

## NOTICE OF VIOLATION

### California Safe Drinking Water and Toxic Enforcement Act

#### Safrole in Lotion, Soap, and Gel Products

May 8, 2026

This Notice of Violation 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. 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 Illegal Toxic Threats Program and a responsible individual within CEH.

#### Description of Violation:

- Violators: 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 May 8, 2025, and are continuing to this day.
- Provision of Proposition 65: This Notice of Violation 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 Safrole. Exposures to Safrole occur from use of the products identified in this Notice.
- Types of Products: The specific types of products causing these violations are lotion, soap, and gel products. Non-exclusive examples of this specific type of product are identified on the attached Exhibit 1.
- Description of Exposure: This Notice addresses consumer exposures to Safrole. Use of the products subject to this Notice results in human exposures to Safrole. The products contain Safrole. The route of exposure for the violation is dermal contact and absorption. These exposures occur through the reasonably foreseeable use of the products when, for example, individuals apply the products to their skin. These exposures occur in homes, workplaces and

everywhere else throughout California where the products are used. No clear and reasonable warning is provided with these products regarding the carcinogenic hazards of Safrole.

**Resolution of Noticed Claims:**

Based on the allegations set forth in this Notice, CEH intends to file a citizen enforcement lawsuit against each 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 Safrole exposures; and (3) pay an appropriate civil penalty based on the factors enumerated in California Health and Safety Code Section 25249.7(b). If any 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 each 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 Safrole in lotion, soap, and gel products; 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 Safrole in such products; and representative exemplars of each lot of each variety of any such product sold by each alleged violator since one year prior to the date of 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 Mark N. Todzo at Lexington Law Group, 503 Divisadero Street, San Francisco, CA 94117, (415) 913-7800, [mtodzo@lexlawgroup.com](mailto:mtodzo@lexlawgroup.com).

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

I, Mark N. Todzo, 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 an attorney with the Lexington Law Group, LLP 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 violators 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.

May 8, 2026



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Mark N. Todzo  
Attorney for CENTER FOR  
ENVIRONMENTAL HEALTH

**EXHIBIT 1**  
**May 8, 2026 Notice of Violation**  
**Safrole in Lotion, Soap, and Gel Products**

Names and Addresses of Responsible Parties	Non-Exclusive Examples of the Products	UPC or Further Description
<p style="text-align: center;"><b>Morrocianoil, Inc.</b>            1185 Avenue of The Americas            33<sup>rd</sup> Floor, Legal Dept.            New York, NY, 10036</p>	<p style="text-align: center;">Morrocianoil Shower Gel            Cleanser</p>	<p style="text-align: center;">UPC: 7290113145306;            Ambre Noir; Size; 8.4 Fl Oz;            Kohl's SKU: 64210764</p>
	<p style="text-align: center;">Morrocianoil Hand Wash</p>	<p style="text-align: center;">UPC: 7290113145320;            Ambre Noir; Size: 12.2 Fl Oz;            Amazon ASIN:            B09Q5MG5MB</p>
	<p style="text-align: center;">Morrocianoil Hand Cream</p>	<p style="text-align: center;">UPC: 7290113146433;            Ambre Noir; Size: 3.4 Fl Oz;            Kohl's SKU: #86227626</p>
	<p style="text-align: center;">Morrocianoil Body Lotion</p>	<p style="text-align: center;">UPC: 7290113146556;            Ambre Noir; Size: 12.2 Fl Oz;            Ulta Beauty SKU: #2644242</p>

1 **PROOF OF SERVICE**

2 I, Morgan Margulies, 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  
mmargulies@lexlawgroup.com.

6 On May 8, 2026, I served the following document(s) on all interested parties in this action  
7 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](https://oag.ca.gov/prop65/60-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 Ursula Jones Dickson, District Attorney  
7677 Oakport Street, Suite 650  
Oakland, CA 94621  
22 CEPDProp65@acgov.org

James Clinchard, El Dorado Assistant  
District Attorney  
778 Pacific Street  
Placerville, CA 95667  
EDCDAPROP65@edcda.us

23 Robert K. Priscaro, District Attorney  
P.O.Box 248  
24 Markleville, CA 96120  
prop65enf@alpinecountyca.gov

Lisa A. Smittcamp, Fresno District Attorney  
2100 Tulare Street  
Fresno, CA 93721  
consumerprotection@fresnocountyca.gov

25 Barbara Yook, Calaveras District Attorney  
26 891 Mountain Ranch Rd.  
San Andreas, CA 95249  
27 Prop65Env@co.calaveras.ca.us

