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8 *Attorneys for Plaintiff*

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

**02/20/2026**  
Clerk of the Court  
BY: JEFFREY FLORES  
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN FRANCISCO

9 EMA BELL,

10 Plaintiff,

11 vs.

12 WALMART INC.,

13 Defendant.

Case No.: CGC-25-632496

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

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

14 Plaintiff Ema Bell (“Plaintiff”), by and through her attorneys, alleges the following cause  
15 of action in the public interest of the citizens of the State of California.

16 **BACKGROUND OF THE CASE**

17 1. Plaintiff brings this representative action on behalf of all California citizens to  
18 enforce relevant portions of Safe Drinking Water and Toxic Enforcement Act of 1986, codified at  
19 the Health and Safety Code § 25249.5 et seq (“Proposition 65”), which reads, in relevant part,  
20 “[n]o person in the course of doing business shall knowingly and intentionally expose any  
21 individual to a chemical known to the state to cause cancer or reproductive toxicity without first  
22 giving clear and reasonable warning to such individual ...”. Health & Safety Code § 25249.6.

23 2. This first amended complaint is a representative action brought by Plaintiff in the  
24 public interest of the citizens of the State of California to enforce the People’s right to be informed  
25 of the health hazards caused by exposure to lead and/or di(2-ethylhexyl) phthalate (DEHP), toxic  
26 chemicals found in (a) *The Grinch*™ plush in jumbo mugs manufactured, sold, and/or distributed  
27 by Grupo Ruz, S.A. de C.V. (lead), (b) Hi Peach Layne berry bougie kits manufactured, sold,  
28

1 and/or distributed by Peach Layne, LLC (DEHP), (c) underbed storage systems (DEHP), (d) anti-  
2 microbial mats manufactured, sold, and/or distributed by Floortex USA, LLC (DEHP), and (e)  
3 *BetterGoods*® Mexican tuna salad bowls (lead), that are sold and/or distributed by defendant  
4 Walmart Inc. (“Walmart” or “Defendant”) in California.

5 3. Lead is a harmful chemical known to the State of California to cause cancer and  
6 birth defects or other reproductive harm. On October 1, 1992, the state of California listed lead as  
7 a chemical known to cause cancer and it has come under the purview of Proposition 65 regulations  
8 since that time. Cal. Code Regs. Tit. 27, § 27001(c); Health & Safety Code §§ 25249.8 &  
9 25249.10(b). On February 27, 1987, the State of California listed lead as a chemical known to  
10 cause birth defects or other reproductive harm.

11 4. DEHP is a harmful chemical known to the State of California to cause cancer and  
12 reproductive toxicity. On January 1, 1988, the State of California listed DEHP as a chemical known  
13 to the State to cause cancer and it has come under the purview of Proposition 65 regulations since  
14 that time. Cal. Code Regs. Tit. 27, § 27001(c); Health & Safety Code §§ 25249.8 & 25249.10(b).  
15 On October 24, 2003, the State of California listed DEHP as a chemical known to cause  
16 reproductive toxicity.

17 5. Proposition 65 requires all businesses with ten (10) or more employees that operate  
18 within California or sell products therein to comply with Proposition 65 regulations. Included in  
19 such regulations is the requirement that businesses must label any product containing a Proposition  
20 65-listed chemical that will create an exposure above safe harbor levels with a “clear and  
21 reasonable” warning before “knowingly and intentionally” exposing any person to any such listed  
22 chemical.

23 6. Proposition 65 allows for civil penalties of up to \$2,500.00 per day per violation  
24 for up to 365 days to be imposed upon defendants in a civil action for violations of Proposition 65.  
25 Health & Safety Code § 25249.7(b). Proposition 65 also allows for any court of competent  
26 jurisdiction to enjoin the actions of a defendant which “violate or threaten to violate” the statute.  
27 Health & Safety Code § 25249.7.



1 Plaintiff alleges that defendant Walmart Inc. is a “person” in the course of doing business within  
2 the meaning of Health & Safety Code sections 25249.6 and 25249.11.

3 **VENUE AND JURISDICTION**

4 14. Venue is proper in the County of San Francisco because one or more of the  
5 instances of wrongful conduct occurred and continue to occur in this county and/or because  
6 Defendant conducted, and continues to conduct, business in the County of San Francisco with  
7 respect to the Products.

8 15. This Court has jurisdiction over this action pursuant to California Constitution  
9 Article VI, § 10, which grants the Superior Court original jurisdiction in all causes except those  
10 given by statute to other trial courts. Health and Safety Code § 25249.7 allows for the enforcement  
11 of violations of Proposition 65 in any Court of competent jurisdiction; therefore, this Court has  
12 jurisdiction over this lawsuit.

13 16. This Court has jurisdiction over Defendant because Defendant is either a citizen of  
14 the State of California, has sufficient minimum contacts with the State of California, is registered  
15 with the California Secretary of State as foreign corporations authorized to do business in the State  
16 of California, and/or has otherwise purposefully availed itself of the California market. Such  
17 purposeful availment has rendered the exercise of jurisdiction by California courts consistent and  
18 permissible with traditional notions of fair play and substantial justice.

19 **STATUTORY BACKGROUND**

20 17. The people of the State of California declared in Proposition 65 their right “[t]o be  
21 informed about exposures to chemicals that cause cancer, birth defects, or other reproductive  
22 harm.” (Section 1(b) of Initiative Measure, Proposition 65.)

23 18. To effect this goal, Proposition 65 requires that individuals be provided with a  
24 “clear and reasonable warning” before being exposed to substances listed by the State of California  
25 as causing cancer or reproductive toxicity. H&S Code § 25249.6 states, in pertinent part:

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

1           19.     An exposure to a chemical in a consumer product is one “which results from a  
2 person’s acquisition, purchase, storage, consumption or other reasonably foreseeable use of a  
3 consumer good, or any exposure that results from receiving a consumer service.” (27 CCR §  
4 25602, para (b).) H&S Code § 25603(c) states that “a person in the course of doing business ...  
5 shall provide a warning to any person to whom the product is sold or transferred unless the product  
6 is packaged or labeled with a clear and reasonable warning.”

