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**ENDORSED
FILED
ALAMEDA COUNTY**

FEB 21 2014

CLERK OF THE SUPERIOR COURT
MARGARET J. DOWNIE
Deputy

5 Attorneys for Plaintiff
6 ENVIRONMENTAL RESEARCH CENTER

7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF ALAMEDA

10 ENVIRONMENTAL RESEARCH CENTER,)
11 a non-profit California corporation,)

12 Plaintiff,)

13 v.)

14 AL GLOBAL CORPORATION, a California)
15 Corporation; YOUNGEVITY)
16 INTERNATIONAL, INC., a Delaware)
17 Corporation; AL INTERNATIONAL, INC.,)
18 WHICH WILL DO BUSINESS IN)
19 CALIFORNIA AS YOUNGEVITY, a)
20 Delaware Corporation; AL)
INTERNATIONAL, INC. dba)
YOUNGEVITY, a Delaware Corporation; AL)
INTERNATIONAL, INC., a California)
Corporation,)

21 Defendant.)

Case No. RG13700552

**FIRST AMENDED COMPLAINT FOR
INJUNCTIVE RELIEF AND CIVIL
PENALTIES**

Health & Safety Code §25249.5, *et seq.*

Provisionally Assigned to Complex Litigation
Hon. George C. Hernandez, Jr.

Hearing: None Requested
Dept: 17

Case Filed: October 24, 2013

22
23 PLAINTIFF Environmental Research Center brings this action in the interests of the
24 general public and, on information and belief, hereby alleges:

25 **INTRODUCTION**

26 1. This action seeks to remedy DEFENDANTS' continuing failure to warn

1 consumers in California that they are being exposed to lead and/or lead compounds, substances
2 known to the State of California to cause cancer, birth defects and other reproductive harm.

3 2. Defendant AL GLOBAL CORPORATION (“AL GLOBAL”) manufactures,
4 packages, distributes, markets, and/or sells in California certain products containing lead and/or
5 lead compounds (the “AL GLOBAL PRODUCTS”) including:

- 6 **Healing The Globe Scarlar Enhanced Detoxal 21**
- 7 **Livinity Livin Slim Plus**
- 8 **Livinity Stress-ese Plus**
- 9 **Youngevity R-Garden Milk Thistle Formula**
- 10 **R-Garden Inc. Memory Formula**
- 11 **Youngevity R-Garden Brown Seaweed Extract Formula**
- 12 **R-Garden Inc. Herbal Blends Female Hormone System**
- 13 **Youngevity R-Garden Green Energy Plus**
- 14 **R-Garden Inc. Herbal Blends Eyes System**
- 15 **R-Garden Inc. Herbal Blends Immune Fungi System**
- 16 **R-Garden Inc. Herbal Blends Liver Gallbladder System**
- 17 **R-Garden Inc. Bowel Toner**
- 18 **R-Garden Inc. Herbal Blends Thyroid System**
- 19 **R-Garden Inc. Herbal Blends Respiratory Lung**
- 20 **R-Garden Inc. Sun Energy**
- 21 **Youngevity Premium Women's Hormonal Balancer**
- 22 **Ancient Legacy Ocean's Gold**
- 23 **Scalar Core International Scalar Enhanced Colon Activator**
- 24 **Youngevity A J.D. Wallach Corporation D'Tox FX**
- 25 **Healing The Globe Reshape America Ameri Trim**
- 26 **Youngevity Ultimate Youth**
- Youngevity Slender FX Meal Replacement Shake Vanilla**
- Youngevity Slender FX Meal Replacement Shake Chocolate**
- True2life Fast Food Chocolate**
- True2life Fast Food Vanilla**
- True2life True Cleanse**
- Youngevity A J.D. Wallach Corporation Majestic Earth –**
Ultimate Osteo-FX
- Youngevity Beyond Osteo-fx Tropical Vanilla Flavor**
- Pure3x Designer Beverage Club tazza di vita**
- Youngevity Beyond Osteo-fx Powder Tropical Vanilla Flavor**

3. Defendants YOUNGEVITY INTERNATIONAL, INC. (“YOUNGEVITY I”),
AL INTERNATIONAL, INC., WHICH WILL DO BUSINESS IN CALIFORNIA AS
YOUNGEVITY (“YOUNGEVITY II”), AL INTERNATIONAL, INC. dba YOUNGEVITY

1 (“YOUNGEVITY III”), and AL INTERNATIONAL, INC. (“AL INTERNATIONAL”)
2 manufacture, package, distribute, market, and/or sell in California certain products containing
3 lead and/or lead compounds (“YOUNGEVITY PRODUCTS” or collectively with AL
4 GLOBAL PRODUCTS as the “PRODUCTS”) including:

5 **Healing The Globe Scarlar Enhanced Detoxal 21**
6 **Livinity Livin Slim Plus**
7 **Livinity Stress-ese Plus**
8 **Youngevity R-Garden Milk Thistle Formula**
9 **R-Garden Inc. Memory Formula**
10 **Youngevity R-Garden Brown Seaweed Extract Formula**
11 **R-Garden Inc. Herbal Blends Female Hormone System**
12 **Youngevity R-Garden Green Energy Plus**
13 **R-Garden Inc. Herbal Blends Eyes System**
14 **R-Garden Inc. Herbal Blends Immune Fungi System**
15 **R-Garden Inc. Herbal Blends Liver Gallbladder System**
16 **R-Garden Inc. Bowel Toner**
17 **R-Garden Inc. Herbal Blends Thyroid System**
18 **R-Garden Inc. Sun Energy**
19 **Youngevity Premium Women’s Hormonal Balancer**
20 **Ancient Legacy Ocean’s Gold**
21 **Scalar Core International Scalar Enhanced Colon Activator**
22 **Youngevity A J.D. Wallach Corporation D’Tox FX**
23 **Healing The Globe Reshape America Ameri Trim**
24 **Youngevity Ultimate Youth**
25 **Youngevity Slender FX Meal Replacement Shake Vanilla**
26 **Youngevity Slender FX Meal Replacement Shake Chocolate**
True2Life Fast Food Chocolate
True2Life Fast Food Vanilla
True2Life True Cleanse
Youngevity A J.D. Wallach Corporation Majestic Earth Ultimate
Osteo-FX
Youngevity Beyond Osteo-fx Tropical Vanilla Flavor
R-Garden Inc. Herbal Blends Respiratory Lung
Pure3x Designer Beverage Club tazza di vita
Youngevity Beyond Osteo-fx Powder Tropical Vanilla Flavor

4. Lead and lead compounds (hereinafter, the “LISTED CHEMICALS”) are substances known to the State¹ of California to cause cancer, birth defects, and other

¹ All statutory and regulatory references herein are to California law, unless otherwise specified.

1 reproductive harm.

2 5. The use and/or handling of the PRODUCTS causes exposures to the LISTED
3 CHEMICALS at levels requiring a “clear and reasonable warning” under California's Safe
4 Drinking Water and Toxic Enforcement Act of 1986, Health & Safety Code (“H&S Code”)
5 §25249.5, *et seq.* (also known as "Proposition 65"). DEFENDANTS have failed to provide the
6 health hazard warnings required by Proposition 65.

7 6. DEFENDANTS’ continued manufacturing, packaging, distributing, marketing
8 and/or sales of the PRODUCTS without the required health hazard warnings, causes
9 individuals to be involuntarily and unwittingly exposed to levels of the LISTED CHEMICALS
10 that violate Proposition 65.

11 7. PLAINTIFF seeks injunctive relief enjoining Defendants from the continued
12 manufacturing, packaging, distributing, marketing and/or sales of the PRODUCTS in
13 California without provision of clear and reasonable warnings regarding the risks of cancer,
14 birth defects and other reproductive harm posed by exposure to the LISTED CHEMICALS
15 through the use and/or handling of the PRODUCTS. Plaintiff seeks an injunctive order
16 compelling DEFENDANTS to bring their business practices into compliance with Proposition
17 65 by providing a clear and reasonable warning to each individual who has been and who in
18 the future may be exposed to LISTED CHEMICALS from the use of the PRODUCTS.
19 Plaintiff also seeks an order compelling DEFENDANTS to identify and locate each individual
20 person who in the past has purchased the PRODUCTS, and to provide to each such purchaser a
21 clear and reasonable warning that the use of the PRODUCTS will cause exposures to the
22 LISTED CHEMICALS.

