CONFIDENTIAL

OFFICIAL INFORMATION PURSUANT TO EVIDENCE CODE § 1040

To: Proposition 65 Coordinator and
Robert Thomas

From: Dr. Mihir Vohra, PhD

Date: April 7, 2026

Subject: Notice of Violation – Documentation Supporting Certificate of Merit
1,4-Dioxane in Serum Sprays for Anti-Aging and/or Skin Firming

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SUMMARY FOR CONSUMER PRODUCT NOTICES

1. Name of each product and description of how it is used:

Beauty Pie Uber Youth Neck and Chest Super Lift Serum Spray. It is an anti-aging and/or skin firming spray that is sprayed directly onto the user's body.

2. Date and location where each product was purchased and, if applicable, the address where it was delivered. For products purchased online, provide the URL.

The non-exclusive exemplar product identified as 14D208 is a Serum Spray for Anti-Aging and/or Skin Firming that was purchased online at www.amazon.com on April 3, 2026, and delivered to Orangevale, CA, 95662 on April 4, 2026.

3. The component of the product causing the exposure and its material:

The entirety of the product causes the alleged exposure to 1,4-Dioxane, a listed carcinogen.

4. The type of test conducted:

The company identified in this notice tested the product in accordance with the California Safe Cosmetics Act of 2005 and Cosmetic Fragrance & Flavor Ingredient Right to Know Act of 2020 and reported the results of the testing to the California Department of Public Health ("CDPH").

5. The results of the testing, including the units, and the limits of detection and quantification. For multiple results, provide a table.

The company identified in this notice reported that the product contains 0.2607% or 2,607 parts per million ("ppm") 1,4 Dioxane. A printout from the CDPH database showing the

concentration of 1,4 Dioxane reported by the company to CDPH is attached hereto as **Exhibit 1**.

6. The daily exposure estimated by the expert that demonstrates that the defendants will not be able to prove an affirmative defense, including any calculations and the basis for assumptions that underlie the calculations:

The Product identified in the Notice contains over 10 ppm 1,4-Dioxane. This level was set pursuant to numerous Proposition 65 consent judgments and has become the de facto standard for a warning level for 1,4-Dioxane in certain personal care and cleaning products, including shampoo, hand soap and body wash.[1] Accordingly, use of each of the Products identified in this Notice result in an exposure under Proposition 65.

7. If the notice is a supplemental or amended notice, the date and number of the prior notice(s), and the relationship between the new and the prior notices:

CEH issued a notice in 2024 pertaining to 1,4-Dioxane in shampoo, soaps and body wash. *See* AG No. 2024-00941 (March 7, 2024).

Detailed Confidential Support for Certificate of Merit

As certified in the attached Certificate of Merit, the Center for Environmental Health ("CEH") believes that there is a reasonable and meritorious case for a citizen enforcement action based on the facts alleged in the Notice of Violation served herewith. Pursuant to Health & Safety Code §§ 25249.7(d)(1) and (h)(2), and 11 C.C.R. § 3102, CEH provides the following documentation in support of the Certificate of Merit:

1. Summary of Investigation:

For over a decade, CEH has been investigating the presence of toxic chemicals in cosmetic and personal care products offered for sale in California. As a result of this ongoing investigation, CEH discovered the problem of 1,4-Dioxane in shampoo, shower gel, body wash, and hand soap (the "Products"). CEH has further investigated other product types, including beautification and anti-aging products such as the Product. CEH reviewed information set forth on the CDPH Cosmetics Database, which is required to list toxic ingredients in cosmetic products that companies selling cosmetic products in California must report. The reporting requirement is set forth in the California Safe Cosmetics Act of 2005 ("CSCA") and requires companies to accurately report the presence and concentrations of a host of toxic chemicals that