7           20.     Pursuant to H&S Code § 25603.1, the warning may be provided by using one or  
8 more of the following methods individually or in combination:<sup>1</sup>

9                 a.     A warning that appears on a product’s label or other labeling.

10                b.     Identification of the product at the retail outlet in a manner which provides  
11 a warning. Identification may be through shelf labeling, signs, menus, or a combination  
12 thereof.

13                c.     The warnings provided pursuant to subparagraphs (a) and (b) shall be  
14 prominently placed upon a product’s labels or other labeling or displayed at the retail outlet  
15 with such conspicuousness, as compared with other words, statements, designs, or devices  
16 in the label, labeling or display as to render it likely to be read and understood by an  
17 ordinary individual under customary conditions of purchase or use.

18                d.     A system of signs, public advertising identifying the system and toll-free  
19 information services, or any other system that provides clear and reasonable warnings.

20           21.     Proposition 65 provides that any “person who violates or threatens to violate” the  
21 statute may be enjoined in a court of competent jurisdiction. (H&S Code § 25249.7.) The phrase  
22 “threaten to violate” is defined to mean creating “a condition in which there is a substantial  
23 probability that a violation will occur.” (H&S Code § 25249.11(e).) Violators are liable for civil  
24

25  
26  
27 <sup>1</sup> Alternatively, a person in the course of doing business may elect to comply with the warning  
28 requirements set out in the amended version of 27 CCR 25601, *et.seq.* as amended on August 30,  
2016, and operative on August 30, 2018.



1           25.     On October 23, 2024 (*The Grinch*<sup>™</sup> plush in jumbo mugs), December 3, 2024 (Hi  
2 Peach Layne berry bougie kits), July 8, 2025 (underbed storage systems and anti-microbial mats),  
3 and August 20, 2025 (*BetterGoods*<sup>®</sup> Mexican tuna salad bowls), Plaintiff purchased the Products  
4 from Defendant. At the time of the purchase, Defendant did not provide a clear and reasonable  
5 exposure warning pursuant to Cal. Code Regs. Tit. 27, § 25602.

6           26.     On December 23, 2024 (*The Grinch*<sup>™</sup> plush in jumbo mugs), February 13, 2025  
7 (Hi Peach Layne berry bougie kits), October 22, 2025 (underbed storage systems), November 14,  
8 2025 (anti-microbial mats), and November 17, 2025 (*BetterGoods*<sup>®</sup> Mexican tuna salad bowls),  
9 Plaintiff served notice of alleged violation of Health and Safety Code § 25249.6 (collectively, the  
10 “Notices” and each a “Notice”) to Defendant concerning the exposure of California citizens to lead  
11 and/or DEHP from use and/or consumption of the Products without proper warning, subject to a  
12 private action to Defendant and to the California Attorney General’s office and the offices of the  
13 County District attorneys and City Attorneys for each city with a population greater than 750,000  
14 persons wherein the herein violations allegedly occurred. The exposures that are the subject of the  
15 Notices result from the purchase, acquisition, handling and recommended use of the Products. The  
16 primary route of exposure to DEHP and lead in ceramic products is through dermal absorption  
17 directly through the skin when consumers use, touch, or handle the Products. Exposure through  
18 ingestion will occur by touching the Products with subsequent touching of the user’s hand to  
19 mouth. The primary route of exposure to lead in food products is through ingestion. When foods  
20 contaminated with lead are consumed, ingestion of lead will occur which will increase blood lead  
21 levels. No clear and reasonable warning is provided with the Products regarding the health hazards  
22 of exposure.

23           27.     Defendant has actual knowledge that sales of the Products in California will result  
24 in an actionable consumer product exposure pursuant to Cal. Health & Safety Code § 25249.5 et  
25 seq.

26           28.     Defendant has sold the Products under a brand or trademark that is owned or  
27 licensed by Defendant or an affiliated entity; and/or Defendant has knowingly introduced lead  
28 and/or DEHP into the Products, or knowingly caused lead and/or DEHP to be created in the

1 Products; and/or Defendant has covered, obscured or altered a warning label that has been affixed  
2 to the Products pursuant to § 25600.2(b); and/or Defendant has received a notice and warning  
3 materials for the exposure pursuant to § 25600.2(b)-(c) and Defendant has sold the Products  
4 without conspicuously posting or displaying the warning; and/or Defendant has actual knowledge  
5 of the potential consumer product exposure requiring the warning, and there is no manufacturer,  
6 producer, packager, importer, supplier, or distributor of the Products who: (i) is a “person in the  
7 course of doing business under § 25249.11(b) of the Act, and (ii) has designated an agent for  
8 service of process in California, or has a place of business in California.

9 29. At all times relevant to this action, Defendant has knowingly and intentionally  
10 exposed users of the Products to lead and/or DEHP without first giving a clear and reasonable  
11 exposure warning to such individuals. More than five business days after receipt of the Notices,  
12 Defendant continued to distribute, sell, and/or offer to and sell in California without the requisite  
13 warning information.

14 30. On December 22, 2025, Plaintiff purchased the Products a second time from  
15 Defendant. At the time of the purchase, Defendant did not provide a clear and reasonable exposure  
16 warning pursuant to Cal. Code Regs. Tit. 27, § 25602.

17 31. As a proximate result of acts by Defendant, as a person in the course of doing  
18 business within the meaning of H&S Code § 25249.11, individuals throughout the State of  
19 California, including in San Francisco County, have been exposed to lead and/or DEHP without a  
20 clear and reasonable warning on the Products. The individuals subject to the violative exposures  
21 include normal and foreseeable users and consumers that use and/or consumption the Products, as  
22 well as all others exposed to the Products.

### 23 **SATISFACTION OF NOTICE REQUIREMENTS**

24 32. On October 23, 2024 (*The Grinch*™ plush in jumbo mugs), December 3, 2024 (Hi  
25 Peach Layne berry bougie kits), July 8, 2025 (underbed storage systems and anti-microbial mats),  
26 and August 20, 2025 (*BetterGoods*® Mexican tuna salad bowls), Plaintiff purchased the Products  
27 from Walmart. At the time of purchase, Walmart did not provide a Proposition 65 exposure  
28

1 warning for lead and/or DEHP or any other Proposition 65 listed chemical in a manner consistent  
2 with H&S Code § 25603.1 as described *supra*.

