



Law Office of Francis J. Flynn, Jr., Esq.

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Notice of Violation

California Safe Drinking Water and Toxic Enforcement Act
California Health & Safety Code Section 25249.5 et seq. (Proposition 65)

This Notice of Violation (the “Notice”) is provided pursuant to California Health & Safety Code Section 25249.7(d). The noticing party hereby provides this Notice to the Attorney General and all appropriate public enforcement agencies. This Notice is provided by Sarah Hale, a private California citizen. All contact with the noticing party should be directed to her attorney at the above-listed information.

Description of Violation:

- (1) The names and address of the violators are identified on the attached Exhibit 1.
- (2) The violations have been occurring since at least December 29, 2024 and are continuing to this day.
- (3) This Notice covers the exposure/warning provision of Proposition 65.
- (4) The names of the listed chemical involved in these violations are Bisphenol S (“BPS”) and/or Bisphenol A (“BPA”). Exposures to BPS and BPA occur from dermal contact, absorption by physical contact and incidental ingestion with the products identified in this Notice.
- (5) The specific products and product types causing these violations are thermal receipt paper.
- (6) This Notice addresses consumer exposures to BPS and BPA. Use of the products identified in this Notice results in human exposures to BPS and BPA. Thermal receipt paper is treated with a surface coating of BPS and/or BPA. The routes of exposure for the violations are dermal absorption directly through the skin when consumers touch or handle the products, and ingestion via hand-to-mouth contact after consumers touch or handle the products. Exposure to BPS and BPA can lead to endocrine disruption, impaired thyroid function and negative reproductive effects. No clear and reasonable Proposition 65 warning is provided with these products regarding the presence of BPS and/or BPA in the products. The noticing party has tested the identified products and confirm the contain BPS and/or BPA at levels above the MADL.

Resolution of Noticed Claims:

Based on the allegations set forth in this Notice, the noticing party intends to file a citizen enforcement lawsuit against the alleged violators unless such violators agree in a binding written instrument to: (1) provide clear and reasonable warnings for products sold or otherwise provided to consumers in the future or reformulate such products to eliminate BPS and BPA exposures; and (2) pay an appropriate civil penalty pursuant to Health & Safety Code §25249.7(b). If the violators wish to resolve this matter they can contact the noticing attorney via email and the telephone number listed above. It should be noted that the noticing party cannot finalize any

settlement until after the 60-day notice period has expired; nor (2) speak for the Attorney General or any District or City Attorney who received the 60-day notice.

Preservation of Relevant Evidence:

This Notice also serves as a demand that the alleged violators preserve and maintain all relevant evidence, including electronic documents and data, pending resolution of this matter. Such relevant evidence includes but is not limited to all documents relating to the presence or potential presence of BPS and BPA in thermal receipt paper; purchase and usage information for such products; efforts to comply with Proposition 65 with respect to such products; communications with any person relating to the presence or potential presence of BPS and BPA in such products; and representative exemplars of any such products provided to customers or consumers by the alleged violator in the year preceding this Notice through the date of any trial of the claims alleged in this Notice.

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

I, Francis “Casey” Flynn, 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 & Safety Code §25249.6 by failing to provide clear and reasonable warnings.
2. I am an attorney with the Law Office of Francis J. Flynn, and I represent the noticing party, Sarah Hale.
3. Members of my firm and/or I have consulted with one or more persons with relevant and appropriate experience or expertise who have reviewed facts, studies, or other data regarding the exposures to the listed chemical that are the subject of the action.
4. Based on the information obtained through these consultations, and on other information in my possession, I believe there is a reasonable and meritorious case for this 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 violators will be able to establish any of the affirmative defenses set forth in the statute.
5. The copy of the 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.

