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8 *Attorneys for Plaintiff*

ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco

04/22/2026
Clerk of the Court
BY: DAEJA ROGERS
Deputy Clerk

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF SAN FRANCISCO

11 EMA BELL, PRECILA BALABBO,

12 Plaintiffs,

13 vs.

14 THE TJX COMPANIES, INC.,

15 Defendant.

Case No.:

CGC-26-636234

**COMPLAINT FOR CIVIL PENALTIES AND
INJUNCTIVE RELIEF**

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

16 Plaintiffs Ema Bell (“Bell”) and Precila Balabbo (“Balabbo”) (collectively, “Plaintiffs” and
17 each a “Plaintiff”), by and through their attorneys, allege the following cause of action in the public
18 interest of the citizens of the State of California.

19 **BACKGROUND OF THE CASE**

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

26 2. This complaint is a representative action brought by Plaintiffs in the public interest
27 of the citizens of the State of California to enforce the People’s right to be informed of the health
28 hazards caused by exposure to lead, a toxic chemical found in ceramicware products with exterior
decorations, including but not limited to, (a) wavy gold trays/tabletops, and (b) cake stand tabletops

1 sold and/or distributed to defendant The TJX Companies, Inc. (“TJX” or “Defendant”) by Ananta
2 Exports in California.

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

9 4. Proposition 65 requires all businesses with ten (10) or more employees that operate
10 within California or sell products therein to comply with Proposition 65 regulations. Included in
11 such regulations is the requirement that businesses must label any product containing a Proposition
12 65-listed chemical that will create an exposure above safe harbor levels with a “clear and
13 reasonable” warning before “knowingly and intentionally” exposing any person to any such listed
14 chemical.

15 5. Proposition 65 allows for civil penalties of up to \$2,500.00 per day per violation
16 for up to 365 days (up to a maximum civil penalty amount per violation of \$912,000.00) to be
17 imposed upon defendants in a civil action for violations of Proposition 65. Health & Safety Code
18 § 25249.7(b). Proposition 65 also allows for any court of competent jurisdiction to enjoin the
19 actions of a defendant which “violate or threaten to violate” the statute. Health & Safety Code §
20 25249.7.

21 6. Plaintiffs allege that Defendant distributes and/or offers for sale in California,
22 without a requisite exposure warning, ceramicware products with exterior decorations, including
23 but not limited to, (a) wavy gold trays/tabletops, and (b) cake stand tabletops sold and/or
24 distributed to Defendant by Ananta Exports in California (collectively, the “Products” and each a
25 “Product) that expose persons to lead when used for their intended purpose.

26 7. Defendant’s failure to warn consumers and other individuals in California of the
27 health hazards associated with exposure to lead in conjunction with the sale and/or distribution of
28

1 the Products is a violation of Proposition 65 and subjects Defendant to the enjoinder and civil
2 penalties described herein.

3 8. Plaintiffs seek civil penalties against Defendant for its violations of Proposition 65
4 in accordance with Health and Safety Code § 25249.7(b).

5 9. Plaintiffs also seek injunctive relief, preliminarily and permanently, requiring
6 Defendant to provide purchasers or users of the Products with required warnings related to the
7 dangers and health hazards associated with exposure to lead pursuant to Health and Safety Code §
8 25249.7(a).

9 10. Plaintiffs further seek a reasonable award of attorney's fees and costs.

10 PARTIES

11 11. Plaintiff Ema Bell is a citizen of the State of California acting in the interest of the
12 general public to promote awareness of exposures to toxic chemicals in products sold in California
13 and to improve human health by reducing hazardous substances contained in such items. She
14 brings this action in the public interest pursuant to Health and Safety Code § 25249.7(d).

15 12. Plaintiff Precila Balabbo is a citizen of the State of California acting in the interest
16 of the general public to promote awareness of exposures to toxic chemicals in products sold in
17 California and to improve human health by reducing hazardous substances contained in such items.
18 She brings this action in the public interest pursuant to Health and Safety Code § 25249.7(d).

19 13. Defendant The TJX Companies, Inc., through its business, effectively imports,
20 distributes, sells, and/or offers the Products for sale or use in the State of California, or it implies
21 by its conduct that it imports, distributes, sells, and/or offers the Products for sale or use in the
22 State of California. Plaintiffs allege that defendant The TJX Companies, Inc. is a "person" in the
23 course of doing business within the meaning of Health & Safety Code sections 25249.6 and
24 25249.11.

25 VENUE AND JURISDICTION

26 14. Venue is proper in the County of San Francisco because one or more of the
27 instances of wrongful conduct occurred, and continue to occur in this county and/or because
28 Defendant conducted, and continues to conduct, business in the County of San Francisco with

1 respect to the Products. The Products are distributed, marketed, and sold to consumers throughout
2 San Francisco County, and the alleged Proposition 65 violations necessarily occurred here. Upon
3 information and belief, the Products are consistently in the stream of commerce and available to
4 consumers for purchase in the City and County of San Francisco.