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

28

1	Devin Chandler, Lassen Program Coordinator 2950 Riverside Dr Susanville, CA 96130 dchandler@co.lassen.ca.us	Paul E. Zellerbach, Riverside District Attorney 3072 Orange Street Riverside, CA 92501 Prop65@rivcoda.org
4	Lori E. Frugoli, Marin District Attorney 3501 Civic Center Drive, Room 145 San Rafael, CA 94903 consumer@marincounty.gov	Anne Marie Schubert, Sacramento District Attorney 901 G Street Sacramento, CA 95814 Prop65@sacda.org
7	Walter W. Wall, Mariposa District Attorney P.O. Box 730 Mariposa, CA 95338 mcda@mariposacounty.org	Summer Stephan, San Diego District Attorney 330 West Broadway San Diego, CA 92101 SanDiegoDAProp65@sdca.org
9	Kimberly Lewis, Merced District Attorney 550 West Main Street Merced, CA 95340 Prop65@countyofmerced.com	Mark Ankcorn, San Diego Deputy City Attorney 1200 Third Avenue San Diego, CA 92101 CityAttyProp65@sandiego.gov
12	Jeannine M. Pacioni, Monterey District Attorney 1200 Aguajito Road Monterey, CA 93940 Prop65DA@co.monterey.ca.us	Brooke Jenkins, District Attorney 350 Rhode Island Street San Francisco, CA 94103 Prop65@sfgov.org
15	Allison Haley, Napa District Attorney 1127 First Street, Suite C Napa, CA 94559 CEPD@countyofnapa.org	Henry Lifton, San Francisco Deputy City Attorney 1390 Market Street, 7th Floor San Francisco, CA 94102 Prop65@sfcityatty.org
17	Clifford H. Newell, Nevada District Attorney 201 Commercial Street Nevada City, CA 95959 DA.Prop65@co.nevada.ca.us	Tori Verber Salazar, San Joaquin District Attorney 222 E. Weber Avenue, Room 202 Stockton, CA 95202 DAConsumer.Environmental@sjcda.org
20	Todd Spitzer, District Attorney of Orange County 300 N Flower St Santa Ana, CA 92703 Prop65Notice@ocdapa.org	Eric J. Dobroth, San Luis Obispo Deputy District Attorney County Government Center Annex, 4th Floor San Luis Obispo, CA 93408 edobroth@co.slo.ca.us
24	Morgan Briggs Gire, Placer District Attorney 10810 Justice Center Drive Roseville, CA 95678 prop65@placer.ca.gov	Christopher Dalbey, Santa Barbara Deputy District Attorney 1112 Santa Barbara St. Santa Barbara, CA 93101 DAProp65@co.santa-barbara.ca.us
27	David Hollister, Plumas District Attorney 520 Main St. Quincy, CA 95971 davidhollister@countyofplumas.com	

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Nora V. Frimann, Santa Clara City Attorney  
200 E. Santa Clara Street, 16th Floor  
San Jose, CA 96113  
Proposition65notices@sanjoseca.gov

Carla Rodriguez, District Attorney  
600 Administration Drive, Room 212J  
Santa Rosa, CA 95403  
ECLD@sonoma-county.org

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

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

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

Jeff W. Reisig, Yolo District Attorney  
301 Second Street  
Woodland, CA 95695  
cfepd@yolocounty.org

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

Executed on May 8, 2026 at San Francisco, California.



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Morgan Margulies

**SERVICE LIST**

District Attorney of Amador County  
708 Court St, Ste. 202  
Jackson, CA 95642

District Attorney of Butte County  
Administration Building  
25 County Center Dr, Ste 245  
Oroville, CA 95965

District Attorney of Colusa County  
310 6th St  
Colusa, CA 95932

District Attorney of Contra Costa County  
1025 Escobar Street  
Martinez, CA 94553

District Attorney of Del Norte County  
450 H St, Ste. 171  
Crescent City, CA 95531

District Attorney of Glenn County  
P.O. Box 430  
Willows, CA 95988

District Attorney of Humboldt County  
825 5th St  
Eureka, CA 95501

District Attorney of Imperial County  
940 W. Main St, Ste. 102  
El Centro, CA 92243

District Attorney of Kern County  
1215 Truxtun Ave  
Bakersfield, CA 93301

District Attorney of Kings County  
1400 West Lacey Blvd.  
Hanford, CA 93230

District Attorney of Lake County  
375 3rd St  
Lakeport, CA 95453

District Attorney of Los Angeles County  
211 W. Temple St, Ste. 1200  
Los Angeles, CA 90012-3210

District Attorney of Madera County  
300 South G St, Ste 300,  
Madera, CA 93637

District Attorney of Mendocino County  
P.O. Box 1000  
Ukiah, CA 95482

District Attorney of Modoc County  
204 S. Court St, Ste 202  
Alturas, CA 96101-4020

District Attorney of Mono County  
P.O. Box 2053  
Mammoth Lakes, CA 93546

District Attorney of San Benito County  
419 Fourth St, 2<sup>nd</sup> Fl.  
Hollister, CA 95023

San Bernardino County  
District Attorney's Office  
303 W. 3rd St  
San Bernardino, CA 92415-0502

District Attorney of San Mateo County  
400 County Center, 3<sup>rd</sup> Fl.  
Redwood City, CA 94063

District Attorney of Shasta County  
1355 West St  
Redding, CA 96001

District Attorney of Sierra County  
P.O. Box 457  
Downieville, CA 95936

District Attorney of Siskiyou County  
311 Fourth St, Rm 204  
Yreka, CA 96097

District Attorney of Solano County  
675 Texas St, Ste. 4500  
Fairfield, CA 94533

District Attorney of Stanislaus County  
832 12th St, Ste. 300  
Modesto, CA 95354

District Attorney of Sutter County  
463 2nd St, Ste 102  
Yuba City, CA 95991

District Attorney of Tehama County  
444 Oak St, Rm L  
Red Bluff, CA 96080

District Attorney of Trinity County  
P.O. Box 310  
11 Court St  
Weaverville, CA 96093

District Attorney of Tulare County  
221 South Mooney Blvd., Room 224  
Visalia, CA 93291

District Attorney of Tuolumne County  
423 N Washington St  
Sonora, CA 95370

District Attorney of Yuba County  
215 Fifth St, Ste 152  
Marysville, CA 95901

Los Angeles City Attorney's Office  
City Hall East  
200 N. Main St, Rm. 800  
Los Angeles, CA 90012

Jay Elarar, President/CEO\*  
Morrocanoil, Inc.  
1185 Avenue of The Americas  
33rd Floor, Legal Dept.  
New York, NY, 10036

Jay Elarar, President/CEO\*  
Morrocanoil, Inc.  
135 East 57th Street, 25th Floor  
New York, NY, 10022

Jay Elarar, President/CEO\*  
Morrocanoil, Inc.  
2049 Century Park East, Suite 3500  
Los Angeles, CA, 90067