

SIXTY-DAY NOTICE OF VIOLATION

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

DATE: July 21, 2022

TO: Andy Jassy, CEO – Amazon.com, Inc.
California Attorney General's Office
District Attorneys and Certain City Attorneys Throughout California

FROM: Laurence Vinocur

My name is Laurence Vinocur. I am a citizen of the State of California acting in furtherance of the public interest. I seek to promote awareness of exposures to certain toxic chemicals in products sold in California and, if possible, to improve human health by reducing hazardous substances contained in such items. This notice is provided to the public agencies listed above pursuant to California Health & Safety Code §25249.6 *et seq.* (Proposition 65). As noted above, this letter is also being provided to the alleged violator, Amazon.com, Inc., which is a person in the course of doing business in California (Violator). The violations covered by this notice consist of the product exposure, routes of exposure and types of harm potentially resulting from exposure to the hazardous substance identified below (listed chemical), as follows:¹

Products:	Fishing Sinkers Containing Lead, Including Kits Containing Such Items
Listed Chemical:	Lead
Routes of Exposure:	Inhalation, Ingestion and Dermal
Types of Harm:	Birth Defects and Other Reproductive Harm

I. NATURE OF ALLEGED VIOLATION (CONSUMER PRODUCT EXPOSURE)

Lead-based fishing sinkers that are causing consumer exposures, in violation of Proposition 65, and that are covered by this letter shall be referred to hereinafter as the “Products.” Exposures to the listed chemical from the use of the Products have been occurring without the “clear and reasonable warning” required by Proposition 65, dating as far back as July 21, 2019. Without proper warnings regarding the toxic effects of exposures to the listed chemical resulting from the use of the Products, California citizens lack the information necessary to make informed decisions on whether and how to eliminate (or reduce) the risk of exposure to the identified toxicant.

California citizens, through the act of buying, acquiring, receiving or utilizing the Products, are exposed to the listed chemical. By way of example, consumers, workers and other individuals, including women of childbearing age, ingest the listed chemical when they, among other activities, touch the Products and transfer the listed chemical from the Products to their mouths through hand-to-mouth activities that may continue to occur for a significant period after one or more contacts with the Products ceases.

¹ The violations exclude sales made by third-party sellers on amazon.com that have settled their disputes with Mr. Vinocur. This exclusion, however, does not include sales of the same ASIN on amazon.com sold by any other entity besides the settling merchant.

Additionally, consumers, workers and other individuals, including women of childbearing age, are exposed to the listed chemical through direct dermal contact when they, among other activities, handle, touch or otherwise use the Products. Further, there are reasonably foreseeable uses of the Products that result in direct ingestion and inhalation.

The California State Plan for Occupational Safety and Health incorporates the provisions of Proposition 65, as approved by Federal OSHA on June 6, 1997. This approval specifically placed certain conditions with regard to occupational exposures on Proposition 65, including that it does not apply to the conduct of manufacturers occurring outside the State of California so long as they are based in the United States. The approval also provides that a United States employer may use the means of compliance in the general hazard communication requirements to comply with Proposition 65. It also requires that supplemental enforcement be subject to the supervision of the California Occupational Safety and Health Administration.

Any settlement, civil complaint or substantive court orders in this matter must be submitted to the state Attorney General.

II. CONTACT INFORMATION

Please direct all questions concerning this notice to me through my counsel's office at the following address, email and/or telephone number:

Laurence Vinocur
c/o Clifford A. Chanler
Chanler, LLC
72 Huckleberry Hill Road
New Canaan, CT 06840-3801
clifford@chanlerllc.com
Telephone: (203) 594-9246

III. PROPOSITION 65 INFORMATION

For general information concerning the provisions of Proposition 65, please feel free to contact the Office of Environmental Health Hazard Assessment's (OEHHA) Proposition 65 Implementation Office at (916) 445-6900. For the Violator's reference, I have attached a copy of "The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary" which has been prepared by OEHHA.

