Thermal Paper provided to consumers by
7 Quay at that location on or about September 21, 2025 detected BPS at a concentration of approximately
8 12,000 µg/g. Plaintiff served a 60-Day Notice of Violation on Quay and the public enforcers on or about
9 10/14/2025 (AG Notice No. 2025-04225).

10 23. Defendant ROWAN INC. d/b/a ROWAN (“Rowan”) is a corporation doing business in
11 the State of California. Rowan is a person in the course of doing business within the meaning of Health
12 & Safety Code § 25249.11. Rowan manufactures, distributes, sells or otherwise makes available
13 Thermal Paper that is provided to California consumers as receipts for the purchase of goods or services,
14 including at the Rowan location at Westfield UTC, 4545 La Jolla Village Drive, San Diego, California
15 92122, Suite E-25. Laboratory testing of Thermal Paper provided to consumers by Rowan at that
16 location on or about September 21, 2025 detected BPS at a concentration of approximately 15,000 µg/g.
17 Plaintiff served a 60-Day Notice of Violation on Rowan and the public enforcers on or about 10/14/2025
18 (AG Notice No. 2025-04225).

19 24. Defendant ARTEAST, LLC d/b/a ZADIG & VOLTAIRE (“Zadig & Voltaire”) is a
20 limited liability company doing business in the State of California. Zadig & Voltaire is a person in the
21 course of doing business within the meaning of Health & Safety Code § 25249.11. Zadig & Voltaire
22 manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to
23 California consumers as receipts for the purchase of goods or services, including at the Zadig & Voltaire
24 location at Westfield UTC, 4305 La Jolla Village Drive, San Diego, California 92122. Laboratory
25 testing of Thermal Paper provided to consumers by Zadig & Voltaire at that location on or about
26 September 21, 2025 detected BPS at a concentration of approximately 12,000 µg/g. On or about
27 10/14/2025, Plaintiff served a 60-Day Notice of Violation (AG Notice No. 2025-04225) on the public
28 enforcers and on the business identified in that Notice as “Zadig & Voltaire,” at the address stated in the

1 Notice. Plaintiff is informed and believes, and on that basis alleges, that ARTEAST, LLC owns and/or
2 operates the business so noticed, does business under that name, and received the Notice.

3 25. Defendants FEDEX CORPORATION and FEDERAL EXPRESS CORPORATION
4 (collectively, “FedEx”) are each a Delaware corporation with its principal place of business in Memphis,
5 Tennessee, and each is authorized to do and is doing business in the State of California. Plaintiff is
6 informed and believes, and on that basis alleges, that Federal Express Corporation is a wholly owned
7 subsidiary of FedEx Corporation, and that FedEx Corporation and/or Federal Express Corporation own
8 and operate the FedEx Ship Center located at 2495 Faraday Avenue, Carlsbad, California 92010, at
9 which the Thermal Paper receipt at issue was obtained. Each of the FedEx defendants is a person in the
10 course of doing business within the meaning of Health & Safety Code § 25249.11. FedEx manufactures,
11 distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers
12 as receipts for the purchase of goods or services, including at that FedEx Ship Center. Laboratory testing
13 of Thermal Paper provided to consumers by FedEx at that location on or about September 21, 2025
14 detected BPS at a concentration of approximately 23,000 µg/g. Plaintiff served a 60-Day Notice of
15 Violation on FedEx Corporation d/b/a FedEx, 942 South Shady Grove Road, Memphis, Tennessee
16 38120, and the public enforcers on or about 10/14/2025 (AG Notice No. 2025-04225). Plaintiff is
17 informed and believes, and on that basis alleges, that Federal Express Corporation, a wholly owned
18 subsidiary of FedEx Corporation that does business under the same “FedEx” name, also received the
19 Notice.

20 26. Defendant BALMAIN (USA) LLC d/b/a BALMAIN (“Balmain”) is a limited liability
21 company with its principal place of business in New York, New York, doing business in the State of
22 California. Balmain is a person in the course of doing business within the meaning of Health & Safety
23 Code § 25249.11. Balmain manufactures, distributes, sells or otherwise makes available Thermal Paper
24 that is provided to California consumers as receipts for the purchase of goods or services, including at
25 the Balmain location at South Coast Plaza, 3333 Bristol Street, Costa Mesa, California 92626, Suite
26 2347. Laboratory testing of Thermal Paper provided to consumers by Balmain at that location on or
27 about September 23, 2025 detected BPS at a concentration of approximately 8,600 µg/g. Plaintiff served
28

1 a 60-Day Notice of Violation on Balmain and the public enforcers on or about 10/10/2025 (AG Notice
2 No. 2025-04201).

3 27. Defendant H & M HENNES & MAURITZ L.P. d/b/a COS (“COS”) is a limited
4 partnership with its principal place of business in New York, New York, doing business in the State of
5 California, and operates the retail stores known as COS in California. COS is a person in the course of
6 doing business within the meaning of Health & Safety Code § 25249.11. COS manufactures, distributes,
7 sells or otherwise makes available Thermal Paper that is provided to California consumers as receipts
8 for the purchase of goods or services, including at the COS location at South Coast Plaza, 3333 Bristol
9 Street, Costa Mesa, California 92626, Suite 2813. Laboratory testing of Thermal Paper provided to
10 consumers by COS at that location on or about September 23, 2025 detected BPS at a concentration of
11 approximately 20,000 µg/g and BPA at a concentration of approximately 5.3 µg/g. Plaintiff served a
12 60-Day Notice of Violation on COS and the public enforcers on or about 10/10/2025 (AG Notice No.
13 2025-04201).

14 28. Defendant GIVENCHY CORPORATION d/b/a GIVENCHY (“Givenchy”) is a
15 corporation with its principal place of business in New York, New York, doing business in the State of
16 California. Givenchy is a person in the course of doing business within the meaning of Health & Safety
17 Code § 25249.11. Givenchy manufactures, distributes, sells or otherwise makes available Thermal Paper
18 that is provided to California consumers as receipts for the purchase of goods or services, including at
19 the Givenchy location at South Coast Plaza, 3333 Bristol Street, Costa Mesa, California 92626, Suite
20 2261. Laboratory testing of Thermal Paper provided to consumers by Givenchy at that location on or
21 about September 23, 2025 detected BPS at a concentration of approximately 9,900 µg/g. Plaintiff served
22 a 60-Day Notice of Violation on Givenchy and the public enforcers on or about 10/10/2025 (AG Notice
23 No. 2025-04201).

24 29. Defendant GGR EAST COAST, LLC d/b/a GIANVITO ROSSI (“Gianvito Rossi”) is
25 a limited liability company with its principal place of business in New York, New York, doing business
26 in the State of California. Gianvito Rossi is a person in the course of doing business within the meaning
27 of Health & Safety Code § 25249.11. Gianvito Rossi manufactures, distributes, sells or otherwise makes
28 available Thermal Paper that is provided to California consumers as receipts for the purchase of goods

1 or services, including at the Gianvito Rossi location at South Coast Plaza, 3333 Bristol Street, Costa
2 Mesa, California 92626, Suite 2213. Laboratory testing of Thermal Paper provided to consumers by
3 Gianvito Rossi at that location on or about September 18, 2025 detected BPA at a concentration of
4 approximately 3,500 µg/g. Plaintiff served a 60-Day Notice of Violation on Gianvito Rossi and the
5 public enforcers on or about 10/28/2025 (AG Notice No. 2025-04421).

6 30. Defendant JP BOUTIQUE, INC. d/b/a JAYDEN P BOUTIQUE and/or JAYDEN P
7 (“Jayden P”) is a corporation doing business in the State of California. Jayden P is a person in the course
8 of doing business within the meaning of Health & Safety Code § 25249.11. Jayden P manufactures,
9 distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers
10 as receipts for the purchase of goods or services, including at the Jayden P location at 2946 State Street,
11 Carlsbad, California 92008. Laboratory testing of Thermal Paper provided to consumers by Jayden P at
12 that location on or about September 20, 2025 detected BPA at a concentration of approximately 5,200
13 µg/g. On or about 10/28/2025, Plaintiff served a 60-Day Notice of Violation (AG Notice No. 2025-
14 04421) on the public enforcers and on the business identified in that Notice as “Jayden P Boutique d/b/a
15 Jayden P,” at the address stated in the Notice. Plaintiff is informed and believes, and on that basis alleges,
16 that JP BOUTIQUE, INC. owns and/or operates the business so noticed, does business under that name,
17 and received the Notice.

