1 2	WILLIAM VERICK, SBN 140972 Klamath Environmental Law Center 424 First Street		
3	Eureka, CA 95501 Telephone: (707) 268-8900	FILED San Francisco County Superior Court	
4	Facsimile: (707) 268-8901	AUG 1 2 2002	
5	DAVID WILLIAMS, SBN 144479 FREDRIC EVENSON, SBN 198059	_	
6	BRIAN ACREE, SBN 202505 2070 Allston Way, Suite 300 P.O. Box 12157	GORDON PARK-LI, Clerk BY: Mike Monto Deputy Clerk	
7	Berkeley, CA 94712-3157	The Commence of the Commence o	
8	Telephone: (510) 647-1900 Facsimile: (510) 6471905	PLAN 1 (10) 1 0 2003 -9 00 AM	
9	Attorneys for Plaintiff,		
10	MATEĚL ENVIRONMENTAL JUSTICE FO	DUNDATION	
11	SUPERIOR COURT OF THE STATE OF CALIFORNIA		
12			
13	(Unlimit	ed Jurisdiction)	
14	MATEEL ENVIRONMENTAL JUSTICE FOUNDATION,	CASE NO. 411379	
15	Í TOTAL TOTA	_	
16	Plaintiff,	COMPLAINT FOR INJUNCTIVE RELIEF	
17	v.	AND CIVIL PENALTIES	
18	KINDERMAN J. & SONS, INC., BED		
19	BATH & BEYOND, INC., SMART INNOVATIONS INC. M.S.A. TRADING		
20	INNOVATIONS, INC., M.S.A. TRADING, INC., HOME DEPOT U.S.A, INC., TRADE ASSOCIATIONS GROUP., LTD.,	TOXIC TORT/ENVIRONMENTAL	
21	ALBERTSON'S INC., FITZ AND FLOYD, INC., FFSC, INC., LINENS N/ THINGS,		
22	INC., LNT, INC., and DOES 1 through 100 inclusive,		
23	Defendants.		
24		,	
25	MATEEL ENVIRONMENTAL JUSTICE FOUNDATION alleges as follows:		
26	INTRODUCTION		
27	1. This Complaint seeks civil penalties and an injunction to remedy the continuing failure of defendants KINDERMAN J. & SONS, INC., BED BATH & BEYOND, INC.,		
28			
	COMPLAINT FOR INJUNCTION AND CIVIL PENALTIES		

SMART INNOVATIONS, INC., M.S.A. TRADING, INC., HOME DEPOT U.S.A., INC., TRADE ASSOCIATIONS GROUP., LTD., ALBERTSON'S INC., FITZ AND FLOYD, INC., FFSC, INC., LINENS N/THINGS, INC., LNT, INC., and DOES 1 through 100 inclusive (hereinafter "Defendants"), to give clear and reasonable warnings to those residents of California, who handle and use decorative string lights which are made of a PVC covered cord with lights strung along the cord, that handling and use of such products causes those residents to be exposed to lead and lead compounds, chemicals known to the State of California to cause cancer, birth defects and other reproductive harm. Such products are referred to variously as Christmas Lights, Holiday Lights, Icicle Lights, Halloween Lights, Mini-Lights, and other terms, and are hereinafter referred to as "PVC Coated Decorative String Lights." Defendants manufacture, distribute and/or market PVC Coated Decorative String Lights. These products cause exposures to lead and lead compounds, which are chemicals known to the State of California to cause cancer, birth defects and other reproductive harm.

- 2. Defendants are businesses that manufacture, market, and/or distribute PVC Coated Decorative String Lights. Defendants intend that residents of California handle and use PVC Coated Decorative String Lights that Defendants manufacture, market, and/or distribute. When these products are handled and used in their normally intended manner, they expose people to lead and lead compounds. In spite of knowing that residents of California were and are being exposed to these chemicals when they handle and use PVC Coated Decorative String Lights, Defendants did not and do not provide clear and reasonable warning that these products cause exposure to chemicals known to cause cancer, birth defects and other reproductive harm.
- 3. Plaintiff seeks injunctive relief pursuant to Health & Safety Code Section 25249.7 to compel Defendants to bring their business practices into compliance with section 25249.5 et seq. by providing a clear and reasonable warning to each individual who in the future may be exposed to the above mentioned toxic chemicals from the use of Defendants' products. Plaintiff also seeks injunctive relief pursuant to Business & Professions Code Sections 17203 and 17204, which grant the Court the authority to enjoin any unlawful business practice constituting an act of unfair competition

