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ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco

05/15/2026
Clerk of the Court
BY: JEFFREY FLORES
Deputy Clerk

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

CENTER FOR ENVIRONMENTAL HEALTH,
a non-profit corporation,

Plaintiff,

v.

TRUFFLUV, LLC; ABAB CO. LLC;
AMAZON.COM SERVICES LLC;
AMAZON.COM, INC.; A-MESHI COSMETIC
INDUSTRIES LTD.; AW BLACKWOOD (USA),
INC.; AW DISTRIBUTING, INC.; BEVI
BEAUTY ELEMENTS VENTURES INC.;
CLEAR ESSENCE COSMETICS U.S.A., INC.;
COSME COMPANY CO., LTD; DIAMOND
INTERNATIONAL SRL; FLAWLESS BEAUTY
LLC; FORUM HEALTH & PERSONAL CARE,
LLC; GUANGZHOU AMARRIE COSMETICS
CO., LTD.; ISDIN CORP.; K5 CONTROL, LLC;
LORNAMEAD UK LTD.; MEDLINE
INDUSTRIES, LP; MILAGROS ENTERPRISE
GROUP S.A.S.; MILLENIA PRODUCTIONS,
LLC; MIZ TRADING CO., LTD; MON PLATIN

Case No.

CGC-26-637036

**COMPLAINT FOR INJUNCTIVE
RELIEF AND CIVIL PENALTIES**

Health & Safety Code § 25249.6, *et seq.*

(Other)

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COSMETICS USA LLC; N.S. PRODUTOS E SISTEMAS DE HIGIENE LTDA.; NATIO PTY LTD.; PERFUME WORLDWIDE INC.; ROSE & CAMEL LTD; SABUN CO.; SODICO USA INC.; TARGET CORPORATION; TENGA CO., LTD; TENGA USA INC.; THE LONDON OIL REFINING COMPANY LIMITED; WALMART.COM USA, LLC; WALMART INC. and DOES 1 through 100, inclusive,

Defendants.

1 Plaintiff Center for Environmental Health, in the public interest, based on information and
2 belief and investigation of counsel, except for information based on knowledge, hereby makes the
3 following allegations:

4 **INTRODUCTION**

5 1. This Complaint seeks to remedy Defendants’ ongoing violations of California’s
6 Proposition 65, Health & Safety Code §25249.5, *et seq.* Defendants violate Proposition 65 by
7 knowingly and intentionally exposing individuals in California to coconut oil diethanolamine
8 condensate (also known as cocamide diethanolamine, coconut diethanolamide, and coconut oil
9 diethanolamide) (hereinafter, “Cocamide DEA”), a chemical known to the State of California to
10 cause cancer, without first providing warning of such exposures. These exposures have occurred,
11 and continue to occur, when, through ordinary use, individuals use Defendants’ clay masks
12 (“Clay Masks”), cuticle softeners and removers (“Cuticle Softeners and Removers”), shampoo,
13 bar and dry soaps, liquid soaps such as hand soap, body wash, intimate care soap, face wash
14 (“Shampoos and Soaps”), antiseptic skin cleaners and surgical scrub (“Antiseptic Skin Cleaners
15 and Surgical Scrub”), and tan removers (“Tan Removers”). Clay Masks, Cuticle Softeners and
16 Removers, Shampoos and Soaps, Antiseptic Skin Cleaners and Surgical Scrub, and Tan
17 Removers are referred to collectively herein as the “Products.”

18 2. Under Proposition 65, it is unlawful for businesses to knowingly and intentionally
19 expose individuals in California to chemicals known to the State to cause cancer without first
20 providing clear and reasonable warnings. Defendants introduce these Products containing
21 significant quantities of Cocamide DEA—which is an intentionally added ingredient—into the
22 California marketplace, thereby exposing consumers of such Products to Cocamide DEA.

23 3. Despite the fact that Defendants expose individuals to Cocamide DEA, Defendants
24 provide no clear and reasonable warnings about the carcinogenic hazards associated with
25 Cocamide DEA exposure. Defendants’ conduct thus violates the warning provision of
26 Proposition 65, Health & Safety Code § 25249.6.