October 28, 2025

Casey Flynn

Francis “Casey” Flynn

EXHIBIT 1

Names and Addresses of Responsible Parties	Non-Exclusive Examples of the Products	Description of Prop 65 Chemical
Matthew J. Reintjes or current CEO President and CEO YETI Holdings, Inc.; YETI Coolers, LLC d/b/a Yeti 7601 Southwest Parkway Austin, TX 78735	Yeti Thermal Receipt 1915 Calle Barcelona Ste 135 Carlsbad, CA 92009 (obtained September 10, 2025)	Contains BPS
Severine Merle or current CEO Celine S.A.; Celine, Inc.; Celine US d/b/a Celine 598 Madison Avenue 5 th Floor New York, NY 10022	Celine Thermal Receipt 3333 Bristol St. Suite 2240 Costa Mesa, CA 92626 (obtained September 18, 2025)	Contains BPS
Costanzo Ruocco or current CEO Gianvito Rossi, S.r.l; GGR East Coast, LLC d/b/a Gianvito Rossi 460 Broome Street Fifth Floor New York, NY 10013	Gianvito Rossi Thermal Receipt 3333 Bristol St. Suite 2213 Costa Mesa, CA 92626 (obtained September 18, 2025)	Contains BPA
Riccardo Broggi or current CEO Max Mara USA, Inc. d/b/a Max Mara 555 Madison Avenue 10 th Floor New York, NY 10022	Max Mara Thermal Receipt 3333 Bristol St. Suite 1407 Costa Mesa, CA 92626 (obtained September 18, 2025)	Contains BPS
Remo Ruffini or current CEO Moncler S.p.A.; Moncler USA, Inc. d/b/a Moncler 200 LaFayette Street 2 nd Floor New York, NY 10012	Moncler Thermal Receipt 3333 Bristol St. Suite 2648 Costa Mesa, CA 92626 (obtained September 18, 2025)	Contains BPA
Jim Harris or current CEO Olukai Retail, LLC; Olukai, LLC d/b/a Olukai 10 Faraday Drive Irvine, CA 92618	Olukai Thermal Receipt 4525 La Jolla Village Dr San Diego, CA 92122 (obtained September 21, 2025)	Contains BPA
Paige Adams-Geller or current CEO Paige, LLC d/b/a Paige 10119 Jefferson Blvd. Culver City, CA 90232	Paige Thermal Receipt 4307 La Jolla Village Dr San Diego, CA 92122 (obtained September 21, 2025)	Contains BPA
Philipp Navratil or current CEO Nespresso USA, Inc. d/b/a Nespresso 111 W. 33 rd Street 5 th Floor New York, NY 10120	Nespresso Thermal Receipt 4545 La Jolla Village Dr San Diego, CA 92122 (obtained September 21, 2025)	Contains BPA
Megan MacIntyre or current CEO Ragz Enterprises, Inc. d/b/a Ragz 1407 Minnesota Avenue Oceanside, CA 92054	Ragz Thermal Receipt 2928 State Street Carlsbad, CA 92008 (obtained September 20, 2025)	Contains BPS

Current CEO or President Jayden P Boutique d/b/a Jayden P 2946 State Street Carlsbad, CA 92008	Jayden P Thermal Receipt 2946 State Street Carlsbad, CA 92008 (obtained September 20, 2025)	Contains BPA
John Resnick or current CEO Wildland 2598 State Street Carlsbad, CA 92008	Wildland Thermal Receipt 2598 State Street Carlsbad, CA 92008 (obtained September 20, 2025)	Contains BPS
Todd Kahn or current CEO Tapestry, Inc. d/b/a Coach 10 Hudson Yards New York, NY 10001	Coach Thermal Receipt 5630 Paseo del Norte Carlsbad, CA 92008 (obtained September 26, 2025)	Contains BPS
Thomas Ripley or current CEO Hat World, Inc. d/b/a Lids 7676 Interactive Way Suite 300 Indianapolis, IN 46278	Lids Thermal Receipt 5620 Paseo del Norte Carlsbad, CA 92008 (obtained September 26, 2025)	Contains BPS
Richard Dickson or current CEO Gap, Inc. d/b/a Banana Republic 2 Folsom Street San Francisco, CA 94105	Banana Republic Thermal Receipt 5610 Paseo del Norte Carlsbad, CA 92008 (obtained September 26, 2025)	Contains BPS
Alexis Nasard or current CEO D. Swarovski KG; Swarovski Digital Business USA, Inc. d/b/a Swarovski 50 Sharpe Drive Cranston, RI 02920	Swarovski Thermal Receipt 5600 Paseo del Norte Carlsbad, CA 92008 (obtained September 26, 2025)	Contains BPS
Current CEO or President Solaris Eyewear, LLC d/b/a Solaris 4629 Cass Street Suite 50 San Diego, CA 92109	Solaris Thermal Receipt 5600 Paseo del Norte Carlsbad, CA 92008	Contains BPS
Eric Marechalle or current CEO Marc Jacobs International, LLC d/b/a Marc Jacobs 350 Mission Street 2 nd Floor San Francisco, CA 94105	Marc Jacobs Thermal Receipt 5630 Paseo del Norte Carlsbad, CA 92008 (obtained September 26, 2025)	Contains BPS
Oscar Feldenkreis or current CEO Perry Ellis International, Inc. d/b/a Perry Ellis 3000 NW 107 th Avenue Miami, FL 33172	Perry Ellis Thermal Receipt 5600 Paseo del Norte Carlsbad, CA 92008 (obtained September 26, 2025)	Contains BPS
Brendan Hoffman or current CEO Vince Holding Corp. d/b/a Vince 500 Fifth Avenue 20 th Floor New York, NY 10110	Vince Thermal Receipt 5610 Paseo del Norte Space B113 Carlsbad, CA 92008 (obtained September 26, 2025)	Contains BPS
Morris Goldfarb or current CEO G-III Apparel Group, Ltd. d/b/a Karl Lagerfeld 512 7 th Avenue New York, NY 10018	Karl Lagerfeld Paris Thermal Receipt 5630 Paseo del Norte Ste D127 Carlsbad, CA 92008 (obtained September 26, 2025)	Contains BPS

