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ELECTRONICALLY FILED
Superior Court of California
County of Marin
06/11/2026

James M. Kim, Clerk of the Court
By: C. St. Clair, Deputy

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 FOR THE COUNTY OF MARIN – UNLIMITED CIVIL JURISDICTION
13

14 BLUE SKY FOREVER,

15 Plaintiff,

16 v.

17 ACE CAM, INC.; and DOES 1-30, inclusive,

18 Defendants.

Case No. CV0010365

**COMPLAINT FOR CIVIL PENALTIES
AND INJUNCTIVE RELIEF**

Violations of Health & Safety Code § 25249.5
et seq. (Proposition 65) Warning Requirement

19 Plaintiff BLUE SKY FOREVER (“BSF”), acting in the public interest, alleges a cause of
20 action against defendants ACE CAM, INC., and Doe Defendants Nos. 1-30 (“Defendants”) for their
21 violations of Health & Safety Code § 25249.5, *et seq.*, as follows:

INTRODUCTION AND NATURE OF THE ACTION

22 1. BSF brings representative action in the public interest on behalf of the citizens of the
23 State of California. By this action, BSF seeks to enforce the People’s right to be informed of the
24 harms caused by exposures to chromium (hexavalent compounds), a toxic chemical found in and on
25 Leather Gloves manufactured, imported, distributed, sold, and offered for sale by Defendants in the
26 State of California.

27 2. By this Complaint, plaintiff seeks to remedy Defendants’ failure to warn individuals
28 not covered by California’s Occupational Safety Health Act, Labor Code § 6300, *et seq.*
 (“consumers”) exposed to substances known to the State of California to cause birth defects or other

1 reproductive harm through exposures to chromium (hexavalent compounds), when they purchase, use
2 and handle Defendants' Leather Gloves.

3 3. Detectable levels of chromium (hexavalent compounds) are found in and on the
4 Leather Gloves Defendants manufacture, import, sell and distribute for sale in California.

5 4. Pursuant to the Safe Drinking Water and Toxic Enforcement Act of 1986, codified at
6 Health and Safety Code § 25249.5 *et seq.* ("Proposition 65"), it is unlawful for a person in the course
7 of doing business to knowingly and intentionally expose consumers and end-users in California to
8 chemicals known to cause cancer, birth defects or other reproductive harm, without first providing a
9 "clear and reasonable warning" regarding the presence of these chemicals in Defendants' products
10 and the harms associated with exposures to such chemicals.

11 5. Defendants manufacture, distribute, import, sell, and offer for sale, in and into
12 California Leather Gloves ("PRODUCTS") containing chromium (hexavalent compounds), without
13 providing a clear and reasonable warning regarding the presence of and the harms associated with
14 exposures to chromium (hexavalent compounds) in Defendants' PRODUCTS. Such PRODUCTS
15 include, without limitation, the *RGC CL-2 Golf Glove (White) Left Hand (For Righties) / Small/*
16 *UAGLCL2WHWH-LS UPC: 0 18211 27019 8*. Defendants' violations subject them to civil penalties,
17 injunction, preliminary and permanent injunctive relief. Health & Safety Code § 25249.7(a) and (b).

18 **PARTIES**

19 6. BSF is a non-profit corporation organized under the laws of California and acting in
20 the public interest to reduce the presence of toxic chemicals found in consumer products and to
21 enforce California citizens' right to be informed about the presence of toxic chemicals in the products
22 they purchase and use and the harms associated with exposures to such chemicals. BSF is a "person"
23 within the meaning of Health & Safety Code § 25249.11(a). It brings this action in the public interest,
24 pursuant to Health and Safety Code § 25249.7(d).

25 7. At all relevant times defendant, ACE CAM, INC. ("ACE"), operates as a "person in
26 the course of doing business" with ten (10) or more employees, within the meaning of and as defined
27 by Health and Safety Code §§ 25249.6 and 25249.11.

1 have jurisdiction pursuant to California Constitution Article VI, section 10, which grants the Superior
2 Courts “original jurisdiction in all causes except those given by statute to other trial courts.” The
3 statute under which this action is brought does not specify any other basis of subject matter
4 jurisdiction.

