NOTICE OF VIOLATION

California Safe Drinking Water and Toxic Enforcement Act

RETINOL/RETINYL ESTERS IN VITAMIN A SUPPLEMENTS

November 11, 2026

To Whom It May Concern: This Notice of Violation ("Notice") is provided to you pursuant to the California Safe Drinking Water and Toxic Enforcement Act ("Proposition 65"), California Health and Safety Code § 25249.7(d).

- For general information regarding 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 Center for Consumer Safety, LLC ("CCS"), 2001 Addison St Ste 300, Berkeley, CA 94704. CCS 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. CCS designates its counsel, Jordan Trent Jones, of Coastal Aegis Law, APC, as the responsible individual with respect to this Notice: (Email: jtjones@coastalaegislaw.com; Phone: (831) 312-8698; Address: 200 Clock Tower Place, Suite D101-E, Carmel, CA 93923).
- This letter serves as notice that the parties listed below are in violation of Proposition 65, the Safe Drinking Water and Toxic Enforcement Act, commencing with section 25249.5 of the Health and Safety Code ("Proposition 65"). The violation has occurred and continues to occur because the alleged violators failed to provide a clear and reasonable health hazard warning in connection with the sale or use of the product(s) detailed below (the "Product(s)") in California.

Description of Violation:

- This Notice covers the warning provision of Proposition 65, which is found at California Health and Safety Code Section 25249.6.
- Time Period of Violations: The violations have been occurring since at least June 16, 2026, and on information and belief, are continuing.
- Chemical(s) Involved: The name of the listed chemical involved in these violations is retinol/retinyl esters, when in daily dosages in excess of 10,000 IU, or 3,000 retinol equivalents ("retinol/retinyl esters").
- Type of Product: The specific type of product causing the violation is vitamin A supplements. Non-exclusive examples of this specific type of product are listed in the table below.
- Method of Exposure: Ordinary use of the products identified in this Notice results in human exposures to retinol/retinyl esters because retinol/retinyl esters are found in the vitamin A supplements. 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 vitamin A supplements.
- No clear and reasonable Proposition 65 warning is provided with these products regarding the presence of retinol/retinyl esters in the products. The products are sold through Amazon.com and fulfilled by Amazon, and units are delivered to consumers in California with an Amazon inventory (FNSKU) label affixed over the manufacturer's on-package warning, so that no warning is visible to the purchaser.

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
CZM Ventures Inc (dba CZM Storefront) c/o Statutory Agent Christopher Schefler 30912 North 27th Avenue Phoenix, AZ 85085	Bio-Tech Pharmacal A-25 Vitamin A 25,000 IU	ASIN B0051HZKKM
VerSure LLC c/o Registered Agent	Bio-Tech Pharmacal A-25 Vitamin A 25,000 IU	ASIN B0051HZKKM

John Hancock 2212 NW 91st Street Miami, FL 33147		
Amazon.com Services LLC 410 Terry Avenue North Seattle, WA 98109	Bio-Tech Pharmacal A-25 Vitamin A 25,000 IU	ASIN B01LWLHVUZ ASIN B0051HZKKM

Resolution of Noticed Claims:

- Center for Consumer Safety 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 retinol/retinyl esters 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 Center for Consumer Safety through its counsel identified in this Notice to discuss resolution of this matter. It should be noted that Center for Consumer Safety 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 CCS's 60-day Notice. Therefore, while reaching an agreement with CCS 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 evidence includes but is not limited to all documents related to the presence or potential presence of retinol/retinyl esters in vitamin A supplements; purchase and sales information; efforts to comply with Proposition 65; advertising and marketing material; testing reports; communications with any person relating to the presence or potential presence of retinol/retinyl esters in the products; and any representative exemplars sold to customers or consumers by the alleged violators in the year preceding this Notice through the date of any trial in this matter.

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 Center for Consumer Safety's counsel, Jordan Trent Jones, at Coastal Aegis Law, APC, 200 Clock Tower Place, Suite D101-E, Carmel, CA 93923, (831) 312-8698, jtjones@coastalaegislaw.com.

Coastal Aegis Law, APC

Jordan Trent Jones

Jordan Trent Jones
Attorney for Center for Consumer Safety, 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, Jordan Trent Jones, 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 Coastal Aegis Law, APC, and I represent the noticing party, Center for Consumer Safety, LLC.

3. I have consulted with one or more persons with relevant and appropriate experience or expertise who have 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.

November 11, 2026

Jordan Trent Jones

Jordan Trent Jones
Attorney for Center for Consumer Safety, 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 2019 Forest Avenue STE 160, #1076, Chico, CA 95928 and my email address is jamie.decker@coastalaegislaw.com.

On November 11, 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 MAIL (CERTIFIED AND FIRST CLASS)**: I am readily familiar with the practice for collection and processing of correspondence for mailing by LetterStream, a printing and mailing company that sends mail via the U.S. Postal Service. I transmitted a PDF version of the documents noted below to LetterStream on November 11, 2026 for printing and mailing in the ordinary course of business to the names and addresses on the attached service list. The printed correspondence will be deposited by LetterStream in the mail with the U.S. Postal Service.

