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ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco

05/18/2026
Clerk of the Court
BY: ERNALYN BURA
Deputy Clerk

6 SUPERIOR COURT OF THE STATE OF CALIFORNIA

7 COUNTY OF SAN FRANCISCO

CGC-26-637065

8
9 PRECILA BALABBO,

10 Plaintiff,

11 vs.

12 THE TJX COMPANIES, INC.,

13 Defendant.

Case No.:

**COMPLAINT FOR CIVIL PENALTIES AND
INJUNCTIVE RELIEF**

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

14 Plaintiff Precila Balabbo ("Plaintiff"), by and through her attorneys, alleges the following
15 cause 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 complaint is a representative action brought by Plaintiff in the public interest
24 of the citizens of the State of California to enforce the People's right to be informed of the health
25 hazards caused by exposure to lead and/or chromium (hexavalent compounds) ("CrVI"), toxic
26 chemicals found in products sold and/or distributed by defendant The TJX Companies, Inc. ("TJX"
27 or "Defendant") in California.
28

1 3. CrVI¹ and lead² are harmful chemicals known to the State of California to cause
2 cancer and birth defects or other reproductive harm.

3 4. Proposition 65 requires all businesses with ten (10) or more employees that operate
4 within California or sell products therein to comply with Proposition 65 regulations. Included in
5 such regulations is the requirement that businesses must label any product containing a Proposition
6 65-listed chemical that will create an exposure above safe harbor levels with a “clear and
7 reasonable” warning before “knowingly and intentionally” exposing any person to any such listed
8 chemical.

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

14 6. Plaintiff alleges that Defendant distributes and/or offers for sale in California,
15 without a requisite exposure warning, (a) *Nature's Kitchen*® chili mangoes manufactured,
16 distributed, and/or sold by Snack World L.L.C. (lead), (b) Martha Stewart garden gift set gloves
17 manufactured, distributed, and/or sold by Ningbo General Union Co., Ltd. (CrVI), (c) Tommy
18 Bahama blue ceramic tabletops manufactured, distributed, and/or sold by K9 Wear, Inc. (lead), (d)
19 Tommy Bahama white ceramic tabletops manufactured, distributed, and/or sold by K9 Wear, Inc.
20 (lead), (e) Slama Poterie evil eye mugs manufactured, distributed, and/or sold by Ste Poterie Slama
21 Sarl (lead), (f) black speckled mugs with exterior designs (lead), and (g) Bella Lux cheese board
22

23 ¹ On February 27, 1987, the State of California listed CrVI as a chemical known to the State to
24 cause cancer and it has come under the purview of Proposition 65 regulations since that time. Cal.
25 Code Regs. Tit. 27, § 27001(c); Health & Safety Code §§ 25249.8 & 25249.10(b). On December
26 19, 2008, the State of California listed CrVI as a chemical known to cause adverse birth defects or
27 other reproductive harm.

28 ² On October 1, 1992, the state of California listed lead as a chemical known to cause cancer and
it has come under the purview of Proposition 65 regulations since that time. Cal. Code Regs. Tit.
27, § 27001(c); Health & Safety Code §§ 25249.8 & 25249.10(b). On February 27, 1987, the State
of California listed lead as a chemical known to cause birth defects or other reproductive harm.

1 and knife sets manufactured, distributed, and/or sold by Aanya Designs (lead) (collectively, the
2 “Products” and each a “Product”) that expose persons to lead and/or CrVI when used and/or
3 consumed for their intended purpose.

4 7. Defendant’s failure to warn consumers and other individuals in California of the
5 health hazards associated with exposure to lead and/or CrVI in conjunction with the sale and/or
6 distribution of the Products is a violation of Proposition 65 and subjects Defendant to the
7 enjoinder and civil penalties described herein.

8 8. Plaintiff seeks civil penalties against Defendant for its violations of Proposition 65
9 in accordance with Health and Safety Code § 25249.7(b).

10 9. Plaintiff also seeks injunctive relief, preliminarily and permanently, requiring
11 Defendant to provide purchasers or users of the Products with required warnings related to the
12 dangers and health hazards associated with exposure to lead and/or CrVI pursuant to Health and
13 Safety Code § 25249.7(a).