3 33. The Hi Peach Layne berry bougie kits, underbed storage systems, and anti-  
4 microbial mats were sent to a testing laboratory for phthalate testing to determine the phthalate  
5 content of the Products. *The Grinch*<sup>™</sup> plush in jumbo mugs were sent to a testing laboratory to  
6 determine if, and what amount of, lead would migrate and/or leach from the Product. The  
7 *BetterGoods*<sup>®</sup> Mexican tuna salad bowl was sent to a testing laboratory to determine if, and what  
8 amount of, lead a consumer would be exposed to per serving size

9 34. The laboratory provided the results of its analysis. Results of these tests determined  
10 the Products expose users and/or consumers to lead and/or DEHP (collectively, the “Chemical  
11 Test Reports” and each a “Chemical Test Report”).

12 35. Plaintiff provided the Chemical Test Reports and Products to an analytical chemist  
13 to determine if, based on the findings of the Chemical Test Reports and the reasonable and  
14 foreseeable use of the Products, exposure to lead and/or DEHP will occur at levels that require  
15 Proposition 65 warnings under the Clear and Reasonable Warnings section 25601 of Title 27 of  
16 the California Code of Regulations.

17 36. On December 23, 2024 (*The Grinch*<sup>™</sup> plush in jumbo mugs) and November 17,  
18 2025 (*BetterGoods*<sup>®</sup> Mexican tuna salad bowls), Plaintiff received from the analytical chemist an  
19 exposure assessment report which concluded that persons in California who use and/or consumer  
20 the Productswill be exposed to levels of lead that require a Proposition 65 exposure warning. On  
21 February 13, 2025 (Hi Peach Layne berry bougie kits), October 22, 2025 (underbed storage  
22 systems), and November 14, 2025 (anti-microbial mats), Plaintiff received from the analytical  
23 chemist an exposure assessment report which concluded that persons in California who use the  
24 Productswill be exposed to levels of DEHP that require a Proposition 65 exposure warning.

25 37. On December 23, 2024 (*The Grinch*<sup>™</sup> plush in jumbo mugs), February 13, 2025  
26 (Hi Peach Layne berry bougie kits), October 22, 2025 (underbed storage systems), November 14,  
27 2025 (anti-microbial mats), and November 17, 2025 (*BetterGoods*<sup>®</sup> Mexican tuna salad bowls),  
28 Plaintiff served the Notices on Defendant concerning the exposure of California citizens to lead

1 and/or DEHP from use and/or consumption of the Products without proper warning, subject to a  
2 private action to Defendant and to the California Attorney General's office and the offices of the  
3 County District attorneys and City Attorneys for each city with a population greater than 750,000  
4 persons wherein the herein violations allegedly occurred. See attached at Exhibits A – E a true and  
5 correct copy of each Notice.

6 38. The Notices complied with all procedural requirements of Proposition 65 including  
7 the attachment of a Certificate of Merit affirming that Plaintiff's counsel had consulted with at  
8 least one person with relevant and appropriate expertise who reviewed relevant data regarding lead  
9 and/or DEHP exposure, and that counsel believed there was meritorious and reasonable cause for  
10 a private action.

11 39. After receiving the Notices, and to Plaintiff's best information and belief, none of  
12 the noticed appropriate public enforcement agencies have commenced and diligently prosecuted a  
13 cause of action against Defendant under Proposition 65 to enforce the alleged violations which are  
14 the subject of the Notices.

15 40. Plaintiff is commencing this action more than sixty (60) days from the date of the  
16 Notices to Defendant, as required by law.

17 **FIRST CAUSE OF ACTION**

18 **(By Plaintiff against Defendant for the Violation of Proposition 65)**

19 41. Plaintiff hereby repeats and incorporates by reference paragraphs 1 through 40 of  
20 this First Amended Complaint as though fully set forth herein.

21 42. Defendant has manufactured, processed, marketed, distributed, offered to sell  
22 and/or sold the Products in California since at least October 23, 2024 with respect to *The Grinch*<sup>™</sup>  
23 plush in jumbo mugs, since at least December 3, 2024 with respect to the Hi Peach Layne berry  
24 bougie kits, since at least October 22, 2025 with respect to the underbed storage systems, since at  
25 least November 14, 2025 with respect to the anti-microbial mats, and since at least November 17,  
26 2025 with respect to the *BetterGoods*<sup>®</sup> Mexican tuna salad bowls.

27 43. On December 23, 2024 (*The Grinch*<sup>™</sup> plush in jumbo mugs), February 13, 2025  
28 (Hi Peach Layne berry bougie kits), October 22, 2025 (underbed storage systems), November 14,

1 2025 (anti-microbial mats), and November 17, 2025 (*BetterGoods*® Mexican tuna salad bowls),  
2 Plaintiff served the Notices on Defendant concerning the exposure of California citizens to lead  
3 and/or DEHP from use and/or consumption of the Products without proper warning, subject to a  
4 private action to Defendant and to the California Attorney General’s office and the offices of the  
5 County District attorneys and City Attorneys for each city with a population greater than 750,000  
6 persons wherein the herein violations allegedly occurred.

7 44. The Notices gives Defendant actual knowledge of the potential consumer product  
8 exposure requiring the warning pursuant to Cal. Code Regs, Tit. 27, § 25600.2. Use and/or  
9 consumption of the Products will expose users and consumers thereof to lead and/or DEHP,  
10 hazardous chemicals found on the Proposition 65 list of chemicals known to be hazardous to  
11 human health.

12 45. The Products do not comply with the Proposition 65 warning requirements.

13 46. Plaintiff, based on her best information and belief, avers that at all relevant times  
14 herein, and since at least December 3, 2024 with respect to the Hi Peach Layne berry bougie kits,  
15 since at least October 22, 2025 with respect to the underbed storage systems, since at least  
16 November 14, 2025 with respect to the anti-microbial mats, and since at least November 17, 2025  
17 with respect to the *BetterGoods*® Mexican tuna salad bowls, continuing until the present, that  
18 Defendant has continued to knowingly and intentionally expose California users and consumers  
19 of the Products to lead and/or DEHP without providing required warnings under Proposition 65.