Andrew Rees or current CEO Crocs, Inc. d/b/a Crocs 500 Eldorado Blvd. Building 5 Broomfield, CO 80021	Crocs Thermal Receipt 5630 Paseo del Norte Carlsbad, CA 92008 (obtained September 26, 2025)	Contains BPS
Pierre-Yves Roussel or current CEO Tory Burch, LLC d/b/a Tory Burch 11 West 19 th Street 7 th Floor New York, NY 10011	Tory Burch Thermal Receipt 5510 Paseo del Norte Suite B112 Carlsbad, CA 92008 (obtained September 26, 2025)	Contains BPS
Gary Muto or current CEO Ann, Inc. d/b/a Ann Taylor 7 Times Square Floor 15 New York, NY 10036	Ann Taylor Thermal Receipt 5620 Paseo del Norte Space C112 Carlsbad, CA 92008 (obtained September 26, 2025)	Contains BPS
Leonardo Ferragamo or current CEO Salvatore Ferragamo S.p.A.; Ferragamo USA, Inc. d/b/a Ferragamo 663 5 th Avenue New York, NY 10022	Ferragamo Thermal Receipt 5620 Paseo del Norte Ste C115 Carlsbad, CA 92008 (obtained September 26, 2025)	Contains BPS
Nate Checketts or current CEO Rhone, Inc. d/b/a Rhone 484 Pacific Street Stamford, CT 06902	Rhone Thermal Receipt 5630 Paseo del Norte Ste D120 Carlsbad, CA 92008 (obtained September 26, 2025)	Contains BPS
Andrew Rosen or current CEO Rag & Bone Industries, LLC d/b/a Rag & Bone 425 W 13 th Street 6 th Floor New York, NY 10014	Rag & Bone Thermal Receipt 5600 Paseo del Norte Carlsbad, CA 92008 (obtained September 26, 2025)	Contains BPS
Patrick Valeo or current CEO Diesel U.S.A., Inc. d/b/a Diesel 220 West 19 th Street New York, NY 10011	Diesel Thermal Receipt 48400 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Riccardo Bellini or current CEO Valentino S.p.A.; Valentino USA, Inc. d/b/a Valentino 11 W. 42 nd Street 26 th Floor New York, NY 10036	Valentino Thermal Receipt 48650 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Patrick Elfassy or current CEO APP Group, Inc. d/b/a Mackage 210 Eleventh Avenue Suite 100-10002 STE 100 New York City, NY 10001	Mackage Thermal Receipt 48400 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
J. Dean Loring or current CEO Burger Lounge of America, LLC d/b/a Burger Lounge 1917 India Street Suite C San Diego, CA 92101	Burger Lounge Thermal Receipt 961 Palomar Airport Rd Carlsbad, CA 92011 (obtained September 29, 2025)	Contains BPS

Emilie Rubinfeld or current CEO PUIG; Carolina Herrera, Ltd d/b/a Carolina Herrera 501 Seventh Street 17 th Floor New York, NY 10018	CH Carolina Herrera Thermal Receipt 48400 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Laura Dubin Wandor or current CEO Margiela USA, Inc. d/b/a Maison Margiela 220 West 19 th Street New York, NY 10011	Maison Margiela Thermal Receipt 48400 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Morris Goldfarb or current CEO G-III Apparel Group, Ltd. d/b/a Vilebrequin 512 7 th Avenue New York, NY 10018	Vilebrequin Thermal Receipt 48650 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Joe Dudy or current CEO Wilson Sporting Goods Co. d/b/a Wilson 1 Prudential Plaza 130 E. Randolph Street Suite 600 Chicago, IL 60601	Wilson Thermal Receipt 48400 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Jessica A. Yocum or current CEO John Varvatos Enterprises, Inc.; JV Asset Holdco, LLC d/b/a John Varvatos 134 Spring Street Suite 502 New York, NY 10012	John Varvatos Thermal Receipt 48400 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Richard Naranjo or current President Alexander McQueen Trading America, Inc. 1 Union Square West 6 th Floor New York, NY 10003	McQueen Thermal Receipt 48400 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Hannah Coleman or current CEO J. Choo Limited; J. Choo USA, Inc. d/b/a Jimmy Choo 11 W. 42 nd Street Floor 27 New York, NY 10036	Jimmy Choo Thermal Receipt 48650 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Andy Lew or current CEO St. John Knits, Inc. d/b/a St. John 5515 E. La Palma Avenue Suite 100 Anaheim, CA 92807	St. John Thermal Receipt 48650 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Jeffrey Abrams or current CEO Rails International, LLC d/b/a Rails 2301 East 51 st Street Vernon, CA 90058	Rails Thermal Receipt 48400 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS

<p>Adrian Ward-Rees or current CEO Atelier Luxury Group LLC d/b/a Amiri 1330 Channing Street Los Angeles, CA 90021</p>	<p>Amiri Thermal Receipt 48650 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)</p>	<p>Contains BPS</p>
<p>Current CEO or President Ricco's Michelaguas 48400 Seminole Drive Cabazon, CA 92230</p>	<p>Ricco's Michelaguas Thermal Receipt 48400 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)</p>	<p>Contains BPS</p>
<p>Karin McLennan or current President Zimmerman (USA), Inc. d/b/a Zimmerman 601 West 26th Street Suite 810 New York, NY 10001</p>	<p>Zimmerman Thermal Receipt 48400 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)</p>	<p>Contains BPS</p>

APPENDIX A

OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

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

The following summary has been prepared by the California Office of Environmental Health Hazard Assessment (OEHHA), the lead agency for the implementation of the Safe Drinking Water and Toxic Enforcement Act of 1986 (commonly known as “Proposition 65”). A copy of this summary must be included as an attachment to any notice of violation served upon an alleged violator of the Act. The summary provides basic information about the provisions of the law, and is intended to serve only as a convenient source of general information. It is not intended to provide authoritative guidance on the meaning or application of the law. The reader is directed to the statute and OEHHA implementing regulations (see citations below) for further information.

