**SIXTY-DAY NOTICE OF INTENT TO SUE FOR VIOLATION OF SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (California Health and Safety Code Section 25249.5 *et seq.*)**

November 9, 2026

**RE: Violations of Proposition 65 related to DEHP in Bondage Tape by Kink**

**TO: Peter Acworth or Current CEO/President of Cybernet Entertainment LLC**
**1750 Folsom St San Francisco, CA 94103**

**Office of the California Attorney General**
Prop 65 Enforcement Reporting via upload to the Office of the Attorney General's website at the web address: *https://oag.ca.gov/prop65/add-60-day-notice*

Dear Alleged Violator(s) and Appropriate Enforcement Agencies:

Greenbaum Law Firm represents Mothers Oversight Network for Actionable Response to Contaminant Harm [MONARCH], LLC who serves this Notice of Violation ("Notice") on Cybernet Entertainment LLC pursuant to California Health & Safety Code Section 25249.7(d) and in compliance with Proposition 65.

This Notice serves to inform you that the Alleged Violators identified ("Alleged Violator(s)") are in violation of California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65") codified at Cal. Health & Safety Code § 25249.5, et seq. This Notice satisfies a prerequisite for MONARCH to commence an action against the Alleged Violator(s) in any Superior Court of California to enforce Proposition 65. A description of the specific Alleged Violation can be found below.

The specific product(s) causing consumer exposures in violation of Proposition 65 is/are listed below. All product(s) within the type covered by this Notice shall be referred to hereinafter as the "Product Category."

## I. Description of Violation

**Noticing Entity:** Mothers Oversight Network for Actionable Response to Contaminant Harm [MONARCH], LLC

**All Communications To:** Daniel N. Greenbaum, Esq.
GREENBAUM LAW FIRM
7120 Hayvenhurst Ave., Ste. 320
Van Nuys, CA 91406
Phone: (818) 230-7106
Fax: (424) 243-7689
Email: service@greenbaumlawfirm.com

**Alleged Violator(s):** Cybernet Entertainment LLC

**Time Period of Exposure:** Violations have been occurring since at least July 27, 2026

**Product Category:** Adult Novelty Tape

**Non-Exclusive Example:** Bondage Tape by Kink

**Listed Chemical(s):** Di-2-ethylhexyl phthalate (DEHP)

**Route(s) of Exposure:** Touch, Dermal Absorption, Ingestion

**Potential Harm:** Reproductive Harm

## II. General Information

MONARCH is organized to promote awareness of exposure to toxic chemicals in California and to improve public health and safety. This Notice is provided to the Alleged Violators listed above pursuant to the Safe Drinking Water and Toxic Enforcement Act of 1986 (commonly referred to as "Proposition 65") for violations of California Health & Safety Code §25249.6, failure to provide consumers with a clear and reasonable warning of the potential for exposure to chemicals known to the State of California to cause cancer, birth defects, or reproductive harm.

*NOTE: While MONARCH identifies Sayward Halling, 573 N Olive St. Ventura, CA. 93001, (805) 665-3853 as the responsible individual within the Noticing Entity,* ***all*** *communication must be sent to MONARCH's attorney, the Greenbaum Law Firm at address above.*

## III. Alleged Violation(s)

Specific examples of products purchased by MONARCH in California are identified in this Notice. This **Non-Exclusive Example product** does not represent an exhaustive identification of all violative products within a Product Category. Alleged Violator(s) are obligated to perform an internal investigation into **ALL** products within the Product Category that may have been manufactured, distributed, sold, or shipped during the relevant period.

The products within the Product Category, including the Non-Exclusive Example product, contain the Listed Chemical(s) and potentially exposes consumers to the Listed Chemical(s) at levels that require warnings as described by California Health & Safety Code §25249.6, et seq. and 27 C.C.R. 25600.2, et seq. The Non-Exclusive Example product purchased by MONARCH does not provide a clear and reasonable warning that complies with the code and regulations. Additional sales of the Non-Exclusive Example product and other products within the Product Category have been sold in California within the last year and do not provide a clear and reasonable warning that complies with the code and regulations.

**Evidence Preservation Request to Alleged Violator(s):** Alleged Violator(s) are hereby requested to preserve any and all evidence relating to the violations described herein.

This includes, without limitation, preserving any warning materials concerning exposure to the Listed Chemical(s) to consumers, and all communications regarding any such exposures. This also includes, without limitation, documenting (through any means, including but not limited to time-stamped photography and/or video recording) the present existence, content, and location of all warning materials—including labels, signs, tags, and other language—that the Alleged Violator(s) contends provides consumers with a "clear and reasonable" warning required by Health & Safety Code section 25249.6 regarding the exposures (and preserving any historical depictions of such warning materials), as well as all testing and sales data related to the Non-Exclusive Example product and the Product Category, as well as any and all related advertising and/or marketing materials. The failure to preserve the requested evidence may result in sanctions and other penalties.

