Vineet Dubey, Esq.
dubey@CD-Lawyers.com

October 30, 2026

Norazza, Inc.
Attn: Legal Department
3938 Broadway St.
Buffalo, NY 14227

Target Corporation
c/o CT Corporation System
330 N. Brand Blvd., Ste 700
Glendale, CA 91203

Re: NOTICE OF VIOLATION AGAINST NORAZZA, INC AND TARGET CORPORATION OF HEALTH & SAFETY CODE SECTION 25249.6

To Whom It May Concern and to Public Prosecutors:

Ecological Alliance, LLC, a California limited liability company ("Alliance") is a California company acting in the interest of the general public seeking to further, among other causes, the protection of the environment, toxics reduction, the promotion and improvement of human health, the improvement of workers and consumer rights, environmental education and corporate accountability. As described below, Alliance has identified violations of California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65" or "Act"), codified at Cal. Health & Safety Code §25249.5 *et seq.* by Norazza, Inc. and Target Corporation (collectively the "Violators"). This letter serves to provide Alliance's notification of these violations to the Violators and elected prosecutors. Pursuant to §25249.7(d) of the statute, Alliance intends to bring an enforcement action sixty (60) days or more after effective service of this notice unless the appropriate public enforcement agencies have commenced and are diligently prosecuting an action to rectify these violations.

The products which are causing an exposure without a warning in violation of Proposition 65 are Endust Surface Cleaning Wipes, including but not limited to UPC # 810598011506 ("Products") manufactured/distributed by Norazza, Inc. and Target Corporation and offered for sale by retailers including Target Corporation to California consumers.

A copy of the Proposition 65 summary prepared by the Office of Environmental Health Hazard Assessment is attached, to the copy of this letter served to the Violators.

Because of this lack of a warning, consumers were exposed to the following chemicals without the proper required Proposition 65 warnings: 1) Perfluorooctanoic Acid [PFOA]. The routes of exposure for this chemical are ingestion and dermal. Such exposure can cause cancer, birth defects and other

reproductive harm. Exposures to the listed chemical from the use of the Products have been occurring without the clear and reasonable warnings required by Proposition 65, dating as far back as October 30, 2026 and will continue every day until clear and reasonable warnings are provided to product purchasers and users or until this known toxic chemical is removed from the Products. Without proper warnings regarding the toxic effects of exposures to the listed chemical resulting from contact with the Products, California citizens lack the information necessary to make informed decisions on whether and how to eliminate (or reduce) the risk of exposure to the listed chemical from reasonable foreseeable use of the Products.

Alliance intends to file a private enforcement action as provided for in the Act for the alleged violations by the Violators, unless Violators agree in an enforceable written instrument to: (1) recall the listed products so as to eliminate further exposures to the identified chemicals; or (2) affix clear and reasonable Proposition 65 warning labels for products sold in the future or reformulate such products to eliminate the exposures; and (3) pay an appropriate civil penalty.

Consistent with the public interest goals of Proposition 65, Alliance is interested in seeking a constructive resolution to this matter, and invites Violators, should they seek early resolution of this matter, to communicate directly with Alliance's attorneys. Such resolution will avoid further unwarned consumer exposures, as well as resource intensive litigation.

Please direct all questions concerning this notice to Alliance's attorney, Vineet Dubey (dubey@cd-lawyers.com), Custodio & Dubey LLP, 718 S. Hill St., Suite 500, Los Angeles, CA 90014, 213-593-9095. Ecological Alliance's contact information is: c/o Harmony Welsh, 26092 Hitching Rail, Laguna Hills, CA 92653, 949-235-4782.

Sincerely,

Vineet Dubey
Custodio & Dubey LLP

cc: see attached distribution list

Attachments:
Proposition 65 summary
Certificate of Merit
Certificate of Service

Re: Ecological Alliance, LLC's Notice of Proposition 65 Violations by Norazza, Inc. and Target Corporation

I, Vineet Dubey, hereby declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged the parties identified in the notice violated California Health & Safety Code Section 25249.6 by failing to provide clear and reasonable warnings.

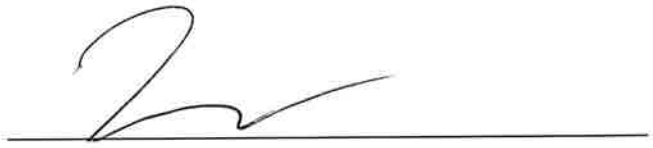
2. I am an attorney for the noticing party.

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 chemical that is the cause 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 plaintiffs' case can be established and the information did not prove that the alleged violator 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 & 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: October 30, 2026



Vineet Dubey, Esq.
dubey@CD-Lawyers.com

CERTIFICATE OF SERVICE

I am over the age of 18 and not a party to this case. I am a resident of or employed in the county where the mailing occurred. My business address is 718 S. Hill St., Suite 500, Los Angeles, CA 90014.

