TUSAN LAW, PC

Christina Tusan
Attorney at Law
Adrian Barnes
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680 E. Colorado Blvd. #180, Pasadena, CA 91101

November 6, 2026

VIA CERTIFIED MAIL

ALLEGED VIOLATOR(S)	
Tarrier Foods Corp. c/o CPM Statutory Agent Corp. Carlile Patchen & Murphy LLP 950 Goodale Blvd., Suite 200 Columbus, OH 43212	Mixt Solutions LLC c/o Alexander Johnson 8435 Rausch Dr. Plain City, OH 43064
Tarrier Foods Corp. 2700 International St. Columbus, OH 43228	Andy Jassy Amazon.com Services LLC c/o CSC – Lawyers Incorporating Service 2710 Gateway Oaks Drive Sacramento, CA 95833

Notice sent to alleged Violator(s) above and the public prosecutors listed on the service list accompanying the attached Certificate of Service.

Re: 60-Day Notice of Violation of California Safe Drinking Water and Toxic Enforcement Act (Proposition 65)

To Whom It May Concern:

We represent the Center for Consumer Safety, LLC ("CCS"), an organization in the State of California acting in the interest of the general public. CCS' responsible individual within the entity is Mike White (email: mike@centerforconsumersafety.com | phone: (510) 636-5051), at 2001 Addison St, Ste 300 #834, Berkeley, CA 94704.

This letter serves as notice that the parties listed above are in violation of Proposition 65, the Safe Drinking Water and Toxic Enforcement Act ("Prop 65") codified at California Health & Safety Code § 25249.5, et seq. This violation has occurred and continues to occur because the alleged Violator(s) failed to provide a clear and reasonable health hazard warning in connection with the sale or use of the product(s) detailed below in California.

This Notice satisfies a prerequisite for CCS to commence an action against the Violator(s) in any Superior Court of California.

I. Description of the Violation

a. **Enforcer**: Center for Consumer Safety, LLC. 2001 Addison St, Ste 300, Berkeley, CA 94704.

b. Alleged Violator(s): Tarrier Foods Corp., Mixt Solutions LLC, and Amazon.com Services LLC.

c. **Time Period of Exposure**: Violations have been occurring since at least March 18, 2026, and are continuing to this day.

d. **Listed Chemical(s)**: Lead. Lead is listed under Proposition 65 as a chemical known to the State of California to cause cancer and birth defects or other reproductive harm.

e. **Product(s)**:

Product Type(s)	Non-Exhaustive Example(s) of the Product[1]
Granola Clusters	Rockin'Ola Cinnamon Granola Clusters

f. **Route(s) of Exposure**: Exposures that are the subject of this Notice result from the purchase, acquisition, handling, and normal and reasonably foreseeable use of this product. Exposures from the Product(s) include: ingestion.

g. **Warnings Provided**: As the Product(s) was/were purchased via the Internet, per Cal. Code Regs. Tit. 27, § 25602(b), Proposition 65-compliant, clear, and reasonable warnings must be made on both the product packaging AND the product display page/point of sale page:

i. The Product DOES NOT contain Proposition 65-compliant, clear, and reasonable warnings on the product packaging;

ii. The Product DOES NOT contain Proposition 65-compliant, clear, and reasonable warnings on the product display page/point of sale page.

II. Proposition 65 Information

For the alleged Violator(s)' reference, enclosed is a copy of "Proposition 65: A Summary" that has been prepared by the Office of Environmental Health Hazard Assessment ("OEHHA"). For more information concerning the provisions of Proposition 65, contact OEHHA at (916) 445-6900 or https://www.p65warnings.ca.gov/contact-us-proposition-65-help-desk.

III. Obligation to Preserve Evidence Given Anticipated Litigation Pursuant to this Notice

The alleged Violator(s) are hereby requested to preserve any and all evidence relating to the violations described herein. This includes, without limitation, preserving any and all:

- Warning materials provided to consumers regarding the Product(s) or Product Type(s) listed above,
- Testing reports relating to the Product(s) or Product Type(s) listed above,
- Advertising or marketing materials relating to the Product(s) or Product Type(s) listed above,
- Information regarding the sale of the Product(s) or Product Type(s) listed above in California or to California consumers,
- Efforts to comply with Proposition 65 with respect to the Product(s) or Product Type(s) listed above, and,
- Communications with any person or entity relating to the presence or potential presence of the Listed Chemicals in the Product(s) or Product Type(s) listed above.

