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Attorneys for Plaintiff

ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco

07/27/2026
Clerk of the Court
BY: JAMES FORONDA
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

EMA BELL,

Plaintiff,

vs.

WORLD MARKET, LLC, COST PLUS
WORLD MARKET, LLC,

Defendants.

Case No.:

CGC-26-638902

**COMPLAINT FOR CIVIL PENALTIES AND
INJUNCTIVE RELIEF**

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

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

BACKGROUND OF THE CASE

1. Plaintiff brings this representative action on behalf of all California citizens to enforce relevant portions of Safe Drinking Water and Toxic Enforcement Act of 1986, codified at the Health and Safety Code § 25249.5 et seq ("Proposition 65"), which reads, in relevant part, "[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 giving clear and reasonable warning to such individual ...". Health & Safety Code § 25249.6.

2. This complaint is a representative action brought by Plaintiff in the public interest of the citizens of the State of California to enforce the People's right to be informed of the health hazards caused by exposure to lead, a toxic chemical found in products sold and/or distributed by defendant World Market, LLC and/or defendant Cost Plus World Market, LLC (collectively, "World Market" or "Defendants" and each a "Defendant") in California.

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

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

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

18 6. Plaintiff alleges that Defendants distribute and/or offer for sale in California,
19 without a requisite exposure warning (a) *Blue Elephant Royal Thai Cuisine*® Thai yellow curry
20 sauce manufactured, distributed, and/or sold by Sequoia Southeast, LLC, and (b) gold picture
21 frames (collectively, the “Products” and each a “Product”) that expose persons to lead when used
22 or consumed for their intended purpose.

23 7. Defendants’ failure to warn consumers and other individuals in California of the
24 health hazards associated with exposure to lead in conjunction with the sale and/or distribution of
25 the Products is a violation of Proposition 65 and subjects Defendants to the enjoinder and civil
26 penalties described herein.

27 8. Plaintiff seeks civil penalties against Defendants for their violations of Proposition
28 65 in accordance with Health and Safety Code § 25249.7(b).

9. Plaintiff also seeks injunctive relief, preliminarily and permanently, requiring Defendants to provide purchasers or consumers of the Products with required warnings related to the dangers and health hazards associated with exposure to lead pursuant to Health and Safety Code § 25249.7(a).

PARTIES

12. Defendant World Market, LLC, through its business, effectively imports, distributes, sells, and/or offers the Products for sale or use in the State of California, or it implies by its conduct that it imports, distributes, sells, and/or offers the Products for sale or use in the State of California. Plaintiff alleges that defendant World Market, LLC is a “person” in the course of doing business within the meaning of Health & Safety Code sections 25249.6 and 25249.11.

VENUE AND JURISDICTION

1 information and belief, the Products are consistently in the stream of commerce and available to
2 consumers for purchase in the City and County of San Francisco.

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

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

15 **STATUTORY BACKGROUND**

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

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

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

25 19. In this case, exposures are caused by consumer products. A “Consumer Product” is
26 defined as “any article, or component part thereof, including food, that is produced, distributed, or
27 sold for the personal use, consumption or enjoyment of a consumer.” (Cal. Code Regs., tit. 27, §
28

1 25600.1, subd. (d).) Food includes “dietary supplements” as defined in California Code of
2 Regulations, title 17, section 10200. (*Id.* at subd. (g).) An exposure to a chemical in a Consumer
3 Product is one “which results from a person’s acquisition, purchase, storage, consumption or other
4 reasonably foreseeable use of a consumer good, or any exposure that results from receiving a
5 consumer service.” (27 CCR § 25602, para (b).) H&S Code § 25603(c) states that “a person in the
6 course of doing business ... shall provide a warning to any person to whom the product is sold or
7 transferred unless the product is packaged or labeled with a clear and reasonable warning.”

8 20. An exposure to a chemical in a consumer product is one “which results from a
9 person’s acquisition, purchase, storage, consumption or other reasonably foreseeable use of a
10 consumer good, or any exposure that results from receiving a consumer service.” (27 CCR §
11 25602, para (b).) H&S Code § 25603(c) states that “a person in the course of doing business ...
12 shall provide a warning to any person to whom the product is sold or transferred unless the product
13 is packaged or labeled with a clear and reasonable warning.”