18 31. Defendant WILDLAND & LILO, LLC d/b/a WILDLAND (“Wildland”) is a limited
19 liability company doing business in the State of California. Wildland is a person in the course of doing
20 business within the meaning of Health & Safety Code § 25249.11. Wildland manufactures, distributes,
21 sells or otherwise makes available Thermal Paper that is provided to California consumers as receipts
22 for the purchase of goods or services, including at the Wildland location at 2598 State Street, Carlsbad,
23 California 92008. Laboratory testing of Thermal Paper provided to consumers by Wildland at that
24 location on or about September 20, 2025 detected BPS at a concentration of approximately 11,000 µg/g
25 and BPA at a concentration of approximately 200 µg/g. On or about 10/28/2025, Plaintiff served a 60-
26 Day Notice of Violation (AG Notice No. 2025-04421) on the public enforcers and on the business
27 identified in that Notice as “Wildland,” at the address stated in the Notice. Plaintiff is informed and
28

believes, and on that basis alleges, that WILDLAND & LILO, LLC owns and/or operates the business so noticed, does business under that name, and received the Notice.

32. Defendant NESPRESSO USA, INC. d/b/a NESPRESSO (“Nespresso”) is a Delaware corporation with its principal place of business in New York, New York, doing business in the State of California. Nespresso is a person in the course of doing business within the meaning of Health & Safety Code § 25249.11. Nespresso manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers as receipts for the purchase of goods or services, including at the Nespresso location at Westfield UTC, 4545 La Jolla Village Drive, San Diego, California 92122. Laboratory testing of Thermal Paper provided to consumers by Nespresso at that location on or about September 21, 2025 detected BPA at a concentration of approximately 4,400 µg/g. Plaintiff served a 60-Day Notice of Violation on Nespresso and the public enforcers on or about 10/28/2025 (AG Notice No. 2025-04421).

33. Defendants OLUKAI, LLC and OLUKAI RETAIL, LLC (collectively, “OluKai”) are each a Delaware limited liability company with its principal place of business in Irvine, California. Each of the OluKai defendants is a person in the course of doing business within the meaning of Health & Safety Code § 25249.11. OluKai manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers as receipts for the purchase of goods or services, including at the OluKai location at Westfield UTC, 4525 La Jolla Village Drive, San Diego, California 92122. Laboratory testing of Thermal Paper provided to consumers by OluKai at that location on or about September 21, 2025 detected BPA at a concentration of approximately 3,200 µg/g. Plaintiff served a 60-Day Notice of Violation on OluKai and the public enforcers on or about 10/28/2025 (AG Notice No. 2025-04421).

34. Defendant PAIGE, LLC d/b/a PAIGE (“Paige”) is a California limited liability company with its principal place of business in Culver City, California. Paige is a person in the course of doing business within the meaning of Health & Safety Code § 25249.11. Paige manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers as receipts for the purchase of goods or services, including at the Paige location at Westfield UTC, 4307 La Jolla Village Drive, San Diego, California 92122. Laboratory testing of Thermal Paper provided to

1 consumers by Paige at that location on or about September 21, 2025 detected BPA at a concentration of
2 approximately 4,800 µg/g. Plaintiff served a 60-Day Notice of Violation on Paige and the public
3 enforcers on or about 10/28/2025 (AG Notice No. 2025-04421).

4 35. Defendants CROCS RETAIL, LLC and CROCS, INC. (collectively, “Crocs”) are,
5 respectively, a Delaware limited liability company and a Delaware corporation, each with its principal
6 place of business in Broomfield, Colorado, and each doing business in the State of California. Each of
7 the Crocs defendants is a person in the course of doing business within the meaning of Health & Safety
8 Code § 25249.11. Crocs manufactures, distributes, sells or otherwise makes available Thermal Paper
9 that is provided to California consumers as receipts for the purchase of goods or services, including at
10 the Crocs location at Carlsbad Premium Outlets, 5630 Paseo del Norte, Carlsbad, California 92008.
11 Laboratory testing of Thermal Paper provided to consumers by Crocs at that location on or about
12 September 26, 2025 detected BPS at a concentration of approximately 5,800 µg/g. Plaintiff served a 60-
13 Day Notice of Violation on Crocs and the public enforcers on or about 10/28/2025 (AG Notice No.
14 2025-04421).

15 36. Defendant FERRAGAMO USA, INC. d/b/a FERRAGAMO (“Ferragamo”) is a New
16 York corporation doing business in the State of California. Ferragamo is a person in the course of doing
17 business within the meaning of Health & Safety Code § 25249.11. Ferragamo manufactures, distributes,
18 sells or otherwise makes available Thermal Paper that is provided to California consumers as receipts
19 for the purchase of goods or services, including at the Ferragamo location at Carlsbad Premium Outlets,
20 5620 Paseo del Norte, Carlsbad, California 92008, Suite C115. Laboratory testing of Thermal Paper
21 provided to consumers by Ferragamo at that location on or about September 26, 2025 detected BPS at
22 a concentration of approximately 11,000 µg/g. Plaintiff served a 60-Day Notice of Violation on
23 Ferragamo and the public enforcers on or about 10/28/2025 (AG Notice No. 2025-04421).

24 37. Defendant PERRY ELLIS INTERNATIONAL, INC. d/b/a PERRY ELLIS (“Perry
25 Ellis”) is a Florida corporation with its principal place of business in Miami, Florida, doing business in
26 the State of California. Perry Ellis is a person in the course of doing business within the meaning of
27 Health & Safety Code § 25249.11. Perry Ellis manufactures, distributes, sells or otherwise makes
28 available Thermal Paper that is provided to California consumers as receipts for the purchase of goods

1 or services, including at the Perry Ellis location at Carlsbad Premium Outlets, 5600 Paseo del Norte,
2 Carlsbad, California 92008. Laboratory testing of Thermal Paper provided to consumers by Perry Ellis
3 at that location on or about September 26, 2025 detected BPS at a concentration of approximately 900
4 µg/g. Plaintiff served a 60-Day Notice of Violation on Perry Ellis and the public enforcers on or about
5 10/28/2025 (AG Notice No. 2025-04421).

6 38. Defendant RHONE, INC. d/b/a RHONE (“Rhone”) is a corporation with its principal
7 place of business in Stamford, Connecticut, doing business in the State of California. Rhone is a person
8 in the course of doing business within the meaning of Health & Safety Code § 25249.11. Rhone
9 manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to
10 California consumers as receipts for the purchase of goods or services, including at the Rhone location
11 at Carlsbad Premium Outlets, 5630 Paseo del Norte, Carlsbad, California 92008, Suite D120.
12 Laboratory testing of Thermal Paper provided to consumers by Rhone at that location on or about
13 September 26, 2025 detected BPS at a concentration of approximately 17,000 µg/g. Plaintiff served a
14 60-Day Notice of Violation on Rhone and the public enforcers on or about 10/28/2025 (AG Notice No.
15 2025-04421).

16 39. Defendant SOLARIS EYEWEAR, LLC d/b/a SOLARIS (“Solaris”) is a California
17 limited liability company with its principal place of business in San Diego, California. Solaris is a person
18 in the course of doing business within the meaning of Health & Safety Code § 25249.11. Solaris
19 manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to
20 California consumers as receipts for the purchase of goods or services, including at the Solaris location
21 at Carlsbad Premium Outlets, 5600 Paseo del Norte, Carlsbad, California 92008. Laboratory testing of
22 Thermal Paper provided to consumers by Solaris at that location on or about September 26, 2025
23 detected BPS at a concentration of approximately 8,600 µg/g and BPA at a concentration of
24 approximately 190 µg/g. Plaintiff served a 60-Day Notice of Violation on Solaris and the public
25 enforcers on or about 10/28/2025 (AG Notice No. 2025-04421).

26 40. Defendants VINCE, LLC and VINCE HOLDING CORP. (collectively, “Vince”) are,
27 respectively, a Delaware limited liability company and a Delaware corporation, each with its principal
28 place of business in New York, New York, and each doing business in the State of California. Each of

1 the Vince defendants is a person in the course of doing business within the meaning of Health & Safety
2 Code § 25249.11. Vince manufactures, distributes, sells or otherwise makes available Thermal Paper
3 that is provided to California consumers as receipts for the purchase of goods or services, including at
4 the Vince location at Carlsbad Premium Outlets, 5610 Paseo del Norte, Carlsbad, California 92008,
5 Space B113. Laboratory testing of Thermal Paper provided to consumers by Vince at that location on
6 or about September 26, 2025 detected BPS at a concentration of approximately 12,000 µg/g. Plaintiff
7 served a 60-Day Notice of Violation on Vince and the public enforcers on or about 10/28/2025 (AG
8 Notice No. 2025-04421).

9 41. Defendant ALEXANDER McQUEEN TRADING AMERICA, INC. d/b/a
10 ALEXANDER McQUEEN (“Alexander McQueen”) is a Delaware corporation with its principal place
11 of business in New York, New York, doing business in the State of California. Alexander McQueen is
12 a person in the course of doing business within the meaning of Health & Safety Code § 25249.11.
13 Alexander McQueen manufactures, distributes, sells or otherwise makes available Thermal Paper that
14 is provided to California consumers as receipts for the purchase of goods or services, including at the
15 Alexander McQueen location at Desert Hills Premium Outlets, 48400 Seminole Drive, Cabazon,
16 California 92230. Laboratory testing of Thermal Paper provided to consumers by Alexander McQueen
17 at that location on or about September 29, 2025 detected BPS at a concentration of approximately 7,900
18 µg/g. Plaintiff served a 60-Day Notice of Violation on Alexander McQueen and the public enforcers on
19 or about 10/28/2025 (AG Notice No. 2025-04421).

