



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 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.

November 1, 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
Guillaume Jesel or current CEO The Estee Laude Companies; Tom Ford Retail, LLC d/b/a Tom Ford 595 Madison Avenue 18 th Floor New York, NY 10022	Tom Ford Thermal Receipt 48650 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Current CEO or President Paul Smith, Inc. d/b/a Paul Smith 88 Wooster Street New York, NY 10012	Paul Smith Thermal Receipt 48650 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Kim Sung-joo or current CEO MCM Worldwide; MCM Products USA, Inc. d/b/a MCM 681 Fifth Avenue 10 th Floor New York, NY 10022	MCM Thermal Receipt 48400 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Anouck Duranteau-Loeper or current CEO Isabel Marant 8454 Melrose Place Los Angeles, CA 90069	Isabel Marant Thermal Receipt 48400 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Jean Cassegrain or current CEO Longchamp USA, Inc. 4 Applegate Drive Suite B Robbinsville, NJ 08691	Longchamp Thermal Receipt 48650 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Silvio Campara or current CEO Golden Goose Retail USA, LLC d/b/a Golden Goose 120 Broadway 33 rd Floor New York, NY 10271	Golden Goose Thermal Receipt 48650 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Dan Rothmann or current CEO Etro USA, Inc. d/b/a Etro 41 West 56 th Street New York, NY 10019	Etro Thermal Receipt 48400 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Joshua Schulman or current CEO Burberry Burberry Group plc; Burberry Ltd. d/b/a Burberry 444 Madison Avenue New York, NY 10022	Burberry Thermal Receipt 48650 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Ramon Ros or current CEO Fendi North America, Inc. d/b/a Fendi 555 Madison Avenue 15 th Floor New York, NY 10022	Fendi Thermal Receipt 1032 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS

John Galantic or current CEO Tod's S.p.A.; Tod's Deva, Inc. d/b/a Tod's 555 Madison Avenue 20 th Floor New York, NY 10022	Tod's Thermal Receipt 48650 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Andy Lew or current CEO Lanvin, Inc. d/b/a Lanvin 20 West 22 nd Street Suite 151 New York, NY 10010	Lanvin Thermal Receipt 48400 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Alfonso Dolce or current CEO Dolce & Gabbana USA, Inc. d/b/a Dolce & Gabbana 546 5 th Avenue 10 th Floor New York, NY 10036	Dolce & Gabbana Thermal Receipt 48650 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Jens Grede or current CEO Skims Body, Inc.; Skims Retail, LLC d/b/a Skims 1601 Vine Street Hollywood, CA 90028	Skims Thermal Receipt 48650 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Laura du Rusquec or current CEO Ganni, Inc. d/b/a Ganni 68 White Street 5 th Floor New York, NY 10013	Ganni Thermal Receipt 48650 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Christos Angelides or current CEO Reiss (Retail) Limited; Reiss (Retail) Limited, Inc. d/b/a Reiss 309 Bleecker Street New York, NY 10014	Reiss Thermal Receipt 48750 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Ari Zlotkin or current CEO Anne Fontaine USA, Inc. d/b/a Anne Fontaine 110 Greene Street Suite 301 New York, NY 10012	Anne Fontaine Thermal Receipt 48650 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Glenn McMahon or current CEO AG Jeans Export, Inc. d/b/a AG Jeans 2741 Seminole Avenue South Gate, CA 90280	AG Jeans Thermal Receipt 48650 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Stefano Rosso or current CEO OTB Group; Marni USA Corp. d/b/a Marni 220 West 19 th Street 11 th Floor New York, NY 10011	Marni Thermal Receipt 48650 Seminole Drive Cabazon, CA 92230 (obtained September 29, 2025)	Contains BPS
Ms. Heather Aiu or current CEO/President Aloha Collection, Inc. d/b/a Aloha 687 S. Coast Highway Suite 310 Encinitas, CA 92024	Aloha Thermal Receipt 687 S. Coast Hwy 101 Encinitas, CA 92024 (obtained September 27, 2025)	Contains BPS