IV. POTENTIAL RESOLUTION OF NOTICED CLAIMS

Based on the assertions set forth in this notice, I intend to file a citizen enforcement action (or amend any existing one that may be filed before the expiration of this sixty-day letter) against the Violator unless such alleged person in the course of doing business enters into a binding written agreement (and/or upstream party such as a supplier enters into an agreement which would resolve allegations pertaining to one or more of the products at issue) to: (a) recall Products already sold or undertake best efforts to ensure that the requisite health hazard warnings are provided to those who have received such Products; (b) provide “clear and reasonable warnings” for Products to be sold in the future or, preferably, reformulate such Products to eliminate potential exposures to lead (or undertake best efforts to ensure upstream selling entities in the chain of commerce such as manufacturers, exporters, importers or distributors do so); and (c) pay an appropriate civil fine based on the factors enumerated in California Health & Safety Code §25249.7(b). If the alleged Violator is interested in resolving this dispute without resorting to litigation, please feel free to contact my counsel identified in Section II above. It should be noted that neither my counsel nor I can finalize any settlement with the Violator until after the statutory sixty-day notice period has expired for the covered products; nor speak for the state Attorney General, any state district attorney or the five city attorneys who received this notice.

V. ADDITIONAL NOTICE INFORMATION

Examples of Products that were purchased and/or available for purchase or use in California covered by this notice are identified on Exhibit A.^{2 3}

The examples on the attachment are for the recipient’s benefit to assist in its investigation of, among other things, the magnitude of potential exposures to the listed chemical from other items within the definition of Products. These examples are not meant to be an exhaustive or comprehensive identification of each specific offending Product. Further, the alleged Violator is obligated to continue to conduct in good faith an investigation into all lead-based fishing sinkers described above that may have been manufactured, imported, distributed, facilitated for sale, sold, shipped, stored, or was otherwise within the notice recipient’s custody or control during the relevant period so as to ensure that the requisite toxic warnings were and continue to be provided to California citizens prior to purchase, especially if the upstream vendor (i.e., party with whom the Violator entered into a contract to sell the products at issue) is exempt from a duty to warn or enforcement under Proposition 65.

² If an applicable manufacturer, supplier, seller, exporter and/or importer of one or more of the Products does not have a known agent for process of service in California or employs less than ten people as defined by the operative regulation, then the Violator has heightened regulatory responsibilities beyond 27 CCR §25600.2(d) especially if the Violator is also an importer or fulfills additional upstream roles in the commercial marketplace.

³ In accordance with 27 CCR §25600.2(g), please promptly answer the questions on **Exhibit B**, and return with receipt confirmation to Laurence Vinocur c/o Clifford Chanler, Chanler, LLC, 72 Huckleberry Hill Road, New Canaan, CT 06840, or via email to clifford@chanlerllc.com on or before **August 20, 2022**.

Exhibit A

<i>Products</i>	<i>Model#/UPC#/Item ID</i>
Fishing Worm Lead Weight Sinkers	B07C6B2QYF, B07C696DJS
VGEBY Fishing Sinkers,	B0784FSWHX, PFB9977785; B07B4FBR9T (various weight/size); B07B51CW9S (various weight/size)
Skinny Finesse Lead Drop Shot Fishing Weights Sinkers,	B07F42TY2N, B079L1F6H6
Tackle Kits with Lead Fishing Jig Heads	B07CQXX8N3
Guyouke Fishing Kits with Lead Fishing Weights and Sinkers	B08BPHQL5J; B089FGT7SK
LPATTERN Round Split Shots	B08BYNN5CJ
Aezek Round Lead Fishing Split Shots	B08BL8GR52
AMYSports Lead Drop Weights Sinkers Kit Casting Removable Fishing Weights Saltwater Bass Round Fishing Sinkers Swivel Round Shaped Cannonball Freshwater	B096M5SQ6T
Lilureena 3pcs Pyramid Fishing Weights Sinker Bullet Weights for Saltwater Freshwater	B09D7GXB6H
FCFKUK Fishing Sinkers Weights Worm Fishing Sinker Weight Bullet Lead Sinkers Fishing Carambola Shape Fishing Sinker	B08P4Q47S2
Proximitck Fishing Weight Triangular Lead Sinkers 20Pcs Bullet Lead Sinker Weights Kit 3/8Oz	B09C632VDJ
<i>Products</i>	<i>Model#/UPC#/Item ID</i>
Alwonder 10PCS/Pack Pyramid Sinkers Kit, 4 Sizes, Surf Fishing Weights Sinker Fishing Lead Weights Sinker No Roll Sinker for Freshwater Saltwater	B092V5ZG4Z
5 Pack Soft Lead for Fishing, Soft Lead Sheet, Fishing Lead Roll, Fishing Tape Lead, Lead Strips	B097R8WF9D

