

**60 DAY NOTICE OF VIOLATION OF CALIFORNIA HEALTH & SAFETY CODE  
SECTION 25249.5 ET SEQ. (PROPOSITION 65)**

February 12, 2026

Sean Elan, CEO  
Sylvermax, Inc.  
6 Shorewood Drive  
Sands Point, NY 11050

Erik Nordstrom, CEO  
Nordstrom, Inc  
1617 Sixth Avenue  
Seattle, WA 98101

Sylvermax, Inc.  
c/o The Corporation, Reg. Agent  
6 Shorewood Drive  
Sands Point, NY 11050

Nordstrom, Inc.  
c/o CSC - Lawyers Incorporating Service, Reg. Agent  
2710 Gateway Oaks Drive, Suite 150N  
Sacramento, CA 95833

CC: California Attorney General's Office;  
District Attorney's Offices for All California Counties; and  
City Attorneys for San Francisco, San Diego, San Jose, Sacramento, and Los Angeles

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**I. INTRODUCTION**

Consumer Protection Group, LLC ("CPG") is the noticing entity, acting in the interest of the general public. It seeks to reduce or eliminate the presence of hazardous substances in consumer products sold in California, and to ensure that California consumers are aware of the presence of such substances in consumer goods so that they can make an educated effort to limit their own exposure where deemed necessary.

This Notice is provided to the public agencies listed above pursuant to California Health & Safety Code §§ 25249.6, *et seq.* ("Proposition 65"). As noted above, notice is provided to the violators - Sylvermax, Inc. and Nordstrom, Inc. (the "Violators"). The violations covered by this Notice consist of the product exposures, routes of exposure, and type of harm potentially resulting from exposure to the toxic chemical ("listed chemical") identified as follows:

Product Exposures:	Aimee Card Holder
Chemical:	Di(2-ethylhexyl) phthalate (DEHP)
Routes of Exposure:	Ingestion and Dermal Absorption
Types of Harm:	Cancer, Developmental Toxicity, and Male Reproductive Toxicity

## II. PRODUCT AND TIME OF VIOLATIONS

The specific type of product that is causing consumer exposures in violations of Proposition 65, and that is covered by this Notice which includes but is not limited to: "AIMEE" "Responsible Leather" "Kindness, confidence, community" "@aimekenstenberg" "www.aimekenstenberg.com" ("Noticed Product").

Ongoing violations have occurred each day between February 12, 2023, and February 12, 2026, as well as every day since the products were introduced for sale in California. These violations will continue until clear and reasonable warnings are provided prior to exposure of the identified chemical. The method of warning should be a label on the product itself.

As a result of sales of this product, exposures to the listed chemical have been occurring without clear and reasonable warnings as required by Proposition 65. Without proper warnings regarding the toxic effects of exposures to the listed chemical, California consumers lack the information necessary to make informed decisions on whether and how to eliminate (or reduce) the risk of exposure to the toxic chemical from the reasonably foreseeable use of the products.

California consumers are exposed to the listed chemical by buying, acquiring, or utilizing the products. By way of example but not limitation, direct exposures occur when people (including children) handle the Noticed Product. The concentration of the chemical present within the Noticed Product constitutes a significant chemical dose exposure to consumers through their use of the Noticed Product. Exposure to the contaminants present within the noticed product may also occur through hand to mouth ingestion under typical and foreseeable use of the Noticed Product.

Per Cal. Code Regs. Tit. 27, section 25600.2(g) (2018) the retail seller noticed on this 60-day notice is hereby requested to promptly provide the names and contact information for the manufacturers, producers, packagers, importers, suppliers, and/or distributors of the products identified in this Notice.

## III. PROPOSITION 65 INFORMATION

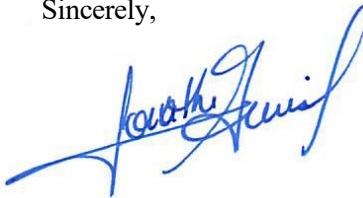
For general information concerning the provisions of Proposition 65, please feel free to contact the Office of Environmental Health Hazard Assessment's ("OEHHA") Proposition 65 Implementation Office at (916) 445-6900. For the Violator's reference, attached is a copy of "Proposition 65: A Summary," which has been prepared by OEHHA.

#### IV. RESOLUTION OF NOTICED CLAIMS

Consistent with goals of Proposition 65 and a desire to have these violations corrected, CPG is interested in seeking a resolution of this matter that includes a binding written agreement by the Violators to: (1) recall any products already sold, or undertake best efforts to ensure that the requisite health hazard warnings are provided to those who have received such products; (2) reformulate the identified products so as to eliminate further exposures to the identified chemical, or provide appropriate warnings on the labels of these products; and (3) pay an appropriate civil penalty. Such a resolution will prevent further unwarned consumer exposures to the identified chemical, as well as expensive and time-consuming litigation. It should be noted that counsel cannot (1) finalize any settlement until after the 60-day notice period has expired; or (2) speak for the California Attorney General or any District or City Attorney who has received this notice. Therefore, while reaching an agreement with CPG will resolve its claims; such an agreement may not satisfy the public prosecutors.

