

NOTICE OF VIOLATION

California Safe Drinking Water and Toxic Enforcement Act

Lead and Cadmium in Integrated Clothing Accessories and Embellishments Such as Brooches, Pins, Charms, and Buckles

September 18, 2026

This Notice of Violation (the "Notice") 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 Toxic Exposures and Pollution Prevention program of and a responsible individual within CEH.

Description of Violation:

- Violators: The names and addresses of the violators are identified on the attached Exhibit 1.
- Time Period of Exposure: The violations have been occurring since at least September 18, 2023 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 names of the listed chemicals involved in these violations are lead and cadmium.
- Type of Product: The specific type of product causing these violations is integrated clothing accessories and embellishments such as brooches, chains, pins, charms, and buckles. Non-exclusive examples of this specific type of product are listed on the attached Exhibit 1.
- Description of Exposure: Ordinary use of the products identified in this Notice results in human exposures to lead and cadmium. The routes of exposure for the violations are ingestion via hand-to-mouth contact after consumers touch or handle the products; direct ingestion when consumers place the products in their mouths; and dermal absorption directly through the skin when consumers touch,

handle, or wear the products. These exposures occur in homes, workplaces and everywhere else throughout California where these products are worn, handled or used. No clear and reasonable Proposition 65 warning is provided with these products regarding the presence of lead and cadmium in the products.

Resolution of Noticed Claims:

Based on the allegations set forth in this Notice, CEH intends to file a citizen enforcement lawsuit against the alleged violators unless such violators agree in a binding written instrument to: (1) 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 (2) pay an appropriate civil penalty based on the factors enumerated in California Health and Safety Code Section 25249.7(b). Alleged violators should contact CEH through its counsel identified below to discuss resolution of this matter. 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 CEH's 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 relating to the presence or potential presence of lead and cadmium in integrated clothing accessories and embellishments such as brooches, pins, charms, and buckles; 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 lead and cadmium in such products; and 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.

Please direct any inquiries regarding this Notice to CEH's counsel Patrick Carey or Jacob Janzen at Lexington Law Group, LLP, 503 Divisadero Street, San Francisco, CA 94117, (415) 913-7800, pcarey@lexlawgroup.com, jjanzen@lexlawgroup.com.

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

I, Patrick Carey, hereby declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged that the party identified in the notice has 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 chemicals that are 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.

September 18, 2026



Patrick Carey
Attorney for CENTER FOR
ENVIRONMENTAL HEALTH

EXHIBIT 1
September 18, 2026 Notice of Violation
Lead and Cadmium in Integrated Clothing Accessories and Embellishments

Names and Addresses of Responsible Parties	Non-Exclusive Examples of the Products	Further Description of Non-Exclusive Exemplar
The TJX Companies, Inc. 770 Cochituate Road Framingham, MA 01701 Marshalls of CA, LLC 770 Cochituate Road Framingham, MA 01701 G-III Apparel Group, Ltd. 512 7th Avenue, 35th Floor New York, NY 10018	Integrated accessory brooches attached to “Karl Lagerfeld” brand sweater	Style L5XSS740 Color BLK/BLACK, Marshalls tag no. 1204-12222-0249-03999-24-1
Burlington Stores, Inc. 1830 Route 130 North Burlington, NJ 08016 Burlington Coat Factory Warehouse Corporation 1830 Route 130 North Burlington, NJ 08016	Integrated accessory bow or brooch attached to “La Lux” brand fleece sweatshirt	Burlington tag # SPT02595807799243

Burlington Stores, Inc. 1830 Route 130 North Burlington, NJ 08016 Burlington Coat Factory Warehouse Corporation 1830 Route 130 North Burlington, NJ 08016 Starland Inc. 1500 Griffith Ave, Unit A Los Angeles, CA 90021	Integrated accessory brooches attached to “Ontwelfth” brand collared shirt	Burlington tag # 0253155171531
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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 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, 2nd 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, 3rd 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 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

Michael O'Sullivan, CEO*
Burlington Stores, Inc.
1830 Route 130
North Burlington, NJ 08016

Michael O'Sullivan, CEO*
Burlington Coat Factory Warehouse Corporation
1830 Route 130
North Burlington, NJ 08016

Ernie Herrman, CEO*
The TJX Companies, Inc.
770 Cochituate Road
Framingham, MA 01701

Erica Farrell, Manager*
Marshalls of CA, LLC
770 Cochituate Road
Framingham, MA 01701

Xiang Zheng, CEO*
Starland Inc.
1500 Griffith Ave, Unit A
Los Angeles, CA 90021

Morris Goldfarb, CEO*
G-III Apparel Group, Ltd.
512 7th Avenue, 35th Floor
New York, NY 10018

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 September 18, 2026, I served the following document(s) on all interested parties in this
7 action 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.