23 8. In addition to injunctive relief, PLAINTIFF seeks an assessment of civil
24 penalties in excess of \$24.5 million to remedy DEFENDANTS’ failure to provide clear and
25 reasonable warnings regarding exposures to the LISTED CHEMICALS.
26

1 **JURISDICTION AND VENUE**

2 9. This Court has jurisdiction over this action pursuant to California Constitution
3 Article VI, Section 10, which grants the Superior Court "original jurisdiction in all causes
4 except those given by statute to other trial courts." The statute under which this action is
5 brought does not specify any other basis for jurisdiction.

6 10. This Court has jurisdiction over DEFENDANTS because, based on information
7 and belief, DEFENDANTS are businesses having sufficient minimum contacts with California,
8 or otherwise intentionally availing themselves of the California market through the distribution
9 and sale of the PRODUCTS in the State of California, to render the exercise of jurisdiction
10 over them by the California courts consistent with traditional notions of fair play and
11 substantial justice.

12 11. Venue in this action is proper in the Alameda Superior Court because the
13 DEFENDANTS have violated California law in the County of Alameda.

14 **PARTIES**

15 12. PLAINTIFF Environmental Research Center ("PLAINTIFF" or "ERC") is a
16 corporation organized under California's Corporation Law. ERC is dedicated to, among other
17 causes, reducing the use and misuse of hazardous and toxic substances, consumer protection,
18 worker safety and corporate responsibility.

19 13. ERC is a person within the meaning of H&S Code §25118 and brings this
20 enforcement action in the public interest pursuant to H&S Code §25249.7(d).

21 14. Defendant AL GLOBAL CORPORATION is a corporation organized under
22 California's Corporation Law and is a person doing business within the meaning of H&S Code
23 §25249.11 with an office at 2400 Boswell Road, Chula Vista, CA 91914. AL GLOBAL
24 Manufactures, packages, DISTRIBUTES, markets and/or sells the AL GLOBAL PRODUCTS
25 for sale or use in California and in Alameda County.

1 15. Defendant YOUNGEVITY INTERNATIONAL, INC. (“YOUNGEVITY I”) is
2 a corporation organized under Delaware’s Corporation Law and is a person doing business
3 within the meaning of H&S Code §25249.11 with an office at 2400 Boswell Road, Chula
4 Vista, CA 91914. YOUNGEVITY I manufactures, packages, DISTRIBUTES, markets and/or
5 sells the YOUNGEVITY PRODUCTS for sale or use in California and in Alameda County.

6 16. Defendant AL INTERNATIONAL, INC., WHICH WILL DO BUSINESS IN
7 CALIFORNIA AS YOUNGEVITY (“YOUNGEVITY II”) is a corporation organized under
8 Delaware’s Corporation Law and is a person doing business within the meaning of H&S Code
9 §25249.11 with an office at 2400 Boswell Road, Chula Vista, CA 91914. YOUNGEVITY II
10 manufactures, packages, DISTRIBUTES, markets and/or sells the YOUNGEVITY
11 PRODUCTS for sale or use in California and in Alameda County.

12 17. Defendant AL INTERNATIONAL, INC. dba YOUNGEVITY
13 (“YOUNGEVITY III”) is a corporation organized under Delaware’s Corporation Law and is a
14 person doing business within the meaning of H&S Code §25249.11 with an office at 2400
15 Boswell Road, Chula Vista, CA 91914. YOUNGEVITY III manufactures, packages,
16 DISTRIBUTES, markets and/or sells the YOUNGEVITY PRODUCTS for sale or use in
17 California and in Alameda County.

18 18. Defendant AL INTERNATIONAL, INC. (“AL INTERNATIONAL”) is a
19 corporation organized under California’s Corporation Law and is a person doing business
20 within the meaning of H&S Code §25249.11 with an office at 2400 Boswell Road, Chula
21 Vista, CA 91914. AL INTERNATIONAL manufactures, packages, DISTRIBUTES, markets
22 and/or sells the YOUNGEVITY PRODUCTS for sale or use in California and in Alameda
23 County.

STATUTORY BACKGROUND

24 19. The People of the State of California have declared in Proposition 65 their right
25 "[t]o be informed about exposures to chemicals that cause cancer, birth defects, or other
26 reproductive harm." Section 1(b) of Initiative Measure, Proposition 65.

1 20. To effect this goal, Proposition 65 requires that individuals be provided with a
2 "clear and reasonable warning" before being exposed to substances listed by the State of
3 California as causing cancer or reproductive toxicity. Health and Safety ("H&S") Code
4 §25249.6 states, in pertinent part:

5 No person in the course of doing business shall knowingly and intentionally
6 expose any individual to a chemical known to the state to cause cancer or
7 reproductive toxicity without first giving clear and reasonable warning to such
8 individual....

9 21. Proposition 65 provides that any person "violating or threatening to violate" the
10 statute may be enjoined in a court of competent jurisdiction. H&S Code §25249.7. The phrase
11 "threatening to violate" is defined to mean creating "a condition in which there is a substantial
12 likelihood that a violation will occur." H&S Code §25249.11(e). Violators are liable for civil
13 penalties of up to \$2,500 per day for each violation of the Act. H&S Code §25249.7.

14 **FACTUAL BACKGROUND**

15 22. On February 27, 1987, the State of California officially listed the chemical lead
16 as a chemical known to cause reproductive toxicity. Lead became subject to the warning
17 requirement one year later and was therefore subject to the "clear and reasonable" warning
18 requirements of Proposition 65 beginning on February 27, 1988. 27 California Code of
19 Regulations ("CCR") §25000, *et seq.*; H&S Code §25249.5, *et seq.*

20 23. On October 1, 1992, the State of California officially listed the chemicals lead
21 and lead compounds as chemicals known to cause cancer. Lead and lead compounds became
22 subject to the warning requirement one year later and were therefore subject to the "clear and
23 reasonable" warning requirements of Proposition 65 beginning on October 1, 1993. 27 CCR §
24 25000, *et seq.*; H&S Code §25249.6, *et seq.* Due to the high toxicity of lead, the maximum
25 allowable dose level for lead is 0.5 ug/day (micrograms a day) for reproductive toxicity.

26 24. To test DEFENDANTS' PRODUCTS for lead, PLAINTIFF hired a well-
respected and accredited testing laboratory that designed the testing protocol used and

1 approved by the California Attorney General years ago for testing heavy metals. The testing
2 results undertaken by PLAINTIFF of DEFENDANTS' PRODUCTS show that the
3 PRODUCTS tested were in violation of the Proposition 65 0.5 ug/day "safe harbor" daily dose
4 limit. Very significant is the fact that people are being exposed to lead through ingestion as
5 opposed to other not as harmful methods of exposure such as dermal exposure. Ingestion of
6 lead produces much higher exposure levels and health risks than dermal exposure to this
7 chemical.

8 25. At all times relevant to this action, DEFENDANTS therefore has knowingly
9 and intentionally exposed the users and/or handlers of the PRODUCTS to LISTED
10 CHEMICALS without first giving a clear and reasonable warning to such individuals.

11 26. The AL GLOBAL PRODUCTS have been sold by AL GLOBAL for use
12 in California since at least May 17, 2010, with the exception of three AL GLOBAL
13 products - Youngevity Beyond Osteo-fx Tropical Vanilla Flavor, Pure3x Designer
14 Beverage Club tazza di vita, and Youngevity Beyond Osteo-fx Powder Tropical Vanilla
15 Flavor (collectively, "ADDITIONAL PRODUCTS"), which ADDITIONAL
16 PRODUCTS have been sold by AL GLOBAL for use in California since at least
17 September 13, 2010. The AL GLOBAL PRODUCTS continue to be distributed and sold
18 in California without the requisite warning information.

19 27. On May 17, 2013, ERC served AL GLOBAL and each of the appropriate public
20 enforcement agencies with a document entitled "Notice of Violations of California Health &
21 Safety Code Section 25249.5 " that provided AL GLOBAL and the public enforcement
22 agencies with notice that AL GLOBAL was in violation of Proposition 65 for failing to warn
23 purchasers and individuals using the AL GLOBAL PRODUCTS (not including the
24 ADDITIONAL PRODUCTS) that the use of the AL GLOBAL PRODUCTS exposes them to
25 lead, a chemical known to the State of California to cause cancer and/or reproductive toxicity
26 ("**Prop. 65 Notice**") (a copy of the 60-Day Notice is attached hereto as **Exhibit A**).