Fishing Sinkers Weights Tackle Accessories Supplies	
Fishing Sinkers Weights Shot Sinker Lead Sinkers for Worm Deep Saltwater Bottom Fishing Rig, 28Pcs Waterdrop Shape Fishing Weights	B095YG569S
50Pcs Fishing Sinkers Weights Kit Worm Fishing Sinker Weight Bullet Lead Sinkers Fishing Set	B07R8DXS2M
30/40pcs Fishing Bullet Weights Kit Worm Fishing Sinker Weights for Bass Fishing Pitching and Flipping, Fishing Bullet Weights,Sinker Fishing Weights Sinkers Worm Weights	B09DKLK758
SXYL Split Shot Fishing Weights Sinkers Kit, 280pcs Round Split Shot Sinker Removable Fishing Weights Egg Sinkers 10 Sizes	B08XLVXHBD
Removable Split Shot Sinker Kit Pure Lead Sinkers Weights Fishing Tackle (5 Size/1 Box)	B08WKL79R1
Isenwill 100Pcs Fishing Weights & Sinkers, Upgrade Round Split Shot Sinker, Removable Split Shot Sinker Weights, Fishing Lead Egg Sinkers 5 Sizes, 0.017 oz, 0.028 oz, 0.035 oz, 0.053 oz, 0.07 oz	B095XS1JRJ
S & J's Tackle Box 1/8 oz Hand Poured Round Split Shots, 100 Per pack	B00IOSBEVO

<i>Products</i>	<i>Model#/UPC#/Item ID</i>
Milepetus 110-Pieces Removable Split Shot Sinker Kit, 0.5g, 0.6g 0.8g 1g 1.2g 1.5g 2g Pure Lead Sinkers Split Shot Weights Fishing Tackle	B08W3WTMJG
Split Shot Fishing Weights Fishing Weights Saltwater, 100Pcs Round Removable Fishing Sinker Lead Fishing Weights Small Fishing Weights Sinkers	B095HP9FVX
FREGITO 100pcs Fishing Weight Sinkers Kit, 5 Sizes Lead Weights Round Split Shot Sinker Removable Fishing Weights Sinkers	B09F388QKT6
KINBOM 102pcs Fishing Weights Sinkers Kit Removable Reusable Fishing Split Shot Fishing Weights Drop Shot Fishing Tackle Round Split Shot Sinkers 6 Sizes	B096VMG285
Dr.Fish 5 Pack Pyramid Fishing Sinkers, Lead Fishing Weights for Surf Fishing, Catfish (various sizes)	B08NJVD2JC B08NJVKKZZ B08NJVW4L B08NJVJSXL B08NJVJJWP B08NJV84KS B08NJVYZD7
Poisson Bullet Sinker Burr-Free Built-in Tube Lead Worm Fishing Sinker Weight	B08Y66BZSS B08Y65YGNJ B08Y67VBW3 B08Y6B9Q4Y B08Y663TWY B08VNQ5MS6 B09M9JHN42
Joyiii Fishing Weights Sinkers 100pcs Lead Split Shot Fishing Line Sinkers 5 Sizes Removable Egg Lead Assortment	B097Y4XB6F