20 42. Defendant BURGER LOUNGE OF AMERICA, LLC d/b/a BURGER LOUNGE
21 (“Burger Lounge”) is a California limited liability company with its principal place of business in San
22 Diego, California. Burger Lounge is a person in the course of doing business within the meaning of
23 Health & Safety Code § 25249.11. Burger Lounge manufactures, distributes, sells or otherwise makes
24 available Thermal Paper that is provided to California consumers as receipts for the purchase of goods
25 or services, including at the Burger Lounge location at 961 Palomar Airport Road, Carlsbad, California
26 92011. Laboratory testing of Thermal Paper provided to consumers by Burger Lounge at that location
27 on or about September 29, 2025 detected BPS at a concentration of approximately 6,500 µg/g. Plaintiff
28

1 served a 60-Day Notice of Violation on Burger Lounge and the public enforcers on or about 10/28/2025
2 (AG Notice No. 2025-04421).

3 43. Defendant CAROLINA HERRERA, LTD. d/b/a CH CAROLINA HERRERA
4 (“Carolina Herrera”) is a corporation with its principal place of business in New York, New York, doing
5 business in the State of California. Carolina Herrera is a person in the course of doing business within
6 the meaning of Health & Safety Code § 25249.11. Carolina Herrera manufactures, distributes, sells or
7 otherwise makes available Thermal Paper that is provided to California consumers as receipts for the
8 purchase of goods or services, including at the Carolina Herrera location at Desert Hills Premium
9 Outlets, 48400 Seminole Drive, Cabazon, California 92230. Laboratory testing of Thermal Paper
10 provided to consumers by Carolina Herrera at that location on or about September 29, 2025 detected
11 BPS at a concentration of approximately 11,000 µg/g. Plaintiff served a 60-Day Notice of Violation on
12 Carolina Herrera and the public enforcers on or about 10/28/2025 (AG Notice No. 2025-04421).

13 44. Defendant DIESEL U.S.A., INC. d/b/a DIESEL (“Diesel”) is a New York corporation
14 doing business in the State of California. Diesel is a person in the course of doing business within the
15 meaning of Health & Safety Code § 25249.11. Diesel manufactures, distributes, sells or otherwise makes
16 available Thermal Paper that is provided to California consumers as receipts for the purchase of goods
17 or services, including at the Diesel location at Desert Hills Premium Outlets, 48400 Seminole Drive,
18 Cabazon, California 92230. Laboratory testing of Thermal Paper provided to consumers by Diesel at
19 that location on or about September 29, 2025 detected BPS at a concentration of approximately 640
20 µg/g. Plaintiff served a 60-Day Notice of Violation on Diesel and the public enforcers on or about
21 10/28/2025 (AG Notice No. 2025-04421).

22 45. Defendants JOHN VARVATOS ENTERPRISES, INC. and JV ASSET HOLDCO,
23 LLC (collectively, “John Varvatos”) are, respectively, a corporation and a limited liability company,
24 each with its principal place of business in New York, New York, and each doing business in the State
25 of California. Each of the John Varvatos defendants is a person in the course of doing business within
26 the meaning of Health & Safety Code § 25249.11. John Varvatos manufactures, distributes, sells or
27 otherwise makes available Thermal Paper that is provided to California consumers as receipts for the
28 purchase of goods or services, including at the John Varvatos location at Desert Hills Premium Outlets,

1 48400 Seminole Drive, Cabazon, California 92230. Laboratory testing of Thermal Paper provided to
2 consumers by John Varvatos at that location on or about September 29, 2025 detected BPS at a
3 concentration of approximately 7,700 µg/g. Plaintiff served a 60-Day Notice of Violation on John
4 Varvatos and the public enforcers on or about 10/28/2025 (AG Notice No. 2025-04421).

5 46. Defendant APP GROUP, INC. d/b/a MACKAGE (“Mackage”) is a corporation doing
6 business in the State of California. Mackage is a person in the course of doing business within the
7 meaning of Health & Safety Code § 25249.11. Mackage manufactures, distributes, sells or otherwise
8 makes available Thermal Paper that is provided to California consumers as receipts for the purchase of
9 goods or services, including at the Mackage location at Desert Hills Premium Outlets, 48400 Seminole
10 Drive, Cabazon, California 92230. Laboratory testing of Thermal Paper provided to consumers by
11 Mackage at that location on or about September 29, 2025 detected BPS at a concentration of
12 approximately 13,000 µg/g. Plaintiff served a 60-Day Notice of Violation on Mackage and the public
13 enforcers on or about 10/28/2025 (AG Notice No. 2025-04421).

14 47. Defendant MARGIELA USA, INC. d/b/a MAISON MARGIELA (“Maison Margiela”) is a corporation with its principal place of business in New York, New York, doing business in the State
15 of California. Maison Margiela is a person in the course of doing business within the meaning of Health
16 & Safety Code § 25249.11. Maison Margiela manufactures, distributes, sells or otherwise makes
17 available Thermal Paper that is provided to California consumers as receipts for the purchase of goods
18 or services, including at the Maison Margiela location at Desert Hills Premium Outlets, 48400 Seminole
19 Drive, Cabazon, California 92230. Laboratory testing of Thermal Paper provided to consumers by
20 Maison Margiela at that location on or about September 29, 2025 detected BPS at a concentration of
21 approximately 520 µg/g. Plaintiff served a 60-Day Notice of Violation on Maison Margiela and the
22 public enforcers on or about 10/28/2025 (AG Notice No. 2025-04421).

24 48. Defendant RICCO’S MICHELAGUAS (“Ricco’s Michelaguas”) is a business entity of
25 unknown form with its principal place of business at 48400 Seminole Drive, Cabazon, California 92230,
26 and is doing business in the State of California. Ricco’s Michelaguas is a person in the course of doing
27 business within the meaning of Health & Safety Code § 25249.11. Ricco’s Michelaguas manufactures,
28 distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers

1 as receipts for the purchase of goods or services, including at the Ricco's Michelaguas location at Desert
2 Hills Premium Outlets, 48400 Seminole Drive, Cabazon, California 92230. Laboratory testing of
3 Thermal Paper provided to consumers by Ricco's Michelaguas at that location on or about September
4 29, 2025 detected BPS at a concentration of approximately 9,200 µg/g. Plaintiff served a 60-Day Notice
5 of Violation on Ricco's Michelaguas and the public enforcers on or about 10/28/2025 (AG Notice No.
6 2025-04421).

7 49. Defendant WILSON SPORTING GOODS CO. d/b/a WILSON ("Wilson") is a
8 Delaware corporation with its principal place of business in Chicago, Illinois, doing business in the State
9 of California. Wilson is a person in the course of doing business within the meaning of Health & Safety
10 Code § 25249.11. Wilson manufactures, distributes, sells or otherwise makes available Thermal Paper
11 that is provided to California consumers as receipts for the purchase of goods or services, including at
12 the Wilson location at Desert Hills Premium Outlets, 48400 Seminole Drive, Cabazon, California
13 92230. Laboratory testing of Thermal Paper provided to consumers by Wilson at that location on or
14 about September 29, 2025 detected BPS at a concentration of approximately 8,600 µg/g. Plaintiff served
15 a 60-Day Notice of Violation on Wilson and the public enforcers on or about 10/28/2025 (AG Notice
16 No. 2025-04421).

17 50. Defendant ZIMMERMANN (USA), INC. d/b/a ZIMMERMANN ("Zimmermann") is
18 a corporation with its principal place of business in New York, New York, doing business in the State
19 of California. Zimmermann is a person in the course of doing business within the meaning of Health &
20 Safety Code § 25249.11. Zimmermann manufactures, distributes, sells or otherwise makes available
21 Thermal Paper that is provided to California consumers as receipts for the purchase of goods or services,
22 including at the Zimmermann location at Desert Hills Premium Outlets, 48400 Seminole Drive,
23 Cabazon, California 92230. Laboratory testing of Thermal Paper provided to consumers by
24 Zimmermann at that location on or about September 29, 2025 detected BPS at a concentration of
25 approximately 11,000 µg/g. Plaintiff served a 60-Day Notice of Violation on Zimmermann and the
26 public enforcers on or about 10/28/2025 (AG Notice No. 2025-04421).

27 51. Defendant TOM FORD RETAIL LLC d/b/a TOM FORD ("Tom Ford") is a New York
28 limited liability company doing business in the State of California. Tom Ford is a person in the course

1 of doing business within the meaning of Health & Safety Code § 25249.11. Tom Ford manufactures,
2 distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers
3 as receipts for the purchase of goods or services, including at the Tom Ford location at Desert Hills
4 Premium Outlets, 48650 Seminole Drive, Cabazon, California 92230. Laboratory testing of Thermal
5 Paper provided to consumers by Tom Ford at that location on or about September 29, 2025 detected
6 BPS at a concentration of approximately 8,700 µg/g. Plaintiff served a 60-Day Notice of Violation on
7 Tom Ford and the public enforcers on or about 11/1/2025 (AG Notice No. 2025-04499).

