KJT LAWGROUP LLP
Jivalagian | Thomassian

230 N. Maryland Ave. Suite 306
Glendale, CA 91206
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November 13, 2026

SIXTY-DAY NOTICE OF INTENT TO SUE FOR VIOLATION OF THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986
(*Cal. Health & Safety Code* § 25249.5, *et seq.*) ("Proposition 65")

Re: Violations of Proposition 65 concerning Enhanced Coffee containing Lead.

Dear Alleged Violator and Public Enforcement Agencies:

Blue Sky Forever ("BSF"), serves this Notice of Violation ("Notice") on Bulletproof 360, Inc. ("Violator") pursuant to and in compliance with Proposition 65. KJT Law Group, LLP represents Blue Sky Forever (BSF). This Notice satisfies a prerequisite for BSF to commence an action against Violator in any Superior Court of California to enforce Proposition 65. The violations addressed by this Notice occurred at numerous locations in each county in California as reflected in the district attorney addresses listed in the attached distribution list. BSF is serving this Notice upon each person or entity responsible for the alleged violations, the California Attorney General, the district attorney for each county where alleged violations occurred, and the City Attorney for each city with a population (according to the most recent decennial census) of over 750,000 located within counties where the alleged violations occurred.

BSF is a California nonprofit corporation acting in the interest of the general public, pursuant to California Health & Safety Code § 25249.7(d). BSF's contact information is the following: 1142 W Orangethorpe Ave, Fullerton, CA 92833 | 657-364-9585. BSF's Chief Executive Officer is Anthony Nguyen. BSF seeks to promote awareness of exposures to toxic chemicals in products sold in California and, if possible, to improve human health by eliminating hazardous substances contained in such items, promoting corporate responsibility.

This Notice concerns violations of the warning prong of Proposition 65, which states that "[n]o person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the state to cause cancer or reproductive toxicity without first giving clear and reasonable warning to such individual . . ." *Cal. Health & Safety Code* § 25249.6.

Pursuant to § 25249.7(d) of the statute, BSF intends to bring an enforcement action against the Violator sixty (60) days after the effective service of this notice unless public enforcement agencies have commenced and are diligently prosecuting an action to rectify these violations. A summary of the statute and its implementing regulations, which was prepared by the Office of Environmental Hazard Assessment, the lead agency designated under the State, is enclosed with the copy of this notice served upon the violator ("Proposition 65: A Summary"). The specific details of the violations that are the subject of this notice are provided below.

<u>Consumer Product and Chemical(s) Involved</u>
BSF has discovered that Enhanced Coffee contains lead. Lead is known to the State of California to cause cancer. "Lead and lead compounds" have been listed as carcinogens since October 1,

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1992 and "lead" has been listed as a developmental toxicant for males and females since February 27, 1987. On February 27, 1987, the State of California officially listed lead as a chemical known to cause developmental toxicity, and male and female reproductive toxicity. On October 1, 1992, the State of California officially listed lead and lead compounds as chemicals known to cause cancer.

Identifiers for the Enhanced Coffee include but are not limited to: **"Bulletproof – Enhanced Coffee Whey Protein | MCT Oil From Coconuts – High Protein Iced Coffee – Mocha Flavored with Other Natural Flavors – UPC# 8 15709 02566 3."**

This Notice addresses consumer products exposures. A "'[c]onsumer products exposure' is an exposure which results from a person's acquisition, purchase, storage, consumption, or other reasonably foreseeable use of a consumer good, or any exposure that results from receiving a consumer service." Cal. Code Regs. 27 tit. § 25602(b).

Description of Violation
Violator caused consumer product exposures in violation of Proposition 65 by producing or making available Enhanced Coffee for distribution or sale in California to consumers. The packaging for Enhanced Coffee (meaning any label or other written, printed or graphic matter affixed to or accompanying the product or its container or wrapper) contains no Proposition 65-compliant warning. Nor did Violator, with regard to Enhanced Coffee, provide a system of signs, public advertising identifying the system and toll-free information services, or any other system, which provided clear and reasonable warnings. Nor did Violator, with regard to Enhanced Coffee, provide identification of the product at retail outlets in a manner that provided a warning through shelf labeling, signs, menus, or a combination thereof.