1 28. On September 13, 2013, ERC served AL GLOBAL and each of the appropriate
2 public enforcement agencies with a document entitled "Notice of Violations of California
3 Health & Safety Code Section 25249.5 " that provided AL GLOBAL and the public
4 enforcement agencies with notice that AL GLOBAL was in violation of Proposition 65 for
5 failing to warn purchasers and individuals using the ADDITIONAL PRODUCTS that the use
6 of the ADDITIONAL PRODUCTS exposes them to lead, a chemical known to the State of
7 California to cause cancer and/or reproductive toxicity (“**Prop. 65 Notice**”) (a copy of the 60-
8 Day Notice is attached hereto as **Exhibit B**).

9 29. The YOUNGEVITY PRODUCTS have been sold by YOUNGEVITY I,
10 YOUNGEVITY II, YOUNGEVITY III, and AL INTERNATIONAL for use in
11 California since at least October 18, 2010. The YOUNGEVITY PRODUCTS continue to
12 be distributed and sold in California without the requisite warning information.

13 30. On October 18, 2013, ERC served YOUNGEVITY I, YOUNGEVITY II,
14 YOUNGEVITY III, and AL INTERNATIONAL and each of the appropriate public
15 enforcement agencies with a document entitled "Notice of Violations of California Health &
16 Safety Code Section 25249.5 " that provided YOUNGEVITY I, YOUNGEVITY II,
17 YOUNGEVITY III, and AL INTERNATIONAL and the public enforcement agencies with
18 notice that YOUNGEVITY I, YOUNGEVITY II, YOUNGEVITY III, and AL
19 INTERNATIONAL were in violation of Proposition 65 for failing to warn purchasers and
20 individuals using the YOUNGEVITY PRODUCTS that the use of the YOUNGEVITY
21 PRODUCTS exposes them to lead, a chemical known to the State of California to cause cancer
22 and/or reproductive toxicity (“**Prop. 65 Notice**”) (a copy of the 60-Day Notice is attached
23 hereto as **Exhibit C**).

24 31. As a proximate result of acts by DEFENDANTS, as persons in the course of
25 doing business within the meaning of Health & Safety Code §25249.11, individuals throughout
26 the State of California, including in the County of Alameda, have been exposed to the LISTED

1 CHEMICALS without clear and reasonable warning. The individuals subject to the violative
2 exposures include normal and foreseeable users of the PRODUCTS, as well as all other
3 persons exposed to the PRODUCTS.

4 **FIRST CAUSE OF ACTION**

5 **Injunctive Relief for Violations of Health and Safety Code § 25249.5, et seq. concerning**
6 **the PRODUCTS described in the May 17, 2013, September 13, 2013, and**
7 **October 18, 2013 Prop. 65 NOTICES OF VIOLATION**
8 **Against ALL DEFENDANTS**

9 32. PLAINTIFF realleges and incorporates by reference all preceding paragraphs as
10 if specifically set forth herein

11 33. On May 17, 2013, PLAINTIFF sent a 60-Day Notice of Proposition 65
12 violations to the requisite public enforcement agencies, and to AL GLOBAL ("Notice 1")
13 attached hereto as Exhibit A. Notice I was issued pursuant to, and in compliance with, the
14 requirements of H&S Code §25249.7(d) and the statute's implementing regulations regarding
15 the notice of the violations to be given to certain public enforcement agencies and to the
16 violator. The notice given included, *inter alia*, the following information: the name, address,
17 and telephone number of the noticing individual; the name of the alleged violator; the statute
18 violated; the approximate time period during which violations occurred; and descriptions of the
19 violations, including the chemicals involved, the routes of toxic exposure, and the specific
20 product or type of product causing the violations, and was issued as follows:

- 21 a. AL GLOBAL was provided a copy of Notice I by Certified Mail.
- 22 b. AL GLOBAL was provided a copy of a document entitled "The Safe
23 Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A
24 Summary," which is also known as Appendix A to Title 27 of CCR
25 §25903.
- 26 c. The California Attorney General was provided a copy of Notice I via
online submission.
- d. The California Attorney General was provided with a Certificate of Merit

1 by the attorney for the noticing party, stating that there is a reasonable
2 and meritorious case for this action, and attaching factual information
3 sufficient to establish a basis for the certificate, including the identity of
4 the persons consulted with and relied on by the certifier, and the facts,
5 studies, or other data reviewed by those persons, pursuant to H&S Code
6 §25249.7(h) (2).

7 34. On September 13, 2013, PLAINTIFF sent a 60-Day Notice of Proposition 65
8 violations to the requisite public enforcement agencies, and to AL GLOBAL (“Notice II”)
9 attached hereto as Exhibit B. Notice II was issued pursuant to, and in compliance with, the
10 requirements of H&S Code §25249.7(d) and the statute's implementing regulations regarding
11 the notice of the violations to be given to certain public enforcement agencies and to the
12 violator. The notice given included, *inter alia*, the following information: the name, address,
13 and telephone number of the noticing individual; the name of the alleged violator; the statute
14 violated; the approximate time period during which violations occurred; and descriptions of the
15 violations, including the chemicals involved, the routes of toxic exposure, and the specific
16 product or type of product causing the violations, and was issued as follows:

- 17 e. AL GLOBAL was provided a copy of Notice II by Certified Mail.
- 18 f. AL GLOBAL was provided a copy of a document entitled "The Safe
19 Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A
20 Summary," which is also known as Appendix A to Title 27 of CCR
21 §25903.
- 22 g. The California Attorney General was provided a copy of Notice II via
23 online submission.
- 24 h. The California Attorney General was provided with a Certificate of Merit
25 by the attorney for the noticing party, stating that there is a reasonable
26 and meritorious case for this action, and attaching factual information

1 sufficient to establish a basis for the certificate, including the identity of
2 the persons consulted with and relied on by the certifier, and the facts,
3 studies, or other data reviewed by those persons, pursuant to H&S Code
4 §25249.7(h) (2).

5 35. On October 18, 2013, PLAINTIFF sent a 60-Day Notice of Proposition 65
6 violations to the requisite public enforcement agencies, and to YOUNGEVITY I,
7 YOUNGEVITY II, YOUNGEVITY III, and AL INTERNATIONAL (“Notice III”) attached
8 hereto as Exhibit C. Notice III was issued pursuant to, and in compliance with, the
9 requirements of H&S Code §25249.7(d) and the statute's implementing regulations regarding
10 the notice of the violations to be given to certain public enforcement agencies and to the
11 violator. The notice given included, *inter alia*, the following information: the name, address,
12 and telephone number of the noticing individual; the name of the alleged violator; the statute
13 violated; the approximate time period during which violations occurred; and descriptions of the
14 violations, including the chemicals involved, the routes of toxic exposure, and the specific
15 product or type of product causing the violations, and was issued as follows:

16 i. YOUNGEVITY I, YOUNGEVITY II, YOUNGEVITY III, and AL
17 INTERNATIONAL were provided a copy of Notice III by Certified
18 Mail.

19 j. YOUNGEVITY I, YOUNGEVITY II, YOUNGEVITY III, and AL
20 INTERNATIONAL were provided a copy of a document entitled "The
21 Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition
22 65): A Summary," which is also known as Appendix A to Title 27 of
23 CCR §25903.

24 k. The California Attorney General was provided a copy of Notice III via
25 online submission.

26 l. The California Attorney General was provided with a Certificate of Merit

1 by the attorney for the noticing party, stating that there is a reasonable
2 and meritorious case for this action, and attaching factual information
3 sufficient to establish a basis for the certificate, including the identity of
4 the persons consulted with and relied on by the certifier, and the facts,
5 studies, or other data reviewed by those persons, pursuant to H&S Code
6 §25249.7(h) (2).

7 26. The appropriate public enforcement agencies have failed to commence and
8 diligently prosecute a cause of action under H&S Code §25249.5, *et seq.* against
9 DEFENDANTS based on the allegations herein.

10 27. By committing the acts alleged in this Complaint DEFENDANTS at all times
11 relevant to this action, and continuing through the present, have violated H&S Code §25249.6
12 by, in the course of doing business, knowingly and intentionally exposing individuals who use
13 or handle the PRODUCTS set forth in the Notice to the LISTED CHEMICALS, without first
14 providing a clear and reasonable warning to such individuals pursuant to H&S Code §§ 25249.6
15 and 25249.11(f).

16 28. By the above-described acts, DEFENDANTS have violated H&S Code §
17 25249.6 and is therefore subject to an injunction ordering DEFENDANTS to stop violating
18 Proposition 65, to provide warnings to all present and future customers and to provide warnings
19 to DEFENDANTS' past customers who purchased or used the PRODUCTS without receiving
20 a clear and reasonable warning.