5 15. This Court has jurisdiction over DEFENDANTS because DEFENDANTS, and each of
6 them are a person, firm, corporation or association that is a citizen of the State of California, does
7 sufficient business in California, has sufficient minimum contacts in California, and/or otherwise
8 purposefully and intentionally avail themselves of the California market through their manufacture,
9 importation, distribution, promotion, marketing and sale of PRODUCTS in California.
10 DEFENDANTS’ purposeful availment renders the exercise of personal jurisdiction by this Court
11 consistent with traditional notions of fair play and substantial justice.

12 16. Venue is proper in the Superior Court for the County of Marin, pursuant to Code of
13 Civil Procedure §§ 393, 395, and 395.5, because this Court is a court of competent jurisdiction,
14 because BSF seeks civil penalties against DEFENDANTS, because one or more instances of
15 wrongful conduct occurred, and continue to occur, in this county, and/or because DEFENDANTS
16 conducted, and continue to conduct, business in the County of Marin with respect to the
17 PRODUCTS.

18 **REGULATORY BACKGROUND AND LAW**

19 17. Formally known as the Safe Drinking Water and Toxic Enforcement Act of 1986 and
20 codified at Health & Safety Code § 25249.6 *et seq.*, Proposition 65 states, in relevant part, “[n]o
21 person in the course of doing business shall knowingly and intentionally expose any individual to a
22 chemical known to cause cancer or reproductive toxicity without first giving a clear and reasonable
23 warning to such individual . . .”

24 18. Under the Act, a “person in the course of doing business” is defined as a business with
25 ten (10) or more employees. Health & Safety Code § 25249.11(b). Businesses are prohibited from
26 exposing consumers to hazardous chemicals without first giving a “clear and reasonable” warning.
27 Health & Saf. Code § 25249.6.

28

1 Proposition 65 alleged in the Notice.

2 **FIRST CAUSE OF ACTION**

3 **(Violation of Proposition 65 - Against All DEFENDANTS)**

4 26. BSF realleges and incorporates by reference, as if fully stated herein, the allegations
5 set forth in Paragraphs 1 through 25, inclusive.

6 27. DEFENDANTS' PRODUCTS contain chromium (hexavalent compounds) in levels
7 requiring a clear and reasonable warning under Proposition 65.

8 28. DEFENDANTS know or should have known their PRODUCTS contain chromium
9 (hexavalent compounds). As a result of BSF's Notice, DEFENDANTS now possess actual
10 knowledge of the presence of chromium (hexavalent compounds) in their PRODUCTS.

11 29. DEFENDANTS' PRODUCTS expose consumers in California to chromium
12 (hexavalent compounds) through dermal contact and ingestion during the reasonably foreseeable use
13 of the PRODUCTS.

14 30. The normal and reasonably foreseeable use of the PRODUCTS causes exposures to
15 chromium (hexavalent compounds).

16 31. DEFENDANTS know the normal and reasonably foreseeable use of the PRODUCTS
17 exposes consumers to chromium (hexavalent compounds) through dermal contact and/or ingestion.

18 32. DEFENDANTS intend to expose consumers in California to chromium (hexavalent
19 compounds) during their reasonably foreseeable use of the PRODUCTS. Such exposures to
20 chromium (hexavalent compounds) occur through DEFENDANTS' deliberate and non-accidental
21 participation in the California market.

22 33. The exposures to chromium (hexavalent compounds) caused by DEFENDANTS and
23 endured by consumers in California are not exempt from the "clear and reasonable warning"
24 requirements of Proposition 65.

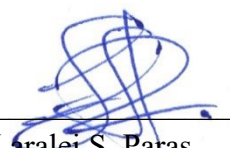
25 34. DEFENDANTS failed to provide a "clear and reasonable warning" to those consumers
26 in California exposed to chromium (hexavalent compounds) through dermal contact and/or ingestion
27 during their reasonably foreseeable use of the PRODUCTS. DEFENDANTS continue to fail to
28 provide such warning.

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Dated: June 11, 2026

Respectfully submitted,

SEVEN HILLS LLP

By: 
Laralee S. Paras
Attorneys for Plaintiff
BLUE SKY FOREVER