

# NOTICE OF VIOLATION

## California Safe Drinking Water and Toxic Enforcement Act

### LEAD IN FLOUR

04/17/2026

This Notice of Violation (“Notice”) is provided to you pursuant to and in compliance with California Health and Safety Code § 25249.7(d).

- For general information regarding the California Safe Drinking Water and Toxic Enforcement Act (“Proposition 65”), see the attached summary provided by the Office of Environmental Health Hazard Assessment (copies of summary not provided to public enforcement agencies).
- This Notice is provided by Public Protection Alliance LLC, 2450 Colorado Ave, Suite 100E, Santa Monica CA 90404. Public Protection Alliance is a California company acting in the interest of the general public seeking to further, among other causes, the protection of the environment, toxin reduction, the promotion and improvement of human health, the improvement of consumer rights, and corporate accountability. Public Protection Alliance designates its counsel, Emily Culbertson, as the responsible individual with regard to this Notice.

#### **Description of Violation:**

- Violators: The names and addresses of the violators are identified in the table below.
- Time Period of Exposure: The violations have been occurring since at least 11/12/2025 and are continuing to this day.
- 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 lead.
- Type of Product: The specific type of product causing the violation is flour. Non-exclusive examples of this specific type of product are listed in the table below.
- Description of Exposure: Ordinary use of the products identified in this Notice results in human exposures to lead because lead is found in the flour. The route of exposure for the violation is ingestion. These exposures occur in homes, workplaces, and everywhere else throughout California where consumers may be exposed to flour.

- No clear and reasonable Proposition 65 warning is provided with these products regarding the presence of lead in the products.

**Violators and Products Subject to this Notice**

Names and Addresses of Violators	Non-Exclusive Examples of the Products	UPC or Further Description of the Non-Exclusive Exemplar
Adusei Enterprise LLC 4120 Hutchinson River Pkwy East Unit 6B (Building 30A) Bronx, NY 10475	Motherland Goods Fermented Banku Flour Mix	ASIN B0DL5NFQ51
Amazon.com Services LLC 410 Terry Avenue North Seattle, WA 98109	Motherland Goods Fermented Banku Flour Mix	ASIN B0DL5NFQ51

**Resolution of Noticed Claims:**

- Public Protection Alliance intends to file a citizen enforcement lawsuit against the alleged violators unless such violators agree in a binding written instrument to: (1) recall all products already sold; (2) provide clear and reasonable warnings for products sold or otherwise provided to consumers in the future or reformulate such products to eliminate the lead exposures; and (3) pay an appropriate civil penalty based on the factors enumerated in California Health and Safety Code § 25249.7(b).
- Alleged violators should contact Public Protection Alliance through its counsel identified below to discuss resolution of this matter. It should be noted that Public Protection Alliance 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 Public Protection Alliance’s 60-day Notice. Therefore, while reaching an agreement with Public Protection Alliance 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 Violators 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 related to the presence or potential presence of lead in flour; purchase and sales information for such products; efforts to comply with Proposition 65 with respect to such products; advertising and marketing material related to such products; testing reports related to such products; communications with any person relating to the presence or potential presence of lead in such products; any

representative exemplars of any such products sold 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.

**Request for Names and Contact Information**

- The retailer 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 per Cal. Code Regs. tit. 27, §25600.2(g).

Please direct any inquiries regarding this Notice to Public Protection Alliance’s counsel, Emily Culbertson, at Akempis PC, 730 Arizona Ave, Floor 2, Santa Monica CA 90401, (424) 433-4760, [emilyculbertson@akempis.com](mailto:emilyculbertson@akempis.com).

AKEMPIS P.C.



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Emily Culbertson  
Attorney for Public Protection Alliance LLC

Enclosures:

Certificate of Merit

Certificate of Service

Appendix A (“The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary”) (sent only to the Violators)

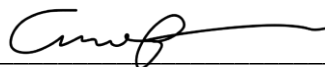
Factual information sufficient to establish the basis of the Certificate of Merit (sent only to Attorney General)

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

I, Emily Culbertson, hereby declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged the parties identified in the notice have violated Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings.
2. I am an attorney with Akempis P.C., and I represent the noticing party, Public Protection Alliance, LLC.
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 exposure to the listed chemical that is the subject of the action.
4. Based on the information obtained through those 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 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 this 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 and Safety Code section 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.