8 52. Defendant PAUL SMITH, INC. d/b/a PAUL SMITH (“Paul Smith”) is a corporation
9 with its principal place of business in New York, New York, doing business in the State of California.
10 Paul Smith is a person in the course of doing business within the meaning of Health & Safety Code §
11 25249.11. Paul Smith manufactures, distributes, sells or otherwise makes available Thermal Paper that
12 is provided to California consumers as receipts for the purchase of goods or services, including at the
13 Paul Smith location at Desert Hills Premium Outlets, 48650 Seminole Drive, Cabazon, California
14 92230. Laboratory testing of Thermal Paper provided to consumers by Paul Smith at that location on or
15 about September 29, 2025 detected BPS at a concentration of approximately 9,200 µg/g. Plaintiff served
16 a 60-Day Notice of Violation on Paul Smith and the public enforcers on or about 11/1/2025 (AG Notice
17 No. 2025-04499).

18 53. Defendant MCM PRODUCTS USA, INC. d/b/a MCM (“MCM”) is a corporation with
19 its principal place of business in New York, New York, doing business in the State of California. MCM
20 is a person in the course of doing business within the meaning of Health & Safety Code § 25249.11.
21 MCM manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to
22 California consumers as receipts for the purchase of goods or services, including at the MCM location
23 at Desert Hills Premium Outlets, 48400 Seminole Drive, Cabazon, California 92230. Laboratory testing
24 of Thermal Paper provided to consumers by MCM at that location on or about September 29, 2025
25 detected BPS at a concentration of approximately 11,000 µg/g. Plaintiff served a 60-Day Notice of
26 Violation on MCM and the public enforcers on or about 11/1/2025 (AG Notice No. 2025-04499).

27 54. Defendant LONGCHAMP USA, INC. d/b/a LONGCHAMP (“Longchamp”) is a
28 corporation with its principal place of business in Robbinsville, New Jersey, doing business in the State

1 of California. Longchamp is a person in the course of doing business within the meaning of Health &
2 Safety Code § 25249.11. Longchamp manufactures, distributes, sells or otherwise makes available
3 Thermal Paper that is provided to California consumers as receipts for the purchase of goods or services,
4 including at the Longchamp location at Desert Hills Premium Outlets, 48650 Seminole Drive, Cabazon,
5 California 92230. Laboratory testing of Thermal Paper provided to consumers by Longchamp at that
6 location on or about September 29, 2025 detected BPS at a concentration of approximately 11,000 µg/g.
7 Plaintiff served a 60-Day Notice of Violation on Longchamp and the public enforcers on or about
8 11/1/2025 (AG Notice No. 2025-04499).

9 55. Defendant LANVIN, INC. d/b/a LANVIN (“Lanvin”) is a corporation with its principal
10 place of business in New York, New York, doing business in the State of California. Lanvin is a person
11 in the course of doing business within the meaning of Health & Safety Code § 25249.11. Lanvin
12 manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to
13 California consumers as receipts for the purchase of goods or services, including at the Lanvin location
14 at Desert Hills Premium Outlets, 48400 Seminole Drive, Cabazon, California 92230. Laboratory testing
15 of Thermal Paper provided to consumers by Lanvin at that location on or about September 29, 2025
16 detected BPS at a concentration of approximately 10,000 µg/g. Plaintiff served a 60-Day Notice of
17 Violation on Lanvin and the public enforcers on or about 11/1/2025 (AG Notice No. 2025-04499).

18 56. Defendant GANNI, INC. d/b/a GANNI (“Ganni”) is a corporation with its principal
19 place of business in New York, New York, doing business in the State of California. Ganni is a person
20 in the course of doing business within the meaning of Health & Safety Code § 25249.11. Ganni
21 manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to
22 California consumers as receipts for the purchase of goods or services, including at the Ganni location
23 at Desert Hills Premium Outlets, 48650 Seminole Drive, Cabazon, California 92230. Laboratory testing
24 of Thermal Paper provided to consumers by Ganni at that location on or about September 29, 2025
25 detected BPS at a concentration of approximately 12,000 µg/g. Plaintiff served a 60-Day Notice of
26 Violation on Ganni and the public enforcers on or about 11/1/2025 (AG Notice No. 2025-04499).

27 57. Defendant REISS (RETAIL) LIMITED, INC. d/b/a REISS (“Reiss”) is a corporation
28 with its principal place of business in New York, New York, doing business in the State of California.

1 Reiss is a person in the course of doing business within the meaning of Health & Safety Code §
2 25249.11. Reiss manufactures, distributes, sells or otherwise makes available Thermal Paper that is
3 provided to California consumers as receipts for the purchase of goods or services, including at the Reiss
4 location at Desert Hills Premium Outlets, 48750 Seminole Drive, Cabazon, California 92230.
5 Laboratory testing of Thermal Paper provided to consumers by Reiss at that location on or about
6 September 29, 2025 detected BPS at a concentration of approximately 8,600 µg/g. Plaintiff served a 60-
7 Day Notice of Violation on Reiss and the public enforcers on or about 11/1/2025 (AG Notice No. 2025-
8 04499).

9 58. Defendant ANNE FONTAINE USA, INC. d/b/a ANNE FONTAINE (“Anne
10 Fontaine”) is a corporation with its principal place of business in New York, New York, doing business
11 in the State of California. Anne Fontaine is a person in the course of doing business within the meaning
12 of Health & Safety Code § 25249.11. Anne Fontaine manufactures, distributes, sells or otherwise makes
13 available Thermal Paper that is provided to California consumers as receipts for the purchase of goods
14 or services, including at the Anne Fontaine location at Desert Hills Premium Outlets, 48650 Seminole
15 Drive, Cabazon, California 92230. Laboratory testing of Thermal Paper provided to consumers by Anne
16 Fontaine at that location on or about September 29, 2025 detected BPS at a concentration of
17 approximately 7,300 µg/g. Plaintiff served a 60-Day Notice of Violation on Anne Fontaine and the
18 public enforcers on or about 11/1/2025 (AG Notice No. 2025-04499).

19 59. Defendant AG JEANS EXPORT, INC. d/b/a AG JEANS (“AG Jeans”) is a corporation
20 with its principal place of business in South Gate, California. AG Jeans is a person in the course of doing
21 business within the meaning of Health & Safety Code § 25249.11. AG Jeans manufactures, distributes,
22 sells or otherwise makes available Thermal Paper that is provided to California consumers as receipts
23 for the purchase of goods or services, including at the AG Jeans location at Desert Hills Premium
24 Outlets, 48650 Seminole Drive, Cabazon, California 92230. Laboratory testing of Thermal Paper
25 provided to consumers by AG Jeans at that location on or about September 29, 2025 detected BPS at a
26 concentration of approximately 7,800 µg/g. Plaintiff served a 60-Day Notice of Violation on AG Jeans
27 and the public enforcers on or about 11/1/2025 (AG Notice No. 2025-04499).
28

1 60. Defendant MARNI USA CORP. d/b/a MARNI (“Marni”) is a corporation with its
2 principal place of business in New York, New York, doing business in the State of California. Marni is
3 a person in the course of doing business within the meaning of Health & Safety Code § 25249.11. Marni
4 manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to
5 California consumers as receipts for the purchase of goods or services, including at the Marni location
6 at Desert Hills Premium Outlets, 48650 Seminole Drive, Cabazon, California 92230. Laboratory testing
7 of Thermal Paper provided to consumers by Marni at that location on or about September 29, 2025
8 detected BPS at a concentration of approximately 1,100 µg/g. Plaintiff served a 60-Day Notice of
9 Violation on Marni and the public enforcers on or about 11/1/2025 (AG Notice No. 2025-04499).

10 61. Defendant ALOHA COLLECTION, INC. d/b/a ALOHA (“Aloha Collection”) is a
11 corporation with its principal place of business in Encinitas, California. Aloha Collection is a person in
12 the course of doing business within the meaning of Health & Safety Code § 25249.11. Aloha Collection
13 manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to
14 California consumers as receipts for the purchase of goods or services, including at the Aloha Collection
15 location at 687 S. Coast Highway 101, Encinitas, California 92024. Laboratory testing of Thermal Paper
16 provided to consumers by Aloha Collection at that location on or about September 27, 2025 detected
17 BPS at a concentration of approximately 11,000 µg/g and BPA at a concentration of approximately 3.3
18 µg/g. Plaintiff served a 60-Day Notice of Violation on Aloha Collection and the public enforcers on or
19 about 11/1/2025 (AG Notice No. 2025-04499).