CPG identifies Ahron Nami as a responsible individual within the entity whose address is PO Box 2305, Huntington Park, CA 90255, and whose phone number is (805) 974-0425, has retained me as legal counsel in this matter. Please direct all questions concerning this notice to the undersigned.

Sincerely,



BLACKSTONE LAW, APC  
Jonathan M. Genish, Esq.

## CERTIFICATE OF MERIT

I, Jonathan M. Genish, hereby declare:

1. This Certificate of Merit accompanies the attached Sixty-Day Notice in which it is alleged that the parties identified in the Notice have violated Health & Safety Code § 25249.6 by failing to provide clear and reasonable warnings;
2. I am the attorney for 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 this action;
4. Based on the information obtained through these 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 plaintiffs' 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; and
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 information identified in Health & Safety Code § 25249.7(11)(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: February 12, 2026



Jonathan M. Genish, Esq.

## **CERTIFICATE OF SERVICE**

I, Kevin Vaz, hereby declare:

1. I am, and was at the time of service hereinafter mentioned, a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 8383 Wilshire Blvd., Suite 745, Beverly Hills, CA 90211.
2. On February 12, 2026, I served the following documents:
  - 60-Day Notice of Violations
  - Certificate of Merit
  - Appendix "A" - "The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary", and Appendix "B" – "The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): Special Compliance Procedure".
  - Certificate of Service

on the following party by placing a true and correct copy thereof in a sealed envelope, addressed to the party listed below, and depositing it at a United States Postal Service Office for delivery both by Certified Mail:

Sean Elan, CEO  
Sylvermax, Inc.  
6 Shorewood Drive  
Sands Point, NY 11050

Sylvermax, Inc.  
c/o The Corporation, Reg. Agent  
6 Shorewood Drive  
Sands Point, NY 11050

Erik Nordstrom, CEO  
Nordstrom, Inc  
1617 Sixth Avenue  
Seattle, WA 98101

Nordstrom, Inc.  
c/o CSC - Lawyers Incorporating Service, Reg. Agent  
2710 Gateway Oaks Drive, Suite 150N  
Sacramento, CA 95833

3. On February 12, 2026, I served the following documents:
  - 60-Day Notice of Violations
  - Certificate of Merit: Health and Safety Code Section 25249.7 (d)
  - Certificate of Merit (Attorney General Copy): Factual information sufficient to establish the basis of the certificate of merit sent only to the office of the California Attorney General via link at [oag.ca.gov/prop65](http://oag.ca.gov/prop65)
  - Certificate of Service
4. On February 12, 2026, I served the following documents:
  - 60-Day Notice of Violations
  - Certificate of Merit
  - Certificate of Service

on each of the following parties by causing a true and correct .PDF copy thereof to be sent via electronic mail to the party listed below, pursuant to Cal. Code Regs., title. 27, § 25903(c)(1):

Alameda County District Attorney <a href="mailto:CEPDProp65@acgov.org">CEPDProp65@acgov.org</a>	San Francisco Deputy City Attorney <a href="mailto:Valerie.Lopez@sfcityattorney.org">Valerie.Lopez@sfcityattorney.org</a>
Calaveras County District Attorney <a href="mailto:Prop65Env@co.calaveras.ca.us">Prop65Env@co.calaveras.ca.us</a>	San Joaquin County District Attorney <a href="mailto:DACConsumer.Environmental@sjcda.org">DACConsumer.Environmental@sjcda.org</a>
Contra Costa County District Attorney <a href="mailto:sgrassini@contracostada.org">sgrassini@contracostada.org</a>	San Luis Obispo County District Attorney <a href="mailto:edobroth@co.slo.ca.us">edobroth@co.slo.ca.us</a>
Inyo County District Attorney <a href="mailto:inyoda@inyocounty.us">inyoda@inyocounty.us</a>	Santa Barbara County District Attorney <a href="mailto:DAProp65@co.santa-barbara.ca.us">DAProp65@co.santa-barbara.ca.us</a>
Lassen County District Attorney <a href="mailto:mlatimer@co.lassen.ca.us">mlatimer@co.lassen.ca.us</a>	Santa Clara County District Attorney <a href="mailto:EPU@da.sccgov.org">EPU@da.sccgov.org</a>
Monterey County District Attorney <a href="mailto:Prop65DA@co.monterey.ca.us">Prop65DA@co.monterey.ca.us</a>	Santa Cruz District Attorney <a href="mailto:Prop65DA@santacruzcounty.us">Prop65DA@santacruzcounty.us</a>
Napa County District Attorney <a href="mailto:CEPD@countyofnapa.org">CEPD@countyofnapa.org</a>	Sonoma County District Attorney <a href="mailto:jbarnes@sonoma-county.org">jbarnes@sonoma-county.org</a>
Riverside County District Attorney <a href="mailto:Prop65@rivcoda.org">Prop65@rivcoda.org</a>	Tulare County District Attorney <a href="mailto:Prop65@co.tulare.ca.us">Prop65@co.tulare.ca.us</a>
Sacramento County District Attorney <a href="mailto:Prop65@sacda.org">Prop65@sacda.org</a>	Ventura County District Attorney <a href="mailto:daspecialops@ventura.org">daspecialops@ventura.org</a>
San Diego County District Attorney <a href="mailto:CityAttyCrimProp65@sandiego.gov">CityAttyCrimProp65@sandiego.gov</a>	Yolo County District Attorney <a href="mailto:cfepd@yolocounty.org">cfepd@yolocounty.org</a>
San Francisco Ass. District Attorney <a href="mailto:alethea.sargent@sfgov.org">alethea.sargent@sfgov.org</a>	