04/17/2026



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Emily Culbertson  
Attorney for Public Protection Alliance LLC

## **CERTIFICATE OF SERVICE**

I, Emily Culbertson, hereby declare:

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to this action. My business address is 730 Arizona Ave, 2<sup>nd</sup> Floor, Santa Monica CA 90401 and my email address is emilyculbertson@akempis.com.

On 04/17/2026, I served the following documents on all interested parties in this action by placing a true copy thereof in the manner and at the addresses indicated below:

**BY CERTIFIED MAIL:** I am readily familiar with the practice for collection and processing for correspondence for certified mailing by LetterStream, a printing and mailing company that sends certified mail via the U.S. Postal Service. I transmitted a PDF version of the documents noted below to LetterStream on 04/17/2026 for printing and mailing in the ordinary course of business to the names and addresses on the attached service lists. The printed correspondence will be deposited by LetterStream in the mail with the U.S. Postal Service.

***Please see attached service list for recipients sent by Certified Mail.***

***Contents mailed:*** NOTICE OF VIOLATION OF CALIFORNIA SAFE DRINKING WATER AND TOXIC ENVIRONMENT ACT; CERTIFICATE OF MERIT; THE SAFE DRINKING WATER AND TOXIC ENVIRONMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY

**BY MAIL:** I am readily familiar with the practice for collection and processing for correspondence for mailing by LetterStream, a printing and mailing company that sends certified mail via the U.S. Postal Service. I transmitted a PDF version of the documents noted below to LetterStream on 04/17/2026 for printing and mailing in the ordinary course of business to the names and addresses on the attached service lists. The printed correspondence will be deposited by LetterStream in the mail with the U.S. Postal Service.

***Please see attached service list for recipients sent by Mail.***

***Contents mailed:*** NOTICE OF VIOLATION OF CALIFORNIA SAFE DRINKING WATER AND TOXIC ENVIRONMENT ACT; CERTIFICATE OF MERIT.

**BY ELECTRONIC MAIL:** I transmitted a PDF version of the documents noted below via email to the email address(es) indicated on the attached service list before 5 p.m. on the date executed.

***Please see attached service list for recipients sent by Electronic Mail***

**Contents emailed:** NOTICE OF VIOLATION OF CALIFORNIA SAFE DRINKING WATER AND TOXIC ENVIRONMENT ACT; CERTIFICATE OF MERIT.

**BY ELECTRONIC UPLOAD:** I transmitted a PDF version of the documents noted below to the Office of Attorney General of California via the Proposition 65 File a 60-Day Notice website at <https://oag.ca.gov/prop65/add-60-day-notice> at before 5 p.m. on the date executed.

**Contents uploaded:** NOTICE OF VIOLATION OF CALIFORNIA SAFE DRINKING WATER AND TOXIC ENVIRONMENT ACT; CERTIFICATE OF MERIT; CONFIDENTIAL SUPPORTING EVIDENCE FOR CERTIFICATE OF MERIT.

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

Executed on 04/17/2026 at Los Angeles, California.



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Emily Culbertson

**SERVICE LIST BY CERTIFIED MAIL:**

Adusei Enterprise LLC  
4120 Hutchinson River Pkwy  
East  
Unit 6B (Building 30A)  
Bronx, NY 10475

Adusei Enterprise LLC  
c/o Registered Agent  
Issac Fenten Adusei  
115 E 57th St  
11th Floor  
New York, NY 10022