FOR INFORMATION CONCERNING THE BASIS FOR THE ALLEGATIONS IN THE NOTICE RELATED TO YOUR BUSINESS, CONTACT THE PERSON IDENTIFIED ON THE NOTICE.

The text of Proposition 65 (Health and Safety Code Sections 25249.5 through 25249.13) is available online at: <http://oehha.ca.gov/prop65/law/P65law72003.html>. Regulations that provide more specific guidance on compliance, and that specify procedures to be followed by the State in carrying out certain aspects of the law, are found in Title 27 of the California Code of Regulations, sections 25102 through 27001.¹ These implementing regulations are available online at: <http://oehha.ca.gov/prop65/law/P65Regs.html>.

WHAT DOES PROPOSITION 65 REQUIRE?

The “Proposition 65 List.” Under Proposition 65, the lead agency (OEHHA) publishes a list of chemicals that are known to the State of California to cause cancer and/or reproductive toxicity. Chemicals are placed on the Proposition 65 list if they are known to cause cancer and/or birth defects or other reproductive harm, such as damage to female or male reproductive systems or to the developing fetus. This list must be updated at least once a year. The current Proposition 65 list of chemicals is available on the OEHHA website at: http://www.oehha.ca.gov/prop65/prop65_list/Newlist.html.

Only those chemicals that are on the list are regulated under Proposition 65. Businesses that produce, use, release or otherwise engage in activities involving listed chemicals must comply with the following:

Clear and reasonable warnings. A business is required to warn a person before “knowingly and intentionally” exposing that person to a listed chemical unless an exemption applies. The

¹ All further regulatory references are to sections of Title 27 of the California Code of Regulations unless otherwise indicated. The statute, regulations and relevant case law are available on the OEHHA website at: <http://www.oehha.ca.gov/prop65/law/index.html>.

warning given must be “clear and reasonable.” This means that the warning must: (1) clearly make known that the chemical involved is known to cause cancer, or birth defects or other reproductive harm; and (2) be given in such a way that it will effectively reach the person before he or she is exposed to that chemical. Some exposures are exempt from the warning requirement under certain circumstances discussed below.

Prohibition from discharges into drinking water. A business must not knowingly discharge or release a listed chemical into water or onto land where it passes or probably will pass into a source of drinking water. Some discharges are exempt from this requirement under certain circumstances discussed below.

DOES PROPOSITION 65 PROVIDE ANY EXEMPTIONS?

Yes. You should consult the current version of the statute and regulations (<http://www.oehha.ca.gov/prop65/law/index.html>) to determine all applicable exemptions, the most common of which are the following:

Grace Period. Proposition 65 warning requirements do not apply until 12 months after the chemical has been listed. The Proposition 65 discharge prohibition does not apply to a discharge or release of a chemical that takes place less than 20 months after the listing of the chemical.

Governmental agencies and public water utilities. All agencies of the federal, state or local government, as well as entities operating public water systems, are exempt.

Businesses with nine or fewer employees. Neither the warning requirement nor the discharge prohibition applies to a business that employs a total of nine or fewer employees. This includes all employees, not just those present in California.

Exposures that pose no significant risk of cancer. For chemicals that are listed under Proposition 65 as known to the State to cause cancer, a warning is not required if the business causing the exposure can demonstrate that the exposure occurs at a level that poses “no significant risk.” This means that the exposure is calculated to result in not more than one excess case of cancer in 100,000 individuals exposed over a 70-year lifetime. The Proposition 65 regulations identify specific “No Significant Risk Levels” (NSRLs) for many listed carcinogens. Exposures below these levels are exempt from the warning requirement. See OEHHA's website at: <http://www.oehha.ca.gov/prop65/getNSRLs.html> for a list of NSRLs, and Section 25701 et seq. of the regulations for information concerning how these levels are calculated.

Exposures that will produce no observable reproductive effect at 1,000 times the level in question. For chemicals known to the State to cause reproductive toxicity, a warning is not required if the business causing the exposure can demonstrate that the exposure will produce no observable effect, even at 1,000 times the level in question. In other words, the level of exposure must be below the “no observable effect level” divided by 1,000. This number is known as the Maximum Allowable Dose Level (MADL). See OEHHA's website at: <http://www.oehha.ca.gov/prop65/getNSRLs.html> for a list of MADLs, and Section 25801 et seq. of the regulations for information concerning how these levels are calculated.

Exposures to Naturally Occurring Chemicals in Food. Certain exposures to chemicals that naturally occur in foods (i.e., that do not result from any known human activity, including activity by someone other than the person causing the exposure) are exempt from the warning requirements of the law. If the chemical is a contaminant² it must be reduced to the lowest level feasible. Regulations explaining this exemption can be found in Section 25501.