Route of Exposure
Use of the product identified above results in human exposure to lead. The primary route of lead exposure to consumers is through direct ingestion when consumers eat the Enhanced Coffee. These exposures take place throughout the State of California. No clear and reasonable warning is provided with regards to the carcinogenic and/or reproductive hazard of lead as required by State law.

Duration of Violations
These violations have been occurring every day between since at least November 13, 2025, and every day since the products were introduced into the California marketplace, and will continue every day until clear and reasonable warnings are provided with regards to the carcinogenic and/or reproductive hazard of lead as required by State law or until these known toxic chemicals are removed or reduced to allowable levels in the products.

Counsel
BSF is represented in connection with this matter and may be contacted through:

Tro Krikorian, Esq.
KJT Law Group, LLP
230 N. Maryland Avenue, Suite 306, Glendale, CA 91206

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Glendale, CA 91206
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F: 818.507.8588
info@KJTLawGroup.com

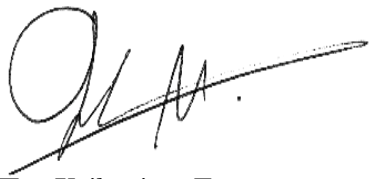
Telephone: (818) 507-8525
Email: Tro@KJTLawGroup.com

In keeping with the public interest goals of the statute and the objective of protecting individuals and the community at-large from further toxic exposures, KJT Law Group, LLP is interested in seeking a constructive and immediate resolution of this matter in order to avoid continuing unwarned exposure to listed chemicals.

Proposition 65 requires that notice of intent to sue be given to the violator(s) sixty (60) days before the suit is filed. *Cal. Health & Safety Code* § 25249.7(d)(1). With this letter, BSF gives notice of the alleged violations to Violator and the appropriate governmental authorities. In absence of any action by the appropriate governmental authorities within sixty (60) calendar days of the sending of this notice (plus ten (10) calendar days because the place of address is beyond the State of California but within the United States), BSF may file suit. *See Cal. Code Civ. Proc.* § 1013; *Cal. Health & Safety Code* § 25249.7(d)(1); and *Cal. Code Regs.* tit. 27 § 25903(d)(1). BSF remains open and willing to discussing the possibility of resolving its grievances short of formal litigation.

All communications regarding this notice can be made to Tro Krikorian, Esq. at the above listed firm address and telephone number.

Regards,



Tro Krikorian, Esq.
KJT Law Group, LLP

Attachments:

- Certificate of Merit
- Supporting Documentation for Certificate of Merit (to Attorney General Only)
- Proposition 65: A Summary
- Proof of Service (including DA Service List)

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Enhanced Coffee containing Lead
CERTIFICATE OF MERIT
Health & Safety Code § 25249.5 et. seq.

I, Tro Krikorian, hereby declare:

1) This Certificate of Merit accompanies the attached sixty (60) day notice in which it is alleged the parties identified in the notice have violated Health & Safety Code section 25249.6 by failing to provide clear and reasonable warnings.

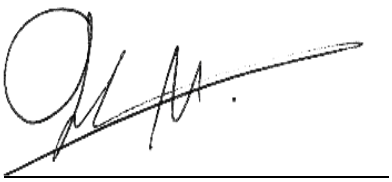
2) I am the attorney for the noticing parties.

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 chemicals that are 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.

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.

Dated: November 13, 2026



Tro Krikorian, Esq.
KJT Law Group, LLP

PROOF 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:

I am a citizen of the United States, over the age of 18 years of age, and am not a party to the action. I am employed in the County of Los Angeles, State of California; my business address is 230 N. Maryland Avenue, Suite 306, Glendale, CA 91206.

On **November 13, 2026,** I served the following documents:

60-DAY NOTICE OF VIOLATIONS; CERTIFICATE OF MERIT; THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY

on the following parties by placing a true and correct copy thereof in a sealed envelope, addressing the party listed below and depositing it in a US Postal Service Office with the postage fully prepaid for delivery by **Certified Mail**:

Entity Address:	**Registered Agent for Service**
Bulletproof 360, Inc. **Attn: Harry Lewis or Current President/CEO** 5335 College Avenue, STE 22 Oakland, CA 94618	**Bulletproof 360, Inc.** **c/o Corporation Service Company** 300 Deschutes Way SW, STE 208 MC-CSC1 Tumwater, WA 98501