Amazon.com Services LLC  
410 Terry Avenue North  
Seattle, WA 98109

**SERVICE LIST BY MAIL:**

Amador County DA  
708 Court Street, #202  
Jackson, CA 95642

Butte County DA  
25 County Center Drive, Suite 245  
Oroville, CA 95965

Colusa County, DA  
310 6th Street  
Colusa, CA 95932

Del Norte County DA  
450 H Street, Room 171  
Crescent City, CA 95531

Glenn County DA  
P.O. Box 430  
Willows, CA 95988

Humboldt County DA  
825 5th Street, 4th Floor  
Eureka, CA 95501

Imperial County DA  
940 West Main Street, Ste 102  
El Centro, CA 92243

Kern County DA  
1215 Truxtun Ave.  
Bakersfield, CA 93301

Kings County DA  
1400 West Lacey Blvd.  
Hanford, CA 93230

Lake County DA  
255 N. Forbes Street  
Lakeport, CA 95453

City of LA, City Atty  
200 N. Main Street #800  
Los Angeles, CA 90012

LA County DA  
211 W. Temple St, Ste. 1200  
Los Angeles, CA 90012

Madera County DA  
300 South G Street, Suite 300  
Madera, CA 93637

Mendocino County DA  
P.O. Box 1000  
Ukiah, CA 95482

Modoc County DA  
204 S. Court Street, Room 202  
Alturas, CA 96101

Mono County DA  
P.O. Box 2053  
Mammoth Lakes, CA 93546

San Benito County DA  
419 4th Street  
Hollister, CA 95023

San Bernardino County DA  
303 W. Third Street  
San Bernardino, CA 92415

San Mateo County DA  
400 County Center, Third Floor  
Redwood City, CA 94063

Shasta County DA  
1355 West Street  
Redding, CA 96001

Sierra County DA  
100 Courthouse Square  
Downieville, CA 95936

Siskiyou County DA  
P.O. Box 986  
Yreka, CA 96097

Solano County DA  
675 Texas Street, Suite 4500  
Fairfield, CA 94533

Stanislaus County DA  
832 12th Street, Suite 300  
Modesto, CA 95354

Sutter County DA  
463 2nd Street, Suite 102  
Yuba City, CA 95991

Tehama County DA  
P.O. Box 519  
Red Bluff, CA 96080

Trinity County DA  
P.O. Box 310  
Weaverville, CA 96093

Tuolumne County DA  
423 N. Washington Street  
Sonora, CA 95370

Yuba County DA  
215 5th. Street, Suite 152  
Marysville, CA 95901

**SERVICE LIST BY ELECTRONIC MAIL:**

Alameda County  
Ursula Jones Dickson, DA 7677  
Oakport St., Ste 650  
Oakland, CA 94621  
[CEPDProp65@acgov.org](mailto:CEPDProp65@acgov.org)

Alpine County  
Robert K. Priscaro DA  
P.O.Box 248  
Markleville, CA 96120  
[prop65enf@alpinecountyca.gov](mailto:prop65enf@alpinecountyca.gov)

Calaveras County  
Barbara Yook DA  
891 Mountain Ranch Rd.  
San Andreas, CA 95249  
[Prop65Env@co.calaveras.ca.us](mailto:Prop65Env@co.calaveras.ca.us)

Contra Costa County  
Bill Washam, DA  
900 Ward Street  
Martinez, CA 94553  
[Bill.Washam@contracostada.org](mailto:Bill.Washam@contracostada.org)

El Dorado County  
James Clinchard, ADA  
778 Pacific Street  
Placerville, CA 95667  
[EDCDAPROP65@edcda.us](mailto:EDCDAPROP65@edcda.us)

Fresno County  
Lisa A. Smittcamp, DA  
2100 Tulare Street  
Fresno, CA 93721  
[consumerprotection@fresnocountyca.gov](mailto:consumerprotection@fresnocountyca.gov)

Inyo County  
Thomas L. Hardy, DA  
168 North Edwards Street  
Independence, CA 93526  
[inyoda@inyocounty.us](mailto:inyoda@inyocounty.us)

Lassen County  
Devin Chandler, Prog. Coord.  
2950 Riverside Dr  
Susanville, CA 96130  
[dchandler@co.lassen.ca.us](mailto:dchandler@co.lassen.ca.us)

Marin County  
Lori E. Frugoli, DA  
3501 Civic Center Dr, Rm 145  
San Rafael, CA 94903  
[consumer@marincounty.gov](mailto:consumer@marincounty.gov)

Mariposa County  
Walter W. Wall, DA  
P.O. Box 730  
Mariposa, CA 95338  
[mcd@mariposacounty.org](mailto:mcd@mariposacounty.org)

Merced County  
Kimberly Lewis, DA  
550 West Main Street  
Merced, CA 95340  
[Prop65@countyofmerced.com](mailto:Prop65@countyofmerced.com)

Monterrey County  
Jeannine M. Pacioni, DA  
1200 Aguajito Road  
Monterey, CA 93940  
[Prop65DA@co.monterey.ca.us](mailto:Prop65DA@co.monterey.ca.us)