PARTIES

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2 4. Plaintiff CENTER FOR ENVIRONMENTAL HEALTH (“CEH”) is a non-profit
3 corporation dedicated to protecting the public from environmental health hazards and toxic
4 exposures. CEH is based in Oakland, California and incorporated under the laws of the State of
5 California. CEH is a “person” within the meaning of Health & Safety Code § 25249.11(a) and
6 brings this enforcement action in the public interest pursuant to Health & Safety Code §
7 25249.7(d). CEH is a nationally recognized non-profit environmental advocacy group that has
8 prosecuted a large number of Proposition 65 cases in the public interest. These cases have
9 resulted in significant public benefit, including the reformulation of millions of products to
10 remove toxic chemicals and to make them safer. CEH also provides information to Californians
11 about the health risks associated with exposure to hazardous substances, where manufacturers and
12 other responsible parties fail to do so.

13 5. Defendant ABAB CO. LLC is a person in the course of doing business within the
14 meaning of Health & Safety Code § 25249.11. Defendant ABAB CO. LLC manufactures,
15 distributes and/or sells Shampoos and Soaps containing Cocamide DEA for sale and use in
16 California.

17 6. Defendant AMAZON.COM SERVICES LLC is a person in the course of doing
18 business within the meaning of Health & Safety Code § 25249.11. Defendant AMAZON.COM
19 SERVICES LLC manufactures, distributes and/or sells Clay Masks, Cuticle Softeners and
20 Removers, Shampoos and Soaps, Antiseptic Skin Cleaners and Surgical Scrub, and Tan
21 Removers containing Cocamide DEA for sale and use in California.

22 7. Defendant AMAZON.COM, INC. is a person in the course of doing business
23 within the meaning of Health & Safety Code § 25249.11. Defendant AMAZON.COM, INC.
24 manufactures, distributes and/or sells Clay Masks, Cuticle Softeners and Removers, Shampoos
25 and Soaps, Antiseptic Skin Cleaners and Surgical Scrub, and Tan Removers containing Cocamide
26 DEA for sale and use in California.

27 8. Defendant A-MESHI COSMETIC INDUSTRIES LTD. is a person in the course
28 of doing business within the meaning of Health & Safety Code § 25249.11. Defendant A-MESHI

1 COSMETIC INDUSTRIES LTD. manufactures, distributes and/or sells Shampoos and Soaps
2 containing Cocamide DEA for sale and use in California.

3 9. Defendant AW BLACKWOOD (USA), INC. is a person in the course of doing
4 business within the meaning of Health & Safety Code § 25249.11. Defendant AW
5 BLACKWOOD (USA), INC. manufactures, distributes and/or sells Shampoos and Soaps
6 containing Cocamide DEA for sale and use in California.

7 10. Defendant AW DISTRIBUTING, INC. is a person in the course of doing business
8 within the meaning of Health & Safety Code § 25249.11. Defendant AW DISTRIBUTING, INC.
9 manufactures, distributes and/or sells Shampoos and Soaps containing Cocamide DEA for sale
10 and use in California.

11 11. Defendant BEVI BEAUTY ELEMENTS VENTURES INC. is a person in the
12 course of doing business within the meaning of Health & Safety Code § 25249.11. Defendant
13 BEVI BEAUTY ELEMENTS VENTURES INC. manufactures, distributes and/or sells
14 Shampoos and Soaps containing Cocamide DEA for sale and use in California.

15 12. Defendant CLEAR ESSENCE COSMETICS U.S.A., INC. is a person in the
16 course of doing business within the meaning of Health & Safety Code § 25249.11. Defendant
17 CLEAR ESSENCE COSMETICS U.S.A., INC. manufactures, distributes and/or sells Shampoos
18 and Soaps containing Cocamide DEA for sale and use in California.

