+1 650 296 101

contact@PoulsenLaw.org

282 11th Avenue, Suite 2612 New York, New York 10001

VIA CERTIFIED FIRST CLASS MAIL

Current Manager or Managing Member Cameron Seafood Online, LLC 875 Hungerford Drive Rockville, MD 20854

Current Manager or Managing Member Cameron Seafood Online, LLC c/o Cameron Manesh 9801 Washington Blvd.#320 Gaithersburg, MD 20878

Current President or CEO Cameron's Seafood Restaurant, Inc. 8807 Central Ave. Capitol Heights, MD 20743

Current President or CEO Cameron's Seafood Restaurant, Inc. c/o Parvis Manesh 8807 Central Ave. Capitol Heights, MD 20743

Current Director or Managing Director Cameron Enterprises LTD 8807 Central Ave. Capitol Heights, MD 20743

Current President or CEO Amazon.com, Inc. and Amazon.com Services LLC c/o Corporation Service Company 251 Little Falls Dr. Wilmington, DE 19808

Michael D. Deal or Current President or CEO Amazon.com Services LLC 410 Terry Avenue N. Seattle, Washington 98109 Current President or CEO Stavis Seafoods Inc. 50 Fleet St., #202 Boston, MA 02109

Current Manager or Managing Partner Stavis Seafoods LLC 212 Northern Ave., Ste. 305 Boston, MA 02210

Current Manager or Managing Partner Stavis Seafoods LLC care of Jay B. Weiss, Esquire 12855 SW 119th Terrace Miami, FL 33186

VIA ELECTRONIC FILING

State of California Department of Justice Office of Attorney General of California Filing link: oag.ca.gov/prop65

VIA FIRST CLASS MAIL

District Attorneys of California Counties and City Attorneys, as in the Certificate of Service

VIA E-MAIL

District Attorneys of California Counties and City Attorneys, as in the Certificate of Service



RE: Lead and lead compounds, and cadmium

in Cameron's Seafood Mussels, Cameron's Seafood Virginia Oysters Pint, Prince Edward Whole Cooked Hard Clams 11/16 sold by Cameron Seafood Online, LLC, Cameron's Seafood Restaurant, Inc., Cameron Enterprises LTD, Amazon.com, Inc., Amazon.com Services LLC, Stavis Seafoods Inc., and Stavis Seafoods LLC

November 7, 2023

60-DAY NOTICE OF INTENT TO SUE

for violations of the Safe Drinking Water and Toxic Enforcement Act of 1986

Dear alleged violators and public enforcement agencies,

Poulsen Law P.C. represents The Chemical Toxin Working Group, Inc., a California non-profit corporation, doing business as Healthy Living Foundation Inc., 1801 Chart Trail, Topanga, California 90290 ("HLF," "Noticing Party") HLF, implements measures to reduce the amount of chemical toxins in consumer products posing targeted dangers to fetuses, children, pregnant women, and women of childbearing age; acts in the interest of the people with a mission to bring truth and transparency to consumer product labeling and advertising; improves safety for workers by reducing their exposure to chemicals; publishes consumer health articles, periodicals, books, comparative test results and educates the public. HLF has achieved reformulation and removal of egregiously carcinogenic products from the market.

HLF has enforced a large number of Cal. Health & Safety Code violations in the public interest and developed an extensive expertise in prosecuting manufacturers and distributors of food and consumer products for violations of health and consumer safety laws. These cases have resulted in significant public benefit, including reformulation of products to remove toxic chemicals to make them safer, and putting label and online warnings on products tested as contaminated with lead, cadmium, acrylamide, dioxane, or removing them from the California market.

HLF's Chief Officer David W. Steinman is a publisher, health and environmental journalist, and bestselling author of Diet For A Poisoned Planet (Crown Ed., 1990, Ballantine 2d Ed., 1992, Running Press 3d Ed., 2007). Among his other books are: The Safe Shoppers' Bible (Macmillan Ed., 1995, Wiley 2d Ed., 2000) and The Breast Cancer Prevention Program (Macmillan Ed., 1997). Mr. Steinman represented the public interest at the National Academy of Sciences on the Safe Seafood Committee that produced Seafood Safety (Washington, D.C.: National Academies Press, 1991), advised Congress on related legislation, testified before Congress as an expert witness on food safety, was an early proponent of Proposition 65, and a child victim of exposure to toxic chemicals.