21 29. An action for injunctive relief under Proposition 65 is specifically authorized by
22 Health & Safety Code §25249.7(a).

23 30. Continuing commission by DEFENDANTS of the acts alleged above will
24 irreparably harm the citizens of the State of California, for which harm they have no plain,
25 speedy, or adequate remedy at law.

26 Wherefore, PLAINTIFF prays judgment against DEFENDANTS, as set forth hereafter.

1 **SECOND CAUSE OF ACTION**

2 **Civil Penalties for Violations of Health and Safety Code § 25249.5, *et seq.* concerning the**
3 **PRODUCTS described in PLAINTIFF's Propr. 65 NOTICES OF VIOLATION**
4 **Against ALL DEFENDANTS**

5 31. PLAINTIFF realleges and incorporates by reference all preceding paragraphs as
6 if specifically set forth herein.

7 32. By committing the acts alleged in this Complaint, DEFENDANTS at all times
8 relevant to this action, and continuing through the present, have violated H&S Code §25249.6
9 by, in the course of doing business, knowingly and intentionally exposing individuals who use or
10 handle the PRODUCTS set forth in the Notice to the LISTED CHEMICALS, without first
11 providing a clear and reasonable warning to such individuals pursuant to H&S Code §§ 25249.6
12 and 25249.11(f).

13 33. By the above-described acts, DEFENDANTS are liable, pursuant to H&S Code
14 §25249.7(b), for a civil penalty of \$2,500 per day per violation for each unlawful exposure to a
15 LISTED CHEMICAL from the PRODUCTS, in an amount in excess of \$24.5 million.

16 Wherefore, PLAINTIFF prays judgment against DEFENDANTS, as set forth hereafter.

17 **THE NEED FOR INJUNCTIVE RELIEF**

18 34. PLAINTIFF realleges and incorporates by this reference all preceding
19 paragraphs as if set forth below.

20 35. By committing the acts alleged in this Complaint, DEFENDANTS have caused
21 irreparable harm for which there is no plain, speedy or adequate remedy at law. In the absence
22 of equitable relief, DEFENDANTS will continue to create a substantial risk of irreparable
23 injury by continuing to cause consumers to be involuntarily and unwittingly exposed to the
24 LISTED CHEMICALS through the use and/or handling of the PRODUCTS.

25 **PRAYER FOR RELIEF**

26 Wherefore, PLAINTIFF accordingly prays for the following relief:

A. A preliminary and permanent injunction, pursuant to H&S Code §25249.7(b),
enjoining DEFENDANTS, their agents, employees, assigns and all persons acting in concert or

1 participating with DEFENDANTS, from distributing or selling the PRODUCTS in California
2 without first providing a clear and reasonable warning, within the meaning of Proposition 65,
3 that the users and/or handlers of the PRODUCTS are exposed to the LISTED CHEMICALS.

4 B. An injunctive order, pursuant to H&S Code §25249.7(b), compelling
5 DEFENDANTS to identify and locate each individual who has purchased the PRODUCTS
6 identified in Notice I since May 17, 2012, the PRODUCTS identified in Notice II since
7 September 13, 2012, and the PRODUCTS identified in Notice III since October 18, 2012, and
8 to provide a warning to such person that the use of the PRODUCTS will expose the user to
9 chemicals known to cause cancer, birth defects, and other reproductive harm.

10 C. An assessment of civil penalties pursuant to Health & Safety Code §25249.7(b),
11 against DEFENDANTS in the amount of \$2,500 per day for each violation of Proposition 65,
12 in an amount in excess of \$24.5 million;

13 D. An award to PLAINTIFF of its reasonable attorneys fees and costs of suit
14 pursuant to California Code of Civil Procedure §1021.5, as PLAINTIFF shall specify in further
15 application to the Court; and,

16 E. Such other and further relief as may be just and proper.

17
18 DATED: February 21, 2014

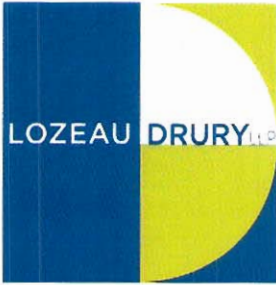
LOZEAU | DRURY LLP

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22 Richard T. Drury
23 Christina M. Caro
24 Attorneys for Plaintiff
25 Environmental Research Center
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Exhibit A



T 510.836 4200
F 510.836 4205

410 12th Street Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
richard@lozeaudrury.com

VIA CERTIFIED MAIL

Current CEO or President
AL Global Corporation
2400 Boswell Road
Chula Vista, CA 91914

Ned Ardagna
(AL Global Corporation's
Registered Agent for Service of Process)
571 Third Avenue
Chula Vista, CA 91910

VIA PRIORITY MAIL

District Attorneys of All California Counties
and Select City Attorneys
(See Attached Certificate of Service)

VIA ONLINE SUBMISSION

Office of the California Attorney General

Re: Notice of Violations of California Health & Safety Code Section 25249.5 *et seq.*

Dear Addressees:

I represent the Environmental Research Center ("ERC") in connection with this Notice of Violations of California's Safe Drinking Water and Toxic Enforcement Act of 1986, which is codified at California Health & Safety Code Section 25249.5 *et seq.* and also referred to as Proposition 65.

ERC is a California non-profit corporation dedicated to, among other causes, helping safeguard the public from health hazards by bringing about a reduction in the use and misuse of hazardous and toxic chemicals, facilitating a safe environment for consumers and employees, and encouraging corporate responsibility.

The name of the Company covered by this notice that violated Proposition 65 (hereinafter the "Violator") is:

AL Global Corporation

The products that are the subject of this notice and the chemical in those products identified as exceeding allowable levels are:

Healing The Globe Scarlar Enhanced Detoxal 21 – Lead
Livinity Livin Slim Plus – Lead
Livinity Stress-ese Plus – Lead
Youngevity R-Garden Milk Thistle Formula – Lead
R-Garden Inc. Memory Formula – Lead
Youngevity R-Garden Brown Seaweed Extract Formula – Lead
R-Garden Inc. Herbal Blends Female Hormone System – Lead
Youngevity R-Garden Green Energy Plus – Lead
R-Garden Inc. Herbal Blends Eyes System – Lead
R-Garden Inc. Herbal Blends Immune Fungi System – Lead
R-Garden Inc. Herbal Blends Liver Gallbladder System – Lead
R-Garden Inc. Bowel Toner – Lead
R-Garden Inc. Herbal Blends Thyroid System – Lead
R-Garden Inc. Herbal Blends Respiratory Lung – Lead
R-Garden Inc. Sun Energy – Lead
Youngevity Premium Women’s Hormonal Balancer – Lead
Ancient Legacy Ocean’s Gold – Lead
Scalar Core International Scalar Enhanced Colon Activator – Lead
Youngevity A J.D. Wallach Corporation D’Tox FX – Lead
Healing The Globe Reshape America Ameri Trim – Lead
Youngevity Ultimate Youth – Lead
Youngevity Slender FX Meal Replacement Shake Vanilla – Lead
Youngevity Slender FX Meal Replacement Shake Chocolate – Lead
True2Life Fast Food Chocolate – Lead
True2Life Fast Food Vanilla – Lead
True2Life True Cleanse – Lead
True2Life True Kids – Lead
Youngevity A J.D. Wallach Corporation Majestic Earth Ultimate Osteo-FX – Lead

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.

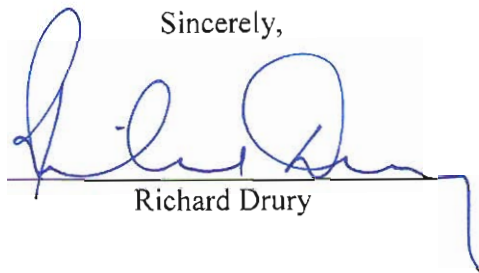
This letter is a notice to the Violator and the appropriate governmental authorities of the Proposition 65 violations concerning the listed products. This notice covers all violations of Proposition 65 involving the Violator currently known to ERC from the information now available. ERC may continue to investigate other products that may reveal further violations. A summary of Proposition 65, prepared by the Office of Environmental Health Hazard Assessment, is enclosed with the copy of this letter to the Violator.

