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July 21, 2026

To: President or CEO – Simply Sooney, LLC
Amazon.com Services LLC
California Attorney General's Office
District Attorney's Office for 58 counties
City Attorney's for San Francisco, San Diego, San Jose, and Los Angeles
(See attached Certificate of Service)

From: Center for Consumer Safety, LLC

Re: Notice of Violations of California Health & Safety Code Section 25249.5 *et seq.*

Dear Addressees:

This firm represents Center for Consumer Safety, LLC ("CCS") in connection with this Notice of Violations of California's Safe Drinking Water and Toxic Enforcement Act, which is codified at California Health & Safety Code Section 25249.5 *et seq.* ("Proposition 65").

CCS is a California limited liability company dedicated to safeguarding the public from harmful and toxic chemicals found in everyday projects. This letter serves to provide notification of these violations to you and to the public enforcement agencies of Proposition 65.

This letter constitutes notice that the entity listed below has violated and continues to violate provisions of Proposition 65. Specifically, the entity listed below has violated and continues to violate the warning requirement at § 25249.6 of the California Health & Safety Code, which provides that "[n]o person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the state to cause cancer or reproductive toxicity without first giving clear and reasonable warning to such individual..." A summary of Proposition 65, prepared by the California Office of Environmental Health Hazard Assessment, is enclosed with the copy of this letter sent to the Violators.

Alleged Violators: The name of the violators covered by this notice that violated Proposition 65 (hereinafter collectively referred to as the "Violators") is Simply Sooney, LLC and Amazon.com Services LLC.

Listed Chemicals: These violations involve exposure to the listed chemical lead. On February 27, 1987, the State of California officially listed lead as a chemical known to cause developmental toxicity, and male and female reproductive toxicity. On October 1, 1992, the State of California officially listed lead and lead compounds as chemicals known to cause cancer.

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Consumer Products: The following specific product that is causing exposures in violation of Proposition 65 and is the subject of this notice is Simply Sooney Vegan Fluoride Free Tooth Powder – Peppermint.

Violation: The alleged Violators knowingly and intentionally exposed and continue to expose consumers within the State of California to lead without providing a Proposition 65 warning. The Violators have manufactured, marketed, distributed, and/or sold the listed product, which has exposed and continues to expose numerous individuals within California to the identified chemicals, lead and cadmium.

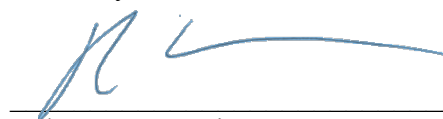
Route of Exposure: The consumer exposures that are the subject of this notice result from the recommended use of these products by consumers. The route of exposure to lead is through ingestion.

Proposition 65 requires that a clear and reasonable warning be provided prior to exposure to lead. The listed product was purchased online. A Proposition 65-compliant warning should have appeared on the listed product's packaging and on the product display page and/or point of sale. The Violators violated Proposition 65 because they failed to provide an appropriate warning to persons using these products that they are being exposed to lead. Each of these ongoing violations has occurred on every day since July 21, 2023, as well as every day since the products were introduced in the California marketplace, and will continue every day until clear and reasonable warnings are provided to product purchasers and users.

Pursuant to California Health & Safety Code § 25249.7(d), CCS intends to file a citizen enforcement action sixty days after effective service of this notice unless the Violators agree in an enforceable written agreement to: (1) reformulate the listed products so as to eliminate further exposures to the identified chemicals; (2) pay an appropriate civil penalty; and (3) provide clear and reasonable warnings compliant with Proposition 65 to all persons located in California who purchased the above products in the last three years. Consistent with the public interest goals of Proposition 65 and my client's objectives in pursuing this notice, CCS is interested in seeking a constructive resolution to this matter. Such resolution will avoid both further unwarned consumer exposures to the identified chemical and expensive and time-consuming litigation.

CCS is located at 2001 Addison St., Suite 300, #834, Berkeley, CA 94704. Its responsible person for the purposes of this notice letter is Mike White, who can be reached at mike@centerforconsumersafety.com, phone: (510) 636-5051. CCS has retained my firm in connection with this matter. Please direct all questions concerning this notice to me, Rebecca Davis, at rebecca@lozeaudrury.com, (510) 836-4200, Lozeau Drury LLP, 1939 Harrison St., Suite 150, Oakland, CA 94612.

Sincerely,



Rebecca L. Davis

Notice of Violation of Cal. Health & Safety Code §§ 25249.5 *et seq.*

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Attachments:

Certificate of Merit

Certificate of Service

OEHHA Summary (to Violators and their Registered Agents for Service of Process only)

Additional Supporting Information for Certificate of Merit (to AG only)

CERTIFICATE OF MERIT

**Re: Center for Consumer Safety, LLC 's Notice of Proposition 65 Violations by
Simply Sooney, LLC, and Amazon.com Services LLC**

I, Rebecca L. Davis, declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged that the party identified in the notice violated California Health & Safety Code Section 25249.6 by failing to provide clear and reasonable warnings.
2. I am an attorney for the noticing party, Center for Consumer Safety, 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 alleged exposure to the listed chemicals that are the subject of the notice.
4. Based on the information obtained through those consultants, and 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 that the information did not prove that the alleged violator(s) will be able to establish any of the affirmative defenses set forth in the statute.
5. Along with the copy of this Certificate of Merit, additional factual information sufficient to establish the basis for this certificate has been served on the Attorney General, including the information identified in California 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.