[1] *See, e.g.*, *Steinman v. Dial Corporation* (2010) Case No. RG10511941 –hand soap; *Steinman v. Proctor and Gamble* (2010) – Hair care products, including shampoo; *Steinman v. Proctor and Gamble* (2011) – Shampoo; *Steinman v. Kroger* (2011) – Dandruff Shampoo; *Steinman v. Kao Brands Company* (2012) – Shampoo; *Steinman v. Alberto-Culver* (2012) – Bodywash; *Steinman v. Petra* (2012) – Bodywash, Hair + Body Shampoo. See also SCCS, *The Report of the ICCR Working Group: Considerations on Acceptable Trace Level of 1,4-Dioxane in Cosmetic Products*, December 15, 2015, accessible at: https://ec.europa.eu/health/scientific_committees/consumer_safety/docs/sccs_o_194.pdf

are contained in their products. California Health and Safety Code §11792. Additionally, the Cosmetic Fragrance & Flavor Ingredient Right to Know Act of 2020 ("CFFIRKA") requires companies selling cosmetic products in California to accurately report the presence and concentrations of toxic chemicals used for fragrance and/or flavoring in cosmetic products. In accordance with the CSCA and CFFIRKA, the company subject to this notice reported that the Product contains 1,4-Dioxane with a concentration of 0.2607%, which translates to 2,607 ppm. CEH then located the Products for sale in California and purchased the Product. The Product contained no warning whatsoever for 1,4-Dioxane or that the product contains a chemical known to cause cancer.

1,4-Dioxane in the Products is of concern in light of evidence that exposure to 1,4-Dioxane is associated with the development of certain cancers. *See generally* U.S. Dept. of Health & Human Services, "Toxicological Profile for 1,4-Dioxane," Chapter 3, publicly available online at https://wwwn.cdc.gov/TSP/ToxProfiles/ToxProfiles.aspx?id=955&tid=199 (updated April 2012) at pg. 29. The European Commission has specifically studied the problem of 1,4-Dioxane in shampoo, finding that the use of shampoo containing 1,4-Dioxane exposes users to significant amounts of the chemical. *See* European Commission Joint Research Centre, European Chemicals Bureau, "1,4-Dioxane Risk Assessment Report," at p. 51 (final report issued 2002), accessible at https://echa.europa.eu/documents/10162/a4e83a6a-c421-4243-a8df-3e84893082aa.

Dr. Mihir Vohra of CEH analyzed the test results that the company reported to CDPH. As reflected in his Curriculum Vitae (attached hereto as **Exhibit 2**), Dr. Vohra has extensive experience reviewing and analyzing the results of laboratory testing for toxic chemicals, reviewing and critiquing exposure assessments, and conducting independent exposure assessments to determine the risk of exposures to toxic chemicals from consumer products. Based on this experience and the high levels of 1,4-Dioxane detected in the Products via laboratory testing performed by the company subject to this notice, it is Dr. Vohra's opinion that consumers will be exposed to a significant amount of 1,4-Dioxane through use of the Products.

In preparing notices of violation, CEH's attorneys at the Lexington Law Group, LLP ("LLG") implemented a set of procedures to identify the proper parties to be noticed. These procedures include: (1) carefully reviewing all evidence to identify any brand names and responsible entities identified on the products or items at issue; and (2) conducting thorough online research to evaluate corporate structure, operations and number of employees of such entities, including government websites (*e.g.*, California Secretary of State, California Department of Labor, US Trademark Office, US Securities and Exchange Commission) and online corporate databases (*e.g.*, Google Finance, Manta, Dunn & Bradstreet). LLG's procedures also include reviewing the California Attorney General's Proposition 65 enforcement website to determine whether the entity has been noticed by any other private enforcers and, if so, the status of such notices and whether such notices could have any effect on CEH's claims. To ensure such due diligence is thoroughly performed for each entity and product or item to be noticed, LLG's office maintains checklists for each notice that have either been completed by or reviewed by an attorney.

2. § 3102(b): Identity and qualifications of the person with relevant and appropriate experience relied upon by the certifier:

Dr. Mihir Vohra, PhD
Center For Environmental Health
2201 Broadway, Suite 508
Oakland, CA 94612

A copy of Dr. Vohra's *Curriculum Vitae* is attached hereto as **Exhibit 2**.

3. § 3102(c): Facts, studies or other data regarding alleged exposure to the listed chemical that is the subject of the action:

After reviewing all of the information described in Section 1, I concluded that an individual using the Products subject to the accompanying Notice of Violation will be exposed to 1,4-Dioxane. I also concluded that none of this information proves that the alleged violators will be able to establish an affirmative defense under Health & Safety Code §25249.10(c).