Discharges that do not result in a “significant amount” of the listed chemical entering any source of drinking water. The prohibition from discharges into drinking water does not apply if the discharger is able to demonstrate that a “significant amount” of the listed chemical has not, does not, or will not pass into or probably pass into a source of drinking water, and that the discharge complies with all other applicable laws, regulations, permits, requirements, or orders. A “significant amount” means any detectable amount, except an amount that would meet the “no significant risk” level for chemicals that cause cancer or that is 1,000 times below the “no observable effect” level for chemicals that cause reproductive toxicity, if an individual were exposed to that amount in drinking water.

HOW IS PROPOSITION 65 ENFORCED?

Enforcement is carried out through civil lawsuits. These lawsuits may be brought by the Attorney General, any district attorney, or certain city attorneys. Lawsuits may also be brought by private parties acting in the public interest, but only after providing notice of the alleged violation to the Attorney General, the appropriate district attorney and city attorney, and the business accused of the violation. The notice must provide adequate information to allow the recipient to assess the nature of the alleged violation. The notice must comply with the information and procedural requirements specified in Section 25903 of Title 27 and sections 3100-3103 of Title 11. A private party may not pursue an independent enforcement action under Proposition 65 if one of the governmental officials noted above initiates an enforcement action within sixty days of the notice.

A business found to be in violation of Proposition 65 is subject to civil penalties of up to \$2,500 per day for each violation. In addition, the business may be ordered by a court to stop committing the violation.

A private party may not file an enforcement action based on certain exposures if the alleged violator meets specific conditions. For the following types of exposures, the Act provides an opportunity for the business to correct the alleged violation:

- An exposure to alcoholic beverages that are consumed on the alleged violator's premises to the extent onsite consumption is permitted by law;
- An exposure to a Proposition 65 listed chemical in a food or beverage prepared and sold on the alleged violator's premises that is primarily intended for immediate consumption on- or off-premises. This only applies if the chemical was not intentionally added to the food, and was formed by cooking or similar

² See Section 25501(a)(4).

preparation of food or beverage components necessary to render the food or beverage palatable or to avoid microbiological contamination;

- An exposure to environmental tobacco smoke caused by entry of persons (other than employees) on premises owned or operated by the alleged violator where smoking is permitted at any location on the premises;
- An exposure to listed chemicals in engine exhaust, to the extent the exposure occurs inside a facility owned or operated by the alleged violator and primarily intended for parking non-commercial vehicles.

If a private party alleges that a violation occurred based on one of the exposures described above, the private party must first provide the alleged violator a notice of special compliance procedure and proof of compliance form.

A copy of the notice of special compliance procedure and proof of compliance form is included in Appendix B and can be downloaded from OEHHA's website at:

<http://oehha.ca.gov/prop65/law/p65law72003.html>.

FOR FURTHER INFORMATION ABOUT THE LAW OR REGULATIONS...

Contact the Office of Environmental Health Hazard Assessment's Proposition 65 Implementation Office at (916) 445-6900 or via e-mail at P65Public.Comments@oehha.ca.gov.

Revised: May 2017

NOTE: Authority cited: Section 25249.12, Health and Safety Code. Reference: Sections 25249.5, 25249.6, 25249.7, 25249.9, 25249.10 and 25249.11, Health and Safety Code

CERTIFICATE OF SERVICE

I, David Bauman, declare that I am over the age of 18 years, and am not a party to the within action. I am a resident of the County of San Diego, California, where the mailing occurs; and my business address is 6057 Metropolitan Plz., Los Angeles, California 90036-3173.

On October 28, 2025, I served the following documents:

- (1) 60-DAY NOTICE OF VIOLATION SENT IN COMPLIANCE WITH HEALTH & SAFETY CODE SECTION 25249.7(d);
- (2) CERTIFICATE OF MERIT;
- (3) PROPOSITION 65: A SUMMARY; and
- (4) CERTIFICATE OF MERIT ATTACHMENT (served only on the Attorney General)

on the parties listed below by placing a true and correct copy thereof in a sealed envelope, addressed to each party and depositing it on October 28, 2025 with the U.S. Postal Service for delivery via certified mail the postage thereon fully prepaid:

