

60-DAY NOTICE OF VIOLATION

OF CALIFORNIA HEALTH&SAFETY CODE§25249.7(d) (PROPOSITION 65)

Date: January 31,2025

TO:

Andy Jassy, CEO Amazon.com Services, LLC c/o CSC - Lawyers Incorporating Service, Agent 2710 Gateway Oaks Drive Sacramento, CA 95833	CEO Mountain Org LLC 3422 Old Capitol Trail Suite 150, WILMINGTON, DE, 19808
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From: Anthony Jiang

I. INTRODUCTION

Anthony Jiang is a California citizen acting in the public interest pursuant to California Health & Safety Code§25249.7(d).Anthony Jiang 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 Jiang 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. NATURE OF ALLEGED VIOLATIONS

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
B089QDL2N6	1.Manufacturer/Distributor:Mountain Org LLC 2.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 2018-05-09 and are continuing to this day

III. 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 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 Jiang identified in Section V.

It should be noted Anthony Jiang 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 Jiang 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. CONTACT INFORMATION

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

Represented private enforcer's contact information:
Anthony Jiang
Address: 137 Bosal St Irvine, CA 92618
Email: eva.kensington2012@gmail.com
Telephone: (949) 372-8828

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 Jiang's Notice of Proposition 65 Violations I, Anthony Jiang, 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 31, 2025

Anthony Jiang

PROOF OF SERVICE

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 31, 2025, I caused to be served the following:

**60-DAY NOTICE OF VIOLATION SENT IN COMPLIANCE
WITH HEALTH & SAFETY CODE §25249.7(d);
APPENDIX A: THE SAFE DRINKING WATER AND TOXIC
ENFORCEMENT ACT OF 1986 (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 Mountain Org LLC , 3422 Old Capitol Trail, Suite 150, WILMINGTON, DE, 19808.

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 01/31/25, at Sebastopol, California.

Cheuk Kwan Li

ELECTRONIC MAIL SERVICE LIST

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@sdca.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.santa-barbara.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