The Safe Drinking Water and Toxic Enforcement Act of 1986, codified in the California Health & Safety Code sections 25249.5, et seq. ("Proposition 65"), requires that a 60-day notice of intent to sue be provided to a violator of Cal. Health & Safety Code § 25249.6.



With this notice of violation (Notice) HLF gives a written notice of the alleged violation, bringing this action in the public interest, as defined under the Cal. Health & Safety Code § 25249.7(d), seeking to prosecute the alleged continuing noncompliance, and to warn consumers about their exposure to the violative chemical(s), or reduce and/or eliminate consumer exposures from product(s) (collectively, the "Specified Products" and each a "Specified Products") listed in the table below, which are manufactured, distributed and/or sold by Advanced Nutrition Inc., Advanced Nutrition, Inc., Amazon.com, Inc. and Amazon.com Services LLC (referred to as the "Noticed Party[ies]").

This Notice covers the violations of Proposition 65 that are currently known to the Noticing Party from information now available as specifically related to the violating products listed below and manufactured, distributed or/and sold by and through the Noticed Parties. HLF is continuing its investigation that may reveal further violations.

The Specified Product(s) subject to this Notice, the chemical(s) in the Specified Product(s) identified as exceeding allowable levels, and the Noticed Parties responsible for sales of the Specified Products, are as follows:

Specified Products	Violative chemical	Noticed Party
Cameron's Seafood Virginia Oysters Pint	Lead and lead compounds and cadmium	Cameron Seafood Online, LLC, Cameron's Seafood Restaurant, Inc.,Cameron Enterprises LTD, Amazon.com, Inc., Amazon.com Services LLC, Stavis Seafoods Inc., and Stavis Seafoods LLC
Cameron's Seafood Mussels	Lead and lead compounds and cadmium	Cameron Seafood Online, LLC, Cameron's Seafood Restaurant, Inc.,Cameron Enterprises LTD, Amazon.com, Inc., Amazon.com Services LLC, Stavis Seafoods Inc., and Stavis Seafoods LLC
Prince Edward Whole Cooked Hard Clams 11/16	Lead and lead compounds and cadmium	Cameron Seafood Online, LLC, Cameron's Seafood Restaurant, Inc.,Cameron Enterprises LTD, Amazon.com, Inc., Amazon.com Services LLC, Stavis Seafoods Inc., and Stavis Seafoods LLC

Lead and lead compounds ("lead") are listed pursuant to Proposition 65 as a chemical known to the State of California to cause developmental toxicity, reproductive toxicity and cancer.

Cadmium ("cadmium") is listed pursuant to Proposition 65 as a chemical known to the State of California to cause developmental toxicity, reproductive toxicity and cancer.



Noticed Parties have manufactured, produced, marketed, distributed and/or sold the Specified Products which, according to the test results, have exposed and continue to expose consumers within the State of California to lead and cadmium.

The primary route of exposure has been through ingestion.

Cal. Health & Safety Code § 25249.6 requires that a "clear and reasonable" warning be provided prior to exposure to a chemical listed under Proposition 65. The Noticed Parties are in violation of Proposition 65 because the Noticed Parties have failed to provide a warning to consumers that consumers are being exposed to lead and cadmium.

HLF alleges that while in the course of doing business, the Noticed Parties are knowingly and intentionally exposing consumers to lead and cadmium without first providing a "clear and reasonable" warning.

The method of warning should be a warning that appears on the product's label. See Cal. Code Regs. tit. 27, § 25602, subd. (a)(3), and subd. (b) for internet purchases also at the point of sale, as applicable. The Noticed Parties have not provided Proposition 65 warnings as required by law that persons handling, ingesting and/or otherwise using the Specified Products are being exposed to lead and cadmium.