20 47. Defendant continues to sell the Products under a brand or trademark that is owned  
21 or licensed by Defendant or an affiliated entity; and/or Defendant has knowingly introduced lead  
22 and/or DEHP into the Products, or knowingly caused lead and/or DEHP to be created in the  
23 Products; and/or Defendant has covered, obscured or altered a warning label that has been affixed  
24 to the Products pursuant to § 25600.2(b); and/or Defendant has received a notice and warning  
25 materials for the exposure pursuant to § 25600.2(b)-(c) and Defendant has sold the Products  
26 without conspicuously posting or displaying the warning; and/or Defendant has actual knowledge  
27 of the potential consumer product exposure requiring the warning, and there is no manufacturer,  
28 producer, packager, importer, supplier, or distributor of the Product who: (i) is a “person in the

1 course of doing business under § 25249.11(b) of the Act, and (ii) has designated an agent for  
2 service of process in California, or has a place of business in California

3 48. On December 22, 2025, more than five business days after Defendant received each  
4 Notice, Plaintiff purchased the Products from Defendant. At the time of purchase, Defendant did  
5 not provide a Proposition 65 compliant exposure warning.

6 49. The exposures that are the subject of the Notices result from the purchase,  
7 acquisition, handling and recommended use of the Products. The primary route of exposure to the  
8 Products is through dermal absorption directly through the skin when consumers use, touch, or  
9 handle the Products. Exposure through ingestion will occur by touching the Products with  
10 subsequent touching of the user's hand to mouth. The primary route of exposure to lead in food  
11 products is through ingestion. When foods contaminated with lead are consumed, ingestion of lead  
12 will occur which will increase blood lead levels. No clear and reasonable warning is provided with  
13 the Products regarding the health hazards of exposure.

14 50. Plaintiff, based on her best information and belief, avers that such exposures will  
15 continue every day until clear and reasonable warnings are provided to purchasers and users or  
16 until these known toxic chemicals are removed from the Products.

17 51. Defendant has knowledge that the normal and reasonably foreseeable use of the  
18 Products exposes individuals to lead and/or DEHP, and Defendant intends that exposures to lead  
19 and/or DEHP will occur by their deliberate, non-accidental participation in the importation,  
20 distribution, sale and offering of the Products to consumers in California.

21 52. Plaintiff has engaged in good faith efforts to resolve the herein claims prior to this  
22 First Amended Complaint.

23 53. Pursuant to Health and Safety Code § 25249.7(b), as a consequence of the above  
24 described acts, Defendant is liable for a maximum civil penalty of \$2,500 per day per violation.

25 54. Pursuant to Health and Safety Code § 25249.7(a), this Court is specifically  
26 authorized to grant injunctive relief in favor of Plaintiff and against Defendant.

27  
28

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff demands judgment against Defendant and requests the following relief:

- A. That the court assess civil penalties against Defendant in the amount of \$2,500 per day for each violation for up to 365 days in accordance with Health and Safety Code § 25249.7(b);
- B. That the court preliminarily and permanently enjoin Defendant mandating Proposition 65 compliant warnings on the Products;
- C. That the court grant Plaintiff reasonable attorney’s fees and costs of suit, in the amount of \$50,000.00.
- D. That the court grant any further relief as may be just and proper.

Dated: February 20, 2026

BRODSKY SMITH

By: \_\_\_\_\_

  
Evan J. Smith (SBN242352)  
Ryan P. Cardona (SBN302113)  
9465 Wilshire Boulevard, Suite 300  
Beverly Hills, CA 90212  
Telephone: (877) 534-2590  
Facsimile: (310) 247-0160

*Attorneys for Plaintiff*

# EXHIBIT “A”

LAW OFFICES  
**BRODSKY SMITH**

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www.brodskysmith.com

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CHERRY HILL, NJ 08034  
856.795.7250

**NEW YORK OFFICE**  
240 MINEOLA BOULEVARD  
MINEOLA, NY 11501  
516.741.4977

**PENNSYLVANIA OFFICE**  
TWO BALA PLAZA, STE. 805  
BALA CYNWYD, PA 19004  
610.667.6200

December 23, 2024

President/CEO Access Asia-Pacific Ltd. Room 10A Por Yen Bldg. 478 Castle Peak Rd. Lai Chi Kok, Kowloon Hong Kong CHINA	President/CEO Grupo Ruz, S.A. de C.V. Av. Pirules S/N Lt. 125 B 3 San Martin Obispo Tepetlixpan Cuautitlan Izcalli Estado De Mexico, 54763 MEXICO
President/CEO Walmart, Inc. c/o CT Corporation System 330 N. Brand Blvd., Suite 700 Glendale, CA 91203	President/CEO Walmart, Inc. c/o The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801
President/CEO Walmart, Inc. 702 SW 8 <sup>th</sup> Street Bentonville, AR 72716	

**60-Day Notice of Violation of California Safe Drinking Water and Toxic Enforcement Act<sup>1</sup>**

To Whom It May Concern:

This Notice of Violation (the "Notice") is provided to you pursuant to and in compliance with California Health & Safety Code § 25249.7(d).

Brodsky Smith represents Ema Bell ("Bell"), a citizen of the State of California acting in the interest of the general public to promote awareness of exposures to toxic chemicals from use of consumer products sold in California and to improve human health and the environment by reducing hazardous substances.

With respect to the Product herein, Bell has identified a violation of California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65") codified at Cal. Health & Safety Code § 25249.5, et seq. This violation has occurred and continues to occur because the alleged Violator(s) failed to provide a clear and reasonable health hazard warning in connection with the sale or use of the Product in California. Health & Safety Code § 25249.6 provides that "[n]o person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the State to cause cancer or reproductive toxicity without first providing a clear and reasonable warning to such individual ..." Without proper warnings regarding the toxic effects of exposures to the Listed Chemical resulting from use of the

<sup>1</sup> The public enforcement agencies that have been served with copies of this Notice are identified in the attached distribution list accompanying the Certificate of Service.

Product, California citizens lack the information necessary to make informed decisions on whether and/or how to eliminate (or reduce) the risk of exposure to the Listed Chemical from the reasonably foreseeable use of the Product.