Mike Jensen or current President Reef Lifestyle, LLC d/b/a Reef 1220 Washington Street West Newton, MA 02465	Reef Thermal Receipt 670 S. Coast Hwy 101 Encinitas, CA 92024 (obtained September 27, 2025)	Contains BPS
Elle Wang or current CEO Emilia George, Inc.; Elle's Bump, LLC d/b/a Emilia George 325 Greenwich Street Ground Floor New York, NY 10013	Emilia George Thermal Receipt 824 Spectrum Center Drive Irvine, CA 92618 (obtained September 28, 2025)	Contains BPS
Bo Hyon Kim or current President Belle Isle, Inc. d/b/a Aveda Belle Isle Salon & Spa 769 Spectrum Center Drive Irvine, CA 92618	Aveda Belle Isle Thermal Receipt 769 Spectrum Center Drive Irvine, CA 92618 (obtained September 28, 2025)	Contains BPS
Michael Fung or current President The Alley USA, Inc.; The Alley Tea, Inc. d/b/a The Alley 224 W. 35 th Street Suite 505 New York, NY 10001	The Alley Thermal Receipt 507 Spectrum Center Drive Irvine, CA 92618 (obtained September 28, 2025)	Contains BPS
Current President Tutu Fun 822 Spectrum Center Drive Irvine, CA 92618	Tutu Fun Thermal Receipt 822 Spectrum Center Drive Irvine, CA 92618 (obtained September 28, 2025)	Contains BPA
Steve Vranes or current CEO Hot Topic, Inc. d/b/a Box Lunch 18305 E. San Jose Avenue City of Industry, CA 91748	Box Lunch Thermal Receipt 753 Spectrum Center Drive Irvine, CA 92618 (obtained September 28, 2025)	Contains BPS
Jeff Geygan or current CEO Rocky Mountain Chocolate Factory 265 Turner Drive Durango, CO 81303	Rocky Mountain Chocolate Factory Thermal Receipt 617 Spectrum Center Drive Irvine, CA 92618 (obtained September 28, 2025)	Contains BPS
Francesco Milleri or current CEO EssilorLuxottica, S.A.; Luxottica Group; Luxottica of America, Inc. d/b/a Sunglass Hut 4000 Luxottica Place Mason, OH 45040	Sunglass Hut Thermal Receipt 641 Spectrum Center Drive Irvine, CA 92618 (obtained September 28, 2025)	Contains BPS
Current President or CEO Honey & Butter Macarons 633 Spectrum Center Drive Irvine, CA 92618	Honey & Butter Macarons Thermal Receipt 633 Spectrum Center Drive Irvine, CA 92618 (obtained September 28, 2025)	Contains BPS
Tonia Misvaer or current CEO EC Design, LLC d/b/a Erin Condren 201 W. Howard Lane Austin, TX 78753	Erin Condren Thermal Receipt 832 Spectrum Center Drive Irvine, CA 92618 (obtained September 28, 2025)	Contains BPS
Lorraine Telnack or current President Soulscape, LLC d/b/a Soulscape Gift and Bookstore 765 S. Coast Hwy 101 Encinitas, CA 92024	Soulscape Gift & Bookstore Thermal Receipt 765 S. Coast Hwy 101 Encinitas, CA 92024 (obtained September 27, 2025)	Contains BPA and BPS