20 62. Defendant REEF LIFESTYLE, LLC d/b/a REEF (“Reef”) is a Delaware limited
21 liability company with its principal place of business in West Newton, Massachusetts, doing business
22 in the State of California. Reef is a person in the course of doing business within the meaning of Health
23 & Safety Code § 25249.11. Reef manufactures, distributes, sells or otherwise makes available Thermal
24 Paper that is provided to California consumers as receipts for the purchase of goods or services,
25 including at the Reef location at 670 S. Coast Highway 101, Encinitas, California 92024. Laboratory
26 testing of Thermal Paper provided to consumers by Reef at that location on or about September 27, 2025
27 detected BPS at a concentration of approximately 250 µg/g and BPA at a concentration of approximately
28

1 6.5 µg/g. Plaintiff served a 60-Day Notice of Violation on Reef and the public enforcers on or about
2 11/1/2025 (AG Notice No. 2025-04499).

3 63. Defendant BELLE ISLE, INC. d/b/a AVEDA BELLE ISLE SALON & SPA (“Aveda
4 Belle Isle”) is a California corporation with its principal place of business in Irvine, California. Aveda
5 Belle Isle is a person in the course of doing business within the meaning of Health & Safety Code §
6 25249.11. Aveda Belle Isle manufactures, distributes, sells or otherwise makes available Thermal Paper
7 that is provided to California consumers as receipts for the purchase of goods or services, including at
8 the Aveda Belle Isle location at Irvine Spectrum Center, 769 Spectrum Center Drive, Irvine, California
9 92618. Laboratory testing of Thermal Paper provided to consumers by Aveda Belle Isle at that location
10 on or about September 28, 2025 detected BPS at a concentration of approximately 15,000 µg/g. Plaintiff
11 served a 60-Day Notice of Violation on Aveda Belle Isle and the public enforcers on or about 11/1/2025
12 (AG Notice No. 2025-04499).

13 64. Defendants THE ALLEY USA, INC. and THE ALLEY TEA, INC. (collectively, “The
14 Alley”) are each a corporation with its principal place of business in New York, New York, and each
15 doing business in the State of California. Each of The Alley defendants is a person in the course of doing
16 business within the meaning of Health & Safety Code § 25249.11. The Alley manufactures, distributes,
17 sells or otherwise makes available Thermal Paper that is provided to California consumers as receipts
18 for the purchase of goods or services, including at The Alley location at Irvine Spectrum Center, 507
19 Spectrum Center Drive, Irvine, California 92618. Laboratory testing of Thermal Paper provided to
20 consumers by The Alley at that location on or about September 28, 2025 detected BPS at a concentration
21 of approximately 11,000 µg/g. Plaintiff served a 60-Day Notice of Violation on The Alley and the public
22 enforcers on or about 11/1/2025 (AG Notice No. 2025-04499).

23 65. Defendant BADGERS CREATION LLC d/b/a TUTU FUN (“Tutu Fun”) is a limited
24 liability company doing business in the State of California. Tutu Fun is a person in the course of doing
25 business within the meaning of Health & Safety Code § 25249.11. Tutu Fun manufactures, distributes,
26 sells or otherwise makes available Thermal Paper that is provided to California consumers as receipts
27 for the purchase of goods or services, including at the Tutu Fun location at Irvine Spectrum Center, 822
28 Spectrum Center Drive, Irvine, California 92618. Laboratory testing of Thermal Paper provided to

1 consumers by Tutu Fun at that location on or about September 28, 2025 detected BPA at a concentration
2 of approximately 5,800 µg/g. On or about 11/1/2025, Plaintiff served a 60-Day Notice of Violation (AG
3 Notice No. 2025-04499) on the public enforcers and on the business identified in that Notice as “Tutu
4 Fun,” 822 Spectrum Center Drive, Irvine, California 92618. Plaintiff is informed and believes, and on
5 that basis alleges, that BADGERS CREATION LLC owns and/or operates the business so noticed, does
6 business under that name, and received the Notice.

7 66. Defendant ROCKY MOUNTAIN CHOCOLATE FACTORY, INC. d/b/a ROCKY
8 MOUNTAIN CHOCOLATE FACTORY (“Rocky Mountain Chocolate Factory”) is a Delaware
9 corporation with its principal place of business in Durango, Colorado, doing business in the State of
10 California. Rocky Mountain Chocolate Factory is a person in the course of doing business within the
11 meaning of Health & Safety Code § 25249.11. Rocky Mountain Chocolate Factory manufactures,
12 distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers
13 as receipts for the purchase of goods or services, including at the Rocky Mountain Chocolate Factory
14 location at Irvine Spectrum Center, 617 Spectrum Center Drive, Irvine, California 92618. Laboratory
15 testing of Thermal Paper provided to consumers by Rocky Mountain Chocolate Factory at that location
16 on or about September 28, 2025 detected BPS at a concentration of approximately 11,000 µg/g. Plaintiff
17 served a 60-Day Notice of Violation on Rocky Mountain Chocolate Factory and the public enforcers on
18 or about 11/1/2025 (AG Notice No. 2025-04499).

19 67. Defendant PAWLICIOUS SNACKS, LLC d/b/a PAWLICIOUS (“Pawlicious”) is a
20 California limited liability company with its principal place of business in Irvine, California. Pawlicious
21 is a person in the course of doing business within the meaning of Health & Safety Code § 25249.11.
22 Pawlicious manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided
23 to California consumers as receipts for the purchase of goods or services, including at the Pawlicious
24 location at Irvine Spectrum Center, 670 Spectrum Center Drive, Irvine, California 92618. Laboratory
25 testing of Thermal Paper provided to consumers by Pawlicious at that location on or about September
26 28, 2025 detected BPA at a concentration of approximately 7,000 µg/g. Plaintiff served a 60-Day Notice
27 of Violation on Pawlicious and the public enforcers on or about 11/1/2025 (AG Notice No. 2025-04499).
28

68. Defendant AURA WOOD INC d/b/a PINKLICIOUS PRESS ON NAILS (“Pinklicious”) is a corporation doing business in the State of California. Pinklicious is a person in the course of doing business within the meaning of Health & Safety Code § 25249.11. Pinklicious manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers as receipts for the purchase of goods or services, including at the Pinklicious location at Irvine Spectrum Center, 670 Spectrum Center Drive, Irvine, California 92618. Laboratory testing of Thermal Paper provided to consumers by Pinklicious at that location on or about September 28, 2025 detected BPS at a concentration of approximately 12,000 µg/g. On or about 11/1/2025, Plaintiff served a 60-Day Notice of Violation (AG Notice No. 2025-04499) on the public enforcers and on the business identified in that Notice as “Pinklicious,” 239 Los Cerritos Center, Cerritos, California 90704. Plaintiff is informed and believes, and on that basis alleges, that AURA WOOD INC owns and/or operates the business so noticed, does business under that name, and received the Notice.

69. Defendant DRYBAR PRODUCTS, LLC d/b/a DRYBAR (“Drybar”) is a limited liability company doing business in the State of California. Drybar is a person in the course of doing business within the meaning of Health & Safety Code § 25249.11. Drybar manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers as receipts for the purchase of goods or services, including at the Drybar location at Irvine Spectrum Center, 837 Spectrum Center Drive, Irvine, California 92618. Laboratory testing of Thermal Paper provided to consumers by Drybar at that location on or about September 28, 2025 detected BPS at a concentration of approximately 14,000 µg/g. Plaintiff served a 60-Day Notice of Violation on Drybar Products, LLC d/b/a Drybar, 201 East Main Street, Suite 200, El Paso, Texas 79901, and the public enforcers on or about 11/1/2025 (AG Notice No. 2025-04499).

70. Defendants LAMKONE RESTAURANTS, INC. and WAHOO’S FISH TACO, LLC (collectively, “Wahoo’s”) are, respectively, a California corporation and a California limited liability company, each with its principal place of business in Tustin, California. Each of the Wahoo’s defendants is a person in the course of doing business within the meaning of Health & Safety Code § 25249.11. Wahoo’s manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers as receipts for the purchase of goods or services, including at the Wahoo’s

1 location at Irvine Spectrum Center, 715 Spectrum Center Drive, Irvine, California 92618. Laboratory
2 testing of Thermal Paper provided to consumers by Wahoo's at that location on or about September 28,
3 2025 detected BPS at a concentration of approximately 23,000 µg/g. Plaintiff served a 60-Day Notice
4 of Violation on Wahoo's and the public enforcers on or about 11/1/2025 (AG Notice No. 2025-04499).

5 71. Defendant GOODS2ORDER, LLC d/b/a HEAT ("Heat") is a California limited liability
6 company with its principal place of business in Sacramento, California. Heat is a person in the course
7 of doing business within the meaning of Health & Safety Code § 25249.11. Heat manufactures,
8 distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers
9 as receipts for the purchase of goods or services, including at the Heat location at Irvine Spectrum
10 Center, 849 Spectrum Center Drive, Irvine, California 92618. Laboratory testing of Thermal Paper
11 provided to consumers by Heat at that location on or about September 28, 2025 detected BPA at a
12 concentration of approximately 6,800 µg/g. Plaintiff served a 60-Day Notice of Violation on Heat and
13 the public enforcers on or about 11/1/2025 (AG Notice No. 2025-04499).

