AMENDED NOTICE OF VIOLATION

California Safe Drinking Water and Toxic Enforcement Act

LEAD AND CADMIUM IN PINE NUTS

October 14, 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.
- This Amended Notice amends the 60-Day Notice of Violation sent on May 15, 2026, California Attorney General No. 2026-02251, to correct a Violator.

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 November 7, 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 names of the listed chemicals involved in these violations are lead and cadmium.
- Type of Product: The specific type of product causing the violation is pine nuts. 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 are

found in the pine nuts. 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 pine nuts.

- 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
We Go Nuts Inc. 51 Forest Rd, #316-208 Monroe, NY 10950	We Got Nuts Raw Whole & Natural Pine Nuts	ASIN B015VYT4EW
Amazon.com Services LLC 410 Terry Avenue North Seattle, WA 98109	We Got Nuts Raw Whole & Natural Pine Nuts	ASIN B015VYT4EW

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 pine nuts; purchase and sales information for such products; efforts to comply with Proposition 65 with respect to such products; advertising and marketing material

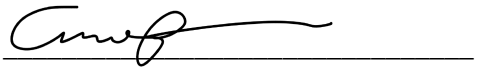
related to such products; testing reports related to such products; communications with any person relating to the presence or potential presence of lead and cadmium in such products; any representative exemplars of any such products sold to customers or consumers by the alleged violator in the year 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 P.C., 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.

October 14, 2026

Emily Culbertson
Attorney for Public Protection Alliance LLC

CERTIFICATE OF SERVICE

I, Jamie Decker, hereby declare under California law:

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 jamie@akempis.com.

On October 14, 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 October 14, 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: AMENDED NOTICE OF VIOLATION OF CALIFORNIA SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT; CERTIFICATE OF MERIT; THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT 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 October 14, 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: AMENDED NOTICE OF VIOLATION OF CALIFORNIA SAFE DRINKING WATER AND TOXIC ENFORCEMENT 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: AMENDED NOTICE OF VIOLATION OF CALIFORNIA SAFE DRINKING WATER AND TOXIC ENFORCEMENT 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 before 5 p.m. on the date executed.

Contents uploaded: AMENDED NOTICE OF VIOLATION OF CALIFORNIA SAFE DRINKING WATER AND TOXIC ENFORCEMENT 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 October 14, 2026 at Los Angeles, California.

Brady Williams

Brady Williams

SERVICE LIST BY CERTIFIED MAIL:

Amazon.com Services LLC
c/o Registered Agent
CSC – Lawyers Incorporating Service
2710 Gateway Oaks Drive
Sacramento, CA 95833

We Go Nuts Inc.
51 Forest Rd, #316-208
Monroe, NY 10950

SERVICE LIST BY MAIL:

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708 Court Street, #202
Jackson, CA 95642

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25 County Center Drive, Ste. 245
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Colusa County DA
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Colusa, CA 95932

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

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255 N. Forbes Street
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200 N. Main Street #800
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419 4th Street
Hollister, CA 95023

San Bernardino County DA
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San Bernardino, CA 92415

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

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1355 West Street
Redding, CA 96001

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P.O. Box 457
Downieville, CA 95936

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

Solano County DA
675 Texas Street, Ste. 4500
Fairfield, CA 94533

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

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

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

Trinity County DA
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