Current CEO or President Brixton, LLC d/b/a Brixton 3821 Ocean Ranch Blvd Oceanside, CA 92056	Brixton Thermal Receipt 670 S. Coast Hwy 101 Encinitas, CA 92024 (obtained September 27, 2025)	Contains BPA
Marisol G. Martinez or current President Pawlicious Snacks, LLC d/b/a Pawlicious 17322 Murphy Avenue Irvine, CA 92614	Pawlicious Thermal Receipt 670 Spectrum Center Drive Irvine, CA 92618 (obtained September 28, 2025)	Contains BPA
Current President or CEO Grounded 765 S. Coast Hwy 101 Encinitas, CA 92024	Grounded Thermal Receipt 765 S. Coast Hwy 101 Encinitas, CA 92024 (obtained September 27, 2025)	Contains BPS
Current President or CEO Pinklicious 239 Los Cerritos Center Cerritos, CA 90704	Pinklicious Press On Thermal Receipt 670 Spectrum Center Drive Irvine, CA 92618 (obtained September 28, 2025)	Contains BPS
John Heffner or current CEO Drybar Products, LLC d/b/a Drybar 201 East Main Street Suite 200 El Paso, TX 79901	Drybar 837 Spectrum Center Drive Irvine, CA 92618 (obtained September 28, 2025)	Contains BPS
Renato Mingo Lee or current President Wahoo's Fish Tacos 1185 Warner Avenue Tustin, CA 92780	Wahoo's 715 Spectrum Center Drive Irvine, CA 92618 (obtained September 28, 2025)	Contains BPS
Current President or Managing Member Goods2Order, LLC d/b/a Heat 1401 21 st Street Suite R Sacramento, CA 95811	Heat 849 Spectrum Center Drive Irvine, CA 92618 (obtained September 28, 2025)	Contains BPA
Michelle Wahler or current CEO Beyond Yoga 11248 Playa Court Culver City, CA 90230	Beyond Yoga 744 Spectrum Center Drive Irvine, CA 92618 (obtained September 28, 2025)	Contains BPS
Current President or CEO Earth Bowl 870 Spectrum Center Drive Irvine, CA 92618	Earth Bowl 870 Spectrum Center Drive Irvine, CA 92618 (obtained September 28, 2025)	Contains BPS
Mai Tran or current managing partner Blk Dot Coffee 924 Spectrum Center Drive Irvine, CA 92618	Blk Dot Coffee 924 Spectrum Center Drive Irvine, CA 92618 (obtained September 28, 2025)	Contains BPS
Shawn Lalehzarian or current CEO The Red Chickz 557 S. Spring Street Los Angeles, CA 90013	The Red Chickz 2525 El Camino Real Carlsbad, CA 92008 (obtained September 28, 2025)	Contains BPS

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 November 1, 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 November 1, 2025 with the U.S. Postal Service for delivery via first class mail the postage thereon fully prepaid:

Guillaume Jesel or current CEO The Estee Laude Companies; Tom Ford Retail, LLC d/b/a Tom Ford 595 Madison Avenue 18 th Floor New York, NY 10022	Ari Zlotkin or current CEO Anne Fontaine USA, Inc. d/b/a Anne Fontaine 110 Greene Street Suite 301 New York, NY 10012	Current CEO or President Brixton, LLC d/b/a Brixton 3821 Ocean Ranch Blvd Oceanside, CA 92056
Current CEO or President Paul Smith, Inc. d/b/a Paul Smith 88 Wooster Street New York, NY 10012	Glenn McMahon or current CEO AG Jeans Export, Inc. d/b/a AG Jeans 2741 Seminole Avenue South Gate, CA 90280	Marisol G. Martinez or current President Pawlicious Snacks, LLC d/b/a Pawlicious 17322 Murphy Avenue Irvine, CA 92614
Kim Sung-joo or current CEO MCM Worldwide; MCM Products USA, Inc. d/b/a MCM 681 Fifth Avenue 10 th Floor New York, NY 10022	Stefano Rosso or current CEO OTB Group; Marni USA Corp. d/b/a Marni 220 West 19 th Street 11 th Floor New York, NY 10011	Current President or CEO Grouned 765 S. Coast Hwy 101 Encinitas, CA 92024
Anouck Duranteau-Loeper or current CEO Isabel Marant 8454 Melrose Place Los Angeles, CA 90069	Ms. Heather Aiu or current CEO/President Aloha Collection, Inc. d/b/a Aloha 687 S. Coast Highway Suite 310 Encinitas, CA 92024	Current President or CEO Pinklicious 239 Los Cerritos Center Cerritos, CA 90704
Jean Cassegrain or current CEO Longchamp USA, Inc. 4 Applegate Drive Suite B Robbinsville, NJ 08691	Mike Jensen or current President Reef Lifestyle, LLC d/b/a Reef 1220 Washington Street West Newton, MA 02465	John Heffner or current CEO Drybar Products, LLC d/b/a Drybar 201 East Main Street Suite 200 El Paso, TX 79901
Silvio Campara or current CEO Golden Goose Retail USA, LLC d/b/a Golden Goose 120 Broadway 33 rd Floor New York, NY 10271	Elle Wang or current CEO Emilia George, Inc.; Elle's Bump, LLC d/b/a Emilia George 325 Greenwich Street Ground Floor New York, NY 10013	Renato Mingo Lee or current President Wahoo's Fish Tacos 1185 Warner Avenue Tustin, CA 92780
Dan Rothmann or current CEO Etro USA, Inc. d/b/a Etro 41 West 56 th Street New York, NY 10019	Bo Hyon Kim or current President Belle Isle, Inc. d/b/a Aveda Belle Isle Salon & Spa 769 Spectrum Center Drive Irvine, CA 92618	Current President or Managing Member Goods2Order, LLC d/b/a Heat 1401 21 st Street Suite R Sacramento, CA 95811
Joshua Schulman or current CEO Burberry Burberry Group plc; Burberry Ltd. d/b/a Burberry 444 Madison Avenue New York, NY 10022	Michael Fung or current President The Alley USA, Inc.; The Alley Tea, Inc. d/b/a The Alley 224 W. 35 th Street Suite 505 New York, NY 10001	Michelle Wahler or current CEO Beyond Yoga 11248 Playa Court Culver City, CA 90230