19 13. Defendant COSME COMPANY CO., LTD is a person in the course of doing
20 business within the meaning of Health & Safety Code § 25249.11. Defendant COSME
21 COMPANY CO., LTD manufactures, distributes and/or sells Shampoos and Soaps containing
22 Cocamide DEA for sale and use in California.

23 14. Defendant DIAMOND INTERNATIONAL SRL is a person in the course of doing
24 business within the meaning of Health & Safety Code § 25249.11. Defendant DIAMOND
25 INTERNATIONAL SRL manufactures, distributes and/or sells Shampoos and Soaps containing
26 Cocamide DEA for sale and use in California.

27 15. Defendant FLAWLESS BEAUTY LLC is a person in the course of doing business
28 within the meaning of Health & Safety Code § 25249.11. Defendant FLAWLESS BEAUTY

1 LLC manufactures, distributes and/or sells Shampoos and Soaps containing Cocamide DEA for
2 sale and use in California.

3 16. Defendant FORUM HEALTH & PERSONAL CARE, LLC is a person in the
4 course of doing business within the meaning of Health & Safety Code § 25249.11. Defendant
5 FORUM HEALTH & PERSONAL CARE, LLC manufactures, distributes and/or sells Shampoos
6 and Soaps containing Cocamide DEA for sale and use in California.

7 17. Defendant GUANGZHOU AMARRIE COSMETICS CO., LTD. is a person in the
8 course of doing business within the meaning of Health & Safety Code § 25249.11. Defendant
9 GUANGZHOU AMARRIE COSMETICS CO., LTD. manufactures, distributes and/or sells
10 Shampoos and Soaps containing Cocamide DEA for sale and use in California.

11 18. Defendant ISDIN CORP. is a person in the course of doing business within the
12 meaning of Health & Safety Code § 25249.11. Defendant ISDIN CORP. manufactures,
13 distributes and/or sells Shampoos and Soaps containing Cocamide DEA for sale and use in
14 California.

15 19. Defendant K5 CONTROL, LLC is a person in the course of doing business within
16 the meaning of Health & Safety Code § 25249.11. Defendant K5 CONTROL, LLC
17 manufactures, distributes and/or sells Shampoos and Soaps containing Cocamide DEA for sale
18 and use in California.

19 20. Defendant LORNAMEAD UK LTD. is a person in the course of doing business
20 within the meaning of Health & Safety Code § 25249.11. Defendant LORNAMEAD UK LTD.
21 manufactures, distributes and/or sells Shampoos and Soaps containing Cocamide DEA for sale
22 and use in California.

23 21. Defendant MEDLINE INDUSTRIES, LP is a person in the course of doing
24 business within the meaning of Health & Safety Code § 25249.11. Defendant MEDLINE
25 INDUSTRIES, LP manufactures, distributes and/or sells Shampoos and Soaps containing
26 Cocamide DEA for sale and use in California.

27 22. Defendant MILAGROS ENTERPRISE GROUP S.A.S. is a person in the course of
28 doing business within the meaning of Health & Safety Code § 25249.11. Defendant MILAGROS

1 ENTERPRISE GROUP S.A.S. manufactures, distributes and/or sells Shampoos and Soaps
2 containing Cocamide DEA for sale and use in California.

3 23. Defendant MILLENIA PRODUCTIONS, LLC is a person in the course of doing
4 business within the meaning of Health & Safety Code § 25249.11. Defendant MILENIA
5 PRODUCTIONS, LLC manufactures, distributes and/or sells Shampoos and Soaps containing
6 Cocamide DEA for sale and use in California.

7 24. Defendant MIZ TRADING CO., LTD is a person in the course of doing business
8 within the meaning of Health & Safety Code § 25249.11. Defendant MIZ TRADING CO., LTD
9 manufactures, distributes and/or sells Clay Masks containing Cocamide DEA for sale and use in
10 California.

11 25. Defendant MON PLATIN COSMETICS USA LLC is a person in the course of
12 doing business within the meaning of Health & Safety Code § 25249.11. Defendant MON
13 PLATIN COSMETICS USA LLC manufactures, distributes and/or sells Shampoos and Soaps
14 containing Cocamide DEA for sale and use in California.