End

Exhibit 1

Search Results

Über Youth™ Neck & Chest Firming Spray

Brand: Beauty Pie
Company: Beauty Pie Ltd

Categories

Other Skin Care Product

Intended Markets

General population

Forms

Spray - Non-Aerosol

UPCs

061030966525

Ingredients Reported and its Function

1,4-Dioxane (1,4-Diethyleneoxide) - Contaminant
Reported 04/01/2025

Benzyl Salicylate - Fragrance Allergen
Reported 04/01/2025

HEXYL CINNAMAL - Fragrance Allergen
Reported 04/01/2025

Limonene (1-Methyl-4-Prop-1-En-2-Yl-Cyclohexene; Dl-Limonene (Racemic); Dipentene; (R)-P-Mentha-1,8-Diene; (D-Limonene); (S)-P-Mentha-1,8-Diene; (L-Limonene)) - Fragrance Allergen
Reported 04/01/2025

Report Details

Product Entered 04/01/2025

Last Updated 07/18/2025

If a product has been reformulated and the reported ingredient removed from the product, "Date Removed" refers to the date of reformulation.

The cosmetics ingredients listed here were reported to the California Safe Cosmetics Program (CSCP). Not all information has been verified. Reporting is required regardless of the amount of the ingredient in the product. Inclusion of a product in this database does not necessarily mean that it has been shown to cause harm. For more on which companies are required to report to the CSCP and the chemicals included in the CA Safe Cosmetics Act, please refer to the FAQ section of this website.

Version 0.0.9

	A	B	C	D	E	F	G	H	I	J	K	L
1	Product Id	Company	Brand	Product Name	Variant	Product Discontinued Date	Product Submitted Date	Ingredient Name	Unit of Measure	Concentration	Ingredient Submitted Date	Ingredient Removed Date
1008	152713	Beauty Pie Ltd	Beauty Pie	Über Youth™ Neck & Chest Firming Spray			4/1/2025	1,4-Dioxane (1,4-Diethyleneoxide) 123-91-1	Percent	0.260712	4/1/2025	

Exhibit 2

Mihir Vohra (he/him/his)
mihir@ceh.org
510-655-3900 Ext. 308
2201 Broadway, Suite 508, Oakland CA 94612

EDUCATION

University of California San Francisco
PhD in Neuroscience. 2011 – 2017

University of Chicago
Bachelor of Arts in Biological Sciences with Specialization in Neuroscience. 2007 – 2011

WORK EXPERIENCE

Center for Environmental Health 2024 – present
Science Lead

- Conduct research in support of public interest litigation to enforce California's Proposition 65.
- Conduct exposure assessments for toxic chemicals in consumer products and environmental exposures from facility emissions.
- Oversee and direct consumer product testing program to identify and assess chemicals of concern.
- Manage Science and Health Advocacy Team to identify environmental exposures to toxic chemicals to support in public interest litigation.

Center for Health, Environment and Justice 2020 – 2024
Science and Technical Associate

- Serve as a subject matter expert on data analysis and health effects of fossil fuel pollution and toxic chemical exposures for community-based organizations in advocacy campaigns.
- Track state and federal policy initiatives related to environmental justice and communicate them to staff and partner organizations via talking points, presentations, and webinars.
- Manage collaboration between EPA officials, health experts, and community organizers to design federal policy to improve government response to toxic chemical exposures.
- Facilitate community engagement grounded in antiracism and environmental justice principles to support community-based organizations in advocacy campaigns.

Washington University in Saint Louis 2018 – 2021
Postdoctoral Research Associate, Principal Investigator: Jeffrey Milbrandt, MD, PhD

- Used *in vitro* and *in vivo* approaches to discover molecular mechanisms by which the enzyme SARM1 mediates axon degeneration.
- Trained lab staff on using HPLC and LC-MS techniques to quantify NAD metabolites from tissues and cells.
- Maintained up-to-date knowledge of latest research to design and execute projects.
- Managed long-term projects and collaborations to publish original research.