On **November 13, 2026,** I served the following documents:

60-DAY NOTICE OF VIOLATIONS; CERTIFICATE OF MERIT; SUPPORTING DOCUMENTATION FOR CERTIFICATE OF MERIT; THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY

on the following parties by uploading the foregoing documents to the webpage listed below:

Office of the California Attorney General | Prop 65 Enforcement Reporting
1515 Clay Street, Ste. 2000 | Post Office Box 70550 | Oakland, California 94612-0550
https://oag.ca.gov/prop65/add-60-day-notice

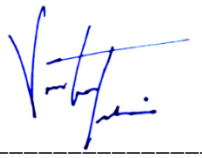
On **November 13, 2026,** I served the following documents:

60-DAY NOTICE OF VIOLATIONS; CERTIFICATE OF MERIT; THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY

by sending a true and correct copy via electronic mail to the address listed below:

Alameda County District Attorney's Office	Marine County District Attorney's Office	Orange County District Attorney's Office
The Honorable Pamela Y. Price	The Honorable Lori Frugoli	The Honorable Todd Spitzer
CEPDProp65@acgov.org	consumer@marincounty.gov	Prop65notice@ocdistrictattorney.gov

Executed under penalty of perjury pursuant to the laws of the State of California in Glendale, California on **November 13, 2026.**



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KJT LAWGROUP LLP
Jivalagian | Thomassian

PROOF OF SERVICE AFFIDAVIT
CCP 1013(a), CCP 1013(b), and CCP 1013a(3)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

My name is David Birdsall.

I am over the age of 18 and not a party to the related cause(s).

I am employed at DocuCents in the county of Los Angeles, State of California, which is where the mailing occurred.

My business address is: 960 S Village Oaks Dr, Covina, CA 91724, which is where I placed the correspondence described herein for deposit in the United States Postal Service unless otherwise stated.

I am readily familiar with the business' practice for collection and processing of correspondence for mailing with the United States Postal Service.

The following correspondence will be deposited with the United States Postal Service this same day in the ordinary course of business.

Each envelope was sealed and placed for collection and mailing on 11/16/2026, following ordinary business practices.

The exact TITLE of the document(s) served and the name(s) and address(s) of the people or entities being served are listed on the following attached Service List(s). This affidavit may include multiple Service Lists for documents which were mailed to many different parties on unrelated causes as part of the ordinary course of services.

I declare under penalty of perjury under the laws of the State of California that the foregoing and all information contained in the attached Service List(s) is true and correct.

Printed name: David Birdsall

Dated: 11/16/2026

X David Birdsall

Attachments: Service List(s) included as part of this affidavit.

SENDER : KJT LAW GROUP
3262 S WESTMONT LN UNIT 3
ONTARIO CA 91761

SERVICE LIST

CCP 1013a(3)

This Service List is part of the attached Proof Of Service Affidavit dated 11/16/2026 signed by David Birdsall and describes the documents served for Mailing ID 850CA26B60F88D34.

Total Number of Images: 18

The TITLE of the document(s) being served is:

SIXTY-DAY NOTICE OF INTENT TO SUE FOR VIOLATION OF THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (Cal. Health & Safety Code 25249.5, et seq.) (Proposition 65)

The following persons/entities were served by placing a true copy thereof into a sealed envelope with postage paid in the manner described in the attached affidavit:

