

60-DAY NOTICE OF VIOLATION

SENT IN COMPLIANCE WITH CALIFORNIA HEALTH & SAFETY CODE §25249.7(d)

DATE: June 13, 2014

To: Amazon.com, Inc.; Stearn's Products Inc.; Reckitt Benckiser, Inc.; Wisconsin Pharmacal Company LLC; Coleman Company; Canus; Bio Creative Enterprises DBA Bio Creative Labs; Amazing White; Amenity LLC; Freipost; Pet Silk Inc.; DoggiDogi; Merlot Corp.; A Family Affair; Koh Gen Do USA; Bellezza Beauty Supply; Taliah Waajid Black Earth Products; CBS Express; BEP Manufacturing; Marc Anthony Cosmetics Inc.; True Beauty Brands; Bloom Bath & Body; Sea To Summit Pty Ltd; Sea to Summit; J. Strickland & Co.; Lafco New York; Elemis LTD; Steiner Beauty Products, Inc.; Knight Distributing Company; Knight Distributing Company; Discontinued Beauty supply; Tec Laboratories, Inc.; myotcstore.com; AGS Labs, Inc.; drugstore.com
California Attorney General's Office;
District Attorney's Office for 58 Counties; and
City Attorney's Office for Los Angeles, San Diego, San Jose and San Francisco.

From: Shefa LMV, LLC

I. INTRODUCTION

Our name is Shefa LMV, LLC. We are citizens and a Limited Liability Company of the State of California acting in the interest of the general public. We seek to promote awareness of exposures to toxic chemicals in products sold in California and, if possible, to improve public health and safety by reducing the hazardous substances contained in such items. This Notice is provided to the parties listed above pursuant to California Health & Safety Code §25249.6, et seq. ("Proposition 65"). The violations alleged by this Notice consist of product exposures, routes of exposures, and types of harm that may potentially result from exposures to the toxic chemical ("listed chemical") identified below:

Product Exposure:	See Section VII, Exhibit A
Listed Chemical:	Coconut Oil Diethanolamine Condensate AKA Cocamide DEA;
Routes of Exposure:	Dermal absorption; Ingestion; and Inhalation
Types of Harm:	Carcinogen

II. NATURE OF ALLEGED VIOLATION (PRODUCT EXPOSURE)

The specific type of product that is causing consumer and occupational exposures in violation of Proposition 65, and which is the subject of this Notice, is listed under “Product Category/Type” in Exhibit A in Section VII below. All products within the type covered by this Notice shall be referred to hereinafter as the “products.” The sales of these products in California dating at least as far back as **June 23, 2013** are subject to this Notice (and probably previously as the Noticed parties have tolled the statute of limitations by fraudulent concealment. Discovery continues). As a result of the sales of these products, exposures to the listed chemical have been occurring without clear and responsible warnings as required by Proposition 65. Without proper warnings regarding the toxic effects of exposures to the listed chemical, resulting from contact with the products from dermal and ingestion exposure as well as inhalation, California citizenry lack the information necessary to make informed decisions on whether and how to eliminate (or reduce) the risk of exposure to the toxic chemical from the reasonably foreseeable use of the products.

Through the act of buying, acquiring and using the products, citizens of California are exposed to the listed chemical in homes, workplaces and elsewhere throughout California where these products are utilized. Exposure to consumers includes, but is not limited to, bathing their bodies, their pets or their children. Exposure in the line of occupation can be in a salon-type setting or pet grooming, or any similar occupation. Exposure to consumers includes, but is not limited to, when handling the product Cocamide DEA is absorbed through dermal, and other migration pathways, including but not limited to incidental ingestion after one touch's the chemical and then touch's food or otherwise places his hands on or near his lips where his tongue can or will continue this pathway to ingestion exposure. Exposure may continue to occur for a significant period after the initial contact. People likely to be exposed are women, men, infants and children. These violations and threatened violations pertain to Proposition 65 chemicals that are listed by the state as known to cause cancer.

III. CONTACT INFORMATION

Please direct all questions concerning this notice to us through our counsel’s offices at the following address:

Daniel N. Greenbaum, Esq.
14752 Otsego Street
Sherman Oaks, CA 91403
Phone: 310.200.2631
Email: danielgreenbaumesq@gmail.com

IV. PROPOSITION 65 INFORMATION

For general information concerning the provisions of Proposition 65, please feel free to contact the Office of Environmental Health Hazard Assessment (“OEHHA”) in the Proposition 65 Implementation Office at (916) 445-6900. For the alleged Violator(s), I have attached a copy of “Proposition 65 in Plain Language” which has been prepared by OEHHA.