**I. DESCRIPTION OF THE VIOLATION**

1. **Enforcer:** Ema Bell, 222 S. Figueroa St. Apt. 1212, Los Angeles, CA 90012-2581; (Ph) 424-332-3817.
2. **Alleged Violator(s):** Access Asia-Pacific Ltd.; Grupo Ruz, S.A. de C.V.; Walmart, Inc.
3. **Time Period of Exposure:** Violations have been occurring since at least December 23, 2024 and are continuing to this day.
4. **Listed Chemical:** Lead. Lead is listed under Proposition 65 as a chemical known to the State to cause cancer and birth defects or other reproductive harm.
5. **Product:**

<b>Product<sup>2</sup></b>	<b>Non- Exclusive Examples of the Product</b>
Ceramicware	The Grinch Plush in Jumbo Mug UPC# 1 93849 06607 5

6. **Description of Exposure:** The exposures that are the subject of this Notice result from the purchase, acquisition, handling and recommended use of the Product. The primary route of exposure to the Listed Chemical is through dermal absorption directly through the skin when consumers use, touch, or handle the Products. Some amount of exposure through ingestion can occur by touching the Product with subsequent touching of the user’s hand to mouth. No clear and reasonable warning is provided with the Products regarding the health hazards of exposure to the Listed Chemical.

**II. PROPOSITION 65 INFORMATION**

For the Violators’ reference, enclosed is a copy of “Proposition 65: A Summary” that has been prepared by the Office of Environmental Health Hazard Assessment (“OEHHA”). For more information concerning the provisions of Proposition 65, contact OEHHA at 916.445.6900.

**III. RESOLUTION OF THE CLAIMS**

Based on the allegations set forth in this Notice, Brodsky Smith intends to file a citizen enforcement lawsuit on behalf of Bell against the alleged Violator(s) unless such Violator(s) agree in a binding written agreement to: (1) recall Products already sold; (2) provide Proposition 65 compliant exposure warnings for Products sold in the future or reformulate the Products to eliminate exposures to the Listed Chemical; and (3) pay an appropriate civil penalty based on the factors enumerated in Health & Safety Code § 25249.7(b). Consistent with the public interest goals of Proposition 65 and the desire to have

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<sup>2</sup> The specifically identified example of the Product in this Notice is to assist the recipients’ investigation of, among other things, the magnitude of potential exposures to the Listed Chemical from other items within the definition of Products. This example is not intended to be an exhaustive or comprehensive identification of each specific offending Product. It is Bell’s position that the alleged Violators are obligated to conduct a good faith investigation into other Products that may have been manufactured, distributed, sold, shipped, stored (or otherwise within the alleged Violators’ custody or control) during the relevant period to ensure that requisite health hazard warnings were and are provided to California citizens prior to purchase and use.

these violations of California law quickly rectified, Bell is interested in seeking a constructive resolution of the claims in this Notice without engaging in costly and protracted litigation.

Bell has retained me as legal counsel in connection with this Notice. **Please direct all communications regarding this Notice to my attention at Brodsky Smith, 9465 Wilshire Blvd., Ste. 300, Beverly Hills, CA 90212, (877) 534-2590, [esmith@brodskysmith.com](mailto:esmith@brodskysmith.com).**

Sincerely,

  
\_\_\_\_\_  
Evan J. Smith

**Attachments**

Certificate of Merit

Certificate of Service

The Safe Drinking Water and Toxic Enforcement Action of 1986 (Proposition 65): A Summary

# EXHIBIT “B”

LAW OFFICES  
**BRODSKY SMITH**

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MINEOLA, NY 11501  
516.741.4977

**PENNSYLVANIA OFFICE**  
TWO BALA PLAZA, STE. 805  
BALA CYNWYD, PA 19004  
610.667.6200

February 13, 2025

Member/Manager Peach Layne, LLC c/o Rachael Bailey Oberste 5517 Stonewall Road Little Rock, AR 72207	Member/Manager Hi Peach Layne, LLC c/o Rachael Oberste 5517 Stonewall Road Little Rock, AR 72207
Member/Manager Hi Peach Layne, LLC c/o Michael Wong 5509 Stockdale Court Jurupa Valley, CA 92509	President/CEO Walmart Inc. c/o The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801
President/CEO Walmart Inc. c/o CT Corporation System 330 N. brand Blvd., Suite 700 Glendale, CA 91203	President/CEO Walmart Inc. 702 SW 8 <sup>th</sup> Street Bentonville, AR 72716

**60-Day Notice of Violation of California Safe Drinking Water and Toxic Enforcement Act<sup>1</sup>**

To Whom It May Concern:

This Notice of Violation (the "Notice") is provided to you pursuant to and in compliance with California Health & Safety Code § 25249.7(d).

Brodsky Smith represents Ema Bell ("Bell"), a citizen of the State of California acting in the interest of the general public to promote awareness of exposures to toxic chemicals from use of consumer products sold in California and to improve human health and the environment by reducing hazardous substances.

With respect to the Product herein, Bell has identified a violation of California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65") codified at Cal. Health & Safety Code § 25249.5, et seq. This violation has occurred and continues to occur because the alleged Violator(s) failed to provide a clear and reasonable health hazard warning in connection with the sale or use of the Product in California. Health & Safety Code § 25249.6 provides that "[n]o person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the State to cause cancer or reproductive toxicity without first providing a clear and reasonable warning to such individual ..." Without proper warnings regarding the toxic effects of exposures to the Listed Chemical resulting from use of the

<sup>1</sup> The public enforcement agencies that have been served with copies of this Notice are identified in the attached distribution list accompanying the Certificate of Service.

Product, California citizens lack the information necessary to make informed decisions on whether and/or how to eliminate (or reduce) the risk of exposure to the Listed Chemical from the reasonably foreseeable use of the Product.

