60-DAY NOTICE OF VIOLATION OF CALIFORNIA HEALTH&SAFETY CODE\$25249.7(d) (PROPOSITION 65)

Date: January 14,2025 TO:

Andy Jassy, CEO Amazon.com Services, LLC	CEO Shenzhen Jiasiman Trading Co., Ltd.
c/o CSC - Lawyers Incorporating Service,	Building 3, 6th Floor, Room 612, Jinhua
Agent 2710 Gateway Oaks Drive Sacramento,	Industrial Area, Longgang District,
CA 95833	Shenzhen, Guangdong, 518000, China

From: Anthony

I. <u>INTRODUCTION</u>

Anthony is a California citizen acting in the public interest pursuant to California Health &Safety Code§25249.7(d). Anthony seeks to promote awareness of exposures to toxic chemicals in products sold in California and, if possible, to improve human health by eliminating hazardous substances contained in such items, promoting corporate responsibility.

This 60-Day Notice of Violation("**Notice**") is being provided to the alleged violator, as well as the California Attorney General's Office, the District Attorney's Offices for 58 Counties, and City Attorneys for San Francisco, San Diego, San Jose, Sacramento and Los Angeles.

Anthony provides this Notice after identifying violations of California's Safe Drinking Water and Toxic Enforcement Act of 1986,codified at California Health &Safety Code§25249.5 et seq.("**Proposition 65**"),based on the failure to provide a clear and reasonable health hazard warning in connection with the sale or use of the products,listed below,in the State of California.The Notice Recipient is hereby given notice it violated and continues to violate Proposition 65 with respect to the warning requirement,codified at California's Health & Safety Code§25249.6:"No person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the State to cause cancer or reproductive toxicity without first giving a clear and reasonable warning to such individual." Without proper warnings about the toxic effects of exposures to listed chemicals,citizens in California lack the information necessary to make an informed decision as to whether or how to eliminate or reduce their risk of exposure from the reasonably foreseeable use of products containing listed chemicals.

II. <u>NATURE OF ALLEGED VIOLATIONS</u>

Product Types/Categories: The specific types or categories of products that are causing consumer exposures in violation of Proposition 65, and that are covered by this Notice, are brass hose splitter Identified below is a specific example of Covered Products recently purchased and witnessed as being available for purchase or use in California (the "Exemplar Product"). Based on publicly available information, the retailers, distributors, and/or manufacturers of the Exemplar Product is also provided. The Exemplar Product is identified for the Notice Recipients' benefit to assist in their investigation of the allegations set forth in this Notice. The Exemplar Product is not meant to be an exhaustive or comprehensive identification of each specific offending product falling within the specific types or categories of Covered Products at issue in this Notice. It is the private enforcer' s position that the Notice Recipients are obligated to conduct a good-faith investigation into other specific products falling within the type or category of Covered Products that have been manufactured, imported, distributed, sold, shipped, stored, or are otherwise within the Notice Recipients' custody or control, so as to ensure the requisite toxic warnings were and are provided to California citizens prior to purchase.

Exemplar Product (ASIN)	Violators
B07T2QKGSF	 Manufacturer/Distributor:Shenzhen Jiasiman Trading Co., Ltd. Retailer:.Amazon.com Services, LLC(www.amazon.com)

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 2 has heightened regulatory responsibilities beyond 27 CCR §25600.2(d) especially if the Violator 2 is also an importer or fulfills additional upstream roles in the commercial marketplace.

Listed Chemical.The chemical that is the subject of this Notice is the heavy metal,Lead.The State of California listed Lead as a chemical known to cause developmental toxicity,male reproductive toxicity,and female reproductive toxicity on February 27, 1987,and as a chemical known to cause cancer on October 1, 1992.

Routes of Exposure. The exposures subject to this Notice result from the purchase, acquisition and handling of Products containing Lead. Exposures occur when individuals, including Children and women of childbearing age, handle, touch or otherwise utilize brass hose splitter containing Lead in accordance with the Products' reasonably foreseeable and intended uses, resulting in exposures through ingestion and dermal absorption. Individuals ingest Lead when they touch or handle the Products or intermediary objects, transferring the chemical from their fingers or hands to their mouths. Dermal absorption of Lead occurs when individuals handle, touch, or utilize the Products.

Violations and Time Period of Exposure.

The violations have been occurring as far back as June 15,2019 and are continuing to this day

III. <u>RESOLUTION OF NOTICED CLAIMS</u>

Based on the allegations set forth in this Notice, I intend to file a citizen enforcement lawsuit against the alleged Violator unless such Violator enters into a binding written agreement 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 sold in the future or, preferably, reformulate such Products to eliminate the Lead exposures (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 penalty based on the factors enumerated in California Health & Safety Code §25249.7(b). If the alleged Violator is particularly interested in resolving this dispute without

resorting to time-consuming and costly litigation, please feel free to contact Anthony identified in Section V.