15 26. Defendant N.S. PRODUTOS E SISTEMAS DE HIGIENE LTDA. is a person in
16 the course of doing business within the meaning of Health & Safety Code § 25249.11. Defendant
17 N.S. PRODUTOS E SISTEMAS DE HIGIENE LTDA. manufactures, distributes and/or sells
18 Shampoos and Soaps containing Cocamide DEA for sale and use in California.

19 27. Defendant NATIO PTY LTD. is a person in the course of doing business within
20 the meaning of Health & Safety Code § 25249.11. Defendant NATIO PTY LTD. manufactures,
21 distributes and/or sells Shampoos and Soaps containing Cocamide DEA for sale and use in
22 California.

23 28. Defendant PERFUME WORLDWIDE INC. is a person in the course of doing
24 business within the meaning of Health & Safety Code § 25249.11. Defendant PERFUME
25 WORLDWIDE INC. manufactures, distributes and/or sells Shampoos and Soaps containing
26 Cocamide DEA for sale and use in California.

27 29. Defendant ROSE & CAMEL LTD is a person in the course of doing business
28 within the meaning of Health & Safety Code § 25249.11. Defendant ROSE & CAMEL LTD

1 manufactures, distributes and/or sells Tan Removers containing Cocamide DEA for sale and use
2 in California.

3 30. Defendant SABUN CO. is a person in the course of doing business within the
4 meaning of Health & Safety Code § 25249.11. Defendant SABUN CO. manufactures, distributes
5 and/or sells Shampoos and Soaps containing Cocamide DEA for sale and use in California.

6 31. Defendant SODICO USA INC. is a person in the course of doing business within
7 the meaning of Health & Safety Code § 25249.11. Defendant SODICO USA INC. manufactures,
8 distributes and/or sells Shampoos and Soaps containing Cocamide DEA for sale and use in
9 California.

10 32. Defendant TARGET CORPORATION is a person in the course of doing business
11 within the meaning of Health & Safety Code § 25249.11. Defendant TARGET CORPORATION
12 manufactures, distributes and/or sells Shampoos and Soaps containing Cocamide DEA for sale
13 and use in California.

14 33. Defendant TENGA CO., LTD is a person in the course of doing business within
15 the meaning of Health & Safety Code § 25249.11. Defendant TENGA CO., LTD manufactures,
16 distributes and/or sells Shampoos and Soaps containing Cocamide DEA for sale and use in
17 California.

18 34. Defendant TENGA USA INC. is a person in the course of doing business within
19 the meaning of Health & Safety Code § 25249.11. Defendant TENGA USA INC. manufactures,
20 distributes and/or sells Shampoos and Soaps containing Cocamide DEA for sale and use in
21 California.

22 35. Defendant THE LONDON OIL REFINING COMPANY LIMITED is a person in
23 the course of doing business within the meaning of Health & Safety Code § 25249.11. Defendant
24 THE LONDON OIL REFINING COMPANY LIMITED manufactures, distributes and/or sells
25 Shampoos and Soaps containing Cocamide DEA for sale and use in California.

26 36. Defendant TRUFFLUV, LLC is a person in the course of doing business within
27 the meaning of Health & Safety Code § 25249.11. Defendant TRUFFLUV, LLC manufactures,
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1 distributes and/or sells Shampoos and Soaps containing Cocamide DEA for sale and use in
2 California.

3 37. Defendant WALMART.COM USA, LLC is a person in the course of doing
4 business within the meaning of Health & Safety Code § 25249.11. Defendant WALMART.COM
5 USA, LLC manufactures, distributes and/or sells Shampoos and Soaps and Antiseptic Skin
6 Cleaners and Surgical Scrub containing Cocamide DEA for sale and use in California.

7 38. Defendant WALMART INC. is a person in the course of doing business within the
8 meaning of Health & Safety Code § 25249.11. Defendant WALMART INC. manufactures,
9 distributes and/or sells Shampoos and Soaps and Antiseptic Skin Cleaners and Surgical Scrub
10 containing Cocamide DEA for sale and use in California.