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

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

17 STATUTORY BACKGROUND

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

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

25 No person in the course of doing business shall knowingly and intentionally expose any
26 individual to a chemical known to the state to cause cancer or reproductive toxicity without
27 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:¹

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
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26
27 ¹ 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 penalties of up to \$2,500.00 per day for each violation of the Act (H&S Code § 25249.7) for up to
2 365 days (up to a maximum civil penalty amount per violation of \$912,000.00).

3 **FACTUAL BACKGROUND**

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

10 23. The exposures that are the subject of the Notices result from the purchase,
11 acquisition, handling and recommended use of the Products. The primary route of exposure to the
12 is through dermal absorption directly through the skin when consumers use, touch, or handle the
13 Products. Exposure through ingestion will occur by touching the Products with subsequent
14 touching of the user's hand to mouth. No clear and reasonable warning is provided with the
15 Products regarding the health hazards of exposure.

16 24. Defendant has manufactured, processed, marketed, distributed, offered to sell
17 and/or sold the Products in California since at least November 7, 2025. Upon information and
18 belief, the Products are consistently in the stream of commerce and available to consumers for
19 purchase in the City and County of San Francisco and the alleged Proposition 65 violations
20 necessarily occurred here. The Products continue to be distributed, offered for sale and/or sold in
21 California without the requisite warning information.

22 25. At all times relevant to this action, Defendant has knowingly and intentionally
23 exposed users and/or consumers of the Products to lead without first giving a clear and reasonable
24 exposure warning to such individuals.

25 26. As a proximate result of acts by Defendant, as a person in the course of doing
26 business within the meaning of H&S Code § 25249.11, individuals throughout the State of
27 California, including in San Francisco County, have been exposed to lead without a clear and
28 reasonable warning on the Products. The individuals subject to the violative exposures include

1 normal and foreseeable users and consumers that use the Products, as well as all others exposed to
2 the Products.

3 **SATISFACTION OF NOTICE REQUIREMENTS**

4 27. Plaintiffs purchased the Products in California. At the time of purchase, Defendant
5 did not provide a Proposition 65 exposure warning for lead or any other Proposition 65 listed
6 chemical in a manner consistent with H&S Code § 25603.1 as described *supra*.

7 28. The Products were sent to a testing laboratory to determine if, and what amount of,
8 lead would migrate and/or leach from the Products.

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

12 30. Plaintiffs 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 will occur at levels that require Proposition 65
15 warnings under the Clear and Reasonable Warnings section 25601 of Title 27 of the California
16 Code of Regulations.

17 31. On November 7, 2025, Plaintiffs received from the analytical chemist exposure
18 assessment reports which concluded that persons in California who use the Products will be
19 exposed to levels of lead that require a Proposition 65 exposure warning.

20 32. On November 7, 2025, Plaintiffs gave notice of alleged violation of Health and
21 Safety Code § 25249.6 (collectively, the “Notices” and each a “Notice”) to Defendant concerning
22 the exposure of California citizens to lead contained in the Products without proper warning,
23 subject to a private action to Defendant and to the California Attorney General’s office and the
24 offices of the County District attorneys and City Attorneys for each city with a population greater
25 than 750,000 persons wherein the herein violations allegedly occurred. See attached at Exhibits
26 “A” – “B” a true and correct copy of each Notice.

27 33. The Notices complied with all procedural requirements of Proposition 65 including
28 the attachment of a Certificate of Merit affirming that Plaintiffs’ counsel had consulted with at

1 least one person with relevant and appropriate expertise who reviewed relevant data regarding lead
2 exposure, and that counsel believed there was meritorious and reasonable cause for a private
3 action.

4 34. After receiving the Notices, and to Plaintiffs' best information and belief, none of
5 the noticed appropriate public enforcement agencies have commenced and diligently prosecuted a
6 cause of action against Defendant under Proposition 65 to enforce the alleged violations which are
7 the subject of the Notices.

8 35. Plaintiffs are commencing this action more than sixty (60) days from the date of
9 each Notice to Defendant, as required by law.

10 **FIRST CAUSE OF ACTION**

11 **(By Plaintiffs against Defendant for the Violation of Proposition 65)**

12 36. Plaintiffs hereby repeats and incorporates by reference paragraphs 1 through 35 of
13 this Complaint as though fully set forth herein.

14 37. Defendant has, at all times mentioned herein, acted as distributor, and/or retailer of
15 the Products.

16 38. Use of the Products will expose users to lead, a hazardous chemical found on the
17 Proposition 65 list of chemicals known to be hazardous to human health.

18 39. The Products do not comply with the Proposition 65 warning requirements.

19 40. Plaintiffs, based on their best information and belief, avers that at all relevant times
20 herein, and since at least November 7, 2025, continuing until the present, that Defendant has
21 continued to knowingly and intentionally expose California users and consumers of the Products
22 to lead without providing required warnings under Proposition 65.