14 10. Plaintiff further seeks a reasonable award of attorney’s fees and costs.

15 **PARTIES**

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

20 12. Defendant The TJX Companies, Inc., through its business, effectively imports,
21 distributes, sells, and/or offers the Products for sale or use in the State of California, or it implies
22 by its conduct that it imports, distributes, sells, and/or offers the Products for sale or use in the
23 State of California. Plaintiff alleges that defendant The TJX Companies, Inc. is a “person” in the
24 course of doing business within the meaning of Health & Safety Code sections 25249.6 and
25 25249.11.

26 **VENUE AND JURISDICTION**

27 13. Venue is proper in the County of San Francisco because one or more of the
28 instances of wrongful conduct occurred and continue to occur in this county and/or because

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

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

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

18 **STATUTORY BACKGROUND**

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

22 17. To effect this goal, Proposition 65 requires that individuals be provided with a
23 “clear and reasonable warning” before being exposed to substances listed by the State of California
24 as causing cancer or birth defects or other reproductive harm. H&S Code § 25249.6 states, in
25 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 18. 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 19. 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:³

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 20. 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 ³ 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.

3 21. Pursuant to Cal. Code Regs. Tit. 27, § 25600.2(e), a retail seller is responsible for
4 providing the warning required by § 25249.6 of the Act for a consumer product exposure when
5 one or more of the following circumstances exist: (a) the retailer seller is selling the product under
6 a brand or trademark that is owned or licensed by the retail seller or an affiliated entity; (b) the
7 retailer seller has knowingly introduced a listed chemical into the product, or knowingly caused
8 the listed chemical to be created in the product; (c) the retail seller has covered, obscured or altered
9 a warning label that has been affixed to the product pursuant to § 25600.2(b); (d) the retail seller
10 has received a notice and warning materials for the exposure pursuant to § 25600.2(b)-(c) and the
11 retail seller has sold the product without conspicuously posting or displaying the warning; or (e)
12 the retailer seller has actual knowledge of the potential consumer product exposure requiring the
13 warning, and there is no manufacturer, producer, packager, importer, supplier, or distributor of the
14 product who: (i) is a “person in the course of doing business under § 25249.11(b) of the Act, and
15 (ii) has designated an agent for service of process in California, or has a place of business in
16 California.

17 **FACTUAL BACKGROUND**

18 22. On February 27, 1987, the State of California listed CrVI as a chemical known to
19 the State to cause cancer and it has come under the purview of Proposition 65 regulations since
20 that time. Cal. Code Regs. Tit. 27, § 27001(c); Health & Safety Code §§ 25249.8 & 25249.10(b).
21 On December 19, 2008, the State of California listed CrVI as a chemical known to cause adverse
22 birth defects or other reproductive harm.

23 23. On October 1, 1992, the state of California listed lead as a chemical known to cause
24 cancer and it has come under the purview of Proposition 65 regulations since that time. Cal. Code
25 Regs. Tit. 27, § 27001(c); Health & Safety Code §§ 25249.8 & 25249.10(b). On February 27,
26 1987, the State of California listed lead as a chemical known to cause birth defects or other
27 reproductive harm.

1 24. Plaintiff purchased the Products from Defendant. At the time of the purchase,
2 Defendant did not provide a clear and reasonable exposure warning pursuant to Cal. Code Regs.
3 Tit. 27, § 25602.

4 25. On May 16, 2025 (*Nature's Kitchen*® chili mangoes), June 13, 2025 (Martha
5 Stewart garden gift set gloves), July 31, 2025 (Tommy Bahama blue ceramic tabletops and Tommy
6 Bahama white ceramic tabletops), October 27, 2025 (Slama Poterie evil eye mugs), October 31,
7 2025 (black speckled mugs with exterior designs), and December 31, 2025 (Bella Lux cheese
8 board and knife sets), Plaintiff served notice of alleged violation of Health and Safety Code §
9 25249.6 (collectively, the "Notices" and each a "Notice") to Defendant concerning the exposure
10 of California citizens to lead and/or CrVI from use and/or consumption of the Products without
11 proper warning, subject to a private action to Defendant and to the California Attorney General's
12 office and the offices of the County District attorneys and City Attorneys for each city with a
13 population greater than 750,000 persons wherein the herein violations allegedly occurred. The
14 exposures that are the subject of the Notices result from the purchase, acquisition, handling and
15 recommended use of the Products. The primary route of exposure to CrVI and/or lead in ceramic
16 products is through dermal absorption directly through the skin when consumers use, touch, or
17 handle the Products. Exposure through ingestion will occur by touching the Products with
18 subsequent touching of the user's hand to mouth. The primary route of exposure to lead in food
19 products is through ingestion. When foods contaminated with lead are consumed, ingestion of lead
20 will occur which will increase blood lead levels. No clear and reasonable warning is provided with
21 the Products regarding the health hazards of exposure. See attached at Exhibits A – G a true and
22 correct copy of each Notice.