I also sent the above to the following parties mentioned on the service list attached hereto by placing a true and correct .PDF copy thereof in a sealed envelope, addressed to each of the parties on the service list attached hereto, and depositing it at a United States Postal Service Office for delivery by First Class Mail.

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



Kevin Vaz

Dated: February 12, 2026

## SERVICE LIST

Alpine County District Attorney P.O. Box 248 Markleeville, CA 96120	Marin County District Attorney 3501 Civic Center Drive, Room 130 San Rafael, CA 94903	Stanislaus County District Attorney 832 12th Street, Suite 300 Modesto, CA 95354
Amador County District Attorney 708 Court Street #202 Jackson, CA 95642	Mariposa County District Attorney 5101 Jones Street, P.O. Box 730 Mariposa, CA 95338	Sutter County District Attorney 466 Second Street, Suite 102 Yuba City, CA 95991
Butte County District Attorney 25 County Center Drive, Suite 245 Oroville, CA 95965	Mendocino County District Attorney 100 North State Street, P.O. Box 1000 Ukiah, CA 95482	Tehama County District Attorney 444 Oak Street, Room L Red Bluff, CA 96080
Colusa County District Attorney 346 Fifth Street, Suite 101 Colusa, CA 95932	Merced County District Attorney 550 W. Main Street Merced, CA 95340	Trinity County District Attorney P.O. Box 310 Weaverville, CA 96093
Del Norte County District Attorney 450 H Street, Room 171 Crescent City, CA 95531	Modoc County District Attorney 204 5. Court Street, Suite 202 Alturas, CA 96101	Tuolumne County District Attorney 423 North Washington Street Sonora, CA 95370
El Dorado County District Attorney 515 Main Street Placerville, CA 95667	Mono County District Attorney 278 Main St Bridgeport, CA 93517	Yuba County District Attorney 215 Fifth Street Marysville, CA 95901
Fresno County District Attorney 2220 Tulare Street, Suite 1000 Fresno, CA 93721	Nevada County District Attorney 201 Commercial Street Nevada City, CA 95959	Office of the City Attorney, Los Angeles City Hall East 200 North Main Street Los Angeles, CA 90012
Glenn County District Attorney P.O. Box 430 Willows, CA 95988	Orange County District Attorney 300 N Flower Street Santa Ana, CA 92703	Office of the City Attorney, Sacramento 915 I Street, 4th Floor Sacramento, CA 95814
Humboldt County District Attorney 825 5th Street, 4th Floor Eureka, CA 95501	Placer County District Attorney 10810 Justice Center Drive, Suite 240 Roseville, CA 95678	Office of the City Attorney, San Diego 1200 Third Avenue, Suite 1620 San Diego, CA 92101
Imperial County District Attorney 940 West Main Street, Suite 102 El Centro, CA 92243	Plumas County District Attorney 520 Main Street, Room 404 Quincy, CA 95971	Office of the City Attorney, San Francisco 1 Dr. Carlton B. Goodlett Place, Room 234 San Francisco, CA 94102
Inyo County District Attorney P.O. Drawer D 168 N Edwards St Independence, CA 93526	San Benito County District Attorney 419 4th Street, Second Floor Hollister, CA 95203	Office of the City Attorney, San Jose 200 East Santa Clara Street, 16th Floor San Jose, CA 95113
Kern County District Attorney 1215 Truxtun Avenue, 4th Floor Bakersfield, CA 93301	San Bernardino County District Attorney 303 West 3rd Street, 6th Floor San Bernardino, CA 92415-0502	
Kings County District Attorney 1400 West Lacey Boulevard Hanford, CA 93230	San Mateo County District Attorney 400 County Center, Third Floor Redwood City, CA 94063	
Lake County District Attorney 255 North Forbes Street Lakeport, CA 95453	Shasta County District Attorney 1355 West Street Redding, CA 96001	
Los Angeles County District Attorney 211 West Temple Street Suite 1200 Los Angeles, CA 90012	Sierra County District Attorney 100 Courthouse Square Downieville, CA 95936	
Madera County District Attorney 209 West Yosemite Avenue Madera, CA 93637	Siskiyou County District Attorney P.O. Box 986 Yreka, CA 96097	
	Solano County District Attorney 675 Texas Street, Suite 4500 Fairfield, CA 94533	