It should be noted Anthony cannot: (1) finalize any settlement until after the expiration of the 60-day Notice period; or (2) speak for the California Attorney General or any District or City in receipt of this Notice. Therefore, while reaching an agreement with Anthony will satisfy its claims, the agreement may not satisfy any public prosecutors.

IV. GENERAL INFORMATION AND SUMMARY OF PROPOSITION 65

A copy of a summary of Proposition 65's provisions, prepared by the Office of Environmental Health Hazard Assessment("OEHHA") is enclosed with the copy of the Notice served on the Notice Recipient for its reference. For further general information concerning Proposition 65, contact OEHHA's Proposition 65 Implementation Office at (916)445-6900.

V. <u>CONTACT INFORMATION</u>

Please direct all questions, issues or communications regarding this 60-Day Notice of Violation and its potential resolution to Anthony at the following Address:

Represented private enforcer's contact information: Anthony 137 Bosal St Irvine, CA 92618 Email:eva.kensington2012@gmail.com

Attachments:

-60-DAY NOTICE OF VIOLATION OF CALIFORNIA HEALTH&SAFETY CODE§25249.7(d) (PROPOSITION 65)

-PROOF OF SERVICE

-APPENDIX A: THE SAFE WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY; OEHHA/CAL EPA (only sent to the Violator(s)); -CERTIFICATE OF MERIT(Attorney General Copy); Factual information sufficient to establish basis of the certificate of merit (only sent to Attorney General)

CERTIFICATE OF MERIT Health and Safety Code§25249.7(d)

Re:Anthony's Notice of Proposition 65 Violations I, Anthony, hereby declare: 1.This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged the party identified in the notice violated Health &Safety Code §25249.6 by failing to provide clear and reasonable warnings.

2.I am 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 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, including the information identified in Health &Safety Code§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:January 14,2025

I, the undersigned, declare under penalty of perjury: I am over the age of 18 years of age and not a party to this case.

On January 14, 2025, I caused to be served the following:

60-DAY NOTICE OF VIOLATION SENT IN COMPLIANCE WITH HEALTH&SAFETY CODE§25249.7(d); APPENDIXA:THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF1986(PROPOSITION 65):A SUMMARY;and CERTIFICATE OF MERIT

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

Representative: CEO Shenzhen Jiasiman Trading Co., Ltd. Building 3, 6th Floor, Room 612, Jinhua Industrial Area, Longgang District, Shenzhen, Guangdong, 518000, China

Andy Jassy, CEO Amazon.com Services, LLC c/o CSC - Lawyers Incorporating Service, Agent 2710 Gateway Oaks Drive Sacramento, CA 95833.

And by providing electronic copies to the addressees listed on the following page, as well as by sending hard copies to the District Attorney for each of the remaining counties and The City Attorney for Los Angeles, San Jose, and Sacramento.

I swear under penalty of perjury under the law of the State of California the foregoing is true and correct.

Executed on 01/14/25, at Sebastopol, California.

The Attorney General of the State of California: Electronic upload via the Attorney General website

Alameda County-Nancy O'Malley, District Attorney: CEPDProp65@acgov.org Calaveras County-Barbara Yook, District Attorney: Prop65Env@co.calaveras.ca.us Contra Costa County- Stacey Grassini, Deputy District Attorney: sgrassini@contracostada.org Fresno County-Lisa A. Smittcamp-District Attorney: consumerprotection@fresnocountyca.gov Inyo County-Thomas Hardy, District Attorney: inyoda@inyocounty.us Lassen County-Michelle Latimer, program Coordinator: mlatimer@co.lassen.ca.us Mariposa County-Walter Wall, District Attorney: mcda@mariposacounty.org Merced County-Kimberly Lewis, District Attorney: Prop65@countyofmerced.com Monterey County-Janine M. Pacioni, District Attorney: Prop65DA@co.monterey.ca.us Napa County-Allison Haley, District Attorney: CEPD@countyofnapa.org Nevada County-Clifford H. Newell, District Attorney: DA.Prop65@co.nevada.ca.us Placer County-Morgan Briggs Gire, District Attorney: prop65@placer.ca.gov Plumas County-David Hollister, District Attorney: davidhollister@countyofplumas.com Riverside County-Paul E. Zellerbach, District Attorney: Prop65@rivcoda.org Sacramento County-Anne Schubert, District Attorney: Prop65@sacda.org San Diego County-Summer Stephan, District Attorney: SanDiegoDAProp65@sdcda.org San Diego City-Mark Ankcorn, Deputy City Attorney: CityAttyProp65@sandiego.gov San Francisco County-Alexandra Grayner, Asst. District Attorney: alexandra.grayner@sfgov.org San Francisco City-Valerie Lopez, Deputy City Attorney: Starla.Sousa@sfcityatty.org San Joaquin County-Tori Verber Salazar, District Attorney: DAConsumer.Environmental@sjcda.org San Luis Obispo County-Eric Dobroth, Deputy District Attorney: edobroth@co.slo.ca.us Santa Barbara County-Christopher Dalbey, Deputy District Attorney: DAProp65@co.santabarbara.ca.us