23 26. 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 27. 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 CrVI into the Products, or knowingly caused lead and/or CrVI to be created in the Products;

1 and/or Defendant has covered, obscured or altered a warning label that has been affixed to the
2 Products pursuant to § 25600.2(b); and/or Defendant has received a notice and warning materials
3 for the exposure pursuant to § 25600.2(b)-(c) and Defendant has sold the product without
4 conspicuously posting or displaying the warning; and/or Defendant has actual knowledge of the
5 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 28. At all times relevant to this action, Defendant has knowingly and intentionally
10 exposed users of the Products to lead and/or CrVI 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 29. As a proximate result of acts by Defendant, as a person in the course of doing
15 business within the meaning of H&S Code § 25249.11, individuals throughout the State of
16 California, including in San Francisco County, have been exposed to lead and/or CrVI without a
17 clear and reasonable warning on the Products. The individuals subject to the violative exposures
18 include normal and foreseeable users and consumers that use the Products, as well as all others
19 exposed to the Products.

20 **SATISFACTION OF NOTICE REQUIREMENTS**

21 30. Plaintiff purchased the Products from TJX in California. At the time of purchase,
22 TJX did not provide a Proposition 65 exposure warning for lead and/or CrVI or any other
23 Proposition 65 listed chemical in a manner consistent with H&S Code § 25603.1 as described
24 *supra*.

25 31. The Tommy Bahama blue ceramic tabletops, Tommy Bahama white ceramic
26 tabletops, Slama Poterie evil eye mugs, black speckled mugs with exterior designs, and Bella Lux
27 cheese board and knife sets were sent to a testing laboratory to determine if, and what amount of,
28 lead would migrate and/or leach from the Products.

1 32. The *Nature's Kitchen*® chili mangoes were sent to a testing laboratory to determine
2 if, and what amount of, lead a consumer would be exposed to per serving size.

3 33. The Martha Stewart garden gift set gloves were sent to a testing laboratory to
4 determine the CrVI content of the Product.

5 34. The laboratory provided the results of its analysis. Results of these tests determined
6 the Products exposes users and/or consumers to lead and/or CrVI (collectively, the "Chemical Test
7 Reports" and each a "Chemical Test Report").

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

13 36. On May 16, 2025 (*Nature's Kitchen*® chili mangoes), June 13, 2025 (Martha
14 Stewart garden gift set gloves), July 31, 2025 (Tommy Bahama blue ceramic tabletops and Tommy
15 Bahama white ceramic tabletops), October 27, 2025 (Slama Poterie evil eye mugs), October 31,
16 2025 (black speckled mugs with exterior designs), and December 31, 2025 (Bella Lux cheese
17 board and knife sets), Plaintiff received from the analytical chemist exposure assessment reports
18 which concluded that persons in California who use and/or consume the Products will be exposed
19 to levels of lead and/or CrVI that require a Proposition 65 exposure warning.

20 37. On May 16, 2025 (*Nature's Kitchen*® chili mangoes), June 13, 2025 (Martha
21 Stewart garden gift set gloves), July 31, 2025 (Tommy Bahama blue ceramic tabletops and Tommy
22 Bahama white ceramic tabletops), October 27, 2025 (Slama Poterie evil eye mugs), October 31,
23 2025 (black speckled mugs with exterior design), and December 31, 2025 (Bella Lux cheese board
24 and knife sets), Plaintiff served the Notices on Defendant concerning the exposure of California
25 citizens to lead and/or CrVI from use and/or consumption of the Products without proper warning,
26 subject to a private action to Defendant and to the California Attorney General's office and the
27 offices of the County District attorneys and City Attorneys for each city with a population greater
28 than 750,000 persons wherein the herein violations allegedly occurred.