14 72. Defendant BEYOND YOGA, LLC d/b/a BEYOND YOGA ("Beyond Yoga") is a
15 limited liability company with its principal place of business in Culver City, California, doing business
16 in the State of California. Beyond Yoga is a person in the course of doing business within the meaning
17 of Health & Safety Code § 25249.11. Beyond Yoga manufactures, distributes, sells or otherwise makes
18 available Thermal Paper that is provided to California consumers as receipts for the purchase of goods
19 or services, including at the Beyond Yoga location at Irvine Spectrum Center, 744 Spectrum Center
20 Drive, Irvine, California 92618. Laboratory testing of Thermal Paper provided to consumers by Beyond
21 Yoga at that location on or about September 28, 2025 detected BPS at a concentration of approximately
22 9,100 µg/g and BPA at a concentration of approximately 12 µg/g. Plaintiff served a 60-Day Notice of
23 Violation on Beyond Yoga and the public enforcers on or about 11/1/2025 (AG Notice No. 2025-
24 04499).

25 73. Defendant SOCAL INVESTMENT GROUP, INC. d/b/a EARTH BOWL ("Earth
26 Bowl") is a corporation doing business in the State of California. Earth Bowl is a person in the course
27 of doing business within the meaning of Health & Safety Code § 25249.11. Earth Bowl manufactures,
28 distributes, sells or otherwise makes available Thermal Paper that is provided to California consumers

1 as receipts for the purchase of goods or services, including at the Earth Bowl location at Irvine Spectrum
2 Center, 870 Spectrum Center Drive, Irvine, California 92618. Laboratory testing of Thermal Paper
3 provided to consumers by Earth Bowl at that location on or about September 28, 2025 detected BPS at
4 a concentration of approximately 15,000 µg/g. On or about 11/1/2025, Plaintiff served a 60-Day Notice
5 of Violation (AG Notice No. 2025-04499) on the public enforcers and on the business identified in that
6 Notice as “Earth Bowl,” 870 Spectrum Center Drive, Irvine, California 92618. Plaintiff is informed and
7 believes, and on that basis alleges, that SOCAL INVESTMENT GROUP, INC. owns and/or operates
8 the business so noticed, does business under that name, and received the Notice.

9 74. Defendant RED DOT RESTAURANT GROUP, INC. d/b/a THE RED CHICKZ (“The
10 Red Chickz”) is a corporation with its principal place of business at 557 S. Spring Street, Los Angeles,
11 California 90013, and is doing business in the State of California. The Red Chickz is a person in the
12 course of doing business within the meaning of Health & Safety Code § 25249.11. The Red Chickz
13 manufactures, distributes, sells or otherwise makes available Thermal Paper that is provided to
14 California consumers as receipts for the purchase of goods or services, including at The Red Chickz
15 location at The Shoppes at Carlsbad, 2525 El Camino Real, Suite 217, Carlsbad, California 92008.
16 Laboratory testing of Thermal Paper provided to consumers by The Red Chickz at that location on or
17 about September 28, 2025 detected BPS at a concentration of approximately 16,000 µg/g. On or about
18 11/1/2025, Plaintiff served a 60-Day Notice of Violation (AG Notice No. 2025-04499) on the public
19 enforcers and on the business identified in that Notice as “The Red Chickz,” 557 S. Spring Street, Los
20 Angeles, California 90013. Plaintiff is informed and believes, and on that basis alleges, that RED DOT
21 RESTAURANT GROUP, INC. owns and/or operates the business so noticed, does business under that
22 name, and received the Notice.

23 75. DOES 1 through 100 are each a person in the course of doing business within the
24 meaning of Health & Safety Code § 25249.11. DOES 1 through 100 manufacture, distribute, sell or
25 otherwise make available Thermal Paper that is offered for sale in California or provided as receipts or
26 other transactional documentation to California consumers.

27 76. The true names of DOES 1 through 100 are either unknown to Plaintiff at this time or
28 the applicable time period before which Plaintiff may file a Proposition 65 action has not run. When

1 their identities are ascertained or the applicable time period before which Plaintiff may file a Proposition
2 65 action has run, the Complaint shall be amended to reflect their true names.

3 77. The defendants identified in Paragraphs 7 through 74 and DOES 1 through 100 are
4 collectively referred to herein as “Defendants.”

5 78. Defendants Levain Bakery, Maybourne, DoorDash, Gorjana, Outerknown, AllSaints,
6 Anine Bing, Giorgio Armani, Jo Malone London, Kiehl’s, Saint Laurent, Stella McCartney, Alice +
7 Olivia, Ba&sh, Joe & The Juice, Quay, Rowan, Zadig & Voltaire, FedEx, Balmain, COS, Givenchy,
8 Wildland, Crocs, Ferragamo, Perry Ellis, Rhone, Solaris, Vince, Alexander McQueen, Burger Lounge,
9 Carolina Herrera, Diesel, John Varvatos, Mackage, Maison Margiela, Ricco’s Michelaguas, Wilson,
10 Zimmermann, Tom Ford, Paul Smith, MCM, Longchamp, Lanvin, Ganni, Reiss, Anne Fontaine, AG
11 Jeans, Marni, Aloha Collection, Reef, Aveda Belle Isle, The Alley, Rocky Mountain Chocolate Factory,
12 Pinklicious, Drybar, Wahoo’s, Beyond Yoga, Earth Bowl, and The Red Chickz, together with DOES 1
13 through 100, are collectively referred to herein as the “BPS Defendants.”

14 79. Defendants Maybourne, Gorjana, COS, Gianvito Rossi, Jayden P, Wildland, Nespresso,
15 OluKai, Paige, Solaris, Aloha Collection, Reef, Tutu Fun, Pawlicious, Heat, and Beyond Yoga, together
16 with DOES 1 through 100, are collectively referred to herein as the “BPA Defendants.”

17 **III.**
JURISDICTION AND VENUE

18 80. The Court has jurisdiction over this action pursuant to Health & Safety Code § 25249.7,
19 which allows enforcement in any court of competent jurisdiction, and pursuant to California
20 Constitution Article VI, Section 10, because this case is a cause not given by statute to other trial courts.

21 81. This Court has jurisdiction over Defendants because each is a business entity that does
22 sufficient business, has sufficient minimum contacts in California, or otherwise intentionally avails itself
23 of the California market through the sale, marketing, or use of the Thermal Paper in California and/or
24 by having such other contacts with California so as to render the exercise of jurisdiction over it by the
25 California courts consistent with traditional notions of fair play and substantial justice.

26 82. Venue is proper in San Francisco County Superior Court because one or more of the
27 violations arise in the County of San Francisco.

28 **IV.**
BACKGROUND FACTS

1 83. The People of the State of California have declared by initiative under Proposition 65
2 their right “[t]o be informed about exposures to chemicals that cause cancer, birth defects, or other
3 reproductive harm.” Proposition 65, § 1(b).

4 84. To effectuate this goal, Proposition 65 prohibits exposing people to chemicals listed by
5 the State of California as known to cause cancer, birth defects, or other reproductive harm above certain
6 levels without a “clear and reasonable warning” unless the business responsible for the exposure can
7 prove that it fits within a statutory exemption. Health & Safety Code § 25249.6 states, in pertinent part:

8 No person in the course of doing business shall knowingly and
9 intentionally expose any individual to a chemical known to the state to
10 cause cancer or reproductive toxicity without first giving clear and
11 reasonable warning to such individual. . . .

12 85. On May 11, 2015, the State of California officially listed BPA as a chemical known to
13 cause reproductive toxicity. BPA is specifically identified as a reproductive toxicant under the
14 subcategory “female reproductive toxicity,” which means harm to the female reproductive system. 27
15 California Code of Regulations (“C.C.R.”) § 27001(c). On May 11, 2016, one year after it was listed as
16 a chemical known to cause reproductive toxicity, BPA became subject to the clear and reasonable
17 warning requirement regarding reproductive toxicants under Proposition 65. Ibid.; Health & Safety
18 Code § 25249.10(b).

19 86. On December 29, 2023, the State of California officially listed BPS as a chemical known
20 to cause reproductive toxicity. On December 29, 2024, one year after it was listed as a chemical known
21 to cause reproductive toxicity, BPS became subject to the clear and reasonable warning requirement
22 regarding reproductive toxicants under Proposition 65. Health & Safety Code § 25249.10(b).

23 87. BPS is a structural analog of BPA that is frequently substituted for BPA in the
24 manufacture of Thermal Paper. Like BPA, BPS functions as the reactant acid or developer that produces
25 text and images on Thermal Paper, and it is likewise transferred to the skin upon handling. A growing
26 body of scientific research indicates that BPS is an endocrine disruptor with reproductive and
27 developmental toxicity comparable to that of BPA, such that substitution of BPS for BPA does not
28 eliminate the hazard giving rise to the exposures alleged herein.