Matthew J. Reintjes or current CEO President and CEO YETI Holdings, Inc.; YETI Coolers, LLC d/b/a Yeti 7601 Southwest Parkway Austin, TX 78735	Current CEO or President Solaris Eyewear, LLC d/b/a Solaris 4629 Cass Street Suite 50 San Diego, CA 92109	Emilie Rubinfeld or current CEO PUIG; Carolina Herrera, Ltd d/b/a Carolina Herrera 501 Seventh Street 17 th Floor New York, NY 10018
Severine Merle or current CEO Celine S.A.; Celine, Inc.; Celine US d/b/a Celine 598 Madison Avenue 5 th Floor New York, NY 10022	Eric Marechalle or current CEO Marc Jacobs International, LLC d/b/a Marc Jacobs 350 Mission Street 2 nd Floor San Francisco, CA 94105	Laura Dubin Wandor or current CEO Margiela USA, Inc. d/b/a Maison Margiela 220 West 19 th Street New York, NY 10011
Costanzo Ruocco or current CEO Gianvito Rossi, S.r.l; GGR East Coast, LLC d/b/a Gianvito Rossi 460 Broome Street Fifth Floor New York, NY 10013	Oscar Feldenkreis or current CEO Perry Ellis International, Inc. d/b/a Perry Ellis 3000 NW 107 th Avenue Miami, FL 33172	Morris Goldfarb or current CEO G-III Apparel Group, Ltd. d/b/a Vilebrequin 512 7 th Avenue New York, NY 10018
Riccardo Broggi or current CEO Max Mara USA, Inc. d/b/a Max Mara 555 Madison Avenue 10 th Floor New York, NY 10022	Brendan Hoffman or current CEO Vince Holding Corp. d/b/a Vince 500 Fifth Avenue 20 th Floor New York, NY 10110	Joe Dudy or current CEO Wilson Sporting Goods Co. d/b/a Wilson 1 Prudential Plaza 130 E. Randolph Street Suite 600 Chicago, IL 60601
Remo Ruffini or current CEO Moncler S.p.A.; Moncler USA, Inc. d/b/a Moncler 200 LaFayette Street 2 nd Floor New York, NY 10012	Morris Goldfarb or current CEO G-III Apparel Group, Ltd. d/b/a Karl Lagerfeld 512 7 th Avenue New York, NY 10018	Jessica A. Yocum or current CEO John Varvatos Enterprises, Inc.; JV Asset Holdco, LLC d/b/a John Varvatos 134 Spring Street Suite 502 New York, NY 10012
Jim Harris or current CEO Olukai Retail, LLC; Olukai, LLC d/b/a Olukai 10 Faraday Drive Irvine, CA 92618	Andrew Rees or current CEO Crocs, Inc. d/b/a Crocs 500 Eldorado Blvd. Building 5 Broomfield, CO 80021	Richard Naranjo or current President Alexander McQueen Trading America, Inc. 1 Union Square West 6 th Floor New York, NY 10003
Paige Adams-Geller or current CEO Paige, LLC d/b/a Paige 10119 Jefferson Blvd. Culver City, CA 90232	Pierre-Yves Roussel or current CEO Tory Burch, LLC d/b/a Tory Burch 11 West 19 th Street 7 th Floor New York, NY 10011	Hannah Coleman or current CEO J. Choo Limited; J. Choo USA, Inc. d/b/a Jimmy Choo 11 W. 42 nd Street Floor 27 New York, NY 10036
Philipp Navratil or current CEO Nespresso USA, Inc. d/b/a Nespresso 111 W. 33 rd Street 5 th Floor New York, NY 10120	Gary Muto or current CEO Ann, Inc. d/b/a Ann Taylor 7 Times Square Floor 15 New York, NY 10036	Andy Lew or current CEO St. John Knits, Inc. d/b/a St. John 5515 E. La Palma Avenue Suite 100 Anaheim, CA 92807
Megan MacIntyre or current CEO Ragz Enterprises, Inc. d/b/a Ragz 1407 Minnesota Avenue Oceanside, CA 92054	Leonardo Ferragamo or current CEO Salvatore Ferragamo S.p.A.; Ferragamo USA, Inc. d/b/a Ferragamo 663 5 th Avenue New York, NY 10022	Jeffrey Abrams or current CEO Rails International, LLC d/b/a Rails 2301 East 51 st Street Vernon, CA 90058

Current CEO or President Jayden P Boutique d/b/a Jayden P 2946 State Street Carlsbad, CA 92008	Nate Checketts or current CEO Rhone, Inc. d/b/a Rhone 484 Pacific Street Stamford, CT 06902	Adrian Ward-Rees or current CEO Atelier Luxury Group LLC d/b/a Amiri 1330 Channing Street Los Angeles, CA 90021
John Resnick or current CEO Wildland 2598 State Street Carlsbad, CA 92008	Andrew Rosen or current CEO Rag & Bone Industries, LLC d/b/a Rag & Bone 425 W 13 th Street 6 th Floor New York, NY 10014	Current CEO or President Ricco's Michelaguas 48400 Seminole Drive Cabazon, CA 92230
Todd Kahn or current CEO Tapestry, Inc. d/b/a Coach 10 Hudson Yards New York, NY 10001	Patrick Valeo or current CEO Diesel U.S.A., Inc. d/b/a Diesel 220 West 19 th Street New York, NY 10011	Karin McLennan or current President Zimmerman (USA), Inc. d/b/a Zimmerman 601 West 26 th Street Suite 810 New York, NY 10001
Thomas Ripley or current CEO Hat World, Inc. d/b/a Lids 7676 Interactive Way Suite 300 Indianapolis, IN 46278	Riccardo Bellini or current CEO Valentino S.p.A.; Valentino USA, Inc. d/b/a Valentino 11 W. 42 nd Street 26 th Floor New York, NY 10036	
Richard Dickson or current CEO Gap, Inc. d/b/a Banana Republic 2 Folsom Street San Francisco, CA 94105	Patrick Elfassy or current CEO APP Group, Inc. d/b/a Mackage 210 Eleventh Avenue Suite 100-10002 STE 100 New York City, NY 10001	
Alexis Nasard or current CEO D. Swarovski KG; Swarovski Digital Business USA, Inc. d/b/a Swarovski 50 Sharpe Drive Cranston, RI 02920	J. Dean Loring or current CEO Burger Lounge of America, LLC d/b/a Burger Lounge 1917 India Street Suite C San Diego, CA 92101	

On October 28, 2025, I served the California Attorney General (via website Portal) by uploading a true and correct copy thereof as a PDF file via the California Attorney General's website.