With respect to the Specified Products listed above, the violation commenced on the latter of the date that the Specified Product was first offered for sale in California, or November 7, 2020; has continued every day since the relevant date the violation commenced; and will continue every day henceforth until lead is removed from the Specified Products, reduced to allowable levels, or the Specified Product(s) are removed from the California market, or until a "clear and reasonable" warning is provided to consumers by the Noticed Parties, as applicable, in accordance with the law.

Pursuant to Title 27, C.C.R. § 25903(b), copies of the following documents are attached hereto for reference by the Notices Parties:

(i) "The Safe Drinking Water and Toxic Enforcement act of 1986 (Proposition 65): A Summary."

Pursuant to Title 11, C.C.R. § 3100, the "Certificate of Merit" is attached hereto.

HLF intends to file a lawsuit after 60 days based on the facts set forth in this Notice. Meanwhile we encourage a prompt resolution of this matter within the said period of 60 days where the Noticed Parties agree in a written agreement to (1) eliminate or reduce lead and cadmium to an allowable level in the Specified Products or, or remove the Specified Product(s) from the California market or, as an alternative, (2) provide a Proposition 65-compliant warning on the label of the Specified Products and online, where applicable, and/or at the point of sale; and (3) pay applicable civil penalties and costs of bringing this action.

Demand to Preserve Evidence

HLF intends to file a lawsuit, in which Noticed Party[ies] will be named as defendants. When a lawsuit is anticipated, California requires a prospective party to take all reasonable steps to preserve documents, tangible things, and electronically stored information (ESI) that are potentially relevant to the anticipated lawsuit and that are in the prospective party's possession, custody, or control. The duty applies equally to hard copy documents, other tangible things and to ESI.



1. Electronically Stored Information

As ESI can be easily deleted, corrupted, or modified in the normal operations of a business, preservation measures must be implemented immediately. These measures include, but are not limited to, those explained herein.

ESI that may be subject to a duty to preserve includes information electronically, digitally, magnetically, or optically stored. Magnetic, optical and other storage media, including archival and backup media, are also potential locations of ESI.

ESI that is potentially relevant to the contemplated action, and that the Noticed Party[ies] should preserve, includes ESI generated during the relevant time period of alleged violations and relating to the allegations in this Notice.

To satisfy its preservation duties, the Noticed Party[ies] must take all reasonable measures to preserve all hard copy documents, tangible things, and ESI that are potentially relevant to the aforementioned anticipated lawsuit, including the ESI described above. These measures include:

- Halting the Noticed Party[ies]'s routine document preservation or retention policies and its backup recycling policies.
- Instituting a litigation hold and monitoring compliance with the hold on an ongoing basis until this legal matter is fully resolved. A litigation hold ensures that all sources of potentially relevant information are identified and preserved.
- Documents and tangible things must be preserved in their original, unmodified condition. ESI must be preserved in the form in which it is normally maintained (its native format) with all metadata, both system metadata and application metadata, intact
- Preserving all hardware, portable and personal storage devices, and any other
 electronic storage devices that contain potentially relevant information. Such devices
 need not be in current use. They may include devices no longer in use and legacy
 hardware if there is no other way to view potentially relevant legacy data. The
 Noticed Party[ies]'s shall not replace, destroy, or modify such hardware and other
 electronic storage devices in any manner that could delete, damage, or alter the ESI
 they store.
- Preserving all support information needed to access potentially relevant ESI. Support
 information includes, but is not limited to, operating systems, installation disks,
 legacy and other software, operating and user manuals, user IDs, passwords, security
 and license keys, and encryption/decryption information.

2. Preservation Duties Extend to Departing Employees

The Noticed Party[ies]'s preservation duties extend to potentially relevant information in the possession of officers, directors, and employees who depart from employment by the Noticed Party[ies]. Caution should be taken to preserve the ESI of departing officers, directors, and employees whose data is subject to litigation hold requirements.

3. <u>Preservation Duties Extend to Information Controlled, but Not Actually Possessed by the Noticed Party[ies]</u>

Since a potential party "controls" documents or information when it has the legal right to obtain them on demand, The Noticed Party[ies]'s preservation duties extend to ESI possessed by its current and former attorneys, accountants, third party information technology vendors,



business service providers, and other agents and contractors, and may extend to its subsidiaries, affiliates, and divisions.

