

**SUPPLEMENTAL NOTICE OF VIOLATION**  
(Supplements Notice 2025-03049)

California Safe Drinking Water  
and Toxic Enforcement Act

Hexavalent Chromium in Footwear Made with Leather Materials

November 12, 2025

This Supplemental Notice of Violation (the "Notice") is provided to you pursuant to and in compliance with California Health and Safety Code Section 25249.7(d).

- For general information regarding the California Safe Drinking Water and Toxic Enforcement Act, see the attached summary provided by the California EPA (copies not provided to public enforcement agencies).
- This Notice is provided by the Center for Environmental Health ("CEH"), 2201 Broadway, Suite 508, Oakland, CA 94612, (510) 655-3900. This Notice adds an alleged violator related to a previously noticed set of violations relating to Chloé Inc. and Chloé SAS (noticed in AG No. 2025-03049). CEH is a nonprofit corporation dedicated to protecting the environment, improving human health, and supporting environmentally sound practices. Shakoora Azimi-Gaylon is the Senior Director of the Toxic Exposures and Pollution Prevention program of and a responsible individual within CEH.

**Description of Violation:**

- Violator: The name and address of the violator is identified on the attached Exhibit 1.
- Time Period of Exposure: The violations have been occurring since at least November 12, 2022, and are ongoing.
- Provision of Proposition 65: This Notice covers the "warning provision" of Proposition 65, which is found at California Health and Safety Code Section 25249.6.
- Chemical(s) Involved: The name of the listed chemical involved in these violations is chromium (hexavalent compounds), which is also known as hexavalent chromium. Hexavalent chromium is listed under Proposition 65 as a chemical known to the State of California to cause cancer and reproductive toxicity. Exposures to hexavalent chromium occur from use of the products identified in this Notice.
- Type of Product: The specific type of product that is the subject of this Notice and is causing these violations is footwear made with leather materials. A non-exclusive example of this specific type of product is identified on the attached Exhibit 1.



- Description of Exposure: This Notice addresses consumer exposures to hexavalent chromium. Use of the products identified in this Notice results in human exposures to hexavalent chromium. The routes of exposure for the violations are: (1) dermal absorption directly through the skin when consumers wear, touch, or handle the products or otherwise have direct skin to leather contact with the leather parts of the products; and (2) ingestion via hand to mouth contact after consumers wear, touch, or handle the products. No clear and reasonable warning is provided with these products regarding the carcinogenic or reproductive hazards of hexavalent chromium.

#### **Resolution of Noticed Claims:**

Based on the allegations set forth in this Notice, CEH intends to file a citizen enforcement lawsuit against the alleged violator unless such violator agrees in a binding written instrument to: (1) recall products already sold; (2) provide clear and reasonable warnings for products sold in the future or reformulate such products to eliminate the hexavalent chromium exposures; and (3) pay an appropriate civil penalty based on the factors enumerated in California Health and Safety Code Section 25249.7(b). If the alleged violator is interested in resolving this dispute without resort to expensive and time-consuming litigation, please feel free to contact CEH through its counsel identified below. It should be noted that CEH cannot: (1) 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 CEH's 60-day Notice. Therefore, while reaching an agreement with CEH will resolve its claims, such agreement may not satisfy the public prosecutors.

#### **Preservation of Relevant Evidence:**

This Notice also serves as a demand that the alleged violator preserve and maintain all relevant evidence, including all 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 hexavalent chromium in footwear; purchase and sales 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 hexavalent chromium in such products; and representative exemplars of each unit of any such products sold by the alleged violator in the year preceding this Notice through the date of any trial of the claims alleged in this Notice.

Please direct any inquiries regarding this Notice to CEH's counsel Joseph Mann at Lexington Law Group, LLP, 503 Divisadero Street, San Francisco, CA 94117, (415) 913-7800, [jmann@lexlawgroup.com](mailto:jmann@lexlawgroup.com).



