



From the Desk of
Sean Southard, Esquire

June 20, 2022

VIA ELECTRONIC AND CERTIFIED MAIL

Lead Safe Mama, LLC
Tamara Rubin
Alexander Rubin
7933 SE 15TH Avenue,
Portland, OR, 97202
TamaraRubin@mac.com

Re: False and misleading statements regarding Primal Life Organics

Dear Mr. and Mrs. Rubin:

The undersigned law firm represents Primal Life Organics, LLC an Ohio limited liability company. It has come to our attention that Mrs. Rubin has been making false and misleading statements via multiple platforms regarding Primal Life Organics, specifically, Primal Life Dirty Mouth Toothpowder. Specifically, Mrs. Rubin has claimed that Primal Life Dirty Mouth Toothpowder has “7,000 ppb Lead, 18,000 ppb Cadmium and 18,000 ppb Antimony.” You portray such allegations as “results,” however, you provide virtually no further information regarding your alleged “tests” other than that such tests were the result of an XRF analyzer (specifically, a *non-radioactive source Niton XL3t GOLDD+ XRF Analyzer* from ThermoFisher Scientific) at a three-minute (one hundred eighty seconds) test. While I should not need to point this out, your scientific methods are highly flawed. First, you provide no standing operating procedures for your tests. Second, there is no video of you (or anyone) testing Primal Life Dirty Mouth Toothpowder and showing the results. Third, you provide no information if you calibrated your XRF, and if so, how and what calibration setting your XRF analyzer is using. Fourth, you never state the form the lead is in (Lead in an un-bonded form vs. lead in bonded form.) Fifth, you mischaracterize any alleged “results” with the implication that my client’s products are unsafe and never disclose the difference between lead in a product meant for ingestion and one that should not be swallowed.¹

My client has a Certificate of Analysis from an independent, third-party laboratory that specifically rebuffs your “results.” Whether your scathing review stems from your apparent dislike of one of the main ingredients in Primal Life Dirty Mouth Toothpowder (bentonite clay – whether in pharmaceutical grade or not) or the fact that you are a competitor (considering you run your own amazon online store for which you receive compensation)², the result is, unfortunately, the same.

¹ Analogously, the FDA has said that “It is not scientifically valid to equate the risk to consumers presented by lead levels in candy, a product intended for ingestion, with that associated with lead levels in lipstick, a product intended for topical use and ingested in much smaller quantities than candy.”

² <https://www.amazon.com/shop/auntietammys/>

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You have recklessly and improperly tarnished my client's name and reputation. Such false and misleading statements have caused and will continue to cause irreparable injury to Primal Life Organics. More importantly, such false publications open up liability not only against Lead Safe Mama, LLC, but also Mrs. Rubin, individually.

As you well expected,³ we demand that you immediately cease and desist any and all such dissemination regarding Primal Life Organics, LLC, its officers, directors, managers, and agents as well as any product of Primal Life Organics, LLC. We further demand that you immediately remove all such publications of your false and misleading statements about Primal Life Organics, LLC, its officers, directors, managers, and agents as well as any product of Primal Life Organics, LLC from all publications on which you published (including, but not limited to, any and all websites that you own or control (including any and all social medial accounts or platforms).

We expect such action to occur immediately. Failing confirmation, we will proceed forward to vigilantly and aggressively pursue our client's interests in every way possible.

This letter does not constitute a complete statement of Primal Life Organics, LLC's claims, rights, or remedies with respect to this matter, all of which are hereby expressly reserved.

PLEASE GOVERN YOUSELF ACCORDINGLY.

PINO NICHOLSON, PLLC

/s/ Sean M. Southard
Sean Southard, Esq.
For the Firm

SMS

³ "I anticipate they will do *nothing* in response to learning of these findings (although – if they are *not familiar with the work of Lead Safe Mama, LLC*, they will possibly send me a "*cease and desist*" letter from their legal team (asking me to "take down" the publication of these findings).)