On October 28, 2025, I transmitted via electronic mail the above-listed documents to the electronic mail addresses of the City and/or District Attorneys who have specifically authorized e-mail service and the authorization appears on the Attorney General's web site. See Attached Electronic Service List.

On October 28, 2025, I served the following persons and/or entities at the last known address by placing a true and correct copy thereof in a sealed envelope and depositing with the U.S. Postal Service for delivery with the postage thereon fully prepaid, and addressed as follows: See Attached U.S. Mail Service List.

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

Executed on October 28, 2025, at Carlsbad, California.


David Bauman
David Bauman

ELECTRONIC SERVICE LIST

<p>The Honorable Pamela Price Alameda County, District Attorney 7677 Oakport Street, Suite 650 Oakland, CA 94621 CEPDProp65@acgov.org</p>	<p>The Honorable Barbara Yook Calaveras County, 891 Mountain Ranch Rd. San Andreas, CA 95249 Phone: 209-754-6330 Prop65Env@co.calaveras.ca.us</p>	<p>The Honorable Stacey Grassini Contra Costa County, Deputy District Attorney 900 Ward Street Martinez, CA 94553 sgrassini@contracostada.org</p>	<p>The Honorable George Marquez Imperial County, District Attorney 940 West Main Street, Suite 102 El Centro, CA 92243 teresasolis@co.imperial.ca.us</p>
<p>The Honorable James Clinchard El Dorado County, Assistant District Attorney 778 Pacific Street Placerville, CA 95667 EDCDAPROP65@edcda.us</p>	<p>The Honorable Lisa A. Smitcamp Fresno County, District Attorney 2100 Tulare Street Fresno, CA 93721 Phone: (559) 600-3141 consumerprotection@fresnocountyca.gov</p>	<p>The Honorable Thomas L. Hardy Inyo County, District Attorney 168 North Edwards Street Independence, CA 93526 Phone: 760.878.0282 inyoda@inyocounty.us</p>	<p>The Honorable Sarah Hacker Kings County, District Attorney 1400 West Lacey Blvd. Hanford, CA 93230 eservice@co.kings.ca.us</p>
<p>The Honorable Michelle Latimer Lassen County, Program Coordinator 220 S. Lassen Street Susanville, CA 96130 Phone: 530-251-8284 mlatimer@co.lassen.ca.us</p>	<p>The Honorable Lori Frugoli Marin County, District Attorney 3501 Civic Center Drive, Room 145 San Rafael, CA 94903 consumer@marincounty.gov</p>	<p>The Honorable Walter W. Wall, Mariposa County, District Attorney P.O. Box 730 Mariposa, CA 95338 Phone: (209) 966-3626 mca@mariposacounty.org</p>	<p>The Honorable Susan Kronen Lake County, District Attorney 255 N. Forbes Street Lakeport, CA 95453 countycounsel@lakecountyca.gov</p>
<p>The Honorable Kimberly Lewis Merced County, District Attorney 550 West Main Street Merced, CA 95340 Phone: (209) 385-7381 Prop65@countyofmerced.com</p>	<p>The Honorable Jeannine M. Pacioni Monterey County, District Attorney 1200 Aguajito Road Monterey, CA 93940 Prop65DA@co.monterey.ca.us</p>	<p>The Honorable Allison Haley Napa County, District Attorney 1127 First Street, Suite C Napa, CA 94559 CEPD@countyofnapa.org</p>	<p>The Honorable Sally O. Moreno, District Attorney 300 South G Street, Suite 300 Madera, CA 93637 mariaElena.leyva@maderacounty.com</p>
<p>The Honorable Clifford H. Newell Nevada County, District Attorney 201 Commercial Street Nevada City, CA 95959 DA.Prop65@co.nevada.ca.us</p>	<p>The Honorable Morgan Briggs Gire Placer County, District Attorney 10810 Justice Center Drive Roseville, CA 95678 Phone: 916-543-8000 prop65@placer.ca.gov</p>	<p>The Honorable David Hollister Plumas County, District Attorney 520 Main St. Quincy, CA 95971 Phone: (530) 283-6303 davidhollister@countyofplumas.com</p>	<p>The Honorable C. David Eyster Mendocino County, District Attorney P.O. Box 1000 UKiah, CA 95482 DA@mendocinocounty.gov</p>
<p>The Honorable Paul E. Zellerbach Riverside County, District Attorney 3072 Orange Street Riverside, CA 92501 Prop65@rivcoda.org</p>	<p>The Honorable Anne Marie Schubert Sacramento County, District Attorney 901 G Street Sacramento, CA 95814 Prop65@sacda.org</p>	<p>The Honorable Summer Stephan San Diego County, District Attorney 330 West Broadway San Diego, CA 92101 SanDiegoDAProp65@sdca.org</p>	<p>The Honorable Cynthia Campbell Modoc County, District Attorney 204 S. Court Street, Room 202 Alturas, CA 96101 DA@co.modoc.ca.us</p>