V. RESOLUTION OF NOTICED CLAIMS

Based on the allegations set forth in this Notice, I intend to file a citizen enforcement lawsuit against the alleged Violator(s), unless such Violator enters into a binding written agreement to: (1) recall products already sold or undertake best efforts to ensure that the requisite health hazard warnings are provided to those whom have received such products; (2) provide clear and reasonable warnings for products sold in the future, or reformulate such products to eliminate the Cocamide DEA exposures.

If the alleged Violator is interested in resolving this dispute without resorting to time-consuming and expensive litigation, please feel free to contact my counsel identified in Section III. It should be noted that neither my counsel nor I can: (1) finalize any settlement until after the 60-day Notice period elapses; nor (2) speak for the Attorney General or any District Attorney or City Attorney who received this Notice. Therefore, while reaching an agreement that will resolve my claims, such an agreement may not be approved by the Attorney General after referral to them, or by the court as the last voice on settlements.

VI. ADDITIONAL INFORMATION

Product

Shampoo/Soap

Retailer(s)

Amazon.com, Inc.;
drugstore.com;

Manufacturer(s)/Distributor(s)

Stearn's Products Inc.; Reckitt
Benckiser, Inc.; Wisconsin
Pharmaceutical Company LLC; Coleman
Company; Canus; Bio Creative
Enterprises DBA Bio Creative Labs;
Amazing White; Amenity LLC;
Freipost; Pet Silk Inc.; DoggiDogi;
Merlot Corp.; A Family Affair; Koh
Gen Do USA; Bellezza Beauty
Supply; Taliah Waajid Black Earth
Products; CBS Express; BEP
Manufacturing; Marc Anthony
Cosmetics Inc.; True Beauty Brands;
Bloom Bath & Body; Sea To
Summit Pty Ltd; Sea to Summit; J.
Strickland & Co.; Lafco New York;
Elemis LTD; Steiner Beauty
Products, Inc.; Knight Distributing
Company; Discontinued Beauty
supply; Tec Laboratories, Inc.;
myotcstore.com; AGS Labs, Inc.;

VII. EXHIBIT A

Identified below are named products which contain the alleged chemicals at issue, and this reference is supportive of the material facts that are a part of my counsels Certificate of Merit that is attached hereto as being available for purchase or use in California that is within the category or type of offending product covered by this Notice. Based on publicly available information, the retailers, distributors and/or manufacturers of the example within the category or type of product are also provided below. I believe and allege that the sale of the offending products also has occurred without the requisite Proposition 65 “clear and reasonable warnings” at one or more locations and/or via other means including, but not limited to, transactions made over-the-counter, business to business, through the internet, and/or via catalog by the alleged Violator(s) and other distributors and retailers of the product.

<u>Product Category</u>	<u>Specific Product¹</u>	<u>UPC</u>	<u>Retailer</u>	<u>Manufacturer/Distributor</u>
Body Wash	derma e psorzema body wash	030985087154	Amazon.com	Stearn's Products Inc.
Shampoo	LiceMD	363824881409	Amazon.com	Reckitt Benckiser, Inc.
Soap	Coleman Camp Soap Sheets	368093268036	Amazon.com	Wisconsin Pharmacal Company LLC
Soap	Coleman Camp Soap Sheets	368093268036	Amazon.com	Coleman Company
Milk bath	Caprina Fresh Goat's Milk foaming Milk bath	779242005387	drugstore.com	Canus
Soap	Petal Fresh Aloe & Peppermint Facial Cleanser	713708701017	Amazon.com	Bio Creative Enterprises DBA Bio Creative Labs
Soap	Petal Fresh Aloe & Peppermint Facial Cleanser	713708701017	Amazon.com	Amazing White
Shaving cream	aMENity shave cream	182015000302	Amazon.com	Amenity LLC
Shaving cream	aMENity shave cream	182015000302	Amazon.com	Freipost
Pet Shampoo	Pet Silk Tea Tree Shampoo	872429004507	Amazon.com	Pet Silk inc.
Pet Shampoo	Pet Silk Tea Tree Shampoo	872429004507	Amazon.com	DoggiDogi
Shower Gel	Merlot Grape Seed Bath & Shower Gel	055005122844	Amazon.com	Merlot Corp.
Shower Gel	Merlot Grape Seed Bath & Shower Gel	055005122844	Amazon.com	A Family Affair
Cleaner	Koh Gen Do sponge cleaner	4560143654127	Amazon.com	Koh Gen Do USA
Cleaner	Koh Gen Do sponge cleaner	4560143654127	Amazon.com	Bellezza Beauty Supply
Shampoo	Taliah Waajid kinky Wavy Natural berry clean	815680001366	Amazon.com	Taliah Waajid Black Earth Products
Shampoo	Taliah Waajid kinky Wavy Natural berry clean	815680001366	Amazon.com	CBS Express