11 39. DOES 1 through 20 (“CLAY MASK DOES”) are each a person in the course of
12 doing business within the meaning of Health & Safety Code § 25249.11. CLAY MASK DOES
13 manufacture, distribute and/or sell Clay Masks for sale and use in California.

14 40. DOES 21 through 40 (“CUTICLE SOFTENER AND REMOVER DOES”) are
15 each a person in the course of doing business within the meaning of Health & Safety Code §
16 25249.11. CUTICLE SOFTENER AND REMOVER DOES manufacture, distribute and/or sell
17 Cuticle Softeners and Removers for sale and use in California.

18 41. DOES 41 through 60 (“SHAMPOO AND SOAP DOES”) are each a person in the
19 course of doing business within the meaning of Health & Safety Code § 25249.11. SHAMPOO
20 AND SOAP DOES manufacture, distribute and/or sell Shampoos and Soaps for sale and use in
21 California.

22 42. DOES 61 through 80 (“ANTISEPTIC SKIN CLEANERS AND SURGICAL
23 SCRUB DOES”) are each a person in the course of doing business within the meaning of Health
24 & Safety Code § 25249.11. ANTISEPTIC SKIN CLEANERS AND SURGICAL SCRUB DOES
25 manufacture, distribute and/or sell Antiseptic Skin Cleaners and Surgical Scrub for sale and use in
26 California.

27 43. DOES 81 through 100 (“TAN REMOVER DOES”) are each a person in the
28 course of doing business within the meaning of Health & Safety Code § 25249.11. TAN

1 REMOVER DOES manufacture, distribute and/or sell Tan Removers for sale and use in
2 California.

3 44. The true names of DOES 1 through 100 are either unknown to CEH at this time or
4 the applicable time period before which CEH may file a Proposition 65 action has not run. When
5 their identities are ascertained or the applicable time period before which CEH may file a
6 Proposition 65 action has run, the Complaint shall be amended to reflect their true names.

7 45. The defendants identified in paragraphs 5 through 38 and DOES 1 through 100 are
8 collectively referred to herein as “Defendants.”

9 **JURISDICTION AND VENUE**

10 46. The Court has jurisdiction over this action pursuant to Health & Safety Code §
11 25249.7, which allows enforcement in any court of competent jurisdiction, and pursuant to
12 California Constitution Article VI, Section 10, because this case is a cause not given by statute to
13 other trial courts.

14 47. This Court has jurisdiction over Defendants because each is a business entity that
15 either (i) has its principal place of business in California or is headquartered in California; or (ii)
16 does sufficient business, has sufficient minimum contacts in California, or otherwise avails itself
17 of the California market through its manufacture, distribution, purchasing sale, selling, offering to
18 sell, providing, or offering to provide the Products in California and such business and contacts
19 gave rise to the claims at issue. Such contacts with California also render the exercise of
20 jurisdiction over Defendants by California courts consistent with traditional notions of fair play
21 and substantial justice.

22 48. Venue is proper in San Francisco County Superior Court because one or more of
23 the violations arise in the County of San Francisco.

24 **BACKGROUND FACTS**

25 49. The People of the State of California have declared by initiative under Proposition
26 65 their right “[t]o be informed about exposures to chemicals that cause cancer, birth defects, or
27 other reproductive harm.” Proposition 65, § 1(b).

28

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

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

9 51. On June 22, 2012, the State of California officially listed Cocamide DEA as a
10 chemical known to cause cancer. On June 22, 2013, one year after it was listed as a chemical
11 known to cause cancer, Cocamide DEA became subject to the clear and reasonable warning
12 requirement regarding carcinogens under Proposition 65. 27 California Code of Regulations
13 (“C.C.R.”) § 27001(b); Health & Safety Code § 25249.10(b).