### **I. DESCRIPTION OF THE VIOLATION**

- 1. Enforcer:** Ema Bell, 222 S. Figueroa St. Apt. 1212, Los Angeles, CA 90012-2581; (Ph) 424-332-3817.
- 2. Alleged Violator(s):** Peach Layne, LLC; Hi Peach Layne, LLC; Walmart Inc.
- 3. Time Period of Exposure:** Violations have been occurring since at least February 13, 2025 and are continuing to this day.
- 4. Listed Chemical:** Di(2-ethylhexyl) phthalate (DEHP). DEHP is listed under Proposition 65 as a chemical known to the State to cause cancer and birth defects or other reproductive harm.
- 5. Product:**

<b>Product<sup>2</sup></b>	<b>Non- Exclusive Examples of the Product</b>
Kit/Bag	Hi Peach Layne Berry Bougie Kit UPC# 8 10141 99225 2

- 6. Description of Exposure:** The exposures that are the subject of this Notice result from the purchase, acquisition, handling and recommended use of the Product. The primary route of exposure to the Listed Chemical is through dermal absorption directly through the skin when consumers use, touch, or handle the Products. Some amount of exposure through ingestion can occur by touching the Product with subsequent touching of the user's hand to mouth. No clear and reasonable warning is provided with the Products regarding the health hazards of exposure to the Listed Chemical.

### **II. PROPOSITION 65 INFORMATION**

For the Violators' reference, enclosed is a copy of "Proposition 65: A Summary" that has been prepared by the Office of Environmental Health Hazard Assessment ("OEHHA"). For more information concerning the provisions of Proposition 65, contact OEHHA at 916.445.6900.

### **III. RESOLUTION OF THE CLAIMS**

Based on the allegations set forth in this Notice, Brodsky Smith intends to file a citizen enforcement lawsuit on behalf of Bell against the alleged Violator(s) unless such Violator(s) agree in a binding written agreement to: (1) recall Products already sold; (2) provide Proposition 65 compliant exposure warnings for Products sold in the future or reformulate the Products to eliminate exposures to the Listed Chemical; and (3) pay an appropriate civil penalty based on the factors enumerated in Health & Safety Code § 25249.7(b). Consistent with the public interest goals of Proposition 65 and the desire to have

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<sup>2</sup> The specifically identified example of the Product in this Notice is to assist the recipients' investigation of, among other things, the magnitude of potential exposures to the Listed Chemical from other items within the definition of Products. This example is not intended to be an exhaustive or comprehensive identification of each specific offending Product. It is Bell's position that the alleged Violators are obligated to conduct a good faith investigation into other Products that may have been manufactured, distributed, sold, shipped, stored (or otherwise within the alleged Violators' custody or control) during the relevant period to ensure that requisite health hazard warnings were and are provided to California citizens prior to purchase and use.

these violations of California law quickly rectified, Bell is interested in seeking a constructive resolution of the claims in this Notice without engaging in costly and protracted litigation.

**Bell has retained me as legal counsel in connection with this Notice. Please direct all communications regarding this Notice to my attention at Brodsky Smith, 9465 Wilshire Blvd., Ste. 300, Beverly Hills, CA 90212, (877) 534-2590, esmith@brodskysmith.com.**

Sincerely,



---

Evan J. Smith

**Attachments**

Certificate of Merit

Certificate of Service

The Safe Drinking Water and Toxic Enforcement Action of 1986 (Proposition 65): A Summary

# EXHIBIT “C”

LAW OFFICES  
**BRODSKY SMITH**

9465 WILSHIRE BLVD., STE. 300  
BEVERLY HILLS, CA 90212  
877.534.2590  
www.brodskysmith.com

**NEW JERSEY OFFICE**  
20 BRACE RD., STE. 350  
CHERRY HILL, NJ 08034  
856.795.7250

**NEW YORK OFFICE**  
240 MINEOLA BOULEVARD  
MINEOLA, NY 11501  
516.741.4977

**PENNSYLVANIA OFFICE**  
TWO BALA PLAZA, STE. 805  
BALA CYNWYD, PA 19004  
610.667.6200

October 22, 2025

President/CEO Walmart Inc. c/o The Corporation Trust Company Corporation Trust Center 1209 Orange St. Wilmington, DE 19801	President/CEO Walmart Inc. c/o CT Corporation System 330 N. Brand Blvd., Suite 700 Glendale, CA 91203
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**60-Day Notice of Violation of California Safe Drinking Water and Toxic Enforcement Act<sup>1</sup>**

To Whom It May Concern:

This Notice of Violation (the "Notice") is provided to you pursuant to and in compliance with California Health & Safety Code § 25249.7(d).

Brodsky Smith represents Ema Bell ("Bell"), a citizen of the State of California acting in the interest of the general public to promote awareness of exposures to toxic chemicals from use of consumer products sold in California and to improve human health and the environment by reducing hazardous substances.

With respect to the Product herein, Bell has identified a violation of California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65") codified at Cal. Health & Safety Code § 25249.5, et seq. This violation has occurred and continues to occur because the alleged Violator(s) failed to provide a clear and reasonable health hazard warning in connection with the sale or use of the Product in California. Health & Safety Code § 25249.6 provides that "[n]o person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the State to cause cancer or reproductive toxicity without first providing a clear and reasonable warning to such individual ..." Without proper warnings regarding the toxic effects of exposures to the Listed Chemical resulting from use of the Product, California citizens lack the information necessary to make informed decisions on whether and/or how to eliminate (or reduce) the risk of exposure to the Listed Chemical from the reasonably foreseeable use of the Product.

**I. DESCRIPTION OF THE VIOLATION**

- 1. Enforcer:** Ema Bell, 222 S. Figueroa St. Apt. 1212, Los Angeles, CA 90012-2581; (Ph) 424-332-3817.
- 2. Alleged Violator(s):** Walmart Inc.

<sup>1</sup> The public enforcement agencies that have been served with copies of this Notice are identified in the attached distribution list accompanying the Certificate of Service.

3. **Time Period of Exposure:** Violations have been occurring since at least October 22, 2025 and are continuing to this day.
4. **Listed Chemical:** Di(2-ethylhexyl) phthalate (DEHP). DEHP is listed under Proposition 65 as a chemical known to the State to cause cancer and birth defects or other reproductive harm.
5. **Product:**

Product <sup>2</sup>	Non- Exclusive Examples of the Product
Underbed Storage System	Underbed Storage System X002ELVMQP

6. **Description of Exposure:** The exposures that are the subject of this Notice result from the purchase, acquisition, handling and recommended use of the Product. The primary route of exposure to the Listed Chemical is through dermal absorption directly through the skin when consumers use, touch, or handle the Products. Some amount of exposure through ingestion can occur by touching the Product with subsequent touching of the user's hand to mouth. No clear and reasonable warning is provided with the Products regarding the health hazards of exposure to the Listed Chemical.