1 88. Exposure to BPA and BPS, each a known endocrine disruptor, has been associated with
2 numerous adverse reproductive impacts. One study summarizing recent scientific research concluded
3 that BPA acts as both an ovarian toxicant (e.g., by altering levels of sex hormones and reducing egg
4 quality) and as a uterine toxicant (e.g., by impairing the ability of the embryo to implant in the uterus).
5 Peretz, J., et al., “Bisphenol A and Reproductive Health: Update of Experimental and Human Evidence,
6 2007–2013,” Environmental Health Perspectives, Vol. 122:8, August 2014. Another study focusing on
7 human epidemiological studies confirmed these impacts, and further found BPA exposure to be linked
8 to a host of developmental harms, including disrupted neurological development and increased asthma
9 prevalence in children. Rochester, J., “Bisphenol A and Human Health: A Review of the Literature,”
10 Reproductive Toxicology, Vol. 42, December 2013.

11 89. The laboratory testing underlying Plaintiff’s Notices detected BPA and/or BPS in the
12 Thermal Paper samples associated with the named Defendants at the concentrations alleged in
13 Paragraphs 7 through 74. Plaintiff alleges that consumers who touch or handle such Thermal Paper are
14 exposed to the Listed Chemicals.

15 90. Thermal Paper is a specialty paper designed for use in thermal printers. Thermal Paper
16 has a layer of a reactant acid combined with a dye on the surface of the Thermal Paper. When heated in
17 a thermal printer, the molecules in the dye bond with molecules in the reactant acid (often called the
18 developer) on the surface of the Thermal Paper to produce text, numbers or images. This resulting
19 darkening of the Thermal Paper appears like ink on the paper surface. The reactant acid in the Thermal
20 Paper at issue here is BPA and/or BPS. Thus, BPA and/or BPS is intentionally added to the surface of
21 the Thermal Paper as a functional component of the paper. Without the precise amount of BPA or BPS,
22 the Thermal Paper will not produce images and text accurately.

23 91. Thermal Paper is used for a diverse array of purposes. Thermal Paper is often used in
24 generating receipts from cash registers, credit card terminals and similar devices. Thermal Paper is also
25 used in generating other transactional documents, such as service and repair estimates, invoices and
26 order forms, delivery notices, and transportation documentation. Thermal Paper is used in label makers
27 and fax machines as well.

92. BPA and BPS are transferred from the surface of the Thermal Paper to the hands when the Thermal Paper is touched or handled. Absorption increases when hands are damp or oily, such as a person who has recently wiped their forehead or handled greasy food, or when the handler has used personal care products on their skin, such as hand sanitizer, soap or lotion. See, e.g., Hormann, A., et al., “Holding Thermal Receipt Paper and Eating Food after Using Hand Sanitizer Results in High Serum Bioactive and Urine Total Levels of Bisphenol A (BPA),” PLOS ONE, Vol. 9:10, October 2014; Biedermann, S., et al., “Transfer of Bisphenol A from Thermal Printer Paper to the Skin,” Analytical & Bioanalytical Chemistry, Vol. 398:1, September 2010.

93. Defendants’ Thermal Paper contains sufficient quantities of BPA and/or BPS such that consumers, including pregnant women, who touch or handle the Thermal Paper are exposed to significant amounts of the Listed Chemicals. The primary routes of exposure for the violations are dermal absorption directly through the skin when consumers touch or handle Thermal Paper, and ingestion via hand-to-mouth contact after consumers touch or handle Thermal Paper. These exposures occur in homes, restaurants, workplaces, retail stores and everywhere else throughout California where the Thermal Paper is touched or handled.

94. No clear and reasonable warning is provided with Defendants’ Thermal Paper regarding the reproductive hazards of BPA or BPS.

95. Any person acting in the public interest has standing to enforce violations of Proposition 65 provided that such person has supplied the requisite public enforcers with a valid 60-Day Notice of Violation and such public enforcers are not diligently prosecuting the action within such time. Health & Safety Code § 25249.7(d).

96. More than sixty days prior to naming each Defendant in this lawsuit, Plaintiff provided a 60-Day “Notice of Violation” of Proposition 65 to the California Attorney General, to the District Attorneys of every county in California, to the City Attorneys of every California city with a population greater than 750,000, and to each named Defendant. In compliance with Health & Safety Code § 25249.7(d) and 27 C.C.R. § 25903(b), each Notice included the following information: (1) the name and address of the violator; (2) the statute violated; (3) the time period during which violations occurred; (4) specific descriptions of the violations, including (a) the routes of exposure to BPA and/or BPS from

1 Thermal Paper, and (b) the specific type of product violating Proposition 65; and (5) the names of the
2 specific Proposition 65-listed chemical or chemicals (BPA and/or BPS) that are the subject of the
3 violations described in each Notice.

4 97. Plaintiff also sent a Certificate of Merit for each Notice to the California Attorney
5 General, to the District Attorneys of every county in California, to the City Attorneys of every California
6 city with a population greater than 750,000, and to each named Defendant. In compliance with Health
7 & Safety Code § 25249.7(d) and 11 C.C.R. § 3101, each Certificate certified that Plaintiff's counsel:
8 (1) has consulted with one or more persons with relevant and appropriate experience or expertise who
9 reviewed facts, studies, or other data regarding the exposures to BPA and/or BPS alleged in each Notice;
10 and (2) based on the information obtained through such consultations, believes that there is a reasonable
11 and meritorious case for a citizen enforcement action based on the facts alleged in each Notice. In
12 compliance with Health & Safety Code § 25249.7(d) and 11 C.C.R. § 3102, each Certificate served on
13 the Attorney General included factual information—provided on a confidential basis—sufficient to
14 establish the basis for each Certificate, including the identity of the person(s) consulted by Plaintiff's
15 counsel and the facts, studies, or other data reviewed by such persons.

16 98. None of the public prosecutors with the authority to prosecute violations of Proposition
17 65 has commenced and/or is diligently prosecuting a cause of action against any Defendant under Health
18 & Safety Code § 25249.5, et seq., based on the claims asserted in Plaintiff's Notices.

19 99. Defendants know and intend that individuals, including pregnant women, will touch or
20 handle Thermal Paper, thus exposing them to BPA and/or BPS.

21 100. Under Proposition 65, an exposure is “knowing” where the party responsible for such
22 exposure has:

23 knowledge of the fact that a[n] . . . exposure to a chemical listed pursuant
24 to [Health & Safety Code § 25249.8(a)] is occurring. No knowledge that
the . . . exposure is unlawful is required.

25 27 C.C.R. § 25102(n). This knowledge may be either actual or constructive. See, e.g., Final Statement
26 of Reasons Revised (November 4, 1988) (pursuant to former 22 C.C.R. Division 2, § 12601).

27 101. Each named Defendant has been informed of the BPA and/or BPS in its Thermal Paper
28 by the 60-Day Notice of Violation and accompanying Certificate of Merit served on it by Plaintiff.

1 102. Because Thermal Paper requires a phenol-based reactant such as BPA or BPS in order
2 to produce text or images, Defendants should have known that their Thermal Paper could contain BPA
3 and/or BPS. Further, Defendants also have constructive knowledge that their Thermal Paper contains
4 BPA and/or BPS due to the widespread media coverage concerning the problem of these chemicals in
5 consumer products in general, and on documents printed on Thermal Paper in particular. The problem
6 of exposures to BPA and BPS from Thermal Paper has been the subject of articles in national
7 newspapers, industry trade papers and scholarly journals, as well as numerous Internet postings.

8 103. As companies that manufacture, import, distribute, sell or otherwise provide Thermal
9 Paper to consumers, Defendants know or should know that Thermal Paper contains BPA and/or BPS
10 and that individuals who touch or handle Thermal Paper will be exposed to the Listed Chemicals. The
11 exposures to consumers who touch or handle Thermal Paper are a natural and foreseeable consequence
12 of Defendants' placing Thermal Paper into the stream of commerce and/or dispensing Thermal Paper
13 to California consumers.

14 104. Nevertheless, Defendants continue to expose consumers, including children, to BPA
15 and/or BPS without prior clear and reasonable warnings regarding the reproductive hazards of the Listed
16 Chemicals.

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

19 106. Any person "violating or threatening to violate" Proposition 65 may be enjoined in any
20 court of competent jurisdiction. Health & Safety Code § 25249.7. "Threaten to violate" is defined to
21 mean "to create a condition in which there is a substantial probability that a violation will occur." Health
22 & Safety Code § 25249.11(e). Proposition 65 provides for civil penalties not to exceed \$2,500 per day
23 for each violation of Proposition 65.

24 **FIRST CAUSE OF ACTION**

25 (Violation of Proposition 65 – Exposure to BPS – Against the BPS Defendants)

26 107. Plaintiff realleges and incorporates by reference as if specifically set forth herein
27 Paragraphs 1 through 106, inclusive.
28

108. By placing Thermal Paper into the stream of commerce or dispensing Thermal Paper to California consumers as receipts or other transactional documentation, each of the BPS Defendants is a person in the course of doing business within the meaning of Health & Safety Code § 25249.11.