14 52. Defendants’ Products contain Cocamide DEA as an intentionally added ingredient.
15 The Products contain sufficient quantities of Cocamide DEA such that individuals who use the
16 Products are exposed to Cocamide DEA. The routes of exposure for the violations include
17 dermal absorption and ingestion by individuals. These exposures occur through the ordinary use
18 of the Products when, for example, individuals apply the Products to their skin. The exposures
19 occur in homes, schools, workplaces, and everywhere else throughout California where the
20 Products are used.

21 53. No clear and reasonable warning is provided with the Products regarding the
22 carcinogenic hazards of Cocamide DEA.

23 54. Any person acting in the public interest has standing to enforce violations of
24 Proposition 65 provided that such person has supplied the requisite public enforcers with a valid
25 60-Day Notice of Violation and such public enforcers are not diligently prosecuting the action
26 within such time. Health & Safety Code § 25249.7(d).

1 55. More than sixty days prior to naming each Defendant in this lawsuit, CEH
2 provided a 60-Day “Notice of Violation of Proposition 65” to the California Attorney General, to
3 the District Attorneys of every county in California, to the City Attorneys of every California city
4 with a population greater than 750,000, and to each of the named Defendants. In compliance with
5 Health & Safety Code § 25249.7(d) and 27 C.C.R. § 25903(b), each Notice included the
6 following information: (1) the name and address of each violator; (2) the statute violated; (3) the
7 time period during which violations occurred; (4) specific descriptions of the violations, including
8 (a) the routes of exposure to Cocamide DEA from the Products, and (b) the specific type of
9 Products sold and used in violation of Proposition 65; and (5) the name of the specific Proposition
10 65-listed chemical that is the subject of the violations described in each Notice.

11 56. CEH also sent a Certificate of Merit for each Notice to the California Attorney
12 General, to the District Attorneys of every county in California, to the City Attorneys of every
13 California city with a population greater than 750,000, and to each of the named Defendants. In
14 compliance with Health & Safety Code § 25249.7(d) and 11 C.C.R. § 3101, each Certificate
15 certified that CEH’s counsel: (1) has consulted with one or more persons with relevant and
16 appropriate experience or expertise who reviewed facts, studies, or other data regarding the
17 exposures to Cocamide DEA alleged in each Notice; and (2) based on the information obtained
18 through such consultations, believes that there is a reasonable and meritorious case for a citizen
19 enforcement action based on the facts alleged in each Notice. In compliance with Health &
20 Safety Code § 25249.7(d) and 11 C.C.R. § 3102, each Certificate served on the Attorney General
21 included factual information – provided on a confidential basis – sufficient to establish the basis
22 for the Certificate, including the identity of the person(s) consulted by CEH’s counsel and the
23 facts, studies, or other data reviewed by such persons.

24 57. None of the public prosecutors with the authority to prosecute violations of
25 Proposition 65 has commenced and/or is diligently prosecuting a cause of action against
26 Defendants under Health & Safety Code § 25249.5, *et seq.*, based on the claims asserted in each
27 of CEH’s Notices.
28

1 **PRAYER FOR RELIEF**

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

3 1. That the Court, pursuant to Health & Safety Code §25249.7(a), preliminarily and
4 permanently enjoin Defendants from offering the Products that will be sold in California without
5 either reducing the Cocamide DEA levels in their Products such that no Proposition 65 warnings
6 are required or providing prior clear and reasonable warnings, as CEH shall specify in further
7 application to the Court;

8 2. That the Court, pursuant to Health & Safety Code §25249.7(b), assess civil
9 penalties against each Defendant in the amount of \$2,500 per day for each violation of
10 Proposition 65 according to proof;

11 3. That the Court, pursuant to Health & Safety Code §25249.7(a), order Defendants
12 to take action to stop ongoing unwarned exposures to Cocamide DEA resulting from the use of
13 the Products sold by Defendants, as CEH shall specify in further application to the Court;

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

16 5. That the Court grant such other and further relief as may be just and proper.
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19 Dated: May 15, 2026

Respectfully submitted,

20 LEXINGTON LAW GROUP, LLP

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22
23 Patrick Carey
24 Jacob Janzen
25 Attorneys for Plaintiff
26 CENTER FOR ENVIRONMENTAL HEALTH
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