14 21. Pursuant to H&S Code § 25603.1, the warning may be provided by using one or
15 more of the following methods individually or in combination:¹

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

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

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

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

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

3 22. Proposition 65 provides that any “person who violates or threatens to violate” the
4 statute may be enjoined in a court of competent jurisdiction. (H&S Code § 25249.7.) The phrase
5 “threaten to violate” is defined to mean creating “a condition in which there is a substantial
6 probability that a violation will occur.” (H&S Code § 25249.11(e).) Violators are liable for civil
7 penalties of up to \$2,500.00 per day for each violation of the Act (H&S Code § 25249.7) for up to
8 365 days.

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

23 **FACTUAL BACKGROUND**

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

1 25249.10(b). On February 27, 1987, the State of California listed lead as a chemical known to
2 cause birth defects or other reproductive harm.

3 25. Defendants have processed, marketed, distributed, offered to sell and/or sold the
4 Products in California since at least January 7, 2026. Upon information and belief, the Products
5 are consistently in the stream of commerce and available to consumers for purchase in the City
6 and County of San Francisco and the alleged Proposition 65 violations necessarily occurred here.
7 The Products continue to be distributed, offered for sale and/or sold in California without the
8 requisite warning information.

9 26. At the time of the purchase, Defendants did not provide a clear and reasonable
10 exposure warning pursuant to Cal. Code Regs. Tit. 27, § 25602.

11 27. As a proximate result of acts by Defendants, as a person in the course of doing
12 business within the meaning of H&S Code § 25249.11, individuals throughout the State of
13 California, including in San Francisco County, have been exposed to lead without a clear and
14 reasonable warning on the Products. The individuals subject to the violative exposures include
15 normal and foreseeable users and consumers that use/consume the Products, as well as all others
16 exposed to the Products.

17 **SATISFACTION OF NOTICE REQUIREMENTS**

18 28. On January 7, 2026, Plaintiff purchased the Products from Defendants in
19 California. At the time of purchases, Defendants did not provide a Proposition 65 exposure
20 warning for lead or any other Proposition 65 listed chemical in a manner consistent with H&S
21 Code § 25603.1 as described *supra*.

22 29. The gold picture frames were sent to a testing laboratory to determine if, and what
23 amount of, lead would migrate and/or leach from the gold picture frames.

24 30. The *Blue Elephant Royal Thai Cuisine*® Thai yellow curry sauce was sent to a
25 testing laboratory to determine if, and what amount of, lead a consumer would be exposed to per
26 serving size.

1 31. The laboratory provided the results of its analysis. Results of these tests determined
2 the Products expose users and consumers to lead (collectively, the “Chemical Test Reports” and
3 each a “Chemical Test Report”).

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

9 33. On February 25, 2026 (*Blue Elephant Royal Thai Cuisine*® Thai yellow curry
10 sauce) and February 26, 2026 (gold picture frames), Plaintiff received from the analytical chemist
11 exposure assessment reports which concluded that persons in California who use or consume the
12 Products will be exposed to levels of lead that require a Proposition 65 exposure warning.

13 34. On February 25, 2026 (*Blue Elephant Royal Thai Cuisine*® Thai yellow curry
14 sauce) and February 26, 2026 (gold picture frames), Plaintiff gave notice of alleged violation of
15 Health and Safety Code § 25249.6 (collectively, the “Notices” and each a “Notice”) to Defendants
16 concerning the exposure of California citizens to lead contained in the Products without proper
17 warning, subject to a private action to Defendants and to the California Attorney General’s office
18 and the offices of the County District attorneys and City Attorneys for each city with a population
19 greater than 750,000 persons wherein the herein violations allegedly occurred. See attached at
20 Exhibits “A” – “B” a true and correct copy of each Notice.