University of California San Francisco 2011 – 2017
Graduate Student Researcher, Principal Investigator: Kaveh Ashrafi, PhD

- Used *C. elegans* to elucidate how neuronal metabolism regulates learning, neurodegeneration, and aging.
- Developed methods for using HPLC to quantify tryptophan metabolites from aging *C. elegans* and taught them to colleagues.
- Maintained up-to-date knowledge of latest research to design and execute projects.
- Managed long-term projects and collaborations to publish original research.

PEER-REVIEWED PUBLICATIONS

Lemieux, G. A., Yoo, S., Lin, L., **Vohra, M.**, & Ashrafi, K (2023). The steroid hormone ADIOL promotes learning by reducing neural kynurenic acid levels. *Genes & Development*, 37(21-24).

Shen C.*, **Vohra, M.***, Zhang P., Mao X., Figley M.D., Zhu J., Sasaki Y., Wu H., DiAntonio A., Milbrandt J. (2021). Multiple domain interfaces mediate SARM1 autoinhibition. *Proceedings of the National Academy of Sciences*, 118(4), e2023151118.

Butler, V. J., Gao, F., Corrales, C. I., Cortopassi, W. A., Caballero, B., **Vohra, M.**, Ashrafi, K., Cuervo, A. M., Jacobson, M. P., Coppola, G., & Kao, A. W. (2019). Age- and stress-associated C. elegans granulins impair lysosomal function and induce a compensatory HLH-30/TFEB transcriptional response. *PLoS Genetics*, *15*(8), e1008295.

Butler, V. J., Salazar, D. A., Soriano-Castell, D., Alves-Ferreira, M., Dennissen, F., **Vohra, M.**, Oses-Prieto, J. A., Li, K. H., Wang, A. L., Jing, B., Li, B., Groisman, A., Gutierrez, E., Mooney, S., Burlingame, A. L., Ashrafi, K., Mandelkow, E. M., Encalada, S. E., & Kao, A. W. (2019). Tau/MAPT disease-associated variant A152T alters tau function and toxicity via impaired retrograde axonal transport. *Human Molecular Genetics*, *28*(9), 1498–1514.

Vohra, M., Lemieux, G. A., Lin, L., & Ashrafi, K. (2018). Kynurenic acid accumulation underlies learning and memory impairment associated with aging. *Genes & Development*, *32*(1), 14–19.

Vohra, M., Lemieux, G. A., Lin, L., & Ashrafi, K. (2017). The beneficial effects of dietary restriction on learning are distinct from its effects on longevity and mediated by depletion of a neuroinhibitory metabolite. *PLoS Biology*, *15*(8), e2002032.

*denotes equal contribution.

AWARDS AND FELLOWSHIPS

- People's Choice Award Winner, UCSF 3 Minute Thesis Competition, March 2016.
- Glenn Foundation/American Federation for Aging Research Scholarship, June 2015 – December 2015.
- Genentech Foundation Predoctoral Fellowship, September 2013 – August 2014.
- Hillblom Foundation Graduate Student Fellowship, September 2012 – August 2013.

PRESENTATIONS & POSTERS

- Caloric restriction improves learning through reducing kynurenic acid levels. **Gordon Research Conference on the Biology of Aging, poster** July 2015.
- Metabolic regulation of behavioral plasticity, neuronal function, and aging of the nervous system. **UCSF neuroscience program annual retreat, oral presentation** September 2014.
- Metabolic regulation of learning and age-induced learning impairment. **Bay Area Aging Meeting, oral presentation** May 2014.
- Kynurenic acid as a mediator of lifespan, behavioral plasticity, and age-related cognitive decline. **Bay Area Aging Meeting, poster** November 2013.
- Kynurenic acid as a mediator of lifespan, behavioral plasticity, and age-related cognitive decline. **The Science of Staying Younger Longer, poster** October 2013.

SKILLS

Programming and Data Analysis: Proficient in ArcGIS, R, and Graphpad Prism.
Community Engagement: Proficient in meeting facilitation strategies to build consensus and make decisions.
Community Organizing: Familiar with Action Network, VAN, and Spoke for digital organizing.
Writing and Organization: Proficient in Microsoft Office, Google Suite, Airtable, and familiar with AP and Chicago styles.