Napa County  
Allison Haley, DA  
1127 First Street, Suite C  
Napa, CA 94559  
[CEPD@countyofnapa.org](mailto:CEPD@countyofnapa.org)

Nevada County  
Clifford H. Newell, DA  
201 Commercial Street  
Nevada City, CA 95959  
[DA.Prop65@co.nevada.ca.us](mailto:DA.Prop65@co.nevada.ca.us)

Orange County  
Todd Spitzer, DA  
300 N. Flower Street  
Santa Ana, CA 92703  
[Prop65Notice@ocdapa.org](mailto:Prop65Notice@ocdapa.org)

Placer County  
Morgan Briggs Gire, DA  
10810 Justice Center Drive  
Roseville, CA 95678  
[prop65@placer.ca.gov](mailto:prop65@placer.ca.gov)

Plumas County  
David Hollister, DA  
520 Main St.  
Quincy, CA 95971  
[davidhollister@countyofplumas.com](mailto:davidhollister@countyofplumas.com)

Riverside County  
Paul E. Zellerbach, DA  
3072 Orange Street  
Riverside, CA 92501  
[Prop65@rivcoda.org](mailto:Prop65@rivcoda.org)

Sacramento County  
Anne Marie Schubert, DA  
901 G Street  
Sacramento, CA 95814  
[Prop65@sacda.org](mailto:Prop65@sacda.org)

San Diego County  
Summer Stephan, DA  
330 West Broadway  
San Diego, CA 92101  
[SanDiegoDAProp65@sdcda.org](mailto:SanDiegoDAProp65@sdcda.org)

San Diego City  
Mark Ankcorn, Dep City Atty  
1200 Third Avenue  
San Diego, CA 92101  
[CityAttyProp65@sandiego.gov](mailto:CityAttyProp65@sandiego.gov)

San Francisco County  
Brooke Jenkins, DA  
350 Rhode Island Street  
San Francisco, CA 94103  
[Prop65@sfgov.org](mailto:Prop65@sfgov.org)

San Francisco City  
Henry Lifton, Dep City Atty  
1390 Market St, 7th Fl.  
San Francisco, CA 94102  
[Prop65@sfcityatty.org](mailto:Prop65@sfcityatty.org)

San Joaquin County  
Tori Verber Salazar, DA  
222 E. Weber Ave., Rm 202  
Stockton, CA 95202  
[DAConsumer.Environmental@sjcda.org](mailto:DAConsumer.Environmental@sjcda.org)

San Luis Obispo County  
Eric J. Dobroth, Deputy DA  
County Government  
Center Annex, 4th Floor  
San Luis Obispo, CA 93408  
[edobroth@co.slo.ca.us](mailto:edobroth@co.slo.ca.us)

Santa Cruz County  
Jeffrey S. Rosell, DA  
701 Ocean Street  
Santa Cruz, CA 95060  
[Prop65DA@santacruzcounty.us](mailto:Prop65DA@santacruzcounty.us)

Ventura County  
Gregory D. Totten, DA  
800 S Victoria Ave  
Ventura, CA 93009  
[daspecialops@ventura.org](mailto:daspecialops@ventura.org)

Santa Barbara County  
Christopher Dalbey, Deputy DA  
1112 Santa Barbara St.  
Santa Barbara, CA 93101  
[DAProp65@co.santa-barbara.ca.us](mailto:DAProp65@co.santa-barbara.ca.us)

Sonoma County  
Carla Rodriguez, DA  
600 Administration Dr, Rm 212J  
Santa Rosa, CA 95403  
[ECLD@sonomacounty.org](mailto:ECLD@sonomacounty.org)

Yolo County  
Jeff W. Reising, DA  
301 Second Street  
Woodland, CA 95695  
[cfepd@yolocounty.org](mailto:cfepd@yolocounty.org)

Santa Clara County  
Bud Porter, Supervising Deputy DA  
70 W Hedding St.  
San Jose, CA 95110  
[EPU@da.sccgov.org](mailto:EPU@da.sccgov.org)

Tulare County  
Phillip J. Cline, DA  
221 S Mooney Blvd  
Visalia, CA 95370  
[Damail@tularecounty.ca.gov](mailto:Damail@tularecounty.ca.gov)