Prompt action of the Noticed Parties on this Notice will prevent further consumer exposures to a highly dangerous chemical without warning, therefore rectifying these alleged ongoing violations of the California law, and will afford the Noticed Parties the opportunity to avoid increasing costs associated with noncompliance and costly litigation.

Please contact this office as soon as possible, and direct all communications regarding this Notice to this office.

Sincerely,

Aida Poulsen | Managing attorney | NY | CA contact@poulsenlaw.org

ATTACHMENTS

- 1. Certificate of Merit;
- 2. Confidential Factual Information supporting Certificate of Merit (to Attorney General only);
- 3. Certificate of Service;
- 4. Appendix "A" "The Safe Drinking Water and Toxic Enforcement act of 1986 (Proposition 65): A Summary" (to the Noticed Parties only).



www.PoulsenLaw.org

282 11th Avenue, Suite 2612 New York, New York 10001



Fage 8 01 18

contact@PoulsenLaw.org

To: California Attorney General

Notice of Violation: November 7, 2023

Noticing Party: Chemical Toxin Working Group Inc. dba Healthy Living Foundation Inc.

Noticed Parties: Cameron Seafood Online, LLC, Cameron's Seafood Restaurant, Inc., Cameron

Enterprises LTD, Amazon.com, Inc., Amazon.com Services LLC, Stavis

Seafoods Inc., and Stavis Seafoods LLC

November 7, 2023

CERTIFICATE OF MERIT

Health and Safety Code Section 25249.7(d)

To the Notice of Violation

I, Aida Poulsen, attorney at law, hereby declare:

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.

I am the attorney for the Noticing Party.

I have reviewed the facts of this case and have consulted with one or more persons with relevant and appropriate experience and expertise who have reviewed facts, studies, and/or other data regarding the alleged exposures to the listed chemical that is the subject of the attached Notice of Violation dated November 3, 2023 (the "Notice").

I have reviewed the laboratory testing results for the chemical subject to the Notice and rely on these results. The testing was conducted by a reputable accredited testing laboratory and by experienced scientists with doctoral and other degrees in relevant sciences. The facts, studies and other data derived through this investigation overwhelmingly demonstrate that the alleged violators have exposed persons to the listed chemical that is the subject of the Notice and is known to the State of California to cause reproductive and/or developmental harm, and/or cancer.



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.

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.

Dated: November 7, 2023

By:

Aida Poulsen | Managing attorney | NY | CA contact@poulsenlaw.org

282 11th Avenue, Suite 2612 New York, New York 10001



4.050.000.404

contact@PoulsenLaw.org

CERTIFICATE OF SERVICE

I, Jesus Abundis, am over the age of eighteen years and am not a party to the action, process or case related to or arising out of the Notice of Violation being served under this Certificate of Service. My address is 1031 W 7th Street, Apt 2, Oxnard, CA 93030.

On August 22, 2023, between 11:00 a.m. and 5:00 p.m. Pacific Time, I served the following documents:

- Notice of Violations of California Health & Safety Code Section 25249.5 et seq. by Cameron Seafood Online, LLC, Cameron's Seafood Restaurant, Inc., Cameron Enterprises LTD, Amazon.com, Inc., Amazon.com Services LLC, Stavis Seafoods Inc., and Stavis Seafoods LLC
- 2. Certificate of Merit:
- 3. Appendix "A" "The Safe Drinking Water and Toxic Enforcement act of 1986 (Proposition 65): A Summary;"

on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to the parties below, and causing it to be deposited at a United States Postal Service Office in Los Angeles County, California, for delivery by Certified Mail:

Current Manager or Managing Member Cameron Seafood Online, LLC 875 Hungerford Drive Rockville, MD 20854 Current Manager or Managing Member Cameron Seafood Online, LLC c/o Cameron Manesh 9801 Washington Blvd.#320 Gaithersburg, MD 20878	Current President or CEO Amazon.com, Inc. and Amazon.com Services LLC c/o Corporation Service Company 251 Little Falls Dr. Wilmington, DE 19808 Michael D. Deal or Current President or CEO Amazon.com Services LLC 410 Terry Avenue N. Seattle, Washington 98109
Current President or CEO Cameron's Seafood Restaurant, Inc. 8807 Central Ave. Capitol Heights, MD 2074	Current President or CEO Cameron's Seafood Restaurant, Inc. c/o Parvis Manesh 8807 Central Ave. Capitol Heights, MD 20743