The Violator has manufactured, marketed, distributed, and/or sold the listed products, which have exposed and continue to expose numerous individuals within California to the identified chemical, lead. The consumer exposures that are the subject of this notice result from the purchase, acquisition, handling and/or recommended use of these products by consumers. The primary route of exposure to lead has been through ingestion, but may have also occurred through inhalation and/or dermal contact. Proposition 65 requires that a clear and reasonable warning be provided prior to exposure to lead. The method of warning should be a warning that appears on the product's label. The Violator violated Proposition 65 because it failed to provide an appropriate warning to persons using and/or handling these products that they are being exposed to lead. Each of these ongoing violations has occurred on every day since May 17, 2010, as well as every day since the products were introduced in the California marketplace, and will continue every day until clear and reasonable warnings are provided to product purchasers and users.

Pursuant to Section 25249.7(d) of the statute, ERC intends to file a citizen enforcement action sixty days after effective service of this notice unless the Violator agrees in an enforceable written instrument to: (1) reformulate the listed products so as to eliminate further exposures to lead; and (2) pay an appropriate civil penalty. Consistent with the public interest goals of Proposition 65 and my client's objectives in pursuing this notice, ERC is interested in seeking a constructive resolution to this matter. Such resolution will avoid both further unwarned consumer exposures to the identified chemical and expensive and time-consuming litigation.

ERC's Executive Director is Chris Heptinstall, and it is located at 3111 Camino Del Rio North, Suite 400, San Diego, CA 92108; Tel. 619-500-3090. ERC has retained me in connection with this matter. We suggest that communications regarding this Notice of Violations should be directed to my attention at the above listed law office address and telephone number.

Sincerely,



Richard Drury

Attachments

Certificate of Merit

Certificate of Service

OEHHA Summary (to AL Global Corporation and its Registered Agent for Service of Process only)

Additional Supporting Information for Certificate of Merit (to AG only)

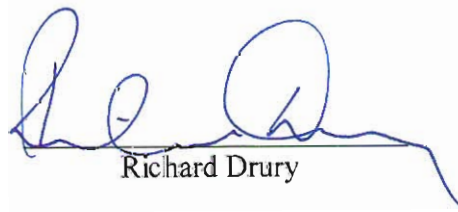
CERTIFICATE OF MERIT

**Re: Environmental Research Center's Notice of Proposition 65 Violations by
AL Global Corporation**

I, Richard Drury, declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged the party 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 have reviewed facts, studies, or other data regarding the exposure to the listed chemical that is the subject of the notice.
4. Based on the information obtained through those consultants, and on 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 that 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. Along with the copy of this Certificate of Merit served on the Attorney General is attached additional factual information sufficient to establish the basis for this certificate, including the information identified in California 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: May 17, 2013



Richard Drury

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:

I am a citizen of the United States, over the age of 18 years of age, and am not a party to the within entitled action. My business address is 306 Joy Street, Fort Oglethorpe, Georgia 30742. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Fort Oglethorpe, Georgia.

On May 17, 2013, I served the following documents: **NOTICE OF VIOLATIONS OF CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; 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 addressed to the parties listed below and depositing it at a U.S. Postal Service Office with the postage fully prepaid for delivery by Certified Mail:

Current CEO or President
AL Global Corporation
2400 Boswell Road
Chula Vista, CA 91914


Ned Ardagna
(AL Global Corporation's
Registered Agent for Service of Process)
571 Third Avenue
Chula Vista, CA 91910

On May 17, 2013, I electronically served the following documents: **NOTICE OF VIOLATION, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; ADDITIONAL SUPPORTING INFORMATION FOR CERTIFICATE OF MERIT AS REQUIRED BY CALIFORNIA HEALTH & SAFETY CODE §25249.7(d)(1)** on the following party by uploading a true and correct copy thereof on the California Attorney General's website, which can be accessed at <https://oag.ca.gov/prop65/add-60-day-notice> :

Office of the California Attorney General
Prop 65 Enforcement Reporting
1515 Clay Street, Suite 2000
Oakland, CA 94612-0550

On May 17, 2013, I served the following documents: **NOTICE OF VIOLATION, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT** on each of the parties on the Service List attached hereto by placing a true and correct copy thereof in a sealed envelope, addressed to each of the parties **on the Service List attached hereto**, and depositing it at a U.S. Postal Service Office with the postage fully prepaid for delivery by Priority Mail.

Executed on May 17, 2013, in Fort Oglethorpe, Georgia.


Rebecca Turner-Smith

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*

May 17, 2013

Page 6

Service List

District Attorney, Alameda County 1225 Fallon Street, Suite 900 Oakland, CA 94612	District Attorney, Los Angeles County 210 West Temple Street, Suite 1800 Los Angeles, CA 90012	District Attorney, San Diego County 330 West Broadway, Suite 1300 San Diego, CA 92101	District Attorney, Tuolumne County 423 N. Washington Street Sonora, CA 95370
District Attorney, Alpine County P.O. Box 248 Markleeville, CA 96120	District Attorney, Madera County 209 West Yosemite Avenue Madera, CA 93637	District Attorney, San Francisco County 850 Bryant Street, Suite 322 San Francisco, CA 94103	District Attorney, Ventura County 800 South Victoria Ave, Suite 314 Ventura, CA 93009
District Attorney, Amador County 708 Court Street, Suite 202 Jackson, CA 95642	District Attorney, Marin County 3501 Civic Center Drive, Room 130 San Rafael, CA 94903	District Attorney, San Joaquin County 222 E. Weber Ave. Rm. 202 Stockton, CA 95202	District Attorney, Yolo County 301 2 nd Street Woodland, CA 95695
District Attorney, Butte County 25 County Center Drive, Suite 245 Oroville, CA 95965	District Attorney, Mariposa County Post Office Box 730 Mariposa, CA 95338	District Attorney, San Luis Obispo County 1035 Palm St, Room 450 San Luis Obispo, CA 93408	District Attorney, Yuba County 215 Fifth Street, Suite 152 Marysville, CA 95901
District Attorney, Calaveras County 891 Mountain Ranch Road San Andreas, CA 95249	District Attorney, Mendocino County Post Office Box 1000 Ukiah, CA 95482	District Attorney, San Mateo County 400 County Ctr., 3 rd Floor Redwood City, CA 94063	Los Angeles City Attorney's Office City Hall East 200 N. Main Street, Suite 800 Los Angeles, CA 90012
District Attorney, Colusa County 346 Fifth Street Suite 101 Colusa, CA 95932	District Attorney, Merced County 550 W. Main Street Merced, CA 95340	District Attorney, Santa Barbara County 1112 Santa Barbara Street Santa Barbara, CA 93101	San Diego City Attorney's Office 1200 3rd Avenue, Ste 1620 San Diego, CA 92101
District Attorney, Contra Costa County 900 Ward Street Martinez, CA 94553	District Attorney, Modoc County 204 S Court Street, Room 202 Alturas, CA 96101-4020	District Attorney, Santa Clara County 70 West Hedding Street San Jose, CA 95110	San Francisco, City Attorney City Hall, Room 234 1 Dr Carlton B Goodlett PL San Francisco, CA 94102
District Attorney, Del Norte County 450 H Street, Room 171 Crescent City, CA 95531	District Attorney, Mono County Post Office Box 617 Bridgeport, CA 93517	District Attorney, Santa Cruz County 701 Ocean Street, Room 200 Santa Cruz, CA 95060	San Jose City Attorney's Office 200 East Santa Clara Street, 16 th Floor San Jose, CA 95113
District Attorney, El Dorado County 515 Main Street Placerville, CA 95667	District Attorney, Monterey County Post Office Box 1131 Salinas, CA 93902	District Attorney, Shasta County 1355 West Street Redding, CA 96001	
District Attorney, Fresno County 2220 Tulare Street, Suite 1000 Fresno, CA 93721	District Attorney, Napa County 931 Parkway Mall Napa, CA 94559	District Attorney, Sierra County PO Box 457 Downieville, CA 95936	
District Attorney, Glenn County Post Office Box 430 Willows, CA 95988	District Attorney, Nevada County 110 Union Street Nevada City, CA 95959	District Attorney, Siskiyou County Post Office Box 986 Yreka, CA 96097	
District Attorney, Humboldt County 825 5th Street 4 th Floor Eureka, CA 95501	District Attorney, Orange County 401 West Civic Center Drive Santa Ana, CA 92701	District Attorney, Solano County 675 Texas Street, Ste 4500 Fairfield, CA 94533	
District Attorney, Imperial County 940 West Main Street, Ste 102 El Centro, CA 92243	District Attorney, Placer County 10810 Justice Center Drive, Ste 240 Roseville, CA 95678	District Attorney, Sonoma County 600 Administration Drive, Room 212J Santa Rosa, CA 95403	
District Attorney, Inyo County 230 W. Line Street Bishop, CA 93514	District Attorney, Plumas County 520 Main Street, Room 404 Quincy, CA 95971	District Attorney, Stanislaus County 832 12 th Street, Ste 300 Modesto, CA 95354	
District Attorney, Kern County 1215 Truxtun Avenue Bakersfield, CA 93301	District Attorney, Riverside County 3960 Orange Street Riverside, CA 92501	District Attorney, Sutter County 446 Second Street Yuba City, CA 95991	
District Attorney, Kings County 1400 West Lacey Boulevard Hanford, CA 93230	District Attorney, Sacramento County 901 "G" Street Sacramento, CA 95814	District Attorney, Tehama County Post Office Box 519 Red Bluff, CA 96080	
District Attorney, Lake County 255 N. Forbes Street Lakeport, CA 95453	District Attorney, San Benito County 419 Fourth Street, 2 nd Floor Hollister, CA 95023	District Attorney, Trinity County Post Office Box 310 Weaverville, CA 96093	
District Attorney, Lassen County 220 South Lassen Street, Ste. 8 Susanville, CA 96130	District Attorney, San Bernardino County 316 N. Mountain View Avenue San Bernardino, CA 92415-0004	District Attorney, Tulare County 221 S. Mooney Blvd., Room 224 Visalia, CA 93291	