## **II. PROPOSITION 65 INFORMATION**

For the Violators' reference, enclosed is a copy of "Proposition 65: A Summary" that has been prepared by the Office of Environmental Health Hazard Assessment ("OEHHA"). For more information concerning the provisions of Proposition 65, contact OEHHA at 916.445.6900.

## **III. RESOLUTION OF THE CLAIMS**

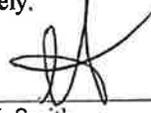
Based on the allegations set forth in this Notice, Brodsky Smith intends to file a citizen enforcement lawsuit on behalf of Bell against the alleged Violator(s) unless such Violator(s) agree in a binding written agreement to: (1) recall Products already sold; (2) provide Proposition 65 compliant exposure warnings for Products sold in the future or reformulate the Products to eliminate exposures to the Listed Chemical; and (3) pay an appropriate civil penalty based on the factors enumerated in Health & Safety Code § 25249.7(b). Consistent with the public interest goals of Proposition 65 and the desire to have these violations of California law quickly rectified, Bell is interested in seeking a constructive resolution of the claims in this Notice without engaging in costly and protracted litigation.

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<sup>2</sup> The specifically identified example of the Product in this Notice is to assist the recipients' investigation of, among other things, the magnitude of potential exposures to the Listed Chemical from other items within the definition of Products. This example is not intended to be an exhaustive or comprehensive identification of each specific offending Product. It is Bell's position that the alleged Violators are obligated to conduct a good faith investigation into other Products that may have been manufactured, distributed, sold, shipped, stored (or otherwise within the alleged Violators' custody or control) during the relevant period to ensure that requisite health hazard warnings were and are provided to California citizens prior to purchase and use.

Bell has retained me as legal counsel in connection with this Notice. Please direct all communications regarding this Notice to my attention at Brodsky Smith, 9465 Wilshire Blvd., Ste. 300, Beverly Hills, CA 90212, (877) 534-2590, [esmith@brodskysmith.com](mailto:esmith@brodskysmith.com).

Sincerely,

A handwritten signature in black ink, appearing to be 'EJ Smith', written over a horizontal line.

Evan J. Smith

**Attachments**

Certificate of Merit

Certificate of Service

The Safe Drinking Water and Toxic Enforcement Action of 1986 (Proposition 65): A Summary

# EXHIBIT “D”

LAW OFFICES  
**BRODSKY SMITH**

9465 WILSHIRE BLVD., STE. 300  
BEVERLY HILLS, CA 90212  
877.534.2590  
www.brodskysmith.com

**NEW JERSEY OFFICE**  
20 BRACE RD., STE. 350  
CHERRY HILL, NJ 08034  
856.795.7250

**NEW YORK OFFICE**  
240 MINEOLA BOULEVARD  
MINEOLA, NY 11501  
516.741.4977

**PENNSYLVANIA OFFICE**  
TWO BALA PLAZA, STE. 805  
BALA CYNWYD, PA 19004  
610.667.6200

November 14, 2025

Member/Manager Floortex USA, LLC c/o Business Filings Incorporated 108 West 13 <sup>th</sup> Street Wilmington, DE 19801	President/CEO Floortex Europe Limited 10 Miller Court Severn Drive Tewkesbury Gloucestershire UNITED KINGDOM GL20 8DN
President/CEO Walmart Inc. c/o The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801	President/CEO Walmart Inc. c/o CT Corporation System 330 N. Brand Blvd., Suite 700 Glendale, CA 91203

**60-Day Notice of Violation of California Safe Drinking Water and Toxic Enforcement Act<sup>1</sup>**

To Whom It May Concern:

This Notice of Violation (the "Notice") is provided to you pursuant to and in compliance with California Health & Safety Code § 25249.7(d).

Brodsky Smith represents Ema Bell ("Bell"), a citizen of the State of California acting in the interest of the general public to promote awareness of exposures to toxic chemicals from use of consumer products sold in California and to improve human health and the environment by reducing hazardous substances.

With respect to the Product herein, Bell has identified a violation of California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65") codified at Cal. Health & Safety Code § 25249.5, et seq. This violation has occurred and continues to occur because the alleged Violator(s) failed to provide a clear and reasonable health hazard warning in connection with the sale or use of the Product in California. Health & Safety Code § 25249.6 provides that "[n]o person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the State to cause cancer or reproductive toxicity without first providing a clear and reasonable warning to such individual ..." Without proper warnings regarding the toxic effects of exposures to the Listed Chemical resulting from use of the Product, California citizens lack the information necessary to make informed decisions on whether and/or how to eliminate (or reduce) the risk of exposure to the Listed Chemical from the reasonably foreseeable use of the Product.

<sup>1</sup> The public enforcement agencies that have been served with copies of this Notice are identified in the attached distribution list accompanying the Certificate of Service.

## I. DESCRIPTION OF THE VIOLATION

1. **Enforcer:** Ema Bell, 222 S. Figueroa St. Apt. 1212, Los Angeles, CA 90012-2581; (Ph) 424-332-3817.
2. **Alleged Violator(s):** Floortex USA, LLC; Floortex Europe Limited; Walmart Inc.
3. **Time Period of Exposure:** Violations have been occurring since at least November 14, 2025 and are continuing to this day.
4. **Listed Chemical:** Di(2-ethylhexyl) phthalate (DEHP). DEHP is listed under Proposition 65 as a chemical known to the State to cause cancer and birth defects or other reproductive harm.
5. **Product:**

<b>Product<sup>2</sup></b>	<b>Non- Exclusive Examples of the Product</b>
Anti-Microbial Mat	Anti-Microbial PVC Mat 8 41776 11223

6. **Description of Exposure:** The exposures that are the subject of this Notice result from the purchase, acquisition, handling and recommended use of the Product. The primary route of exposure to the Listed Chemical is through dermal absorption directly through the skin when consumers use, touch, or handle the Products. Some amount of exposure through ingestion can occur by touching the Product with subsequent touching of the user's hand to mouth. No clear and reasonable warning is provided with the Products regarding the health hazards of exposure to the Listed Chemical.