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

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

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

FIRST CAUSE OF ACTION

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

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

42. On May 16, 2025 (*Nature's Kitchen*® chili mangoes), June 13, 2025 (Martha Stewart garden gift set gloves), July 31, 2025 (Tommy Bahama blue ceramic tabletops and Tommy Bahama white ceramic tabletops), October 27, 2025 (Slama Poterie evil eye mugs), October 31, 2025 (black speckled mugs), and December 31, 2025 (Bella Lux cheese board and knife sets), Plaintiff served the Notices on Defendant concerning the exposure of California citizens to lead and/or CrVI from use and/or consumption of the Products without proper warning, subject to a private action to Defendant and to the California Attorney General's office and the offices of the County District attorneys and City Attorneys for each city with a population greater than 750,000 persons wherein the herein violations allegedly occurred.

43. The Notices give Defendant actual knowledge of the potential consumer product exposure requiring the warning pursuant to Cal. Code Regs, Tit. 27, § 25600.2. Use and/or consumption of the Products will expose users and consumers thereof to lead and/or CrVI,

1 hazardous chemicals found on the Proposition 65 list of chemicals known to be hazardous to
2 human health.

3 44. The Products do not comply with the Proposition 65 warning requirements.

4 45. Plaintiff, based on her best information and belief, avers that at all relevant times
5 herein, and since at least May 16, 2025 with respect to the *Nature's Kitchen*® chili mangoes; since
6 at least June 13, 2025 with respect to Martha Stewart garden gift set gloves; since at least July 31,
7 2025 with respect to the Tommy Bahama blue ceramic tabletops and Tommy Bahama white
8 ceramic tabletops; since at least October 27, 2025 with respect to the Slama Poterie evil eye mugs;
9 since at least October 31, 2025 with respect to the black speckled mugs with exterior designs; and
10 since at least December 31, 2025 with respect to the Bella Lux cheese board and knife sets,
11 continuing until the present, that Defendant has continued to knowingly and intentionally expose
12 California users and consumers of the Products to lead and/or CrVI without providing required
13 warnings under Proposition 65. Upon information and belief, the Products are consistently in the
14 stream of commerce and available to consumers for purchase in the City and County of San
15 Francisco and the alleged Proposition 65 violations necessarily occurred here. The Products
16 continue to be distributed, offered for sale and/or sold in California – including, but not limited to,
17 San Francisco County - without the requisite warning information.

18 46. Defendant continues to sell the Products under a brand or trademark that is owned
19 or licensed by Defendant or an affiliated entity; and/or Defendant has knowingly introduced lead
20 and/or CrVI into the Products, or knowingly caused lead and/or CrVI to be created in the Products;
21 and/or Defendant has covered, obscured or altered a warning label that has been affixed to the
22 Products pursuant to § 25600.2(b); and/or Defendant has received a notice and warning materials
23 for the exposure pursuant to § 25600.2(b)-(c) and Defendant has sold the product without
24 conspicuously posting or displaying the warning; and/or Defendant has actual knowledge of the
25 potential consumer product exposure requiring the warning, and there is no manufacturer,
26 producer, packager, importer, supplier, or distributor of the Products who: (i) is a “person in the
27 course of doing business under § 25249.11(b) of the Act, and (ii) has designated an agent for
28 service of process in California, or has a place of business in California

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

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

13 49. Defendant has knowledge that the normal and reasonably foreseeable use and/or
14 consumption of the Products exposes individuals to lead and/or CrVI, and Defendant intends that
15 exposures to lead and/or CrVI will occur by their deliberate, non-accidental participation in the
16 importation, distribution, sale and offering of the Products to consumers in California.

17 50. Plaintiff has engaged in good faith efforts to resolve the herein claims prior to this
18 Complaint.