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
22 7677 Oakport Street, Suite 650
Oakland, CA 94621
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
24 P.O.Box 248
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

1	Devin Chandler, Lassen Program Coordinator	Paul E. Zellerbach, Riverside District Attorney
2	2950 Riverside Dr	3072 Orange Street
3	Susanville, CA 96130	Riverside, CA 92501
	dchandler@co.lassen.ca.us	Prop65@rivcoda.org
4	Lori E. Frugoli, Marin District Attorney	Anne Marie Schubert, Sacramento District Attorney
5	3501 Civic Center Drive, Room 145	901 G Street
6	San Rafael, CA 94903	Sacramento, CA 95814
	consumer@marincounty.gov	Prop65@sacda.org
7	Walter W. Wall, Mariposa District Attorney	Summer Stephan, San Diego District Attorney
8	P.O. Box 730	330 West Broadway
	Mariposa, CA 95338	San Diego, CA 92101
	mcda@mariposacounty.org	SanDiegoDAProp65@sdcda.org
9	Kimberly Lewis, Merced District Attorney	Mark Ankcorn, San Diego Deputy City Attorney
10	550 West Main Street	1200 Third Avenue
11	Merced, CA 95340	San Diego, CA 92101
	Prop65@countyofmerced.com	CityAttyProp65@sandiego.gov
12	Jeannine M. Pacioni, Monterey District Attorney	Brooke Jenkins, District Attorney
13	1200 Aguajito Road	350 Rhode Island Street
14	Monterey, CA 93940	San Francisco, CA 94103
	Prop65DA@co.monterey.ca.us	Prop65@sfgov.org
15	Allison Haley, Napa District Attorney	Henry Lifton, San Francisco Deputy City Attorney
16	1127 First Street, Suite C	1390 Market Street, 7th Floor
	Napa, CA 94559	San Francisco, CA 94102
	CEPD@countyofnapa.org	Prop65@sfcityatty.org
17	Clifford H. Newell, Nevada District Attorney	Tori Verber Salazar, San Joaquin District Attorney
18	201 Commercial Street	222 E. Weber Avenue, Room 202
19	Nevada City, CA 95959	Stockton, CA 95202
	DA.Prop65@co.nevada.ca.us	DAConsumer.Environmental@sjcda.org
20	Todd Spitzer, District Attorney of Orange County	Eric J. Dobroth, San Luis Obispo Deputy District Attorney
21	300 N Flower St	County Government Center Annex, 4th Floor
22	Santa Ana, CA 92703	San Luis Obispo, CA 93408
	Prop65Notice@ocdapa.org	edobroth@co.slo.ca.us
23	Morgan Briggs Gire, Placer District Attorney	Christopher Dalbey, Santa Barbara Deputy District Attorney
24	10810 Justice Center Drive	1112 Santa Barbara St.
25	Roseville, CA 95678	Santa Barbara, CA 93101
	prop65@placer.ca.gov	DAProp65@co.santa-barbara.ca.us
26	David Hollister, Plumas District Attorney	
27	520 Main St.	
	Quincy, CA 95971	
28	davidhollister@countyofplumas.com	

1 Nora V. Frimann, Santa Clara City Attorney
2 200 E. Santa Clara Street, 16th Floor
3 San Jose, CA 96113
4 Proposition65notices@sanjoseca.gov

5 Bud Porter, Supervising Santa Clara, Deputy
6 District Attorney
7 70 W Hedding St
8 San Jose, CA 95110
9 EPU@da.sccgov.org

10 Jeffrey S. Rosell, Santa Cruz District
11 Attorney
12 701 Ocean Street
13 Santa Cruz, CA 95060
14 Prop65DA@santacruzcounty.us

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

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

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

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

17 Executed on September 18, 2026 at San Francisco, California.

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Morgan Margulies