<i>Products</i>	<i>Model#/UPC#/Item ID</i>
AMYSports Bullet Drop Weights Sinkers Kit Saltwater Removable Fishing Sinkers Tackle Lead Bass Fishing Sinkers Shot Casting Freshwater	B09D7MTV9C B09D7P1J2D B09D7NFYWM B09D7LQKMP B09D7P3J93 B09D7PWLJ5 B09D7N79BG
Fishing Drop Shot Weights Rig Kit Sinkers 35pcs Trokar with Lead for Bass Fishing with Tackle Box	B081TBNWYW
Skipaelf 500pcs Split Shot Fishing Weights, Round Removable Fishing Weights Sinkers with Small Box, Lead Fishing Weights Saltwater Freshwater	B09BBD86PH B09BBDDMM3 B09BBFJGL7 B09BBDZJ6C B09BBDJCZL B09BBDK9MM B09BBDMMSJ B09BBD8SLT B09BBG1H54 B09BBQLR13 B09BBD41QM
ANYI 100 Pieces Fishing Weights Sinkers, Round Removable Split Shot Sinker Weights, 8 Sizes Fishing Lead Egg Weights with Tackle Box, Small Fishing Accessories Equipment Gear Stuff Lead Shot Sinkers	B09BQCG3LX
Avlcoaky Fishing Weights Sinkers Streamlined Shape Weights Freshwater Saltwater Casting Drifting Bottom Fishing Accessory	B08L9C3C52
FishingPepo 100pcs Fishing Weights Sinkers Kit, Round Removable Split Shot Sinker Weights, Small Fishing Lead Egg Weights, Fishing Accessories Equipment Gear Stuff Lead Shot Sinkers 5 Sizes	B099DMS8Z9 B0998ZV49C B0998YHHM1

<i>Products</i>	<i>Model#/UPC#/Item ID</i>
Proximitck Fishing Weight Triangular Lead Sinkers 20Pcs Bullet Lead Sinkers Weights Kit	B09C632VDJ
DongciTACi Fishing Sinkers and Weights Bass Casting Sinkers Plomos para Pescar Lead Fishing Tackle Kit for Saltwater Freshwater Bottom Fishing	B08GKGDBWL B097TVHXY3
TaoTaoChong Egg Fishing Sinkers Weights Assortment Lead Oval Shape Bass Casting Worm Weights Tackle for Saltwater Freshwater Fishing	B08GBYZNTB
Milepetus 10Pcs Fishing Sinkers Weights Bullet Lead Sinkers Rolling Swivel with Interlock Snap Connector Inline,8g 10g 15g 20g 25g Available	B077GYLTM5 B077H18QH7 B077GY4QQW B077GZXYJM B077H1CZCQ B077GYQXQD
QCQIANG 390Pcs Fishing Weights Sinkers Kit, 8 Size Round Fishing Sinkers with Multifunction Fishing Plier	B09JNRRVM3
Mimilure 131 Pcs Removable Split Shot Sinkers Assortment Pure Lead Weights Sinkers Kit Fishing Tackle Set,7 Sizes	B08RXBTVCG
SF Micro Split Shot Lead Combo Removable Fly Fishing Lead Pure Lead Sinkers Weights Fishing Tackle(112Pcs/4 Size/1 Box)	B0995PS7BG
10Pcs Fishing Weights Sinkers Lead Fishing Weights Assortment Drop Shot Fishing Weights Kit	B09Q96229G B09Q96LML8 B09Q96RBLT B09Q967FD7 B09Q9573QD B09Q95MD4Y B09Q955GR7 B09Q94P8PT B09Q94WZ3Y