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

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

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: May 18, 2026

BRODSKY SMITH

By: 

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EXHIBIT “A”

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May 16, 2025

Member/Manager Snack World L.L.C. c/o Shawn M. Lima 1400 S. Bonnie Brae St., Apt. 12 Los Angeles, CA 90006	Member/Manager Century Snacks, LLC c/o CT Corporation System 330 N. Brand Blvd., Suite 700 Glendale, CA 91203
Member/Manager Century Snacks, LLC 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
President/CEO The TJX Companies, Inc. c/o The Corporation Trust Company 1209 Orange Street Wilmington, DE 19801	Member/Manager T.J. Maxx of CA, LLC 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 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

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.

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:** Precila Balabbo, 285 6th Street, Unit 209, San Pedro, CA 90731; (Ph) 818-434-4023.
2. **Alleged Violator(s):** Snack World L.L.C.; Century Snacks, LLC; The TJX Companies, Inc.; T.J. Maxx of CA, LLC
3. **Time Period of Exposure:** Violations have been occurring since at least May 16, 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 ²	Non- Exclusive Examples of the Product
Mango	Nature's Kitchen Chili Mango UPC# 6 90166 22850 1

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

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 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

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.

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 Action of 1986 (Proposition 65): A Summary

EXHIBIT “B”

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

June 13, 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 Marshalls 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 Marshalls of CA, LLC c/o CT Corporation System 330 N. Brand Blvd., Suite 700 Glendale, CA 91203
President/CEO Newton Buying Corp. c/o The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801	

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

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.

...” 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:** 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 Marshalls; Newton Buying Corp.; Marshalls of CA, LLC
3. **Time Period of Exposure:** Violations have been occurring since at least June 13, 2025 and are continuing to this day.
4. **Listed Chemical:** Chromium (VI). Chromium (VI) 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 ²	Non- Exclusive Examples of the Product
Gloves	Martha Stewart Garden Gift Set Gloves 1284-117887530-02999-11-6

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 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 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

July 31, 2025

President/CEO Oxford Industries, Inc. c/o CT Corporation System 289 S. Culver St. Lawrenceville, GA 30046-4805	President/CEO Oxford Industries, Inc. 999 Peachtree St. NE Suite 688 Atlanta, GA 30309
President/CEO Oxford Industries, Inc. CT Corporation System 711 Capitol Way S., Suite 204 Olympia, WA 98501-1267	President/CEO Tommy Bahama Group, Inc. c/o CT Corporation System 330 N. Brand Blvd., Suite 700 Glendale, CA 91203
President/CEO Tommy Bahama Group, Inc. 999 Peachtree Street, N.E. Suite 688 Atlanta, GA 30309	President/CEO Tommy Bahama Group, Inc. c/o The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801
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

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).

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.

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 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):** Oxford Industries, Inc.; Tommy Bahama Group, Inc.; The TJX Companies, Inc.; The TJX Companies, Inc. dba TJ Maxx; TJ Maxx of CA, LLC
3. **Time Period of Exposure:** Violations have been occurring since at least July 31, 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 ²	Non- Exclusive Examples of the Product
Tabletop	Tommy Bahama Blue Ceramic Tabletop 22 423598 2205 30 1224

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.

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.

II. PROPOSITION 65 INFORMATION

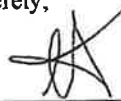
For the Violators' reference, enclosed is a copy of "Proposition 65: A Summary" that has been prepared by the Office of Environmental Health Hazard Assessment ("OEHHA"). For more information concerning the provisions of Proposition 65, contact OEHHA at 916.445.6900.

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 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 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 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

July 31, 2025

President/CEO Oxford Industries, Inc. c/o CT Corporation System 289 S. Culver St. Lawrenceville, GA 30046-4805	President/CEO Oxford Industries, Inc. 999 Peachtree St. NE Suite 688 Atlanta, GA 30309
President/CEO Oxford Industries, Inc. CT Corporation System 711 Capitol Way S., Suite 204 Olympia, WA 98501-1267	President/CEO Tommy Bahama Group, Inc. c/o CT Corporation System 330 N. Brand Blvd., Suite 700 Glendale, CA 91203
President/CEO Tommy Bahama Group, Inc. 999 Peachtree Street, N.E. Suite 688 Atlanta, GA 30309	President/CEO Tommy Bahama Group, Inc. c/o The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801
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

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).

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.