¹ We are identifying herein for all recipients' benefit to assist in its investigation of, among other things, the magnitude of potential exposure to the listed chemical from other items within the product category listed in Exhibit A. It is important to note that this example does not represent an exhaustive or comprehensive identification of any or all specific products. Further, it is our position that the alleged Violator(s) are obligated to continue to conduct in good faith an investigation into other specific products within the type or category described above that may have been manufactured, distributed, sold, shipped, stored (or otherwise within the alleged Violator(s)' custody or control) during the relevant period so as to ensure that the requisite toxic warnings are provided to California citizens prior to purchase.

Shampoo	Taliah Waajid kinky Wavy Natural berry clean	815680001366	Amazon.com	BEP Manufacturing
Shampoo	Marc Anthony Brilliant Color	621732900002	Amazon.com	Marc Anthony Cosmetics Inc.
Shampoo	Marc Anthony Brilliant Color	621732900002	Amazon.com	True Beauty Brands
Body Soap	Apotheke:M	696166111164	drugstore.com	Bloom Bath & Body
body Wash	Sea to Summit Wilderness citronella wash	9327868022793	Amazon.com	Sea To Summit Pty Ltd
body Wash	Sea to Summit Wilderness citronella wash	9327868022793	Amazon.com	Seat to Summit
Shampoo	Doo gro Moisturizing Gro Shampoo	649010751726	Amazon.com	J. Strickland & Co.
Soap	Claus Porto Cerina	5601135090420	Amazon.com	Lafco New York
Milk bath	Elemis sp@ home milk bath		Amazon.com	Elemis LTD
Milk bath	Elemis sp@ home milk bath		Amazon.com	Steiner Beauty Products, Inc.
Milk bath	Elemis sp@ home milk bath		Amazon.com	Steiner Beauty Products, Inc.
Shampoo	My Secret Correctives Hair enhancing shampoo	052672082426	Amazon.com	Knight Distributing Company
Shampoo	My Secret Correctives Hair enhancing shampoo	052672082426	Amazon.com	Knight Distributing Company
Shampoo	My Secret Correctives Hair enhancing shampoo	052672082426	Amazon.com	Discontinued Beauty supply
First Aid Gel	tecnu first aid gel	083926121004	Amazon.com	Tec Laboratories, Inc.
First Aid Gel	tecnu first aid gel	083926121004	Amazon.com	myotcstore.com
Soap	Outdoor RX Biodegradable camp soap	699876003101	Amazon.com	AGS Labs, Inc.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this case or action. My business address is:
14752 Otsego Street, Sherman Oaks, CA 91403

A True and Correct copy of the documents entitled **60 DAY NOTICE OF VIOLATION; CERTIFICATE OF MERIT; THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY** will be served or was served in the manner stated below:

I. Interested Parties (Served via Certified Mail): On June 13, 2014, I served the following persons and/or entities at the last known addresses by placing a true and correct copy thereof in a sealed envelope in the United States Mail, postage prepaid, and addressed as follows:

See attached pages for full service list

II. California Attorney General (via website Portal): On June 13, 2014, I uploaded a true and correct copy thereof as a PDF file via the California Attorney General's website.

III. District and City Attorneys (via U.S. Mail): On June 13, 2014, I served the following persons and/or entities at the last known addresses by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and addressed as follows

See attached pages for full service list

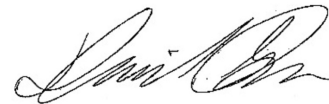
I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

June 13, 2014

Date

Daniel N. Greenbaum, Esq.