## II. PROPOSITION 65 INFORMATION

For the Violators' reference, enclosed is a copy of "Proposition 65: A Summary" that has been prepared by the Office of Environmental Health Hazard Assessment ("OEHHA"). For more information concerning the provisions of Proposition 65, contact OEHHA at 916.445.6900.

## III. RESOLUTION OF THE CLAIMS

Based on the allegations set forth in this Notice, Brodsky Smith intends to file a citizen enforcement lawsuit on behalf of Bell against the alleged Violator(s) unless such Violator(s) agree in a binding written agreement to: (1) recall Products already sold; (2) provide Proposition 65 compliant exposure warnings for Products sold in the future or reformulate the Products to eliminate exposures to the Listed Chemical; and (3) pay an appropriate civil penalty based on the factors enumerated in Health & Safety Code § 25249.7(b). Consistent with the public interest goals of Proposition 65 and the desire to have these violations of California law quickly rectified, Bell is interested in seeking a constructive resolution of the claims in this Notice without engaging in costly and protracted litigation.

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<sup>2</sup> The specifically identified example of the Product in this Notice is to assist the recipients' investigation of, among other things, the magnitude of potential exposures to the Listed Chemical from other items within the definition of Products. This example is not intended to be an exhaustive or comprehensive identification of each specific offending Product. It is Bell's position that the alleged Violators are obligated to conduct a good faith investigation into other Products that may have been manufactured, distributed, sold, shipped, stored (or otherwise within the alleged Violators' custody or control) during the relevant period to ensure that requisite health hazard warnings were and are provided to California citizens prior to purchase and use.

Bell has retained me as legal counsel in connection with this Notice. Please direct all communications regarding this Notice to my attention at Brodsky Smith, 9465 Wilshire Blvd., Ste. 300, Beverly Hills, CA 90212, (877) 534-2590, esmith@brodskysmith.com.

Sincerely,

A handwritten signature in black ink, appearing to be 'Evan J. Smith', written over a horizontal line.

Evan J. Smith

**Attachments**

Certificate of Merit

Certificate of Service

The Safe Drinking Water and Toxic Enforcement Action of 1986 (Proposition 65): A Summary

# EXHIBIT “E”

LAW OFFICES  
**BRODSKY SMITH**

9465 WILSHIRE BLVD., STE. 300  
BEVERLY HILLS, CA 90212  
877.534.2590  
www.brodskysmith.com

**NEW JERSEY OFFICE**  
20 BRACE RD., STE. 350  
CHERRY HILL, NJ 08034  
856.795.7250

**NEW YORK OFFICE**  
240 MINEOLA BOULEVARD  
MINEOLA, NY 11501  
516.741.4977

**PENNSYLVANIA OFFICE**  
TWO BALA PLAZA, STE. 805  
BALA CYNWYD, PA 19004  
610.667.6200

November 17, 2025

President/CEO Walmart Inc. c/o The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801	President/CEO Walmart Inc. c/o CT Corporation System 330 N. Brand Blvd., Suite 700 Glendale, CA 91203
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**60-Day Notice of Violation of California Safe Drinking Water and Toxic Enforcement Act<sup>1</sup>**

To Whom It May Concern:

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Brodsky Smith represents Ema Bell ("Bell"), a citizen of the State of California acting in the interest of the general public to promote awareness of exposures to toxic chemicals from use of consumer products sold in California and to improve human health and the environment by reducing hazardous substances.

With respect to the Product herein, Bell has identified a violation of California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65") codified at Cal. Health & Safety Code § 25249.5, et seq. This violation has occurred and continues to occur because the alleged Violator(s) failed to provide a clear and reasonable health hazard warning in connection with the sale or use of the Product in California. Health & Safety Code § 25249.6 provides that "[n]o person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the State to cause cancer or reproductive toxicity without first providing a clear and reasonable warning to such individual ..." Without proper warnings regarding the toxic effects of exposures to the Listed Chemical resulting from use of the Product, California citizens lack the information necessary to make informed decisions on whether and/or how to eliminate (or reduce) the risk of exposure to the Listed Chemical from the reasonably foreseeable use of the Product.

**I. DESCRIPTION OF THE VIOLATION**

- 1. Enforcer:** Ema Bell, 222 S. Figueroa St. Apt. 1212, Los Angeles, CA 90012-2581; (Ph) 424-332-3817.
- 2. Alleged Violator(s):** Walmart Inc.

<sup>1</sup> The public enforcement agencies that have been served with copies of this Notice are identified in the attached distribution list accompanying the Certificate of Service.

3. **Time Period of Exposure:** Violations have been occurring since at least November 17, 2025 and are continuing to this day.
4. **Listed Chemical:** Lead. Lead is listed under Proposition 65 as a chemical known to the State to cause cancer and birth defects or other reproductive harm.
5. **Product:**

Product <sup>2</sup>	Non- Exclusive Examples of the Product
Mexican Tuna Salad Bowl	Better Goods Mexican Tuna Salad Bowl UPC# 1 94346 13606 3

6. **Description of Exposure:** The exposures that are the subject of this Notice result from the purchase and recommended use of the Product. The primary route of exposure to the Listed Chemical is through ingestion. When foods contaminated with the Listed Chemical are consumed, ingestion of the Listed Chemical will occur which will increase BLLs. No clear and reasonable warning is provided with the Products regarding the health hazards of exposure to the Listed Chemical.

## **II. PROPOSITION 65 INFORMATION**

For the Violators' reference, enclosed is a copy of "Proposition 65: A Summary" that has been prepared by the Office of Environmental Health Hazard Assessment ("OEHHA"). For more information concerning the provisions of Proposition 65, contact OEHHA at 916.445.6900.

## **III. RESOLUTION OF THE CLAIMS**

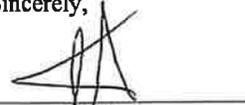
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Bell has retained me as legal counsel in connection with this Notice. Please direct all communications regarding this Notice to my attention at Brodsky Smith, 9465 Wilshire Blvd., Ste. 300, Beverly Hills, CA 90212, (877) 534-2590, [esmith@brodskysmith.com](mailto:esmith@brodskysmith.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Evan J. Smith', written over a horizontal line.

Evan J. Smith

**Attachments**

Certificate of Merit

Certificate of Service

The Safe Drinking Water and Toxic Enforcement Action of 1986 (Proposition 65): A Summary