<i>Products</i>	<i>Model#/UPC#/Item ID</i>
Lead Sheet,5 Rolls 0.6MM Fishing Soft Lead Sheet Strip Sinkers Weights Tackle Accessories Supplies New,Balance The Fishing Accessories Group	B085THQBD2
Huoutspor Lead Fishing Weights Sinkers for Bass Fishing Saltwater Freshwater Heavy Aircraft Triangle Shaped Casting Bottom Fishing Tackle	B09DV8VDV1 B09DV7ZYB7
8 Pieces 3oz Bullet Weights Fishing Sinkers Kit ,Bullet Pyramid and Disc Fishing Sinkers, Removable Fishing Weights Casting Sinkers Gear Tackle for Saltwater	B09SGZKBHV
Phuayok Fishing Weights Drop Shot Kit Fishing Sinkers of Round Fishing Weights,Lead Sinkers Drop Shot Rig Bass for Fishing	B09L43JTTR B09L5LVLCG B09L5KWTL6 B09L5KBMPC B09L5L9C7Y B09L5KTTM9 B09L5LPGKV
Pheanto Fishing Weights, 100PCS/Box Round Split Shots Fishing Weights, Fishing Weights Sinkers 5 Sizes kit, 0.2g, 0.5g, 1g, 1.5g, 1.8g	B095YKC48Q
HRC Fish Fishing Sinkers Lead Weights 1oz - 40oz	B07NL16MLV B07NHMT158 B07NHHHFG3
Atibin Bass Fishing Bullet Weights Set Saltwater Casting Fishing Weight Shot Removable Bullet Fishing Sinkers Lead 1/14oz-3/4oz	B09SYM3Q8M B09SYN9VBN B09SYMRSST B09SYN2PMQ B09SYNBLLF B09SYN3MQW B09SYNMNDJ
ZONGR 160pcs Silver White Fishing Sinkers Weights Shot Weight Sinkers Tackle Round bite	B08GM9SGDS

<i>Products</i>	<i>Model#/UPC#/Item ID</i>
Split Shot Sinkers Weights Kit - 215pcs Round Removable Fishing Sinker Weight Assortment Total 5OZ Small Egg Fishing Sinker Weight Fishing Tackle 7 Sizes with Plastic Box	B096DNCYY9
Split Shot Fishing Weights Sinkers 205Pcs 5 Sizes Weights 0.2/0.3/0.4/0.6/0.8g Round Fishing Line Sinker Removable Egg Lead Assortment	B099NX1GDM
Jyongmer 65Pcs Fishing Weights Sinkers Kit, 6 Assorted Size Worm Fishing Sinker Weights, Bullet Weights Lead Sinker for Bass Fishing Saltwater, Rig Fishing (0.07 - 0.5 oz)	B09BHZMXTTP
Beocudo Split Shot Sinkers Fishing Weights, Large Size 15g/7g/4g Removable Round Fishing Line Weights Saltwater Freshwater	B09MK5GBLR B09MK5YSH4 B09MK59Y9H
YEXPRESS 50 PCS Fishing Lead Sinkers Weights, 6 Sizes Weight Bullet Lead Sinkers Fishing Set for Fishing Pitching and Flipping, 1/8 1/16 3/16 1/4 3/8 1/2Ounce	B09BZCKQLT
30/40pcs Fishing Weights Kit Worm Fishing Sinker Weights for Bass Fishing Pitching and Flipping, Fishing Weights,Sinker Fishing Weights Sinkers Worm Weights	B09DKN7BW3 B09DPJPD5C B09DNZ53N5 B09DP9HNFQ B09DKN3J75 B09DKNJ2T6
Joyiii Fishing Weights Sinkers 205pcs Lead Split Shot Fishing Line Sinkers 5 Sizes Removable Egg Lead Assortment	B0925TT936

<i>Products</i>	<i>Model#/UPC#/Item ID</i>
YCDMLJC 100pcs Fishing Weights Sinkers Kit, Round Removable Split Shot Sinker Weights, Fishing Lead Egg Weights, Fishing Accessories Equipment Gear Stuff Lead Shot Sinkers	B0928Q5YND B0924H7NQT B096K9F6C3
Qunweidi 100Pcs Fishing Weights Sinkers Kit, 5 Sizes Round Split Shot Sinker, Upgrade Fishing Weights Egg Sinkers 5 Sizes, 0.007 oz, 0.017 oz, 0.035 oz, 0.05 oz, 0.07 oz	B0999BC5VQ B0999BVRQ2
Keadic Fishing Weights Sinkers Assortment Kit, 3g 5g 7g 10g 20g 25g 30g 40g 50g Olive Bass Casting Hollow Egg Fishing Weights with for Freshwater/Saltwater Fishing Gear	B08KVV6D4B B08KW26YJW
FOXJIGS 100pcs Fishing Weights Sinkers, Round Split Shot Sinker Kit, Fishing Lead Egg Weights 5 Sizes, 2g, 2.5g, 3g, 4g, 5g	B08VWR2NB6
Amersumer 20 Pcs Raindrop Fishing Weights, Lead Fishing Sinkers Weights, Streamlined Shape Fishing Weights for Bottom Fishing	B08F9Z7VJT