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Exhibit B



T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
richard@lozeaudrury.com

VIA CERTIFIED MAIL

Current CEO or President
AL Global Corporation
2400 Boswell Road
Chula Vista, CA 91914

Ned Ardagna
(AL Global Corporation's
Registered Agent for Service of Process)
571 Third Avenue
Chula Vista, CA 91910

VIA PRIORITY MAIL

District Attorneys of All California Counties
and Select City Attorneys
(See Attached Certificate of Service)

VIA ONLINE SUBMISSION

Office of the California Attorney General

Re: Notice of Violations of California Health & Safety Code Section 25249.5 *et seq.*

Dear Addressees:

I represent the Environmental Research Center ("ERC") in connection with this Notice of Violations of California's Safe Drinking Water and Toxic Enforcement Act of 1986, which is codified at California Health & Safety Code Section 25249.5 *et seq.* and also referred to as Proposition 65.

ERC is a California non-profit corporation dedicated to, among other causes, helping safeguard the public from health hazards by bringing about a reduction in the use and misuse of hazardous and toxic chemicals, facilitating a safe environment for consumers and employees, and encouraging corporate responsibility.

The name of the Company covered by this notice that violated Proposition 65 (hereinafter the "Violator") is:

AL Global Corporation

The products that are the subject of this notice and the chemicals in those products identified as exceeding allowable levels are:

Youngevity Beyond Osteo-fx Tropical Vanilla Flavor - Lead
Pure3x Designer Beverage Club tazza di vita - Lead
Youngevity Beyond Osteo-fx Powder Tropical Vanilla Flavor - Lead

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.

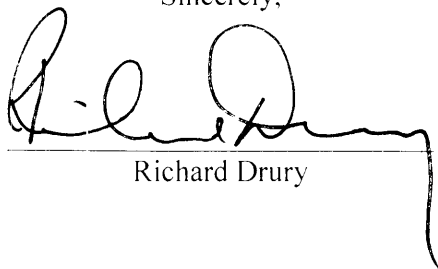
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The Violator has manufactured, marketed, distributed, and/or sold the listed products, which have exposed and continue to expose numerous individuals within California to the identified chemical, lead. The consumer exposures that are the subject of this notice result from the purchase, acquisition, handling and/or recommended use of these products by consumers. The primary route of exposure to lead has been through ingestion, but may have also occurred through inhalation and/or dermal contact. Proposition 65 requires that a clear and reasonable warning be provided prior to exposure to lead. The method of warning should be a warning that appears on the product's label. The Violator violated Proposition 65 because it failed to provide an appropriate warning to persons using and/or handling these products that they are being exposed to lead. Each of these ongoing violations has occurred on every day since September 13, 2010, as well as every day since the products were introduced in the California marketplace, and will continue every day until clear and reasonable warnings are provided to product purchasers and users.

Pursuant to Section 25249.7(d) of the statute, ERC intends to file a citizen enforcement action sixty days after effective service of this notice unless the Violator agrees in an enforceable written instrument to: (1) reformulate the listed products so as to eliminate further exposures to lead; and (2) pay an appropriate civil penalty. Consistent with the public interest goals of Proposition 65 and my client's objectives in pursuing this notice, ERC is interested in seeking a constructive resolution to this matter. Such resolution will avoid both further unwarned consumer exposures to the identified chemicals and expensive and time consuming litigation.

ERC's Executive Director is Chris Heptinstall, and is located at 3111 Camino Del Rio North, Suite 400, San Diego, CA 92108; Tel. 619-500-3090. ERC has retained me in connection with this matter. We suggest that communications regarding this Notice of Violations should be directed to my attention at the above listed law office address and telephone number.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Drury", written over a horizontal line. The signature is stylized with large loops and a long, thin tail extending downwards and to the right.

Richard Drury

Attachments

- Certificate of Merit
- Certificate of Service
- OEHHA Summary (to AL Global Corporation and its Registered Agent for Service of Process only)
- Additional Supporting Information for Certificate of Merit (to AG only)

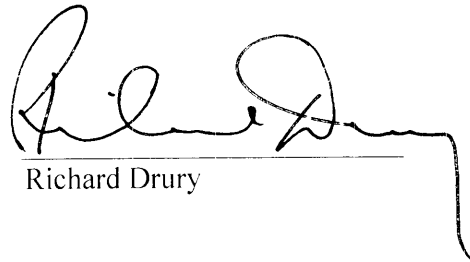
CERTIFICATE OF MERIT

**Re: Environmental Research Center's Notice of Proposition 65 Violations by
AL Global Corporation**

I, Richard Drury, declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged the party 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 have reviewed facts, studies, or other data regarding the exposure to the listed chemical that is the subject of the notice.
4. Based on the information obtained through those consultants, and on 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 that 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. Along with the copy of this Certificate of Merit served on the Attorney General is attached additional factual information sufficient to establish the basis for this certificate, including the information identified in California 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: September 13, 2013


Richard Drury

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:

I am a citizen of the United States, over the age of 18 years of age, and am not a party to the within entitled action. My business address is 306 Joy Street, Fort Oglethorpe, Georgia 30742. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Fort Oglethorpe, Georgia.

On September 13, 2013, I served the following documents: **NOTICE OF VIOLATIONS OF CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; 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, addressed to the party listed below and depositing it in a U.S. Postal Service Office with the postage fully prepaid for delivery by Certified Mail:

Current CEO or President
AL Global Corporation
2400 Boswell Road
Chula Vista, CA 91914

Ned Ardagna
(AL Global Corporation’s
Registered Agent for Service of Process)
571 Third Avenue
Chula Vista, CA 91910

On September 13, 2013, I electronically served the following documents: **NOTICE OF VIOLATION, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; ADDITIONAL SUPPORTING INFORMATION FOR CERTIFICATE OF MERIT AS REQUIRED BY CALIFORNIA HEALTH & SAFETY CODE §25249.7(d)(1)** on the following party by uploading a true and correct copy thereof on the California Attorney General’s website, which can be accessed at <https://oag.ca.gov/prop65/add-60-day-notice> :

Office of the California Attorney General
Prop 65 Enforcement Reporting
1515 Clay Street, Suite 2000
Oakland, CA 94612-0550

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Executed on September 13, 2013, in Fort Oglethorpe, Georgia.



