

NOTICE OF VIOLATION

California Safe Drinking Water and Toxic Enforcement Act

LEAD AND CADMIUM IN MATCHA

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 11/07/2025 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 chemicals involved in these violations are lead and cadmium.
- Type of Product: The specific type of product causing the violation is matcha. 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 and cadmium because lead and cadmium is found in the matcha. 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 matcha.

- No clear and reasonable Proposition 65 warning is provided with these products regarding the presence of lead and cadmium 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
Organically Raw, LLC 4243 SW 71 Ave. Miami, FL 33155	Save the Rainforest by Shanti Balance - Blueberry Matcha	ASIN B0839Q6JF4
Amazon.com Services LLC 410 Terry Avenue North Seattle, WA 98109	Save the Rainforest by Shanti Balance - Blueberry Matcha	ASIN B0839Q6JF4

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 and cadmium 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 and cadmium in matcha; 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 and cadmium 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.

AKEMPIS P.C.



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)

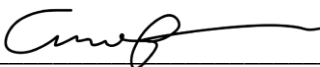
Factual information sufficient to establish the basis of the Certificate of Merit (sent only to Attorney General)

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



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, 2nd 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.



Emily Culbertson

SERVICE LIST BY CERTIFIED MAIL:

Organically Raw, LLC
c/o Registered Agent
Lauren Feingold
4243 SW 71 AVE
Miami, FL 33155

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

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

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

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

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

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

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

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

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

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

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

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

Kern County DA
1215 Truxtun Ave.
Bakersfield, CA 93301

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

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

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

Shasta County DA
1355 West Street
Redding, CA 96001

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

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

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

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

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

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

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

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

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

Sierra County DA
100 Courthouse Square
Downieville, CA 95936

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

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

SERVICE LIST BY ELECTRONIC MAIL:

Alameda County
Ursula Jones Dickson, DA 7677
Oakport St., Ste 650
Oakland, CA 94621
CEPDProp65@acgov.org

Alpine County
Robert K. Priscaro DA
P.O.Box 248
Markleville, CA 96120
prop65enf@alpinecountyca.gov

Calaveras County
Barbara Yook DA
891 Mountain Ranch Rd.
San Andreas, CA 95249
Prop65Env@co.calaveras.ca.us

Contra Costa County
Bill Washam, DA
900 Ward Street
Martinez, CA 94553
Bill.Washam@contracostada.org

El Dorado County
James Clinchard, ADA
778 Pacific Street
Placerville, CA 95667
EDCDAPROP65@edcda.us

Fresno County
Lisa A. Smittcamp, DA
2100 Tulare Street
Fresno, CA 93721
consumerprotection@fresnocountyca.gov

Inyo County
Thomas L. Hardy, DA
168 North Edwards Street
Independence, CA 93526
inyoda@inyocounty.us

Lassen County
Devin Chandler, Prog. Coord.
2950 Riverside Dr
Susanville, CA 96130
dchandler@co.lassen.ca.us

Marin County
Lori E. Frugoli, DA
3501 Civic Center Dr, Rm 145
San Rafael, CA 94903
consumer@marincounty.gov

Mariposa County
Walter W. Wall, DA
P.O. Box 730
Mariposa, CA 95338
mcd@mariposacounty.org

Merced County
Kimberly Lewis, DA
550 West Main Street
Merced, CA 95340
Prop65@countyofmerced.com

Monterrey County
Jeannine M. Pacioni, DA
1200 Aguajito Road
Monterey, CA 93940
Prop65DA@co.monterey.ca.us

Napa County
Allison Haley, DA
1127 First Street, Suite C
Napa, CA 94559
CEPD@countyofnapa.org

Nevada County
Clifford H. Newell, DA
201 Commercial Street
Nevada City, CA 95959
DA.Prop65@co.nevada.ca.us

Orange County
Todd Spitzer, DA
300 N. Flower Street
Santa Ana, CA 92703
Prop65Notice@ocdapa.org

Placer County
Morgan Briggs Gire, DA
10810 Justice Center Drive
Roseville, CA 95678
prop65@placer.ca.gov

Plumas County
David Hollister, DA
520 Main St.
Quincy, CA 95971
davidhollister@countyofplumas.com

Riverside County
Paul E. Zellerbach, DA
3072 Orange Street
Riverside, CA 92501
Prop65@rivcoda.org

Sacramento County
Anne Marie Schubert, DA
901 G Street
Sacramento, CA 95814
Prop65@sacda.org

San Diego County
Summer Stephan, DA
330 West Broadway
San Diego, CA 92101
SanDiegoDAProp65@sdacda.org

San Diego City
Mark Ankcorn, Dep City Atty
1200 Third Avenue
San Diego, CA 92101
CityAttyProp65@sandiego.gov

San Francisco County
Brooke Jenkins, DA
350 Rhode Island Street
San Francisco, CA 94103
Prop65@sfgov.org

San Francisco City
Henry Lifton, Dep City Atty
1390 Market St, 7th Fl.
San Francisco, CA 94102
Prop65@sfcityatty.org

San Joaquin County
Tori Verber Salazar, DA
222 E. Weber Ave., Rm 202
Stockton, CA 95202
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

Santa Cruz County
Jeffrey S. Rosell, DA
701 Ocean Street
Santa Cruz, CA 95060
Prop65DA@santacruzcounty.us

Ventura County
Gregory D. Totten, DA
800 S Victoria Ave
Ventura, CA 93009
daspecialops@ventura.org

Santa Barbara County
Christopher Dalbey, Deputy DA
1112 Santa Barbara St.
Santa Barbara, CA 93101
DAProp65@co.santa-barbara.ca.us

Sonoma County
Carla Rodriguez, DA
600 Administration Dr, Rm 212J
Santa Rosa, CA 95403
ECLD@sonomacounty.org

Yolo County
Jeff W. Reising, DA
301 Second Street
Woodland, CA 95695
cfepd@yolocounty.org

Santa Clara County
Bud Porter, Supervising Deputy DA
70 W Hedding St.
San Jose, CA 95110
EPU@da.sccgov.org

Tulare County
Phillip J. Cline, DA
221 S Mooney Blvd
Visalia, CA 95370
Damail@tularecounty.ca.gov