[1] The specifically identified example of the Product in this Notice is to assist the recipients' investigation into, among other things, the magnitude and breadth of potential exposures to the Listed Chemical from other items within the Product Type(s). This is not intended to be a comprehensive identification of each offending Product. CCS maintains the position that the alleged Violator(s) is/are obligated to conduct a good faith investigation into other Products that may have been manufactured, distributed, sold, shipped, or stored during the period to ensure full compliance.

IV. Demand for Retailer, Pursuant to Cal. Code Regs. Tit. 27, § 25600.2(g), to Identify Manufacturer(s), Producer(s), Packager(s), Importer(s), Supplier(s), and Distributor(s) of Product(s)

Pursuant to Cal. Code Regs. Tit. 27, § 25600.2(g), "The retail seller of a product that may cause a consumer product exposure shall promptly provide the name and contact information for the manufacturer, producer, packager, importer, supplier, and distributor of the product to the following persons on written request, to the extent that this information is reasonably available to the retail seller," including "[a]ny person who has served notice under Section 25249.7(d)(1) of the Act alleging that the consumer product causes an exposure that requires a warning under the Act."

Please accept this Notice as a formal demand for any non-manufacturing seller or distributor receiving this Notice to promptly provide the names and contact information for any and all manufacturers, producers, packagers, importers, suppliers, and/or distributors of the Product(s) listed above. This information should be provided by electronic mail to ctusan@ctusanlaw.com.

V. Resolution of Claims

Based on the allegations set forth in this Notice, Tusan Law intends to file a citizen enforcement lawsuit on behalf of CCS against the alleged Violator(s) should no appropriate governmental authority take action and should no resolution be reached by January 15, 2027. However, consistent with the public interest goals of Proposition 65 and the desire to have these violations of California law quickly rectified, CCS is interested in seeking a constructive resolution of the claims in this Notice without engaging in costly and protracted litigation. If you are interested in discussing a potential pre-filing resolution of these claims, please contact me promptly.

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CCS has retained Tusan Law in connection with this Notice and, therefore, all communications relating to this Notice or to this matter should be directed to **Christina Tusan** via:

- Email: ctusan@ctusanlaw.com (copying my law partner, Adrian Barnes at abarnes@ctusanlaw.com, and my legal assistant Amy Saturday at asaturday@ctusanlaw.com)
- Phone: (626) 418-8203
- Mail: Christina Tusan, Tusan Law, P.C., 680 E. Colorado Blvd. #180, Pasadena, CA 91101

Sincerely,



Christina Tusan

cc: Adrian Barnes, Esq.

Attachments:

Certificate of Merit
Certificate of Service

Enclosure:

The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary

CERTIFICATE OF MERIT

Health & Safety Code Section 25249.7(d)

I, Christina Tusan, 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 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(s) that is/are the subject of the action.

4. Based on the information obtained through these 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(s) 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 information identified in Health & 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.

Dated: November 6, 2026



Christina Tusan
Attorneys for CCS

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:

1. I am a citizen of the United States.
2. I am over the age of 18.
3. I am not a party to this case or action.
4. My business address is Tusan Law, P.C., 680 E. Colorado Blvd. #180, Pasadena, CA 91101. I am a resident of Escambia County, Florida, where the service by e-mail and mailing occurred.

On November 6, 2026, I caused the following documents to be served:

5. 60-Day Notice of Violation sent in compliance with Health & Safety Code section 25249.7(d);
6. Certificate of Merit;
7. Certificate of Service;
8. Proposition 65: A Summary; (**sent only to the alleged Violator(s)**), and
9. Certificate of Merit Attachment (**served only on the Attorney General**)

The above-listed documents were served as follows:

To the parties below (the alleged Violator(s)) by placing a true and correct copy thereof in a sealed envelope (addressed to each party at the party's respective last known address as set out below), and depositing it with the United States Postal Service for delivery by First Class Certified Mail with Return Receipt Requested with the postage thereon fully prepaid:

Tarrier Foods Corp. c/o CPM Statutory Agent Corp. Carlile Patchen & Murphy LLP 950 Goodale Blvd., Suite 200 Columbus, OH 43212	Mixt Solutions LLC c/o Alexander Johnson 8435 Rausch Dr. Plain City, OH 43064
Tarrier Foods Corp. 2700 International St. Columbus, OH 43228	Andy Jassy Amazon.com Services LLC c/o CSC – Lawyers Incorporating Service 2710 Gateway Oaks Drive Sacramento, CA 95833

To the California Attorney General (via website portal) by uploading a true and correct copy thereof as a PDF file via the California Attorney General's website.

