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14 Environmental Health Advocates, Inc.

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

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

17 ENVIRONMENTAL HEALTH ADVOCATES,  
18 INC.,

19 Plaintiff,

20 v.

21 MONAT GLOBAL CORP., a Florida  
22 corporation; and DOES 1 through 100,  
23 inclusive,

24 Defendants.

Case No.:

**COMPLAINT FOR CIVIL PENALTIES  
AND INJUNCTIVE RELIEF**

(Health & Safety Code § 25249.6 et seq.)

ELECTRONICALLY  
**FILED**  
Superior Court of California,  
County of San Francisco

**05/27/2026**  
Clerk of the Court

BY: MARIVIC VIRAY  
Deputy Clerk

**CGC-26-637350**

**I.**  
**INTRODUCTION**

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2           1.       This Complaint is a representative action brought by Environmental Health Advocates,  
3 Inc. (“Plaintiff”) in the public interest of the citizens of the State of California (“the People”). Plaintiff  
4 seeks to remedy Defendants’ failure to inform the People of exposure to Di(2-ethylhexyl) phthalate  
5 (“DEHP”), a known carcinogen and reproductive/developmental toxin and Di-n-butyl Phthalate  
6 (“DBP”), a known developmental/reproductive toxin. Defendants expose consumers to DEHP and DBP  
7 by manufacturing, importing, selling, and/or distributing travel cases including, but not limited to, Large  
8 Beauty Travel Case – MONAT GEAR US (“Products”). Defendants know and intend that customers  
9 will use Products containing DEHP and DBP.

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

15           3.       California identified and listed DEHP as a chemical known to cause cancer as early as  
16 January 1, 1988, and as a chemical known to cause developmental/reproductive toxicity on October 24,  
17 2003.

18           4.       California indentified and listed DBP as achemical known to cause  
19 developmental/reproductive toxicity on December 2, 2005.

20           5.       Defendants failed to sufficiently warn consumers and individuals in California about  
21 potential exposure to DEHP and DBP in connection with Defendants’ manufacture, import, sale, or  
22 distribution of Products. This is a violation of Proposition 65.

23           6.       Plaintiff seeks injunctive relief compelling Defendants to sufficiently warn consumers  
24 in California before exposing them to DEHP and DBP in Products. (Health & Safety Code, §  
25 25249.7(a).) Plaintiff also seeks civil penalties against Defendants for violations of Proposition 65 along  
26 with attorney’s fees and costs. (Health & Safety Code, § 25249.7(b).)

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**II.**  
**PARTIES**

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

8. Defendant MONAT GLOBAL CORP. ("Monat") is a corporation organized and existing under the laws of Florida. Monat is registered to do business in California, and does business in the County of San Francisco, within the meaning of Health and Safety Code, section 25249.11. Monat manufactures, imports, sells, or distributes the Products in California and San Francisco County.

9. Plaintiff does not know the true names and/or capacities, whether individual, partners, or corporate, of the Defendants sued herein as DOES 1 through 100, inclusive, and for that reason sues said Defendants under fictitious names pursuant to Cal. Civ. Proc. § 474. Plaintiff will seek leave to amend this Complaint when the true names and capacities of these Defendants have been ascertained. Plaintiff is informed and believes and thereon alleges that these Defendants are responsible in whole or in part for the remedies and penalties sought herein.

10. At all times mentioned, Defendants were the agents, alter egos, servants, joint venturers, joint employers, or employees for each other. Defendants acted with the consent of the other Co-Defendants and acted within the course, purpose, and scope of their agency, service, or employment. All conduct was ratified by Defendants, and each of them.

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**III.**  
**VENUE AND JURISDICTION**

11. California Constitution Article VI, Section 10 grants the Superior Court original jurisdiction in all cases except those given by statute to other trial courts. The Health and Safety Code statute upon which this action is based does not give jurisdiction to any other court. As such, this Court has jurisdiction.

12. Venue is proper in San Francisco County Superior Court pursuant to Code of Civil Procedure, sections 394, 395, and 395.5. Wrongful conduct occurred and continues to occur in this County. Defendants conducted and continue to conduct business in this County as it relates to Products.





1 **PRAYER FOR RELIEF**

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

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

13 Dated: May 27, 2026

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