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

I, Joseph Mann, 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 Lexington Law Group, and I represent the noticing party, the Center for Environmental Health.

3. Members of my firm and 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 exposures to the listed chemical that is the subject of the action.

4. Based on the information obtained through those consultations, and on 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 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 12, 2025



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Joseph Mann  
Attorney for CENTER FOR  
ENVIRONMENTAL HEALTH



**EXHIBIT 1**  
**November 12, 2025 Supplemental Notice of Violation**  
**Hexavalent Chromium in Footwear Made with Leather Materials**

| <b>Name and Address<br/>of Responsible Party</b>   | <b>Non-Exclusive<br/>Example<br/>of the Products</b> | <b>Further Description of Non-<br/>Exclusive Exemplar Product</b> |
|--|--|---|
| <b>Richemont North America, Inc.</b><br><b>dba Chloé</b><br>645 5th Avenue<br>New York, NY 10022 | See By Chloé Ruffled<br>Leather Slides in Pink       | UPC No. 8051524119084<br>Style No. SB40110A-17041                 |



1 **PROOF OF SERVICE**

2 I, Sophia Filipe, declare:

3 I am a citizen of the United States and employed in the County of San Francisco, State of  
4 California. I am over the age of eighteen (18) years and not a party to this action. My business  
5 address is 503 Divisadero Street, San Francisco, CA 94117 and my email address is  
sfilipe@lexlawgroup.com.

6 On November 12, 2025, I served the following document(s) on all interested parties in this  
7 action by placing a true copy thereof in the manner and at the addresses indicated below:

8 **NOTICE OF VIOLATION OF CALIFORNIA SAFE DRINKING WATER AND  
TOXIC ENFORCEMENT ACT;**

9 **CERTIFICATE OF MERIT;** and

10 **THE SAFE DRINKING AND TOXIC ENFORCEMENT ACT OF 1986**  
11 **(PROPOSITION 65): A SUMMARY** (only sent to those on service list marked with an  
asterisk).

12 ☒ **BY MAIL:** I am readily familiar with the firm's practice for collecting and processing mail  
13 with the United States Postal Service ("USPS"). Under that practice, mail would be deposited  
14 with USPS that same day with postage thereon fully prepaid at San Francisco, California in the  
ordinary course of business. On this date, I placed sealed envelopes containing the above  
mentioned documents for collection and mailing following my firm's ordinary business practices.

15 *Please see attached service list.*

16 ☒ **BY ELECTRONIC UPLOAD:** I transmitted a PDF version of the document(s) listed above,  
17 as well as a Confidential Supporting Certificate of Merit, to the Office of the Attorney General of  
California via the Proposition 65 60-Day Notice Search website at [https://oag.ca.gov/prop65/60-](https://oag.ca.gov/prop65/60-day-notice-search)  
18 day-notice-search.

19 ☒ **BY ELECTRONIC MAIL:** I transmitted a PDF version of the document(s) listed above via  
20 email to the email address(es) indicated on the attached service list [or noted above] before 5 p.m.  
on the date executed.

21 Pamela Y. Price, Alameda District Attorney  
22 7677 Oakport Street, Suite 650  
Oakland, CA 94621  
CEPDProp65@acgov.org

James Clinchard, El Dorado Assistant  
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23 Barbara Yook, Calaveras District Attorney  
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consumerprotection@fresnocountyca.gov

25 Stacey Grassini, Contra Costa Deputy  
26 District Attorney  
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27 sgrassini@contracostada.org  
28