To District and City Attorneys who have specifically authorized e-mail service and for whom authorization appears on the California Attorney General's website by transmission of true and correct copies thereof via electronic mail to the email addresses on the attached service list.

To District and City Attorneys who have not specifically authorized e-mail service, by placing a true and correct copy thereof in a sealed envelope (addressed to each party at the party's respective last known address as set out on the attached service list), and depositing it with the United States Postal Service for delivery by First Class Mail with the postage thereon fully prepaid.

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

Date: November 6, 2026

Name: Amy Leigh Saturday

Signature: 

SERVICE LIST
VIA ELECTRONIC MAIL

Alameda County District Attorney
CEPDProp65 @acgov.org

Calaveras County District Attorney
Prop65Env@co.calaveras.ca.us

Contra Costa County District Attorney
Bill.Washam@contracostada.org

Inyo County District Attorney
inyoda@inyocounty.us

Lassen County District Attorney
dchandler@co.lassen.ca.us

Mariposa County District Attorney
mcda@mariposacounty.org

Merced County District Attorney
Prop65@countyofmerced.com

Monterey County District Attorney
Prop65DA@co.monterey.ca.us

Napa County District Attorney
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Nevada County District Attorney
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Plumas County District Attorney
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Riverside County District Attorney
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Sacramento County District Attorney
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San Diego City Attorney
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San Diego County District Attorney
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San Francisco County District Attorney
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San Francisco City Attorney
Prop65@sfcityatty.org

San Joaquin County District Attorney DA
DAConsumer.Environmental@sjcda.org

San Luis Obispo County District Attorney
edobroth@co.slo.ca.us

Santa Barbara County District Attorney
DAProp65@co.santa-barbara.ca.us

Santa Clara County District Attorney
EPU@da.sccgov.org

Santa Cruz County District Attorney
Prop65DA@santacruzcounty.us

Sonoma County District Attorney
ECLD@sonoma-county.org

Tulare County District Attorney
damail@tularecounty.ca.gov

Ventura County District Attorney
daspecialops@ventura.org

Yolo County District Attorney
cfepd@yolocounty.org

Santa Clara City Attorney
proposition65notices@sanjoseca.gov

District Attorney Fresno
consumerprotection@fresnocountyca.gov

Tuolumne County District Attorney
DA@tuolumnecounty.ca.gov

Alpine County District Attorney
Prop65enf@alpinecountyca.gov

El Dorado Assistant District Attorney
EDCDAPROP65@edcda.us

Marin County District Attorney
consumer@marincounty.gov

Orange County District Attorney
Prop65notice@ocdistrictattorney.gov

SERVICE LIST
VIA FIRST CLASS MAIL

District Attorney Lake County
255 North Forbes Street
Lakeport, CA 95453

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

District Attorney Madera County
300 South G Street, Suite 300
Madera, CA 93637

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

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

District Attorney Mono County
Post Office Box 2053
Mammoth Lakes, CA 93546

District Attorney San Benito County
419 4th Street
Hollister, CA 95023

District Attorney Yuba County
215 Fifth Street, Suite 152
Marysville, CA 95901

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

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

District Attorney Sierra County
PO Box 457
Downieville, CA 95936

District Attorney Siskiyou County
PO Box 986
Yreka, CA 96097

District Attorney Solano County
675 Texas Street, Ste 4500
Fairfield, CA 94533

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

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

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

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

District Attorney Imperial County
940 West Main Street, Suite 102
El Centro, CA 92243

District Attorney Kern County
1215 Truxtun Avenue, 4th Floor
Bakersfield, CA 93301

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

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

District Attorney Colusa County
310 6th Street
Colusa, CA 95932

District Attorney Mendocino County
PO Box 1000
Ukiah, CA 95482

District Attorney Tehama County
PO Box 519
Red Bluff, CA 96080

District Attorney Glenn County
Post Office Box 430
Willows, CA 95988

District Attorney San Bernardino County
303 West Third Street, 6th Floor
San Bernardino, CA 92415

District Attorney San Mateo County
400 County Ctr., 3rd Floor
Redwood City, CA 94063

District Attorney Shasta County
1355 West Street
Redding, CA 96001