Tiffany Capehart

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*

September 13, 2013

Page 6

Service List

District Attorney, Alameda County 1225 Fallon Street, Suite 900 Oakland, CA 94612	District Attorney, Los Angeles County 210 West Temple Street, Suite 1800 Los Angeles, CA 90012	District Attorney, San Diego County 330 West Broadway, Suite 1300 San Diego, CA 92101	District Attorney, Tuolumne County 423 N. Washington Street Sonora, CA 95370
District Attorney, Alpine County P.O. Box 248 Markleeville, CA 96120	District Attorney, Madera County 209 West Yosemite Avenue Madera, CA 93637	District Attorney, San Francisco County 850 Bryant Street, Suite 322 San Francisco, CA 94103	District Attorney, Ventura County 800 South Victoria Ave. Suite 314 Ventura, CA 93009
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District Attorney, Fresno County 2220 Tulare Street, Suite 1000 Fresno, CA 93721	District Attorney, Napa County 931 Parkway Mall Napa, CA 94559	District Attorney, Sierra County PO Box 457 Downieville, CA 95936	
District Attorney, Glenn County Post Office Box 430 Willows, CA 95988	District Attorney, Nevada County 110 Union Street Nevada City, CA 95959	District Attorney, Siskiyou County Post Office Box 986 Yreka, CA 96097	
District Attorney, Humboldt County 825 5th Street 4 th Floor Eureka, CA 95501	District Attorney, Orange County 401 West Civic Center Drive Santa Ana, CA 92701	District Attorney, Solano County 675 Texas Street, Ste 4500 Fairfield, CA 94533	
District Attorney, Imperial County 940 West Main Street, Ste 102 El Centro, CA 92243	District Attorney, Placer County 10810 Justice Center Drive, Ste 240 Roseville, CA 95678	District Attorney, Sonoma County 600 Administration Drive, Room 212J Santa Rosa, CA 95403	
District Attorney, Inyo County 230 W. Line Street Bishop, CA 93514	District Attorney, Plumas County 520 Main Street, Room 404 Quincy, CA 95971	District Attorney, Stanislaus County 832 12 th Street, Ste 300 Modesto, CA 95354	
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District Attorney, Kings County 1400 West Lacey Boulevard Hanford, CA 93230	District Attorney, Sacramento County 901 "G" Street Sacramento, CA 95814	District Attorney, Tehama County Post Office Box 519 Red Bluff, CA 96080	
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District Attorney, Lassen County 220 South Lassen Street, Ste. 8 Susanville, CA 96130	District Attorney, San Bernardino County 316 N. Mountain View Avenue San Bernardino, CA 92415-0004	District Attorney, Tulare County 221 S. Mooney Blvd., Room 224 Visalia, CA 93291	

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Exhibit C



T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
richard@lozeaudrury.com

VIA CERTIFIED MAIL

Current CEO or President
Youngevity International, Inc.
2400 Boswell Road
Chula Vista, CA 91914

Current CEO or President
AL International, Inc.
2400 Boswell Road
Chula Vista, CA 91914

Current CEO or President
AL International, Inc. dba Youngevity
2400 Boswell Road
Chula Vista, CA 91914

Current CEO or President
AL International, Inc.
2525 E Lincoln Avenue
Anaheim, CA 92806

CT Corporation System
(AL International, Inc. dba Youngevity's
Registered Agent for Service of Process)
818 West Seventh Street
Los Angeles, CA 90017

Albraa Almubiad
(AL International, Inc.'s
Registered Agent for Service of Process)
2525 East Lincoln Avenue
Anaheim, CA 92806

Corporation Trust Company
(Youngevity International, Inc.'s
Registered Agent for Service of Process)
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

VIA ONLINE SUBMISSION

Office of the California Attorney General

VIA PRIORITY MAIL

District Attorneys of All California Counties
and Select City Attorneys
(See Attached Certificate of Service)

Re: Notice of Violations of California Health & Safety Code Section 25249.5 *et seq.*

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The names of the Companies covered by this notice that violated Proposition 65 (hereinafter the “Violators”) are:

**AL International, Inc.
AL International, Inc. dba Youngevity
Youngevity International, Inc.**

The products that are the subject of this notice and the chemicals in those products identified as exceeding allowable levels are:

**Healing The Globe Scarlar Enhanced Detoxal 21 - Lead
Livinity Livin Slim Plus - Lead
Livinity Stress-ese Plus - Lead
Youngevity R-Garden Milk Thistle Formula - Lead
R-Garden Inc. Memory Formula - Lead
Youngevity R-Garden Brown Seaweed Extract Formula - Lead
R-Garden Inc. Herbal Blends Female Hormone System - Lead
Youngevity R-Garden Green Energy Plus - Lead
R-Garden Inc. Herbal Blends Eyes System - Lead
R-Garden Inc. Herbal Blends Immune Fungi System - Lead
R-Garden Inc. Herbal Blends Liver Gallbladder System - Lead
R-Garden Inc. Bowel Toner - Lead
R-Garden Inc. Herbal Blends Thyroid System - Lead
R-Garden Inc. Sun Energy - Lead
Youngevity Premium Women’s Hormonal Balancer - Lead
Ancient Legacy Ocean’s Gold - Lead
Scalar Core International Scalar Enhanced Colon Activator - Lead
Youngevity A J.D. Wallach Corporation D’Tox FX - Lead
Healing The Globe Reshape America Ameri Trim - Lead
Youngevity Ultimate Youth - Lead**

Youngevity Slender FX Meal Replacement Shake Vanilla - Lead
Youngevity Slender FX Meal Replacement Shake Chocolate - Lead
True2Life Fast Food Chocolate - Lead
True2Life Fast Food Vanilla – Lead
True2Life True Cleanse - Lead
Youngevity A J.D. Wallach Corporation Majestic Earth Ultimate Osteo-FX – Lead
Youngevity Beyond Osteo-fx Tropical Vanilla Flavor – Lead
R-Garden Inc. Herbal Blends Respiratory Lung - Lead
Pure3x Designer Beverage Club tazza di vita - Lead
Youngevity Beyond Osteo-fx Powder Tropical Vanilla Flavor - Lead

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.

This letter is a notice to each of the Violators and the appropriate governmental authorities of the Proposition 65 violations concerning the listed products. This notice covers all violations of Proposition 65 involving the Violators currently known to ERC from the information now available. ERC may continue to investigate other products that may reveal further violations. A summary of Proposition 65, prepared by the Office of Environmental Health Hazard Assessment, is enclosed with the copy of this letter to each of the Violators.

Each of the Violators has manufactured, marketed, distributed, and/or sold the listed products, which have exposed and continue to expose numerous individuals within California to the identified chemical, lead. The consumer exposures that are the subject of this notice result from the purchase, acquisition, handling and/or recommended use of these products by consumers. The primary route of exposure to lead has been through ingestion, but may have also occurred through inhalation and/or dermal contact. Proposition 65 requires that a clear and reasonable warning be provided prior to exposure to lead. The method of warning should be a warning that appears on the product's label. Each of the Violators violated Proposition 65 because they failed to provide an appropriate warning to persons using and/or handling these products that they are being exposed to lead. Each of these ongoing violations has occurred on every day since October 18, 2010, as well as every day since the products were introduced in the California marketplace, and will continue every day until clear and reasonable warnings are provided to product purchasers and users.

Pursuant to Section 25249.7(d) of the statute, ERC intends to file a citizen enforcement action sixty days after effective service of this notice unless each of the Violators agrees in an enforceable written instrument to: (1) reformulate the listed products so as to eliminate further exposures to the identified chemicals; and (2) pay an appropriate civil penalty. Consistent with the public interest goals of Proposition 65 and my client's objectives in pursuing this notice, ERC is interested in seeking a constructive resolution to this matter. Such resolution will avoid

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*

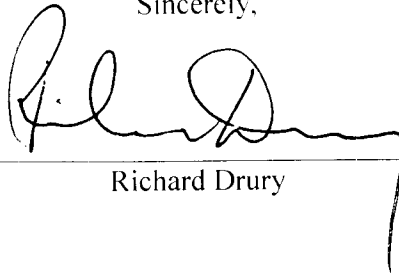
October 18, 2013

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both further unwarned consumer exposures to the identified chemicals and expensive and time consuming litigation.

ERC's Executive Director is Chris Heptinstall, and is located at 3111 Camino Del Rio North, Suite 400, San Diego, CA 92108; Tel. 619-500-3090. ERC has retained me in connection with this matter. We suggest that communications regarding this Notice of Violations should be directed to my attention at the above listed law office address and telephone number.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Drury', is written over a horizontal line. The signature is cursive and somewhat stylized.

Richard Drury

Attachments

Certificate of Merit

Certificate of Service

OEHHA Summary (to AL International, Inc., AL International, Inc. dba Youngevity, Youngevity International, Inc., and their Registered Agents for Service of Process only)

Additional Supporting Information for Certificate of Merit (to AG only)

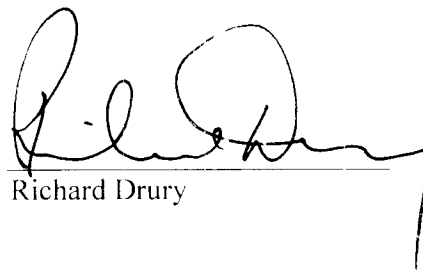
CERTIFICATE OF MERIT

**Re: Environmental Research Center's Notice of Proposition 65 Violations by
AL International, Inc., AL International, Inc. dba Youngevity, and
Youngevity International, Inc.**

I, Richard Drury, 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 have reviewed facts, studies, or other data regarding the exposure to the listed chemical that is the subject of the notice.
4. Based on the information obtained through those consultants, and on 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 that 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. Along with the copy of this Certificate of Merit served on the Attorney General is attached additional factual information sufficient to establish the basis for this certificate, including the information identified in California 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 18, 2013


Richard Drury

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:

I am a citizen of the United States, over the age of 18 years of age, and am not a party to the within entitled action. My business address is 306 Joy Street, Fort Oglethorpe, Georgia 30742. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Fort Oglethorpe, Georgia.