Products within the Product Category, including the Non-Exclusive Example product, contain the Listed Chemical(s) as an intentionally added ingredient. Products within the Product Category, including the Non-Exclusive Example product, are designed, manufactured, distributed, and marketed to be used by consumers with, or on, their hands. During this handling, the Listed Chemical(s) will transfer from products within the Product Category, including the Non-Exclusive Example product, to consumers' mouths. This directly leads to consumer exposure to the Listed Chemical(s) through touch, dermal absorption, and ingestion.

| **Product Category** | **Non-Exclusive Example Product** |
|---|---|
| Adult Novelty Tape | Bondage Tape by Kink |

## IV. Proposition 65 Information

For general information concerning Proposition 65, please contact the Office of Environmental Health Hazard Assessment ("OEHHA") Proposition 65 Implementation Office or visit their website at http://oehha.ca.gov/proposition-65.

## V. Resolution of Claim(s)

MONARCH intends to file a lawsuit against the alleged Violator(s) unless such Violator(s) enters into a binding written agreement to become compliant with California Health & Safety Code 25249.6 *et seq*. Please feel free to contact the counsel identified above to discuss this further.

## Certificate of Merit

I, Daniel N. Greenbaum, hereby declare:

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

2. I am the 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 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 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.

   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.

Dated: November 9, 2026



Daniel N. Greenbaum, Esq.
Attorneys for MONARCH

## CERTIFICATE OF SERVICE

I hereby declare that I am over the age of 18 and not a party to this case or action. My business address is: **7120 Hayvenhurst Ave., Suite 320, Van Nuys CA 91406.** My business email address is mboggs@greenbaumlawfirm.com. A True and Correct copy of the document entitled **NOTICE OF VIOLATION** will be served or was served in the manner stated below:

I. First Class Mail: On November 9, 2026, I served the following persons and/or entities at the last known addresses by placing a true and correct copy thereof in a sealed envelope with the USPS, postage prepaid, and addressed as follows:

| | |
|---|---|
| Attn: Peter Acworth or Current CEO/President | Cybernet Entertainment LLC 1750 Folsom St San Francisco, CA 94103 |
| Attn: Peter Acworth or Current CEO/President | Cybernet Entertainment LLC 1800 Mission St San Francisco, CA 94103 |
| Attn: Peter Acworth or Current CEO/President | Cybernet Entertainment LLC 245 8th St San Francisco, CA 94103 |
| Attn: Peter Acworth or Current CEO/President | Cybernet Entertainment LLC 3141 Gough St San Francisco, CA 94123 |
| Attn: Peter Acworth or Current CEO/President | Cybernet Entertainment LLC 942 Mission St San Francisco, CA 94103 |
| Attn: Peter Acworth or Current CEO/President | Cybernet Entertainment LLC 1155 Mission St San Francisco, CA 94103 |

II. California Attorney General (via website Portal): On November 9, 2026, I uploaded a true and correct copy thereof as a PDF file via the California Attorney General's website.

III. District and City Attorneys (via First Class Mail): On November 9, 2026, I caused to be served the following persons and/or entities at the last known addresses by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and addressed as follows: **SEE ATTACHED SERVICE LIST.**

IV. District and City Attorneys (via email): On November 9, 2026, I served the following persons and/or entities at the last known electronic addresses via email (the transmission was reported as sent without error): CEPDProp65@acgov.org; Prop65Env@co.calaveras.ca.us; sgrassini@contracostada.org; EDCDAPROP65@edcda.us; consumerprotection@fresnocountyca.gov; inyoda@inyocounty.us; mlatimer@co.lassen.ca.us; consumer@marincounty.gov; mcda@mariposacounty.org; Prop65@countyofmerced.com; Prop65DA@co.monterey.ca.us; CEPD@countyofnapa.org; DA.Prop65@co.nevada.ca.us; prop65@placer.ca.gov; davidhollister@countyofplumas.com; Prop65@rivcoda.org; Prop65@sacda.org; SanDiegoDAProp65@sdcda.org; alexandra.grayner@sfgov.org; DAConsumer.Environmental@sjcda.org; edobroth@co.slo.ca.us; DAProp65@co.santa-barbara.ca.us; EPU@da.sccgov.org; Prop65DA@santacruzcounty.us; ECLD@sonomacounty.org; Prop65@co.tulare.ca.us;

daspecialops@ventura.org; cfepd@yolocounty.gov; CityAttyProp65@sandiego.gov; Prop65@sfcityatty.org; Proposition65notices@sanjoseca.gov

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

Dated: November 9, 2026

Megan Boggs

# Service List

Alpine County District Attorney
P.O. Box 248
Markleeville, CA 96120

Amador County District Attorney
708 Court St, #202
Jackson, CA 95642

Butte County District Attorney
25 County Center Dr
Oroville, CA 95965

Colusa County District Attorney
346 Fifth Street, Suite 101
Colusa, CA 95932

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

Glenn County District Attorney
P.O. Box 430
Willows, CA 95988

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

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

Kern County District Attorney
1215 Truxtun Avenue
Bakersfield, CA 93301

Kings County District Attorney
1400 West Lacey Boulevard
Hanford, CA 93230

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

Los Angeles County District Attorney
211 West Temple Street, Suite 1200
Los Angeles, CA 90012

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Ukiah, CA 95482

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204 5. Court Street, Room 202
Alturas, CA 96101

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Orange County District Attorney
300 N Flower Street
Santa Ana, CA 92703

San Benito County District Attorney
419 4th Street
Hollister, CA 95203

San Bernardino County District Attorney
303 West 3rd Street
San Bernardino, CA 92415

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200 North Main Street
Los Angeles, CA 90012