Printed Name



Signature

INTERESTED PARTIES

ATTN: CEO or President	Amazon.com, Inc.	1200 12th Avenue S Suite 1200	Seattle	WA	98144
ATTN: CEO or President	Amazon.com, Inc.	410 Terry Avenue N	Seattle	WA	98109
c/o Amazon.com, Inc.	Corporation Service Company	300 Deschutes Way SW, Suite 304	Seattle	WA	98501
ATTN: CEO or President	Stearn's Products, Inc.	4485 Runway Street	Simi Valley	CA	93063
Dennis Duskin & Assoc.	Agent for Stearn's Products, Inc.	1180 E. Patricia Street, Ste 200	Simi Valley	CA	93065
ATTN: CEO or President	Reckitt Benckiser, Inc.	399 Interpace Pkwy	Parsippany	NJ	07054
CSC Lawyers Inc. Service	Agent for Reckitt Benckiser, inc.	2710 Gateway Oaks Dr., Ste 150N	Sacramento	CA	95833
ATTN: CEO or President	Wisconsin Pharmacal Company, LLC	One Pharmacal Way	Jackson	WI	53037
Attn: Jeffrey Potts	Wisconsin Pharmacal Company, LLC	One Pharmacal Way	Jackson	WI	53037
ATTN: CEO or President	The Coleman Company, Inc.	3600 N. Hydraulic St.	Wichita	KS	67219
CT Corp System	Agent for Jarden Corp (The Coleman Co.)	111 Eighth Avenue	New York	NY	10011
ATTN: CEO or President	Canus USA	153 S. Main Street	Waterbury	VT	05676
ATTN: CEO or President	Canus USA	5 Pilgrim Park Rd., #1	Waterbury	VT	05676
National Corp. Research Ltd	Agent for Canus USA	85 Brown's Rd.	Newfane	VT	05345
ATTN: CEO or President	Canus Canada	5924 Henri Bourassa West	Ville Saint-Laurent Quebec	Canada	H4R 1V9
ATTN: CEO or President	drugstore.com, Inc.	12835 Old Virginia Rd.	Reno	NV	89521
CSC Service of Nevada, Inc.	Agent for drugstore.com, Inc.	2215-B Renaissance Dr.	Las Vegas	NV	89119
ATTN: CEO or President	drugstore.com, Inc.	300 Wilmot Rd.	Deerfield	IL	60015
Illinois Corp. Service	Agent for Walgreen Co.	801 Adlai Stevenson Dr.	Springfield	IL	62703
ATTN: CEO or President	Walgreen Co.	200 Wilmot Rd.	Deerfield	IL	60015
ATTN: Jason Freeman, CEO	Bio Creative Enterprises DBA Bio Creative Labs	2710 Temple Ave.	Long Beach	CA	90806
ATTN: Robert C. Harris	Bio Creative Enterprises DBA Bio Creative Labs	564 Wedge Ln.	Fernly	NV	89408
ATTN: CEO or President	Amazing White	3330 Reynard Way, #7	San Diego	CA	92103
ATTN: CEO or President	Amenity, LLC	16356 86th Street	New York	NY	11414
ATTN: CEO or President	Freipost	718 S. Isis Ave., Unit B	Inglewood	CA	90301
ATTN: Mary Sakaguchi	MICOM CHB, INC.	2139 W. 166th Pl.	Torrance	CA	90504
ATTN: CEO or President	Pet Silk, Inc.	20411 imperial Valley Dr.	Houston	TX	77073
ATTN: Basim Farouk Shami	Pet Silk, Inc.	20411 imperial Valley Dr.	Houston	TX	77073
ATTN: CEO or President	DoggiDogi	8271 Garden Grove Blvd.	Garden Grove	CA	92844
ATTN: CEO or President	Merlot Corp.	1519 Camino Alto Rd.	El Paso	TX	79902
ATTN: Wayne Beckley	Merlot Corp.	1519 Camino Alto Rd.	El Paso	TX	79902
ATTN: CEO or President	A Family Affair	172 trade Street	Lexington	KY	40511
ATTN: CEO or President	KohGenDo USA, Inc.	18113 Sundown Ct. SE	Yelm	WA	98597
ATTN: Diane Nakauchi	KohGenDo USA, Inc.	18113 Sundown Ct. SE	Yelm	WA	98597
ATTN: CEO or President	Bellezza Beauty Supply	1488 Pioneer Way, Ste 8	El Cajon	CA	92020
ATTN: CEO or President	Taliah Waajid Black Earth Products	4620 S. Atlanta Rd., E	Smyrna	GA	30080
ATTN: Taliah Waajid	Braids, Weaves & Things, Inc.	4045 Orchard Rd., Ste 510	Smyrna	GA	30080
ATTN: CEO or President	CBS Express	5643 N. Lincoln Ave.	Chicago	IL	60659
ATTN: CEO or President	BEP Manufacturing	365 Etowah Trace, Ste 106	Fayetteville	GA	30214
ATTN: CEO or President	Marc Anthony Cosmetics, Inc.	190 Pippin Rd.	Concord Ontario	Canada	L4K 4X9
ATTN: CEO or President	True Beauty Brands	16172 Metcalf Ave.	Stilwell	KS	66085
ATTN: CEO or President	Bloom Bath & Body	6890 S. Emporia St.	Englewood	CO	80112
ATTN: CEO or President	Bloom Bath & Body	704 Massachusetts St.	Lawrence	KS	66044