<p>The Honorable Alexander Grayner San Francisco County, Asst. District Attorney 350 Rhode Island Street San Francisco, CA 94103 alexandra.grayner@sfgov.org</p>	<p>The Honorable Tori Verber Salazar San Joaquin County, District Attorney 222 E. Weber Avenue, Room 202 Stockton, CA 95202 DAConsumer.Environmental@sjcda.org</p>	<p>The Honorable Eric J. Dobroth San Luis Obispo County, Deputy District Attorney County Government Center Annex, 4th Floor San Luis Obispo, CA 93408 Phone: 805-781-5800 edobroth@co.slo.ca.us</p>	<p>The Honorable David Anderson Mono County, District Attorney P.O. Box 2053 Mammoth Lakes, CA 93546 districtattorney@mono.ca.gov</p>
<p>The Honorable Christopher Dalbey Santa Barbara County, Deputy District Attorney 1112 Santa Barbara St. Santa Barbara, CA 93101 Phone: 805-568-2300 DAProp65@co.santa-barbara.ca.us</p>	<p>The Honorable Bud Porter Santa Clara County, Supervising Deputy District Attorney 70 W Hedding St San Jose, CA 95110 EPU@da.sccgov.org</p>	<p>The Honorable Jeffrey S. Rosell Santa Cruz County, District Attorney 701 Ocean Street Santa Cruz, CA 95060 Phone: 831-454-2400 Prop65DA@santacruzcounty.us</p>	<p>The Honorable Todd Spitzer Orange County, District Attorney 300 N. Flower Street Santa Ana, CA 92703 prop65notice@ocdapa.org</p>
<p>The Honorable Jill Ravitch Sonoma County, District Attorney 600 Administration Drive Santa Rosa, CA 95403 ECLD@sonoma county.org</p>	<p>The Honorable Phillip J. Cline Tulare County, District Attorney 221 S Mooney Blvd Visalia, CA 95370 Prop65@co.tulare.ca.us</p>	<p>The Honorable Gregory D. Totten Ventura County, District Attorney 800 S Victoria Ave Ventura, CA 93009 daspecialops@ventura.org</p>	<p>The Honorable Stephen M. Wagstaffe San Mateo County, District Attorney 400 County Center, Third Floor Redwood City, CA 94063 DA_info@smcgov.org</p>
<p>The Honorable Jeff W. Resig Yolo County, District Attorney 301 Second Street Woodland, CA 95695 cfepd@yolocounty.gov</p>	<p>The Honorable Mark Ankom City of San Diego, Deputy City Attorney 1200 Third Avenue San Diego, CA 92101 CityAttyProp65@sandiego.gov</p>	<p>The Honorable Henry Lifton City of San Francisco, Deputy City Attorney 1390 Market Street, 7th Floor San Francisco, CA 94102 Prop65@sfcityatty.org</p>	<p>The Honorable Sandra Groven Sierra County, District Attorney 100 Courthouse Square Downieville, CA 95936 smarshall@sierracounty.ca.gov</p>
<p>The Honorable Nora V. Frimann City of Santa Clara, City Attorney 200 E. Santa Clara Street, 16th Floor San Jose, CA 96113 Proposition65notices@sanjoseca.gov</p>	<p>The Honorable Michael L. Ramsey Butte County, District Attorney 25 County Center Drive - Administrative Building Oroville, CA 95965 DA@buttecounty.net</p>	<p>The Honorable Krishna A. Abrams Solano County, District Attorney 675 Texas Street, Suite 4500 Fairfield, CA 94533 DACEPU@solanocounty.gov</p>	<p>The Honorable Mike Feuer City of Los Angeles, City Attorney 200 N. Main Street Los Angeles, CA 90012 Cityatty.help@lacity.org</p>

U.S. MAIL SERVICE LIST

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The Honorable Cynthia Zimmer Kern County, District Attorney 1215 Truxtun Avenue Bakersfield, CA 93301	The Honorable George Gascon Los Angeles County, District Attorney 211 W. Temple Street, Suite 1200 Los Angeles, CA 90012	The Honorable Joel Buckingham San Benito County, District Attorney 419 4th Street Hollister, CA 95023
The Honorable Jason Anderson San Bernardino County, District Attorney 303 W. Third Street San Bernardino, CA 92415	The Honorable Stephanie A. Bridgett Shasta County, District Attorney 1355 West Street Redding, CA 96001	The Honorable James Kirk Andrus Siskiyou County, District Attorney P.O. Box 986 Yreka, CA 96097
The Honorable Jeff Laugero Stanislaus County, District Attorney 832 12th Street, Suite 300 Modesto, CA 95353	The Honorable Jennifer Dupre Sutter County, District Attorney 463 2nd Street, Suite 102 Yuba City, CA 95991	The Honorable Matthew Rogers Tehama County, District Attorney P.O. Box 519 Red Bluff, CA 96080
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