Please see attached service lists for recipients sent by Certified and First-Class Mail.

Contents mailed: NOTICE OF VIOLATION OF CALIFORNIA SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT; CERTIFICATE OF MERIT; Recipients designated on the service list as "Certified Mail" also received THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY.

☒ **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 on the date executed.

Please see attached service list for recipients sent by Electronic Mail.

Contents emailed: 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 on the date executed.

Contents uploaded: 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 November 11, 2026 at Oroville, California.

Jamie Decker

Jamie Decker

SERVICE LIST BY CERTIFIED MAIL:

Amazon.com Services LLC c/o Registered Agent CSC - Lawyers Incorporating Service 2710 Gateway Oaks Drive Sacramento, CA 95833	CZM Ventures Inc c/o Statutory Agent Christopher Schefler 30912 North 27th Avenue Phoenix, AZ 85085	VerSure LLC c/o Registered Agent John Hancock 2212 NW 91st Street Miami, FL 33147

SERVICE LIST BY FIRST-CLASS MAIL:

Amador County DA 708 Court Street, #202 Jackson, CA 95642	Butte County DA 25 County Center Drive, Ste. 245 Oroville, CA 95965	Colusa County DA 310 6th Street Colusa, CA 95932
Del Norte County DA 450 H Street, Ste. 171 Crescent City, CA 95531	Glenn County DA P.O. Box 430 Willows, CA 95988	Humboldt County DA 825 5th Street, 4th Floor Eureka, CA 95501
Imperial County DA 940 West Main Street, Ste. 102 El Centro, CA 92243	Kern County DA 1215 Truxtun Ave., 4th Floor Bakersfield, CA 93301	Kings County DA 1400 West Lacey Blvd. Hanford, CA 93230
Lake County DA 255 N. Forbes Street Lakeport, CA 95453	City of LA, City Atty 200 N. Main Street #800 Los Angeles, CA 90012	LA County DA 211 W. Temple St, Ste. 1200 Los Angeles, CA 90012
Madera County DA 300 South G Street, Ste. 300 Madera, CA 93637	Mendocino County DA P.O. Box 1000 Ukiah, CA 95482	Modoc County DA 204 S. Court Street, Room 202 Alturas, CA 96101
Mono County DA P.O. Box 2053 Mammoth Lakes, CA 93546	San Benito County DA 419 4th Street Hollister, CA 95023	San Bernardino County DA 303 W. Third Street San Bernardino, CA 92415
San Mateo County DA 500 County Center, Third Floor Redwood City, CA 94063	Shasta County DA 1355 West Street Redding, CA 96001	Sierra County DA 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 P.O. Box 310 Weaverville, CA 96093
Yuba County DA 215 5th Street, Ste. 152 Marysville, CA 95901		

SERVICE LIST BY ELECTRONIC MAIL:

Alameda County DA CEPDProp65@acgov.org	**Alpine County DA** prop65enf@alpinecountyca.gov	**Calaveras County DA** Prop65Env@co.calaveras.ca.us
Contra Costa County DA Bill.Washam@contracostada.org	**El Dorado County DA** EDCDAPROP65@edcda.us	**Fresno County DA** consumerprotection@fresnocountyca.gov
Inyo County DA inyoda@inyocounty.us	**Lassen County DA** dchandler@co.lassen.ca.us	**Marin County DA** consumer@marincounty.gov
Mariposa County DA mcda@mariposacounty.org	**Merced County DA** Prop65@countyofmerced.com	**Monterey County DA** Prop65DA@co.monterey.ca.us
Napa County DA CEPD@countyofnapa.org	**Nevada County DA** DA.Prop65@co.nevada.ca.us	**Orange County DA** Prop65Notice@ocdistrictattorney.gov Prop65Notice@ocdapa.org
Placer County DA prop65@placer.ca.gov	**Plumas County DA** davidhollister@countyofplumas.com	**Riverside County DA** Prop65@rivcoda.org
Sacramento County DA Prop65@sacda.org	**San Diego County DA** SanDiegoDAProp65@sdcda.org	**San Diego City, City Attorney** CityAttyProp65@sandiego.gov
San Francisco County DA Prop65@sfgov.org	**San Francisco City, City Attorney** Prop65@sfcityatty.org	**San Joaquin County DA** DAConsumer.Environmental@sjcda.org
San Jose City, City Attorney Proposition65notices@sanjoseca.gov	**San Luis Obispo County DA** edobroth@co.slo.ca.us	**Santa Barbara County DA** DAProp65@co.santa-barbara.ca.us
Santa Clara County DA EPU@da.sccgov.org	**Santa Cruz County DA** Prop65DA@santacruzcounty.us	**Sonoma County DA** ECLD@sonoma-county.org ecld@sonomacounty.gov
Tulare County DA Damail@tularecounty.ca.gov	**Tuolumne County DA** DA@tuolumnecounty.ca.gov	**Ventura County DA** daspecialops@ventura.org
Yolo County DA cfepd@yolocounty.org		