23 41. The exposures that are the subject of the Notices result from the purchase,
24 acquisition, handling, and recommended use of the Products. The primary route of exposure to the
25 is through dermal absorption directly through the skin when consumers use, touch, or handle the
26 Products. Exposure through ingestion will occur by touching the Products with subsequent
27 touching of the user's hand to mouth. No clear and reasonable warning is provided with the
28 Products regarding the health hazards of exposure.

1 42. Plaintiffs, based on their best information and belief, avers that such exposures will
2 continue every day until clear and reasonable warnings are provided to purchasers and users or
3 until this known toxic chemical is removed from the Products.

4 43. Defendant has knowledge that the normal and reasonably foreseeable use of the
5 Products exposes individuals to lead, and Defendant intends that exposures to lead will occur by
6 its deliberate, non-accidental participation in the importation, distribution, sale and offering of the
7 Products to consumers in California

8 44. Plaintiffs have engaged in good faith efforts to resolve the herein claims prior to
9 this Complaint.

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

12 46. Pursuant to Health and Safety Code § 25249.7(a), this Court is specifically
13 authorized to grant injunctive relief in favor of Plaintiffs and against Defendant.

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PRAYER FOR RELIEF

WHEREFORE, Plaintiffs demand 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 (up to a maximum civil penalty amount per violation of \$912,000.00) 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 Plaintiffs' 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: April 22, 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
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9465 WILSHIRE BLVD., STE. 300
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877.534.2590
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

November 7, 2025

President/CEO The TJX Companies, Inc. c/o The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801	President/CEO The TJX Companies, Inc. dba HomeGoods c/o The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801
President/CEO The TJX Companies, Inc. c/o CT Corporation System 101 Federal Street Boston, MA 02110	Member/Manager HomeGoods, LLC c/o CT Corporation System 330 N. Brand Blvd., Suite 700 Glendale, CA 91202
President/CEO Ananta Exports RJ9C + M23, NH, Dhanupura, Uttar Pradesh, 244221, India	

60-Day Notice of Violation of California Safe Drinking Water and Toxic Enforcement Act¹

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

¹ 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.

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):** The TJX Companies, Inc.; The TJX Companies, Inc. dba HomeGoods; HomeGoods, LLC; Ananta Exports
3. **Time Period of Exposure:** Violations have been occurring since at least November 7, 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:**

Product²	Non- Exclusive Examples of the Product
Ceramicware products with exterior decorations sold and/or distributed to The TJX Companies, Inc. by Ananta Exports	Wavy Gold Tray/Tabletop 31 35 278101 001699 05

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 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

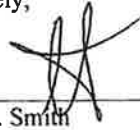
Based on the allegations set forth in this Notice, Brodsky Smith intends to file a citizen enforcement lawsuit on behalf of Bell against the alleged Violator(s) unless such Violator(s) agree in a binding written agreement to: (1) recall Products already sold; (2) provide Proposition 65 compliant exposure 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 &

² 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.

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.

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 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 Act of 1986 (Proposition 65): A Summary

EXHIBIT “B”

LAW OFFICES
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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. 305
 BALA CYNWYD, PA 19004
 610.667.6200

November 7, 2025

President/CEO The TJX Companies, Inc. c/o The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801	President/CEO The TJX Companies, Inc. dba TJ Maxx c/o The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801
President/CEO The TJX Companies, Inc. c/o CT Corporation System 101 Federal Street Boston, MA 02110	Member/Manager TJ Maxx of CA, LLC c/o CT Corporation System 330 N. Brand Blvd., Suite 700 Glendale, CA 91203
President/CEO Ananta Exports RJ9C + M23, NH, Dhanupura, Uttar Pradesh, 244221, India	

60-Day Notice of Violation of California Safe Drinking Water and Toxic Enforcement Act¹

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 Precila Balabbo ("Balabbo"), 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, Balabbo 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

¹ 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.

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:** Precila Balabbo, 285 6th Street, Unit 209, San Pedro, CA 90731; (Ph) 818-434-4023.
2. **Alleged Violator(s):** The TJX Companies, Inc.; The TJX Companies, Inc. dba TJ Maxx; TJ Maxx of CA, LLC; Ananta Exports
3. **Time Period of Exposure:** Violations have been occurring since at least November 7, 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:**

Product²	Non- Exclusive Examples of the Product
Ceramicware products with exterior decorations sold and/or distributed to The TJX Companies, Inc. by Ananta Exports	Cake Stand Tabletop 80 0562 875232 001299

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 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.

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Based on the allegations set forth in this Notice, Brodsky Smith intends to file a citizen enforcement lawsuit on behalf of Balabbo 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

² 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 Balabbo'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.

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, Balabbo is interested in seeking a constructive resolution of the claims in this Notice without engaging in costly and protracted litigation.

Balabbo 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 Act of 1986 (Proposition 65): A Summary