

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

13 Attorneys for Plaintiff
14 Environmental Health Advocates, Inc.

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

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

17 ENVIRONMENTAL HEALTH ADVOCATES,
18 INC.,

19 Plaintiff,

20 v.

21 SVA GLOBAL VENTURES LLC, a Texas
22 limited liability company; SVA GLOBAL
23 VENTURES LTD., an English corporation; and
24 DOES 1 through 100, inclusive,

25 Defendants.

Case No.:

**COMPLAINT FOR CIVIL PENALTIES
AND INJUNCTIVE RELIEF**

(Health & Safety Code § 25249.6 et seq.)

ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco

05/11/2026
Clerk of the Court

BY: MARIVIC VIRAY
Deputy Clerk

CGC-26-636791

I.
INTRODUCTION

1
2 1. This Complaint is a representative action brought by Environmental Health Advocates,
3 Inc. (“Plaintiff”) in the public interest of the citizens of the State of California (“the People”). Plaintiff
4 seeks to remedy Defendants’ failure to inform the People of exposure to Di(2-ethylhexyl) phthalate
5 (“DEHP”), a known carcinogen and reproductive/developmental toxin. Defendants expose consumers
6 to DEHP by manufacturing, importing, selling, and/or distributing skipping ropes including, but not
7 limited to, RDX C4 Aluminum Handle Skipping Rope- RDX Sport (“Products”). Defendants know and
8 intend that customers will use Products containing DEHP.

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

14 3. California identified and listed DEHP as a chemical known to cause cancer as early as
15 January 1, 1988, and as a chemical known to cause developmental/reproductive toxicity on October 24,
16 2003.

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

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

II.
PARTIES

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

1 **PRAYER FOR RELIEF**

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

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

12 Respectfully submitted:

13 Dated: May 11, 2026

ENTORNO LAW, LLP

14 By: 
15 Noam Glick

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

20 Attorneys for Plaintiff
21 Environmental Health Advocates, Inc.
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