282 11th Avenue, Suite 2612 New York, New York 10001

contact@PoulsenLaw.org

Current Director or Managing Director	Current President or CEO
Cameron Enterprises LTD	Stavis Seafoods Inc.
8807 Central Ave.	50 Fleet St., #202
Capitol Heights, MD 20743	Boston, MA 02109
Current Manager o Managing Partner Stavis Seafoods LLC 212 Northern Ave., Ste. 305 Boston, MA 02210	Current Manager o Managing Partner Stavis Seafoods LLC care of Jay B. Weiss, Esquire 12855 SW 119th Terrace Miami, FL 33186

On November 7, 2023, between 11:00 a.m. and 11:30 p.m. Pacific Time, I served the following documents:

 Notice of Violations of California Health & Safety Code Section 25249.5 et seq. by Cameron Seafood Online, LLC, Cameron's Seafood Restaurant, Inc., Cameron Enterprises LTD, Amazon.com, Inc., Amazon.com Services LLC, Stavis Seafoods Inc., and Stavis Seafoods LLC on the following parties by filing electronically a true and correct copy thereof as permitted through the website of the California Office of the Attorney General via link at oag.ca.gov/prop65:

State of California Department of Justice; Office of the Attorney General of California.

On November 7, 2023, between 11:00 a.m. and 5:00 p.m. Pacific Time, I served the following documents:

 Notice of Violations of California Health & Safety Code Section 25249.5 et seq. by Cameron Seafood Online, LLC, Cameron's Seafood Restaurant, Inc., Cameron Enterprises LTD, Amazon.com, Inc., Amazon.com Services LLC, Stavis Seafoods Inc., and Stavis Seafoods LLC

2. Certificate of Merit

on the following parties below by placing a true and correct copy thereof in a sealed envelope, addressed to each of the District Attorney and City Attorney offices listed below, and causing each envelope to be deposited at a United States Postal Service mail box for delivery by First Class Mail:

District Attorney	District Attorney	District Attorney
Alpine County	Lake County	Sierra County
PO Box 248	255 North Forbes Street	PO Box 457
Markleeville, CA 96120	Lakeport, CA 95453	Downieville, CA 95936
District Attorney	District Attorney	District Attorney's Office

+1 650 296 1014



282 II''' Avenue, Suite 2612 New York, New York 10001

contact@PoulsenLaw.org

Amador County 708 Court Street, Suite 202 Jackson, CA 95642	Los Angeles County Hall of Justice 211 West Temple St. Ste 1200 Los Angeles, CA 90012	Siskiyou County Courthouse 311 Fourth Street, Room 204 Yreka, CA 96097
District Attorney Butte County 25 County Center Drive, Suite 245 Oroville, CA 95965	District Attorney Madera County 209 West Yosemite Avenue Madera, CA 93637	District Attorney Solano County 675 Texas Street, Ste 4500 Fairfield, CA 94533
District Attorney Colusa County 310 6 th Street August 22Colusa, CA 95932	District Attorney Marin County 3501 Civic Center Drive, Room 130 San Rafael, CA 94903	District Attorney Stanislaus County 832 12th Street, Ste 300 Modesto, CA 95354
District Attorney Del Norte County 450 H Street, Suite 171 Crescent City, CA 95531	District Attorney Mendocino County PO Box 1000 Ukiah, CA 95482	District Attorney Sutter County 446 Second Street Yuba City, CA 95991
District Attorney EL Dorado County 778 Pacific Street Placerville, CA 95667	District Attorney Modoc County 204 S Court Street, Room 202 Alturas, CA 96101-4020	District Attorney Tehama County PO Box 519 Red Bluff, CA 96080
District Attorney Fresno County 2220 Tulare Street Suite 1000 Fresno, CA 93721	Orange County 300 N Flower St. Santa Ana, CA 92703	District Attorney Trinity County Post Office Box 310 Weaverville, CA 96093
District Attorney Glenn County Post Office Box 430 Willows, CA 95988	District Attorney San Benito County 419 4th Street Hollister, CA 95023	District Attorney Tuolumne County 423 North Washington St. Sonora, CA 95370
District Attorney Humboldt County 825 5th Street 4 th Floor Eureka, CA 95501	District Attorney San Bernardino County 316 No. Mountain View Avenue San Bernardino, CA 92415	District Attorney Yuba County 215 Fifth Street, Suite 152 Marysville, CA 95901
District Attorney Imperial County 940 West Main Street, Suite 102 El Centro, CA 92243 District Attorney	District Attorney San Mateo County 400 County Ctr., 3rd Floor Redwood City, CA 94063 District Attorney	Los Angeles City Attorney's Office City Hall East 200 N. Main Street, Suite 800 Los Angeles, CA 90012 San Jose City Attorney's