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

26 36. After receiving the Notices, and to Plaintiff’s best information and belief, none of
27 the noticed appropriate public enforcement agencies have commenced and diligently prosecuted a
28

1 cause of action against Defendants under Proposition 65 to enforce the alleged violations which
2 are the subject of the Notices.

3 37. On or about March 10, 2026, more than five business days after Defendants
4 received the Notices, Plaintiff purchased the Products a second time from Defendants in California.
5 At the time of purchase, Defendants did not provide a Proposition 65 compliant exposure warning.

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

8 **FIRST CAUSE OF ACTION**

9 **(By Plaintiff against Defendants for the Violation of Proposition 65)**

10 39. Plaintiff hereby repeats and incorporates by reference paragraphs 1 through 38 of
11 this Complaint as though fully set forth herein.

12 40. Defendants have, at all times mentioned herein, acted as distributor, and/or retailer
13 of the Products.

14 41. Use and/or consumption of the Products will expose consumers to lead, a hazardous
15 chemical found on the Proposition 65 list of chemicals known to be hazardous to human health.

16 42. The Notices gives Defendants actual knowledge of the potential consumer product
17 exposure requiring the warning pursuant to Cal. Code Regs, Tit. 27, § 25600.2.

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

19 44. Plaintiff, based on her best information and belief, avers that at all relevant times
20 herein, and at least since February 25, 2026 with respect to the *Blue Elephant Royal Thai Cuisine*®
21 Thai yellow curry sauce and February 26, 2026 with respect to the gold picture frames, continuing
22 until the present, that Defendants have continued to knowingly and intentionally expose California
23 users and consumers of the Products to lead without providing required warnings under
24 Proposition 65.

25 45. The exposures that are the subject of the Notices result from the purchase,
26 acquisition, handling and recommended consumption of the Products. The primary route of
27 exposure to lead in ceramic products is through dermal absorption directly through the skin when
28 consumers use, touch, or handle the Products. The primary route of exposure to lead in food

1 products is through ingestion. When foods contaminated with lead are consumed, ingestion of lead
2 will occur which will increase blood lead levels. Exposure through ingestion will also occur by
3 touching the Product with subsequent touching of the user's hand to mouth. No clear and
4 reasonable warning is provided with the Products regarding the health hazards of exposure.

5 46. Plaintiff, based on her best information and belief, avers that such exposures will
6 continue every day until clear and reasonable warnings are provided to purchasers and consumers
7 or until this known toxic chemical is removed from the Products.

8 47. Defendants have knowledge that the normal and reasonably foreseeable
9 consumption of the Products exposes individuals to lead, and Defendants intend that exposures to
10 lead will occur by their deliberate, non-accidental participation in the importation, distribution,
11 sale and offering of the Products to consumers in California.

12 48. Plaintiff has engaged in good faith efforts to resolve the herein claims prior to this
13 Complaint.

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

17 50. Pursuant to Health and Safety Code § 25249.7(a), this Court is specifically
18 authorized to grant injunctive relief in favor of Plaintiff and against each Defendant.

PRAYER FOR RELIEF

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

A. That the court assess civil penalties against Defendants 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 Defendants 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: July 27, 2026

BRODSKY SMITH

By: 

Evan J. Smith (SBN242352)

Ryan P. Cardona (SBN302113)

9465 Wilshire Boulevard, Suite 300

Beverly Hills, CA 90212

Telephone: (877) 534-2590

Facsimile: (310) 247-0160

Attorneys for Plaintiff

EXHIBIT “A”

LAW OFFICES
BRODSKY SMITH

9465 WILSHIRE BLVD., STE. 300
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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