109. BPS is a chemical listed by the State of California as known to cause reproductive harm.

110. The BPS Defendants know that average use of their Thermal Paper will expose people who touch or handle the Thermal Paper to BPS. The BPS Defendants intend that the Thermal Paper be used in a manner that results in Thermal Paper's being touched or handled, which results in exposures to BPS from the Thermal Paper.

111. The BPS Defendants have failed, and continue to fail, to provide clear and reasonable warnings regarding the reproductive toxicity of BPS to consumers who touch or handle their Thermal Paper.

112. By committing the acts alleged above, the BPS Defendants have at all times relevant to this Complaint violated Proposition 65 by knowingly and intentionally exposing individuals to BPS without first giving clear and reasonable warnings to such individuals regarding the reproductive toxicity of BPS.

SECOND CAUSE OF ACTION

(Violation of Proposition 65 – Exposure to BPA – Against the BPA Defendants)

113. Plaintiff realleges and incorporates by reference as if specifically set forth herein Paragraphs 1 through 112, inclusive.

114. By placing Thermal Paper into the stream of commerce or dispensing Thermal Paper to California consumers as receipts or other transactional documentation, each of the BPA Defendants is a person in the course of doing business within the meaning of Health & Safety Code § 25249.11.

115. BPA is a chemical listed by the State of California as known to cause reproductive harm.

116. The BPA Defendants know that average use of their Thermal Paper will expose people who touch or handle the Thermal Paper to BPA. The BPA Defendants intend that the Thermal Paper be used in a manner that results in Thermal Paper's being touched or handled, which results in exposures to BPA from the Thermal Paper.

117. The BPA Defendants have failed, and continue to fail, to provide clear and reasonable warnings regarding the reproductive toxicity of BPA to consumers who touch or handle their Thermal Paper.

118. By committing the acts alleged above, the BPA Defendants have at all times relevant to this Complaint violated Proposition 65 by knowingly and intentionally exposing individuals to BPA without first giving clear and reasonable warnings to such individuals regarding the reproductive toxicity of BPA.

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 each of the Defendants in the amount of \$2,500 per day for each violation of Proposition 65 according to proof;

2. That the Court, pursuant to Health & Safety Code § 25249.7(a), preliminarily and permanently enjoin Defendants either from offering Thermal Paper for sale in California or from providing Thermal Paper as receipts or other transactional documentation in California without either reformulating the Thermal Paper such that no Proposition 65 warnings are required or providing prior clear and reasonable warnings regarding BPA and BPS, as Plaintiff shall specify in further application to the Court;

3. That the Court, pursuant to Health & Safety Code § 25249.7(a), order Defendants to take action to stop ongoing unwarned exposures to BPA and BPS resulting from use of the Thermal Paper sold or provided to consumers by Defendants, as Plaintiff shall specify in further application to the Court;

4. That the Court, pursuant to Code of Civil Procedure § 1021.5 or any other applicable theory, grant Plaintiff her reasonable attorneys' fees and costs of suit; and

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

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4 Dated: September 17, 2026
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Respectfully submitted:

LAW OFFICE OF FRANCIS J. FLYNN, JR.

/s/ Francis Flynn

By: _____

Francis J. Flynn, Jr. (SBN 304712)
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Attorneys for Plaintiff
Sarah Hale

EXHIBIT 1

Hale v. Levain Larchmont LA, LLC, et al.

Links to 60-Day Notices of Violation on the California Attorney General's Proposition 65 Website

The Notices of Violation identified in footnote 1 of the First Amended Complaint, together with the Certificates of Merit served with them, are publicly available on the website of the California Attorney General at the addresses below. The October 17, 2025 amendment records for AG Nos. 2025-03609 and 2025-03688 are also identified below, and each record links to the filed notice or amendment and any related public filings.

AG Notice No.	Date Filed	Defendants Named in This Action	Links (AG Website)
2025-03609	September 17, 2025 Amended October 17, 2025 (AG No. 2025-04303)	Maybourne Beverly Hills Operator LLC d/b/a Maybourne Hotel Café	Original notice record Amendment record (AG 2025-04303)
2025-03688	September 22, 2025 Amended October 17, 2025 (AG No. 2025-04304)	Levain Larchmont LA, LLC; Levain Bakery Newport Beach, LLC; Levain Bakery California 2, LLC d/b/a Levain Bakery DoorDash, Inc.	Original notice record Amendment record (AG 2025-04304)
2025-04201	October 10, 2025	Gorjana & Griffin, Inc. Outerknown, LLC Balmain (USA) LLC d/b/a Balmain H & M Hennes & Mauritz L.P. d/b/a COS Givenchy Corporation d/b/a Givenchy	Notice record
2025-04225	October 14, 2025	AllSaints USA Limited d/b/a AllSaints Anine Bing Corporation d/b/a Anine Bing Giorgio Armani Corporation d/b/a Giorgio Armani Jo Malone Inc. d/b/a Jo Malone London (noticed as "Estee Lauder, Inc. d/b/a Jo Malone London") Kiehl's LLC d/b/a Kiehl's Yves Saint Laurent America, Inc. d/b/a Saint Laurent Stella McCartney America, Inc. d/b/a Stella McCartney Alice + Olivia, LLC d/b/a Alice + Olivia Ba&sh America Corp. d/b/a Ba&sh Joe & The Juice US Holdings Inc. d/b/a Joe & The Juice Quay Eyeware, Inc. d/b/a Quay Rowan Inc. d/b/a Rowan Arteast, LLC d/b/a Zadig & Voltaire (noticed as "Zadig & Voltaire")	Notice record

AG Notice No.	Date Filed	Defendants Named in This Action	Links (AG Website)
		FedEx Corporation d/b/a FedEx (the noticed entity) and Federal Express Corporation	
2025-04421	October 28, 2025	GGR East Coast, LLC d/b/a Gianvito Rossi JP Boutique, Inc. d/b/a Jayden P Boutique and/or Jayden P (noticed as “Jayden P Boutique d/b/a Jayden P”) Wildland & Lilo, LLC d/b/a Wildland (noticed as “Wildland”) Nespresso USA, Inc. d/b/a Nespresso OluKai, LLC and OluKai Retail, LLC d/b/a OluKai Paige, LLC d/b/a Paige Crocs Retail, LLC and Crocs, Inc. d/b/a Crocs Ferragamo USA, Inc. d/b/a Ferragamo Perry Ellis International, Inc. d/b/a Perry Ellis Rhone, Inc. d/b/a Rhone Solaris Eyewear, LLC d/b/a Solaris Vince, LLC and Vince Holding Corp. d/b/a Vince Alexander McQueen Trading America, Inc. d/b/a Alexander McQueen Burger Lounge of America, LLC d/b/a Burger Lounge Carolina Herrera, Ltd. d/b/a CH Carolina Herrera Diesel U.S.A., Inc. d/b/a Diesel John Varvatos Enterprises, Inc. and JV Asset Holdco, LLC d/b/a John Varvatos APP Group, Inc. d/b/a Mackage Margiela USA, Inc. d/b/a Maison Margiela Ricco’s Michelaguas (as noticed) Wilson Sporting Goods Co. d/b/a Wilson Zimmermann (USA), Inc. d/b/a Zimmermann	Notice record
2025-04499	November 1, 2025	Tom Ford Retail LLC d/b/a Tom Ford Paul Smith, Inc. d/b/a Paul Smith MCM Products USA, Inc. d/b/a MCM Longchamp USA, Inc. d/b/a Longchamp Lanvin, Inc. d/b/a Lanvin Ganni, Inc. d/b/a Ganni Reiss (Retail) Limited, Inc. d/b/a Reiss Anne Fontaine USA, Inc. d/b/a Anne Fontaine AG Jeans Export, Inc. d/b/a AG Jeans Marni USA Corp. d/b/a Marni Aloha Collection, Inc. d/b/a Aloha Reef Lifestyle, LLC d/b/a Reef	Notice record

AG Notice No.	Date Filed	Defendants Named in This Action	Links (AG Website)
		Belle Isle, Inc. d/b/a Aveda Belle Isle Salon & Spa The Alley USA, Inc. and The Alley Tea, Inc. d/b/a The Alley Badgers Creation LLC d/b/a Tutu Fun (noticed as “Tutu Fun”) Rocky Mountain Chocolate Factory, Inc. d/b/a Rocky Mountain Chocolate Factory Pawlicious Snacks, LLC d/b/a Pawlicious Aura Wood Inc d/b/a Pinklicious Press On Nails (noticed as “Pinklicious”) Drybar Products, LLC d/b/a Drybar Lamkone Restaurants, Inc. and Wahoo’s Fish Taco, LLC d/b/a Wahoo’s Fish Tacos Goods2Order, LLC d/b/a Heat Beyond Yoga, LLC d/b/a Beyond Yoga SoCal Investment Group, Inc. d/b/a Earth Bowl (noticed as “Earth Bowl”) Red Dot Restaurant Group, Inc. d/b/a The Red Chickz (noticed as “The Red Chickz”)	

The Attorney General’s searchable 60-Day Notice database is available at <https://oag.ca.gov/prop65/60-day-notice-search>.