INTERESTED PARTIES

ATTN: CEO or President	Bloom Bath & Body	8161 S. Grant Way	Littleton	CO	80122
ATTN: CEO or President	Sea to Summit Pty Ltd	6 Brown St.	East Perth	Australia	06004
ATTN: CEO or President	Sea to Summit	3550 Frontier Ave.	Boulder	CO	80301
ATTN: CEO or President	J. Strickland & Co.	PO Box 1637	Olive Branch	MS	38654
ATTN: James McKelroy	Agent for J. Strickland & Co.	10420 Desoto Rd.	Olive Branch	MS	38654
ATTN: CEO or President	Lafco New York	285 Lafayette St., #2	New York	NY	10012
ATTN: Jonathan Bresler, CEO	Lafco Enterprises, Inc.	285 Lafayette St.	New York	NY	10012
ATTN: CEO or President	Elemis LTD	The Lodge, 92 Uxbridge Rd.	Harrow Weald, Middlesex	England	HA3 6DQ
ATTN: CEO or President	Elemis LTD	No 1 Baker Street	London	UK	W1U 8ED
ATTN: CEO or President	Steiner Beauty Products, Inc.	5350 NW 35th Terrace, Ste 100	Fort Lauderdale	FL	33309
ATTN: Gladys Rodriguez	Steiner Beauty Products, Inc.	770 S. Dixie Hwy., Ste 200	Coral Gable	FL	33146
ATTN: CEO or President	Knight Distributing Co.	2150 Boggs Rd., Ste 370	Duluth	GA	30096
ATTN: CEO or President	Knight Distributing Co.	1625 Lakes Pkwy, Ste G	Lawrenceville	GA	30043
ATTN: AJ Block	Agent for Knight Distributing Co.	2060 Mt. Paran Rd., NW #106	Atlanta	GA	30327
ATTN: CEO or President	Discontinued Beauty Supply	275 Oleander Dr.	Pawleys Island	SC	29585
ATTN: CEO or President	Tec Laboratories, Inc.	7100 Tec Labs Way SW	Albany	OR	97321
ATTN: Steven Adkins	Agent for Tec Laboratories, Inc.	745 NW Van Buren Ave.	Corvallis	OR	97330
ATTN: CEO or President	myotcstore.com	19-35 Hazel St.	East Elmhurst	NY	11370
ATTN: CEO or President	AGS Labs, Inc.	4871 Sharp St.	Dallas	TX	75247
ATTN: James Tehan	Agent for AGS Labs, Inc.	1139 Timplemore Dr.	Dallas	TX	75218

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City Hall, Room 234
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

CERTIFICATE OF MERIT

I, Daniel N. Greenbaum, hereby declare:

(1) This Certificate of Merit accompanies the attached sixty-day notice(s) in which it is alleged the parties identified in the notices have violated Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings.

(2) I am the attorney for the noticing party.

(3) I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the alleged exposure to the listed chemical that is the subject of the action.

(4) Based on the information obtained through those consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiffs' case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute.

(5) The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health and Safety Code section 25249.7(h)(2), i.e., (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

June 13, 2014

Daniel N. Greenbaum, Esq.



Date

Printed Name

Signature