EXHIBIT B

As it relates to *each* of the Products, including those identified on **Exhibit A**, provide the full legal entity name and any known contact information (on or before **August 20, 2022**) for:

- (a) Any and all manufacturers
- (b) Any and all producers
- (c) Any and all packagers
- (d) Any and all direct vendors
- (e) Any and all exporters
- (f) Any and all shippers, and
- (g) Any and all sellers

Please email (or send via overnight delivery) the above-requested information to the address provided in Section II. Thank you.

PROOF OF SERVICE

I, the undersigned, declare under penalty of perjury:

I am over the age of 18 years and not a party to the within action. I am a resident or employed in the county where the mailing occurred. My business address is 72 Huckleberry Hill Road, New Canaan, CT 06840.

On **July 25, 2022**, I caused to be served the following documents:

SIXTY-DAY NOTICE OF VIOLATION SENT IN COMPLIANCE WITH HEALTH & SAFETY CODE §25249.7(d);

CERTIFICATE OF MERIT; AND

THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY

XXXX **By First Class Certified Mail** through the United States Postal Service by placing true and correct copies of the above documents in a sealed envelope, addressed to each alleged violator listed below and providing such envelope to a United States Postal Service Representative.

Andy Jassy, CEO
Amazon.com, Inc.
410 Terry Avenue N
Seattle, WA 98109

On **July 25, 2022**, I caused to be served the following documents:

SIXTY-DAY NOTICE OF VIOLATION SENT IN COMPLIANCE WITH HEALTH & SAFETY CODE §25249.7(d); AND

CERTIFICATE OF MERIT

XXXX **By Mail** I placed a true and correct copy of the foregoing document(s) in a sealed envelope addressed to each entity on the attached "Mail Service List." I placed each such envelope, with postage thereon fully prepaid, for collection and mailing in one of the United States Post Office Boxes located at 18 Locust Avenue, New Canaan, Connecticut.

On **July 25, 2022**, I caused to be served the following documents:

**SIXTY-DAY NOTICE OF VIOLATION SENT IN COMPLIANCE WITH
HEALTH & SAFETY CODE §25249.7(d); AND**

CERTIFICATE OF MERIT

XXXX **By Electronic Mail** by sending true and correct copies of the above documents to the electronic notification (Email) address(es) on the attached “Email Service List” and “Mail Service List.”

On **July 25, 2022**, I caused to be served the following documents:

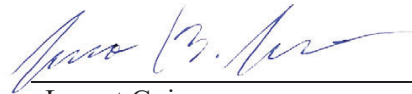
**SIXTY-DAY NOTICE OF VIOLATION SENT IN COMPLIANCE WITH
HEALTH & SAFETY CODE §25249.7(d);**

CERTIFICATE OF MERIT; AND

CERTIFICATE OF MERIT ATTACHMENTS

XXXX **By Electronic Upload** by causing true and correct copies of the above documents to be uploaded to the California Attorney General’s website at the web address on the attached “Electronic Upload Service List.”

Executed on **July 25, 2022**, in New Canaan, Connecticut.



Lorent Guimaraes

CERTIFICATE OF MERIT

California Health & Safety Code Section 25249.7(d)

I, Clifford A. Chanler, hereby declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged that the party identified in the notice has violated Health and Safety Code §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 this action and/or the listed chemical in substantially similar products and exposes individuals through the same potential routes;
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 plaintiff’s 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 under Health and Safety Code §25249.7(h)(2) including (i) the identity of the persons consulted with and relied on by the certifier, and (ii) certain facts, studies, or other data reviewed by those persons.

Dated: July 21, 2022


Clifford A. Chanler