Thomas L. Hardy, Inyo District Attorney  
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|    |   |  |
|----|---|--|
| 1  | Devin Chandler, Lassen Program Coordinator      | Anne Marie Schubert, Sacramento District Attorney            |
| 2  | 2950 Riverside Dr                               | 901 G Street   |
| 3  | Susanville, CA 96130                            | Sacramento, CA 95814   |
|    | dchandler@co.lassen.ca.us                       | Prop65@sacda.org   |
| 4  | Lori E. Frugoli, Marin District Attorney        | Summer Stephan, San Diego District Attorney                  |
| 5  | 3501 Civic Center Drive, Room 145               | 330 West Broadway  |
| 6  | San Rafael, CA 94903                            | San Diego, CA 92101  |
|    | consumer@marincounty.gov                        | SanDiegoDAProp65@sdcda.org                                   |
| 7  | Walter W. Wall, Mariposa District Attorney      | Mark Ankorn, San Diego Deputy City Attorney                  |
| 8  | P.O. Box 730                                    | 1200 Third Avenue  |
|    | Mariposa, CA 95338                              | San Diego, CA 92101  |
|    | mcda@mariposacounty.org                         | CityAttyProp65@sandiego.gov                                  |
| 9  | Kimberly Lewis, Merced District Attorney        | Henry Lifton, San Francisco Deputy City Attorney             |
| 10 | 550 West Main Street                            | 1390 Market Street, 7th Floor                                |
| 11 | Merced, CA 95340                                | San Francisco, CA 94102                                      |
|    | Prop65@countyofmerced.com                       | Prop65@sfcityatty.org  |
| 12 | Jeannine M. Pacioni, Monterey District Attorney | Alexandra Grayner, San Francisco Assistant District Attorney |
| 13 | 1200 Aguajito Road                              | 350 Rhode Island Street                                      |
| 14 | Monterey, CA 93940                              | San Francisco, CA 94103                                      |
|    | Prop65DA@co.monterey.ca.us                      | alexandra.grayner@sfgov.org                                  |
| 15 | Allison Haley, Napa District Attorney           | Tori Verber Salazar, San Joaquin District Attorney           |
| 16 | 1127 First Street, Suite C                      | 222 E. Weber Avenue, Room 202                                |
|    | Napa, CA 94559                                  | Stockton, CA 95202   |
|    | CEPD@countyofnapa.org                           | DAConsumer.Environmental@sjcda.org                           |
| 17 | Clifford H. Newell, Nevada District Attorney    | Eric J. Dobroth, San Luis Obispo Deputy District Attorney    |
| 18 | 201 Commercial Street                           | County Government Center Annex, 4th Floor                    |
| 19 | Nevada City, CA 95959                           | San Luis Obispo, CA 93408                                    |
|    | DA.Prop65@co.nevada.ca.us                       | edobroth@co.slo.ca.us  |
| 20 | Morgan Briggs Gire, Placer District Attorney    | Christopher Dalbey, Santa Barbara Deputy District Attorney   |
| 21 | 10810 Justice Center Drive                      | 1112 Santa Barbara St.                                       |
| 22 | Roseville, CA 95678                             | Santa Barbara, CA 93101                                      |
|    | prop65@placer.ca.gov                            | DAProp65@co.santa-barbara.ca.us                              |
| 23 | David Hollister, Plumas District Attorney       | Nora V. Frimann, Santa Clara City Attorney                   |
| 24 | 520 Main St.                                    | 200 E. Santa Clara Street, 16th Floor                        |
| 25 | Quincy, CA 95971                                | San Jose, CA 96113   |
|    | davidhollister@countyofplumas.com               | Proposition65notices@sanjoseca.gov                           |
| 26 | Paul E. Zellerbach, Riverside District Attorney |  |
| 27 | 3072 Orange Street                              |  |
| 28 | Riverside, CA 92501                             |  |
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1 Bud Porter, Supervising Santa Clara, Deputy  
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10 Todd Spitzer, District Attorney of Orange County  
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12 Santa Ana, CA 92703  
13 Prop65Notice@ocdapa.org

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

14 Executed on November 12, 2025 at San Francisco, California.



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Sophia Filipe



### **SERVICE LIST**

District Attorney of Alpine County  
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