

Natalie Keshishian Zarneh
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November 07, 2025

VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED

AND EMAIL: info@tallowbourn.com

Dr. Dave's Primal Essence LLC
1721 Canal Clipper Ct
Point of Rocks, MD 21777

60-DAY NOTICE OF VIOLATION

California Health & Safety Code § 25249.7(d)

Federal Cosmetic Labeling Violations – 21 CFR 701

Dear Violator:

I am a California resident and purchased your product "Dr. Dave's Primal Essence Tallow Lip Balm (Unscented 3-pack)" on Amazon.com on July 30, 2025 (Order # 113-2067273-0343403).

This product violates 21 CFR 701 in 34 separate, documented instances as follows:

ON OUTER BOX (ALL 6 PANELS):

1. No net quantity declaration at all – "3-Pack" is NOT a weight (21 CFR 701.11)
2. No complete manufacturer street address (only "Frederick, MD")
3. "Made in USA" claim with no street address on same panel (21 CFR 701.11(g))
4. Wrong INCI name "100% Grass Fed Beef Tallow" instead of "Beef Tallow"

5. Wrong INCI name "Organic Virgin Coconut Oil" instead of "Cocos Nucifera (Coconut) Oil"
6. Wrong INCI name "Organic Beeswax" instead of "Cera Alba"
7. Wrong INCI name "Tocopherol (Vitamin E)" instead of "Tocopherol"
8. False "100% Grass Fed Beef Tallow" claim while listing five ingredients
9. Lot number "C048" printed ONLY on bottom of individual tubes – MISSING from outer box (21 CFR 701.13(f))

ON EACH OF 3 TUBES (identical printing):

10. Net weight in ounces only – NO GRAMS (21 CFR 701.11)
11. No complete manufacturer street address (only "Frederick, MD")
12. "Made in USA" claim with no street address on same panel
13. Wrong INCI name "100% Grass Fed Beef Tallow" instead of "Beef Tallow"
14. Wrong INCI name "Organic Virgin Coconut Oil" instead of "Cocos Nucifera (Coconut) Oil"
15. Wrong INCI name "Organic Beeswax" instead of "Cera Alba"
16. Wrong INCI name "Tocopherol (Vitamin E)" instead of "Tocopherol"
17. False "100%" claim while listing 5 ingredients

18–25. Violations 10–17 repeated on Tube 2

26–33. Violations 10–17 repeated on Tube 3

34. Violation 9 (lot missing from outer box) applies to all 3 tubes sold

Attached (all embedded in this PDF):

1. Collage of all 6 sides of outer box – proves violations 1-9



2. Close-up of individual tube - proves violations 10-17 + lot "C048" on bottom



3. Amazon order confirmation – July 30, 2025 – shipped to California address

Order Summary

Order placed July 30, 2025 | Order # 113-2067273-0343403

Ship to

Natalie Keshishian
1412 N SERRANO AVE
LOS ANGELES, CA 90027-
5610
United States

Payment method

Amazon gift card balance
Visa ending in 2625

[View related transactions](#)

Order Summary

Item(s) Subtotal:	\$13.99
Shipping & Handling:	\$0.00
Subscribe & Save:	-\$0.70
Total before tax:	\$13.29
Estimated tax to be collected:	\$1.30
Gift Card Amount:	-\$4.07
Grand Total:	\$10.52

Delivered July 31

Your package was left near the front door or porch.



Moisturizing Tallow Lip Balm – Grass-Fed Beef Tallow with Organic Coconut Oil, Beeswax, and Vitamin E – Unscented Lip Balm Set – Travel Essential - 3-Pack

Sold by: [Dr. Dave's Primal Essence](#)

Return window closed on August 30, 2025

\$13.99

Auto-delivered: Every 4 months

4. Maryland SDAT business record – 1721 Canal Clipper Ct, Point of Rocks, MD 21777

DR. DAVE'S PRIMAL ESSENCE LLC: W24673154

Department ID Number:

W24673154

Business Name:

DR. DAVE'S PRIMAL ESSENCE LLC

Principal Office:

1721 CANAL CLIPPER CT

POINT OF ROCKS MD 21777-2072

Resident Agent:

DAVID J MALONEY

1721 CANAL CLIPPER CT

POINT OF ROCKS MD 21777

Status:

ACTIVE

Good Standing:

THIS BUSINESS IS IN GOOD STANDING

Business Type:

DOMESTIC LLC

Business Code:

20 ENTITIES OTHER THAN CORPORATIONS

Date of Formation/ Registration:

01/08/2024

State of Formation:

MD

Stock Status:

N/A

Close Status:

N/A

I intend to file a citizen enforcement action sixty (60) days after the postmark of this notice unless you:

- a) immediately cease all sales of the violating product in California, OR
- b) pay a civil penalty of \$2,500 for the 34 separate violations documented above and correct all labeling within 30 days.

Payment shall be made payable to Natalie Keshishian Zarneh and mailed to the address above.

Sincerely,

Natalie Keshishian Zarneh

California Resident