On October 18, 2013, I served the following documents: **NOTICE OF VIOLATIONS OF CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; 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, addressed to the party listed below and depositing it in a U.S. Postal Service Office with the postage fully prepaid for delivery by Certified Mail:

Current CEO or President
Youngevity International, Inc.
2400 Boswell Road
Chula Vista, CA 91914

CT Corporation System
(AL International, Inc. dba Youngevity’s
Registered Agent for Service of Process)
818 West Seventh Street
Los Angeles, CA 90017

Current CEO or President
AL International, Inc.
2400 Boswell Road
Chula Vista, CA 91914

Albraa Almubiad
(AL International, Inc.’s
Registered Agent for Service of Process)
2525 East Lincoln Avenue
Anaheim, CA 92806

Current CEO or President
AL International, Inc. dba Youngevity
2400 Boswell Road
Chula Vista, CA 91914

Corporation Trust Company
(Youngevity International, Inc.’s
Registered Agent for Service of Process)

Current CEO or President
AL International, Inc.
2525 E Lincoln Avenue
Anaheim, CA 92806

Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

On October 18, 2013, I electronically served the following documents: **NOTICE OF VIOLATION, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; ADDITIONAL SUPPORTING INFORMATION FOR CERTIFICATE OF MERIT AS REQUIRED BY CALIFORNIA HEALTH & SAFETY CODE §25249.7(d)(1)** on the following party by uploading a true and correct copy thereof on the California Attorney General’s website, which can be accessed at <https://oag.ca.gov/prop65/add-60-day-notice> :

Office of the California Attorney General
Prop 65 Enforcement Reporting
1515 Clay Street, Suite 2000
Oakland, CA 94612-0550

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*

October 18, 2013

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On October 18, 2013, I served the following documents: **NOTICE OF VIOLATION, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT** on each of the parties on the Service List attached hereto by placing a true and correct copy thereof in a sealed envelope, addressed to each of the parties **on the Service List attached hereto**, and depositing it with the U.S. Postal Service with the postage fully prepaid for delivery by First Class Mail.

Executed on October 18, 2013, in Fort Oglethorpe, Georgia.

A handwritten signature in black ink, appearing to read "Tiffany Capehart", written over a horizontal line.

Tiffany Capehart

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*

October 18, 2013

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Service List

District Attorney, Alameda County 1225 Fallon Street, Suite 900 Oakland, CA 94612	District Attorney, Los Angeles County 210 West Temple Street, Suite 18000 Los Angeles, CA 90012	District Attorney, San Diego County 330 West Broadway, Suite 1300 San Diego, CA 92101	District Attorney, Tuolumne County 423 N. Washington Street Sonora, CA 95370
District Attorney, Alpine County P.O. Box 248 Markleeville, CA 96120	District Attorney, Madera County 209 West Yosemite Avenue Madera, CA 93637	District Attorney, San Francisco County 850 Bryant Street, Suite 322 San Francisco, CA 94103	District Attorney, Ventura County 800 South Victoria Ave, Suite 314 Ventura, CA 93009
District Attorney, Amador County 708 Court Street Jackson, CA 95642	District Attorney, Marin County 3501 Civic Center Drive, Room 130 San Rafael, CA 94903	District Attorney, San Joaquin County 222 E. Weber Ave. Rm. 202 Stockton, CA 95202	District Attorney, Yolo County 301 2 nd Street Woodland, CA 95695
District Attorney, Butte County 25 County Center Drive, Suite 245 Oroville, CA 95965	District Attorney, Mariposa County Post Office Box 730 Mariposa, CA 95338	District Attorney, San Luis Obispo County 1035 Palm St, Room 450 San Luis Obispo, CA 93408	District Attorney, Yuba County 215 Fifth Street, Suite 152 Marysville, CA 95901
District Attorney, Calaveras County 891 Mountain Ranch Road San Andreas, CA 95249	District Attorney, Mendocino County Post Office Box 1000 Ukiah, CA 95482	District Attorney, San Mateo County 400 County Ctr., 3 rd Floor Redwood City, CA 94063	Los Angeles City Attorney's Office City Hall East 200 N. Main Street, Suite 800 Los Angeles, CA 90012
District Attorney, Colusa County 346 Fifth Street Suite 101 Colusa, CA 95932	District Attorney, Merced County 550 W. Main Street Merced, CA 95340	District Attorney, Santa Barbara County 1112 Santa Barbara Street Santa Barbara, CA 93101	San Diego City Attorney's Office 1200 3rd Avenue, Ste 1620 San Diego, CA 92101
District Attorney, Contra Costa County 900 Ward Street Martinez, CA 94553	District Attorney, Modoc County 204 S Court Street, Room 202 Alturas, CA 96101-4020	District Attorney, Santa Clara County 70 West Hedding Street San Jose, CA 95110	San Francisco, City Attorney City Hall, Room 234 1 Dr Carlton B Goodlett PL San Francisco, CA 94102
District Attorney, Del Norte County 450 H Street, Room 171 Crescent City, CA 95531	District Attorney, Mono County Post Office Box 617 Bridgeport, CA 93517	District Attorney, Santa Cruz County 701 Ocean Street, Room 200 Santa Cruz, CA 95060	San Jose City Attorney's Office 200 East Santa Clara Street, 16 th Floor San Jose, CA 95113
District Attorney, El Dorado County 515 Main Street Placerville, CA 95667	District Attorney, Monterey County Post Office Box 1131 Salinas, CA 93902	District Attorney, Shasta County 1355 West Street Redding, CA 96001	
District Attorney, Fresno County 2220 Tulare Street, Suite 1000 Fresno, CA 93721	District Attorney, Napa County 931 Parkway Mall Napa, CA 94559	District Attorney, Sierra County PO Box 457 Downieville, CA 95936	
District Attorney, Glenn County Post Office Box 430 Willows, CA 95988	District Attorney, Nevada County 110 Union Street Nevada City, CA 95959	District Attorney, Siskiyou County Post Office Box 986 Yreka, CA 96097	
District Attorney, Humboldt County 825 5th Street 4 th Floor Eureka, CA 95501	District Attorney, Orange County 401 West Civic Center Drive Santa Ana, CA 92701	District Attorney, Solano County 675 Texas Street, Ste 4500 Fairfield, CA 94533	
District Attorney, Imperial County 940 West Main Street, Ste 102 El Centro, CA 92243	District Attorney, Placer County 10810 Justice Center Drive, Ste 240 Roseville, CA 95678	District Attorney, Sonoma County 600 Administration Drive, Room 212J Santa Rosa, CA 95403	
District Attorney, Inyo County 230 W. Line Street Bishop, CA 93514	District Attorney, Plumas County 520 Main Street, Room 404 Quincy, CA 95971	District Attorney, Stanislaus County 832 12 th Street, Ste 300 Modesto, CA 95354	
District Attorney, Kern County 1215 Truxtun Avenue Bakersfield, CA 93301	District Attorney, Riverside County 3960 Orange Street Riverside, CA 92501	District Attorney, Sutter County 446 Second Street Yuba City, CA 95991	
District Attorney, Kings County 1400 West Lacey Boulevard Hanford, CA 93230	District Attorney, Sacramento County 901 "G" Street Sacramento, CA 95814	District Attorney, Tehama County Post Office Box 519 Red Bluff, CA 96080	
District Attorney, Lake County 255 N. Forbes Street Lakeport, CA 95453	District Attorney, San Benito County 419 Fourth Street, 2 nd Floor Hollister, CA 95023	District Attorney, Trinity County Post Office Box 310 Weaverville, CA 96093	
District Attorney, Lassen County 220 South Lassen Street, Ste. 8 Susanville, CA 96130	District Attorney, San Bernardino County 316 N. Mountain View Avenue San Bernardino, CA 92415-0004	District Attorney, Tulare County 221 S. Mooney Blvd., Room 224 Visalia, CA 93291	