+1 650 296 1014



282 11th Avenue, Suite 2612 New York, New York 10001

contact@PoulsenLaw.org

Kern County	Shasta County	Office
1215 Truxtun Avenue	1355 West Street	200 East Santa Clara Street,
Bakersfield, CA 93301	Redding, CA 96001	16 th Floor
		San Jose, CA 95113
District Attorney	District Attorney	
Kings County	Mono County	
1400 West Lacey Blvd.	Post Office Box 617	
Hanford, CA 93230	Bridgeport, CA 93517	

On November 7, 2023, between 11:00 a.m. and 11:30 p.m. Pacific Time, I served the following documents:

 Notice of Violations of California Health & Safety Code Section 25249.5 et seq. by Cameron Seafood Online, LLC, Cameron's Seafood Restaurant, Inc., Cameron Enterprises LTD, Amazon.com, Inc., Amazon.com Services LLC, Stavis Seafoods Inc., and Stavis Seafoods LLC

2. Certificate of Merit

on each of the parties below, all of which have requested electronic service only via the following email addresses:

Alameda County District Attorney	Calaveras County District Attorney
Prop65@acgov.org	Prop65Env@co.calaveras.ca.us
Contra Costa County District Attorney	Inyo County District Attorney
sgrassini@contracostada.org	inyoda@inyocounty.us
Lassen County District Attorney	Mariposa County District Attorney
mlatimer@co.lassen.ca.us	mcda@mariposacounty.org
Merced County District Attorney	Monterey County District Attorney
Prop65@countyofmerced.com	Prop65DA@co.monterey.ca.us
Napa County District Attorney	Nevada County District Attorney
CEPD@countyofnapa.org	DA.Prop65@co.nevada.ca.us
Placer County District Attorney	Plumas County District Attorney
Prop65@placer.ca.gov	davidhollister@countyofplumas.com
Riverside County District Attorney	Sacramento County District Attorney
Prop65@rivcoda.org	Prop65@sacda.org
San Diego City Attorney	San Diego County District Attorney
CityAttyProp65@sandiego.gov	SanDiegoDAProp65@sdcda.org
San Francisco County District Attorney	San Francisco City Attorney
alexandra.grayner@sfgov.org	Prop65@sfcityatty.org
San Joaquin County District Attorney DA	San Luis Obispo County District Attorney
DAConsumer.Environmental@sjcda.org	edobroth@co.slo.ca.us

28211th Avenue, Suite 2612 New York, New York 10001 POULSEN LAW P.C.

Page 18 of 18

+1 650 296 1014

contact@PoulsenLaw.org

Santa Barbara County District Attorney DAProp65@co.santa-barbara.ca.us	Santa Clara County District Attorney EPU@da.sccgov.org
Santa Cruz County District Attorney Prop65DA@santacruzcounty.us	Sonoma County District Attorney jbarnes@sonoma-county.org
Tulare County District Attorney Prop65@co.tulare.ca.us	Ventura County District Attorney daspecialops@ventura.org
Yolo County District Attorney cfepd@yolocounty.org	

I, Jesus Abundis, declare under penalty of perjury that the foregoing is true and correct.

Signature

1031 W 7th Street, Apt 2

Oxnard, CA 93030

November 7, 2023