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13 Attorneys for Plaintiff  
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 PALEO TIGER LLC, a Georgia limited liability  
22 company; and DOES 1 through 100, inclusive,

23 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*

**03/20/2026**  
**Clerk of the Court**  
BY: MARIVIC VIRAY  
Deputy Clerk

**CGC-26-635087**

**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 cadmium and lead, known  
5 carcinogens and reproductive/developmental toxins. Defendants expose consumers to cadmium and  
6 lead by manufacturing, importing, selling, and/or distributing tiger nut butter including, but not limited  
7 to, Paleo Tiger Cinnamon Tiger Nut Butter (“Products”). Defendants know and intend that customers  
8 will directly ingest Products containing cadmium and lead.

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

14           3.       California identified and listed cadmium as a chemical known to cause developmental/  
15 reproductive toxicity as early as May 1, 1997.

16           4.       California identified and listed lead as a chemical known to cause cancer as early as  
17 October 1, 1992, and as a chemical known to cause developmental/reproductive toxicity on February  
18 27, 1987.

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

22           6.       Plaintiff seeks injunctive relief compelling Defendants to sufficiently warn consumers  
23 in California before exposing them to cadmium and lead in Products. (Health & Safety Code, §  
24 25249.7(a).) Plaintiff also seeks civil penalties against Defendants for violations of Proposition 65 along  
25 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 PALEO TIGER LLC ("Paleo Tiger") is a limited liability company organized and existing under the laws of Georgia. Paleo Tiger 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. Paleo Tiger 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.

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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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- 11

12 Respectfully submitted:

13 Dated: March 20, 2026

**ENTORNO LAW, LLP**

14  
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