Dated: July 21, 2026



Rebecca L. Davis

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury under the laws of the State of California that the following is true and correct:

I am a citizen of the United States and over the age of 18 years of age. My business address is 1939 Harrison St., Suite 150, Oakland, California. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Oakland, California.

On July 21, 2026, I served the following documents: **(1) NOTICE OF VIOLATIONS OF CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; (2) CERTIFICATE OF MERIT; and (3) “THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY”** on the following parties by placing a true and correct copy thereof in a sealed envelope with postage fully prepaid for delivery by Certified Mail, addressed to the entity listed below, and placing the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business’s practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.

Cynthia Rodriguez, President
or Current President or CEO
Simply Sooney, LLC
496 County Road 3567
Cleveland, TX 77327

United States Corporation Agents, Inc.
(Registered Agent for Simply Sooney, LLC)
10601 Clarence Dr., Suite 250
Frisco, TX 75033

CSC – Lawyers Incorporating Service
(Registered Agent for Amazon.com Services
LLC)
2710 Gateway Oaks Dr. #150N
Sacramento, CA 95833

On July 21, 2026, I served the following documents: **(1) NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; (2) CERTIFICATE OF MERIT; and (3) ADDITIONAL SUPPORTING INFORMATION FOR CERTIFICATE OF MERIT AS REQUIRED BY CALIFORNIA HEALTH & SAFETY CODE §25249.7(d)(1)** on the following party when a true and correct copy thereof was uploaded on the California Attorney General’s website, which can be accessed at <https://oag.ca.gov/prop65/add-60-day-notice> :

Office of the California Attorney General
Prop 65 Enforcement Reporting
1515 Clay Street, Suite 2000
Oakland, CA 94612-0550

On July 21, 2026, I served the following documents: **(1) NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; and (2) CERTIFICATE OF MERIT** on the following parties when a true and correct copy thereof was sent via electronic mail to each of the parties listed below:

Ursula Jones Dickson, District Attorney
Alameda County
7677 Oakport Street, Suite 650
Oakland, CA 94621
CEPDProp65@acgov.org

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Barbara Yook, District Attorney
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San Andreas, CA 95249
Prop65Env@co.calaveras.ca.us

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Jeannine M. Pacioni, District Attorney
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Prop65notice@ocdapa.org

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San Diego, CA 92101
CityAttyProp65@sandiego.gov

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Prop65@sfcityatty.org

Tori Verber Salazar, District Attorney
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Eric J. Dobroth, Deputy District Attorney
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edobroth@co.slo.ca.us

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Santa Clara City Attorney
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Proposition65notices@sanjoseca.gov

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Prop65DA@santacruzcounty.us

Carla Rodriguez, District Attorney
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Phillip J. Cline, District Attorney
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Prop65@co.tulare.ca.us

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

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

On July 21, 2026, I served the following documents: I served the following documents: **(1) NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; and (2) CERTIFICATE OF MERIT** on each of the parties on the Service List attached hereto by placing a true and correct copy thereof in a sealed envelope with postage fully prepaid for delivery by First Class Mail, addressed to each of the entities on the Service List attached hereto, and placing the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.

Executed on July 21, 2026 in Oakland, California.


Toyer Grear

Service List

District Attorney, Amador County
708 Court Street, Suite 202
Jackson, CA 95642

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

District Attorney, Kern County
1215 Truxtun Avenue
Bakersfield, CA 93301

District Attorney, Los Angeles County
Hall of Justice
211 West Temple St., Ste 1200
Los Angeles, CA 90012

District Attorney, Modoc County
204 S Court Street, Room 202
Alturas, CA 96101-4020

District Attorney, San Bernardino
County
303 West Third Street
San Bernadino, CA 92415

District Attorney, Sierra County
Post Office Box 457
100 Courthouse Square, 2nd Floor
Downieville, CA 95936

District Attorney, Stanislaus County
832 12th Street, Ste 300
Modesto, CA 95354

District Attorney, Trinity County
Post Office Box 310
Weaverville, CA 96093

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

District Attorney, Butte County
25 County Center Drive, Suite 245
Oroville, CA 95965

District Attorney, Humboldt County
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District Attorney, Kings County
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Hanford, CA 93230

District Attorney, Madera County
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Madera, CA 93637

District Attorney, Mono County
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District Attorney, San Mateo County
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Yreka, CA 96097

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463 2nd Street
Yuba City, CA 95991

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423 N. Washington Street
Sonora, CA 95370

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Sacramento, CA 95814

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Colusa, CA 95932

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