Santa Clara County-Bud Porter, Deputy District Attorney: EPU@da.sccgov.org Santa Clara City-Nora Frimann, City Attorney: Proposition65notices@sanjoseca.gov Santa Cruz County-Jeffrey Rosell, District Attorney: Prop65DA@santacruzcounty.us Sonoma County-Jill Ravitch, District Attorney: Jeannie.Barnes@sonoma-county.org Tulare County-Phillip J. Cline, District Attorney: Prop65@co.tulare.ca.us Ventura County-Gregory Trotten, District Attorney: daspecialops@ventura.org Yolo County-Jeff W. Reisig, District Attorney: cfepd@yolocounty.org

Public Agency USPS Mail Service List

District Attorney, Alpine County Attn: Prop. 65 Enforcement P.O. Box 248 Markleeville, CA 96120

District Attorney, Amador County Attn: Prop. 65 Enforcement 708 Court Street, #202 Jackson, CA 95642

District Attorney, Butte County Attn: Prop. 65 Enforcement 25 County Center Drive Oroville, CA 95965

District Attorney, Colusa County Attn: Prop. 65 Enforcement 547 Market Street Colusa, CA 95932

District Attorney, Del Norte County Attn: Prop. 65 Enforcement 450 H Street, Ste. 171 Crescent City, CA 95531

District Attorney, El Dorado County Attn: Prop. 65 Enforcement 515 Main Street Placerville, CA 95667

District Attorney, Glenn County Attn: Prop. 65 Enforcement Post Office Box 430 Willows, CA 95988

District Attorney, Humboldt County Attn: Prop. 65 Enforcement 825 5th Street Eureka, CA 95501 District Attorney, Imperial County Attn: Prop. 65 Enforcement 939 West Main Street El Centro, CA 92243 Post Office Box 617 Bridgeport, CA 93517 District Attorney, Orange County Attn: Prop. 65 Enforcement 401 Civic Center Drive West Santa Ana, CA 92701

District Attorney, San Benito County Attn: Prop. 65 Enforcement 419 Fourth Street, 2nd Floor Hollister, CA 95023

District Attorney, San Bernardino Co. Attn: Prop. 65 Enforcement 316 N. Mountain View Avenue San Bernardino, CA 92415-0004

District Attorney, San Mateo County Attn: Prop. 65 Enforcement 400 County Ctr., 3rd Floor Redwood City, CA 94063

District Attorney, Sutter County Attn: Prop. 65 Enforcement 446 Second Street Yuba City, CA 95991

District Attorney, Santa Cruz County Attn: Prop. 65 Enforcement 701 Ocean Street, Room 200 Santa Cruz, CA 95060

District Attorney, Shasta County Attn: Prop. 65 Enforcement 1525 Court Street, Third Floor Redding, CA 96001-1632

District Attorney, Sierra County Attn: Prop. 65 Enforcement Courthouse, Post Office Box 457 Downieville, CA 95936 District Attorney, Kern County Attn: Prop. 65 Enforcement 1215 Truxtun Avenue Bakersfield, CA 93301

District Attorney, Mono County Attn: Prop. 65 Enforcement

District Attorney, Lake County Attn: Prop. 65 Enforcement 255 N. Forbes Street Lakeport, CA 95453

District Attorney, Los Angeles County Attn: Prop. 65 Enforcement 210 West Temple Street, Rm 345 Los Angeles, CA 90012

District Attorney, Madera County Attn: Prop. 65 Enforcement 209 West Yosemite Avenue Madera, CA 93637

District Attorney, Marin County Attn: Prop. 65 Enforcement 3501 Civic Center, Room 183 San Rafael, CA 94903

District Attorney, Mendocino County Attn: Prop. 65 Enforcement Post Office Box 1000 Ukiah, CA 95482

District Attorney, Modoc County Attn: Prop. 65 Enforcement 204 S Court Street Alturas, CA 96101-4020

District Attorney, Solano County Attn: Prop. 65 Enforcement District Attorney, Siskiyou County Attn: Prop. 65 Enforcement Post Office Box 986 Yreka, CA 96097

District Attorney, Kings County Attn: Prop. 65 Enforcement 1400 West Lacey Boulevard Hanford, CA 93230

600 Union Avenue Fairfield, CA 94533

District Attorney, Stanislaus County Attn: Prop. 65 Enforcement 800 11th Street, Room 200 Modesto, CA 95353

District Attorney, Tehama County Attn: Prop. 65 Enforcement Post Office Box 519 Red Bluff, CA 96080

District Attorney, Trinity County Attn: Prop. 65 Enforcement Post Office Box 310 Weaverville, CA 96093

District Attorney, Tuolumne County Attn: Prop. 65 Enforcement 2 South Green Sonora, CA 95370

District Attorney, Yuba County Attn: Prop. 65 Enforcement 215 Fifth Street Marysville, CA 95901

Los Angeles City Attorney's Office Attn: Prop. 65 Enforcement 200 N. Main Street, Suite 1800 Los Angeles, CA 90012