ALPINE COUNTY
THE HONORABLE MICHAEL ATWELL
PO BOX 248
MARKLEEVILLE CA 96120

BUTTE COUNTY
THE HONORABLE MICHAEL RAMSEY
25 COUNTY CENTER DR STE 110
OROVILLE CA 95965

CALAVERAS COUNTY
THE HONORABLE BARBARA YOOK
891 MOUNTAIN RANCH RD
SAN ANDREAS CA 95249

CONTRA COSTA COUNTY
THE HONORABLE DIANA BECTON
900 WARD ST
MARTINEZ CA 94553

EL DORADO COUNTY
THE HONORABLE VERNON PIERSON
778 PACIFIC ST
PLACERVILLE CA 95667

DEL NORTE COUNTY

THE HONORABLE KRISHNA A ABRAMS
450 H ST RM 171
CRESCENT CITY CA 95531

HUMBOLDT COUNTY
THE HONORABLE MAGGIE FLEMING
825 5TH ST
EUREKA CA 95501

GLENN COUNTY
THE HONORABLE DWAYNE STEWART
PO BOX 430
WILLOWS CA 95988

IMPERIAL COUNTY
THE HONORABLE GILBERT G OTERO
940 W MAIN ST STE 102
EL CENTRO CA 92243

KERN COUNTY
THE HONORABLE CYTHIA ZIMMER
1215 TRUXTUN AVE
BAKERSFIELD CA 93301

KINGS COUNTY
THE HONORABLE KEITH FAGUNDES
1400 W LACEY BLVD
HANFORD CA 93230

LAKE COUNTY
THE HONORABLE SUSAN KRONES
255 N FORBES ST
LAKEPORT CA 95453

LASSEN COUNTY
THE HONORABLE MELYSSAH RIOS
2950 RIVERSIDE DR STE 102
SUSANVILLE CA 96130

MARIPOSA COUNTY
THE HONORABLE WALTER WALL
PO BOX 730
MARIPOSA CA 95338

NEVADA COUNTY
THE HONORABLE CLIFFORD NEWELL
201 COMMERCIAL ST
NEVADA CITY CA 95959

SANTA BARBARA COUNTY
THE HONORABLE JOYCE DUDLEY
1112 SANTA BARBARA ST
SANTA BARBARA CA 93101

SANTA CRUZ COUNTY
THE HONORABLE JEFF ROSELL
701 OCEAN ST RM 200
SANTA CRUZ CA 95060

SHASTA COUNTY
THE HONORABLE STEPHANIE A BRIDGETT
1355 WEST ST
REDDING CA 96001

SISKIYOU COUNTY
THE HONORABLE JAMES KIRK ANDRUS
PO BOX 986
YREKA CA 96097

SONOMA COUNTY
THE HONORABLE JILL RAVITCH
600 ADMINISTRATION DR RM 212J
SANTA ROSA CA 95403

STANISLAUS COUNTY
THE HONORABLE BIRGIT FLADAGER
832 12TH ST STE 300
MODESTO CA 95354

TRINITY COUNTY
THE HONORABLE DONNA DALY
PO BOX 310
WEAVERVILLE CA 96093

YOLO COUNTY
THE HONORABLE JEFFERY REISIG
301 2ND ST
WOODLAND CA 95695

TEHAMA COUNTY
THE HONORABLE MATTHEW ROGERS
PO BOX 519
RED BLUFF CA 96080

YUBA COUNTY
THE HONORABLE CLINT CURRY
215 5TH ST STE 152
MARYSVILLE CA 95901

MENDOCINO COUNTY
THE HONORABLE C DAVID EYSTER
PO BOX 1000
UKIAH CA 95482

MODOC COUNTY
THE HONORABLE JORDAN FUNK
204 S COURT ST STE 6
ALTURAS CA 96101

MONO COUNTY
THE HONORABLE SAMUEL KYLLO
PO BOX 2053
MAMMOTH LAKES CA 93546

PLUMAS COUNTY
THE HONORABLE DAVID HOLLISTER
520 MAIN ST RM 404
QUINCY CA 95971

SACRAMENTO COUNTY
THE HONORABLE ANNE MARIE SCHUBERT
901 G ST
SACRAMENTO CA 95814

RIVERSIDE COUNTY
THE HONORABLE MICHAEL HESTRIN
3960 ORANGE ST STE 500
RIVERSIDE CA 92501

SAN BERNARDINO COUNTY
THE HONORABLE JASON ANDERSON
303 W 3RD ST
SAN BERNARDINO CA 92415

SUTTER COUNTY
DISTRICT ATTORNEY
446 2ND ST STE 102
YUBA CITY CA 95991

COLUSA COUNTY
THE HONORABLE MATTHEW BEAUCHAMP
310 6TH ST