February 25, 2026

Member/Manager Sequoia Southeast, LLC c/o Debby Winters 34 East Center Street Fayetteville, AR 72701	President/CEO Sequoia Southeast, Inc. c/o Debby Winters 34 East Center Street Fayetteville, AR 72701
President/CEO Sequoia Southeast, Inc. c/o Zenbusiness Inc. 611 South Dupont Highway, Suite 102 Dover, DE	Member/Manager Toprank Corporation N.V. Landhuis Joonchi Estate Kaya R.J. Beaujon Willemstad, Curaçao DUTCH CARIBBEAN
Member/Manager World Market, LLC c/o The Prentice-Hall Corporation System, Inc. 2710 Gateway Oaks Drive, Suite 150N Sacramento, CA 95833	Member/Manager Cost Plus World Market, LLC c/o The Prentice-Hall Corporation System, Inc. 2710 Gateway Oaks Drive, Suite 150N Sacramento, CA 95833
Member/Manager Cost Plus World Market, LLC c/o Corporation Service Company 251 Little Falls Drive Wilmington, DE 19808	Member/Manager World Market Management Services, LLC c/o CSC-Lawyers Incorporating Service 2710 Gateway Oaks Drive Sacramento, CA 95833

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

To Whom It May Concern:

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

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

With respect to the Product herein, Bell has identified a violation of California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65") codified at Cal. Health & Safety Code §

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.

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

I. DESCRIPTION OF THE VIOLATION

1. **Enforcer:** Ema Bell, 222 S. Figueroa St. Apt. 1212, Los Angeles, CA 90012-2581; (Ph) 424-332-3817.
2. **Alleged Violator(s):** Sequoia Southeast, LLC; Sequoia Southeast, Inc.; Toprank Corporation N.V.; World Market, LLC; Cost Plus World Market, LLC; World Market Management Services, LLC
3. **Time Period of Exposure:** Violations have been occurring since at least February 25, 2026 and are continuing to this day.
4. **Listed Chemical:** Lead. Lead is listed under Proposition 65 as a chemical known to the State to cause cancer and birth defects or other reproductive harm.
5. **Product:**

Product²	Non- Exclusive Examples of the Product
<i>Blue Elephant</i> ® curry sauces that are offered for sale and/or sold in California by World Market, LLC	Blue Elephant Royal Thai Cuisine Yellow Curry Sauce UPC# 8 55425 00802 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.

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

III. RESOLUTION OF THE CLAIMS

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

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

Sincerely,



Evan J. Smith

Attachments

Certificate of Merit

Certificate of Service

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

EXHIBIT “B”

LAW OFFICES
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BEVERLY HILLS, CA 90212
877.534.2590
www.brodskysmith.com

NEW JERSEY OFFICE
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CHERRY HILL, NJ 08034
856.795.7250

NEW YORK OFFICE
240 MINEOLA BOULEVARD
MINEOLA, NY 11501
516.741.4977

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

February 26, 2026

Member/Manager World Market, LLC c/o The Prentice-Hall Corporation System, Inc. 2710 Gateway Oaks Drive, Suite 150N Sacramento, CA 95833	Member/Manager Cost Plus World Market, LLC c/o The Prentice-Hall Corporation System, Inc. 2710 Gateway Oaks Drive, Suite 150N Sacramento, CA 95833
Member/Manager Cost Plus World Market, LLC c/o Corporation Service Company 251 Little Falls Drive Wilmington, DE 19808	Member/Manager World Market Management Services, LLC c/o CSC-Lawyers Incorporating Service 2710 Gateway Oaks Drive, Suite 150N Sacramento, CA 95833

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

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

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

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

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:** Ema Bell, 222 S. Figueroa St. Apt. 1212, Los Angeles, CA 90012-2581; (Ph) 424-332-3817.
2. **Alleged Violator(s):** World Market, LLC; Cost Plus World Market, LLC; World Market Management Services, LLC
3. **Time Period of Exposure:** Violations have been occurring since at least February 26, 2026 and are continuing to this day.
4. **Listed Chemical:** Lead. Lead is listed under Proposition 65 as a chemical known to the State to cause cancer and birth defects or other reproductive harm.
5. **Product:**

Product²	Non- Exclusive Examples of the Product
<i>World Market®</i> glassware that is offered for sale and/or sold in California by World Market, LLC	Gold Picture Frame # 2655 3375

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

II. PROPOSITION 65 INFORMATION

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

III. RESOLUTION OF THE CLAIMS

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

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

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

Sincerely,



Evan J. Smith

Attachments

Certificate of Merit

Certificate of Service

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