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 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):** Oxford Industries, Inc.; Tommy Bahama Group, Inc.; The TJX Companies, Inc.; The TJX Companies, Inc. dba TJ Maxx; TJ Maxx of CA, LLC
3. **Time Period of Exposure:** Violations have been occurring since at least July 31, 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 ²	Non- Exclusive Examples of the Product
Tabletop	Tommy Bahama White Ceramic Tabletop 22 423589 2002 1224

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.

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.

II. PROPOSITION 65 INFORMATION

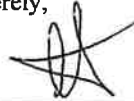
For the Violators' reference, enclosed is a copy of "Proposition 65: A Summary" that has been prepared by the Office of Environmental Health Hazard Assessment ("OEHHA"). For more information concerning the provisions of Proposition 65, contact OEHHA at 916.445.6900.

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 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 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 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

October 27, 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. c/o CT Corporation System 101 Federal Street Boston, MA 02110
President/CEO The TJX Companies, Inc. c/o Ernie Ernie 770 Cochituate Road Framingham, MA 01701	President/CEO The TJX Companies, Inc. dba HomeGoods c/o The Corporation Trust Center 1209 Orange Street Wilmington, DE 19801
Member/Manager HomeGoods, LLC 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 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

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.

...” 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:** 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 HomeGoods; HomeGoods, LLC
3. **Time Period of Exposure:** Violations have been occurring since at least October 27, 2025 and are continuing to this day.
4. **Listed Chemicals:** 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 ²	Non- Exclusive Examples of the Product
Slama Poterie Mug	Slama Poterie Evil Eye Mug 31 338460 8

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

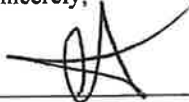
Based on the allegations set forth in this Notice, Brodsky Smith intends to file a citizen enforcement lawsuit on behalf of Balabbo against the alleged Violator(s) unless such Violator(s) agree in a binding written agreement to: (1) recall Products already sold; (2) provide Proposition 65 compliant exposure 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 Action of 1986 (Proposition 65): A Summary

EXHIBIT “F”

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 31, 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. c/o CT Corporation System 101 Federal Street Boston, MA 02110
President/CEO The TJX Companies, Inc. c/o Ernie Ernie 770 Cochituate Road Framingham, MA 01701	President/CEO The TJX Companies, Inc. dba HomeGoods c/o The Corporation Trust Center 1209 Orange Street Wilmington, DE 19801
Member/Manager HomeGoods, LLC 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 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

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.

...” 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:** 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 HomeGoods; HomeGoods, LLC
3. **Time Period of Exposure:** Violations have been occurring since at least October 31, 2025 and are continuing to this day.
4. **Listed Chemicals:** 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 ²	Non- Exclusive Examples of the Product
Mug	Black Speckled Mug with exterior design 31 83 333656

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

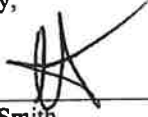
Based on the allegations set forth in this Notice, Brodsky Smith intends to file a citizen enforcement lawsuit on behalf of Balabbo against the alleged Violator(s) unless such Violator(s) agree in a binding written agreement to: (1) recall Products already sold; (2) provide Proposition 65 compliant exposure 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 Action of 1986 (Proposition 65): A Summary

EXHIBIT “G”

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

December 31, 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. 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 The TJX Companies, Inc. dba TJ Maxx c/o The Corporation Trust Center 1209 Orange Street Wilmington, DE 19801

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 whether and/or how to eliminate (or reduce) the risk of exposure to the Listed Chemical from the reasonably foreseeable use of the Product.

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.

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
3. **Time Period of Exposure:** Violations have been occurring since at least December 31, 2025 and are continuing to this day.
4. **Listed Chemicals:** Lead is listed under Proposition 65 as chemicals known to the State to cause cancer and birth defects or other reproductive harm.
5. **Product:**

Product²	Non- Exclusive Examples of the Product
Bella Lux cheese boards that are offered for sale and/or sold in California by The TJX Companies, Inc.	Bella Lux Cheese Board and Knife Set 68 0560 793326 001699 19 6

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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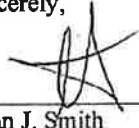
III. RESOLUTION OF THE CLAIMS

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

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Sincerely,



Evan J. Smith

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