Ramon Ros or current CEO Fendi North America, Inc. d/b/a Fendi 555 Madison Avenue 15 th Floor New York, NY 10022	Current President Tutu Fun 822 Spectrum Center Drive Irvine, CA 92618	Current President or CEO Earth Bowl 870 Spectrum Center Drive Irvine, CA 92618
John Galantic or current CEO Tod's S.p.A.; Tod's Deva, Inc. d/b/a Tod's 555 Madison Avenue 20 th Floor New York, NY 10022	Steve Vranes or current CEO Hot Topic, Inc. d/b/a Box Lunch 18305 E. San Jose Avenue City of Industry, CA 91748	Mai Tran or current managing partner Blk Dot Coffee 924 Spectrum Center Drive Irvine, CA 92618
Andy Lew or current CEO Lanvin, Inc. d/b/a Lanvin 20 West 22 nd Street Suite 151 New York, NY 10010	Jeff Geygan or current CEO Rocky Mountain Chocolate Factory 265 Turner Drive Durango, CO 81303	Shawn Lalehzarian or current CEO The Red Chickz 557 S. Spring Street Los Angeles, CA 90013
Alfonso Dolce or current CEO Dolce & Gabbana USA, Inc. d/b/a Dolce & Gabbana 546 5 th Avenue 10 th Floor New York, NY 10036	Francesco Milleri or current CEO EssilorLuxottica, S.A.; Luxottica Group; Luxottica of America, Inc. d/b/a Sunglass Hut 4000 Luxottica Place Mason, OH 45040	
Jens Grede or current CEO Skims Body, Inc.; Skims Retail, LLC d/b/a Skims 1601 Vine Street Hollywood, CA 90028	Current President or CEO Honey & Butter Macarons 633 Spectrum Center Drive Irvine, CA 92618	
Laura du Rusquec or current CEO Ganni, Inc. d/b/a Ganni 68 White Street 5 th Floor New York, NY 10013	Tonia Misvaer or current CEO EC Design, LLC d/b/a Erin Condren 201 W. Howard Lane Austin, TX 78753	
Christos Angelides or current CEO Reiss (Retail) Limited; Reiss (Retail) Limited, Inc. d/b/a Reiss 309 Bleecker Street New York, NY 10014	Lorraine Telnack or current President Soulscape, LLC d/b/a Soulscape Gift and Bookstore 765 S. Coast Hwy 101 Encinitas, CA 92024	

On November 1, 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 November 1, 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 November 1, 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 November 1, 2025, at Carlsbad, California.

David Bauman
David Bauman

ELECTRONIC SERVICE LIST

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