COLUSA CA 95932

PLACER COUNTY
THE HONORABLE R MORGAN GIRE
10810 JUSTICE CENTER DR STE 240

ROSEVILLE CA 95678

MONTEREY COUNTY
THE HONORABLE JEANNINE PACIONI
1200 AGUAJITO RD RM 301
MONTEREY CA 93940

AMADOR COUNTY
THE HONORABLE TODD RIEBE
708 COURT ST STE 101
JACKSON CA 95642

MERCED COUNTY
THE HONORABLE NICOLE A SILVEIRA
550 W MAIN ST
MERCED CA 95340

INYO COUNTY
THE HONORABLE THOMAS L HARDY
DISTRICT ATTORNEY 168 N EDWARDS
INDEPENDENCE CA 93526

SAN LUIS OBISPO COUNTY
THE HONORABLE DAN DOW
DISTRICT ATTORNEY COURTHOUSE ANX 4TH FL
SAN LUIS OBISPO CA 93408

CITY OF SAN JOSE
CITY ATTORNEY S OFC
200 E SANTA CLARA ST FL 16
SAN JOSE CA 95113

CITY OF LOS ANGELES
CITY ATTORNEY S OFC
200 N MAIN ST STE 800
LOS ANGELES CA 90012

CITY OF SACRAMENTO
OFC OF THE CITY ATTORNEY
915 I ST FL 4
SACRAMENTO CA 95814

CITY OF OAKLAND
CITY ATTORNEY S OFFICE
1 FRANK H OGAWA PLZ FL 1ST
OAKLAND CA 94612

LOS ANGELES COUNTY
THE HONORABLE JACKIE LACEY

211 W TEMPLE ST FL 5 STE 1200
LOS ANGELES CA 90012

SAN DIEGO COUNTY
THE HONORABLE SUMMER STEPHAN
330 W BROADWAY STE 1100 STE 1300
SAN DIEGO CA 92101

SOLANO COUNTY
THE HONORABLE KRISHNA A ABRAMS
675 TEXAS ST STE 2600 STE 4500
FAIRFIELD CA 94533

CITY OF SAN DIEGO
CITY ATTORNEY S OFC
1200 3RD AVE STE 1624 STE 1620
SAN DIEGO CA 92101

TULARE COUNTY
THE HONORABLE TIM WARD
221 S MOONEY BLVD STE 224
VISALIA CA 93291

SANTA CLARA COUNTY
THE HONORABLE JEFFREY ROSEN
70 W HEDDING ST
SAN JOSE CA 95110

NAPA COUNTY
THE HONORABLE ALLISON HALEY
1127 1ST ST STE 128 STE C
NAPA CA 94559

SAN BENITO COUNTY
THE HONORABLE JOEL BUCKINGHAM
419 4TH ST
HOLLISTER CA 95023

CITY OF SAN FRANCISCO
CITY ATTORNEY S OFFICE
1 DR CARLTON B GOODLETT PL STE 234
SAN FRANCISCO CA 94102

SIERRA COUNTY
THE HONORABLE SANDRA GROVEN
100 COURTHOUSE SQ
DOWNIEVILLE CA 95936

MADERA COUNTY

THE HONORABLE SALLY MORENO
300 S G ST STE 300
MADERA CA 93637

VENTURA COUNTY
THE HONORABLE ERIK NASARENKO
800 S VICTORIA AVE
VENTURA CA 93009

FRESNO COUNTY
THE HONORABLE LISA SMITTCAMP
2100 TULARE ST
FRESNO CA 93721

SUTTER COUNTY
THE HONORABLE JENNIFER DUPR
463 2ND ST STE 102
YUBA CITY CA 95991

SAN FRANCISCO COUNTY
THE HONORABLE BROOKE JENKINS DISTRICT AT
350 RHODE ISLAND ST STE 400N
SAN FRANCISCO CA 94103

TUOLUMNE COUNTY
THE HONORABLE CASSANDRA ANN JENECKE
423 N WASHINGTON ST
SONORA CA 95370

SAN MATEO COUNTY
THE HONORABLE STEPHEN M WAGSTAFFE
400 COUNTY CTR FL THIRD
REDWOOD CITY CA 94063

SAN JOAQUIN COUNTY
THE HONORABLE RON FREITAS
PO BOX 990 DISTRICT ATTORNEY
STOCKTON CA 95201

END OF SERVICE LIST FOR THE ABOVE TITLED DOCUMENTS

NOTICE: PAGES PRINTED DUPLEX. SCAN BOTH SIDES OF EACH PAGE TO ENSURE COMPLETE DOCUMENT INTAKE
VENDOR SUBMITTAL ID: 850CA26B60F88D34 **US PATENT NO 8,600,904**