On the date shown below, I served the following:

1) 60-Day Notice of Intent to Sue Under Health and Safety Code section 25249.6
2) Certificate of Merit; Health and Safety Code Section 25249.7(d)
3) Certificate of Merit (Attorney General Copy); Factual information sufficient to establish the basis of the certificate of merit *(only sent to Attorney General)*
4) The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65); A Summary

on the alleged violator listed below via First Class Mail through the United States Postal Service by placing a true and correct copy in a sealed envelope, addressed to the entity listed below and providing such envelope to a United States Postal Service Representative:

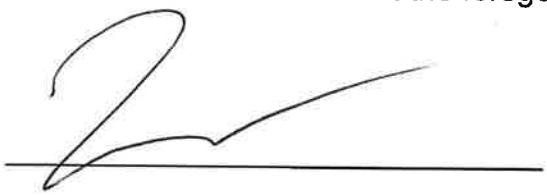
Norazza, Inc.
Attn: Legal Department
3938 Broadway St.
Buffalo, NY 14227

Target Corporation
c/o CT Corporation System
330 N. Brand Blvd., Ste 700
Glendale, CA 91203

as well as providing copies of the notice to the public enforcers by placing a true and correct copy in a sealed envelope, addressed to the parties listed on the attached Distribution List.

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

October 30, 2026



Vineet Dubey

Alameda County District Attorney
1225 Fallon St, Room 900
Oakland, CA 94612

Alpine County District Attorney
PO Box 248
Markleeville, CA 96120

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

Butte County District Attorney
25 County Center Dr.
Oroville, CA 95965-3385

Calaveras County District Attorney
891 Mountain Ranch Road
San Andreas, CA 95249

Office of the Attorney General
P.O. Box 70550
Oakland, CA 94612-0550

Colusa County District Attorney
Courthouse, 547 Market St
Colusa, CA 95932

Contra Costa County District Attorney
725 Court St., Room 402
Martinez, CA 94553

Del Norte County District Attorney
450 "H" St.
Crescent City, CA 95531

El Dorado County District Attorney
515 Main St.
Placerville, CA 95667-5697

Fresno County District Attorney
2220 Tulare St, Ste. 1000
Fresno, CA 93721

Glenn County District Attorney
PO Box 430
Willows, CA 95988

Humboldt County District Attorney
825 5th St., 4th Floor
Eureka, CA 95501

Imperial County District Attorney
939 W. Main St., 2nd Floor
El Centro, CA 92243-2860

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

Kings County District Attorney
Gov't Ctr, 1400 W Lacey Blvd
Hanford, CA 93230

Lake County District Attorney
255 N Forbes St
Lakeport, CA 95453-4790

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

San Diego City Attorney
City Center Plaza
1200 3rd Ave # 1100
San Diego, CA 92101

Los Angeles County District Attorney
210 W Temple St, 18th Floor
Los Angeles, CA 90012

Madera County District Attorney
209 W Yosemite Ave
Madera, CA 93637

Mariposa County District Attorney
P.O. Box 730
Mariposa, CA 95338

Marin County District Attorney
3501 Civic Center Drive, #130
San Rafael, CA 94903

Mendocino County District Attorney
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Ukiah, CA 95482

Los Angeles City Attorney
200 N Main St Ste 1800
Los Angeles CA 90012

Inyo County District Attorney
P.O. Drawer D
Independence, CA 93526

Orange County District Attorney
P0 Box 808
Santa Ana, CA 92702

Nevada County District Attorney
10075 Levon Ave.
Truckee, CA 96161

Plumas County District Attorney
520 Main Street, Rm 404
Quincy, CA 95971

Sacramento County District Attorney
901 G Street
Sacramento, CA 95814

San Luis Obispo County District Attorney
County Government Center, Rm 450
San Luis Obispo, CA 93408

San Mateo County District Attorney
400 County Center
Redwood City, CA 94063

Santa Barbara County District Attorney
1112 Santa Barbara St.
Santa Barbara, CA 93101

Santa Clara County District Attorney
70 W Hedding St.
San Jose, CA 95110

Santa Cruz County District Attorney
701 Ocean St., Room 200
Santa Cruz, CA 95060

Stanislaus County District Attorney
P0 Box 442
Modesto, CA 95353

Sutter County District Attorney
446 Second Street
Yuba City, CA 95991

Lassen County District Attorney
200 S Lassen St, Suite 8
Susanville, CA 96130

Mono County District Attorney
P0 Box 617
Bridgeport, CA 93517

San Joaquin County District Attorney
PO Box 990
Stockton, CA 95201 -0990

San Francisco County District Attorney
850 Bryant St, Rm 322
San Francisco, CA 94103

San Diego County District Attorney
220 W Broadway, ste 1200
San Diego, CA 92101-3803

San Bernardino County District Attorney
316 N Mountain View Ave
San Bernardino, CA 92415-0004

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1 Dr. Carlton B. Goodlett Place, Suite 234
San Francisco, CA 94102

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10810 Justice Center Drive
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Roseville, CA 95678-6231

Merced County District Attorney
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Merced, CA 95340

Napa County District Attorney
P0 Box 720
Nana, CA 94559-0720

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3960 Orange Street, Suite 6
Riverside, CA 92501

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Hollister, CA 95023

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1355 West St.
Redding, CA 96001-1632

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Trinity County District Attorney
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Weaverville, CA 96093

Yuba County District Attorney
215 5th St
Marysville, CA 95901

Monterey County District Attorney
PO Box 1131
Salinas, CA 93902