4. In addition to injunctive relief, plaintiff seeks civil penalties to remedy the defendants KINDERMAN J. & SONS, INC., BED BATH & BEYOND, INC., SMART INNOVATIONS, INC., M.S.A. TRADING, INC., HOME DEPOT U.S.A., INC., TRADE ASSOCIATIONS GROUP., LTD., ALBERTSON'S INC., FITZ AND FLOYD, INC., FFSC, INC., LINENS N/ THINGS, INC., LNT, INC., from continuing to fail to provide clear and reasonable warnings to many individuals that they have been and continue to be exposed to chemicals known to cause cancer, birth defects and other reproductive harm.

PARTIES

- 5. Plaintiff MATEEL ENVIRONMENTAL JUSTICE FOUNDATION ("Mateel") is a non-profit foundation dedicated to, among other causes, the protection of the environment, promotion of human health, environmental education, and consumer rights. Mateel is based in Eureka, and is incorporated under the laws of the State of California. Mateel is a "person" pursuant to Health & Safety Code Section 25118. Mateel brings this enforcement action in the public interest pursuant to Health & Safety Code §25249.7(d) and Business & Professions Code §17204. Residents of California are regularly exposed to lead and lead compounds from PVC Coated Decorative String Lights manufactured, distributed or marketed by Defendants without a clear and reasonable Proposition 65 warning and in violation of the prohibition against unlawful business practices within the meaning of Business & Professions Code §17200.
- 6. Defendants are each a person within the meaning of Business & Professions Code §17201 and a person doing business within the meaning of Health & Safety Code Section 25249.11. Defendants are businesses that manufacture, distribute, and/or market PVC Coated Decorative String Lights in California, including the City and County of San Francisco. Manufacture, distribution and/or marketing of these products in the City and County of San Francisco causes people to be exposed to lead and lead compounds while they are physically present in the City and County of San Francisco.
- 7. Mateel is unaware of the true names or capacities of the Defendants sued herein under the fictitious names DOES 1 through 100, inclusive. Defendants DOES 1 through 100 inclusive are therefore sued herein pursuant to Cal. Code Civ. Proc. §474. When Mateel learns

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their identities, it will amend the complaint.

8. Plaintiff brings this enforcem

- 8. Plaintiff brings this enforcement action against Defendants pursuant to Health & Safety Code Section 25249.7(d). Attached hereto and incorporated by reference is a copy of the 60-day Notice Letter, which Mateel sent to California's Attorney General. Substantially similar letters were sent to every District Attorney in the state, and to the City Attorneys of every California city with a population greater than 750,000. On those same dates, Mateel sent a similar 60-Day Notice Letter to each defendant. Attached to the 60-Day Notice Letters sent to each defendant was a summary of Proposition 65 that was prepared by California's Office of Environmental Health Hazard Assessment. In addition, each 60-Day Notice Letter plaintiff sent was accompanied by a Certificate of Service attesting to the service of the 60-Day Notice Letter on each entity which received it as well as a Certificate of Merit. Moreover, the 60 Day Notice Letter sent to the Attorney General enclosed laboratory reports and the names of experts that Mateel consulted and which formed the basis of the Certificate of Merit.
 - 9. Defendants are all businesses that employ ten or more people.

JURISDICTION

- 10. The Court has jurisdiction over this action pursuant to California Health & Safety Code Section 25249.7, and Business & Professions Code Sections 17203 and 17204, which allow enforcement in any court of competent jurisdiction. California Constitution Article VI, Section 10 grants the Superior Court "original jurisdiction in all causes except those given by statute to other trial courts." Chapter 6.6 of the Health & Safety Code, and Division 7, part 2 (Sections 17200 et seq.) of the Business & Professions Code, which contain the statutes under which this action is brought, do not grant jurisdiction to any other trial court.
- 11. This Court also has jurisdiction over Defendants because they are businesses that have sufficient minimum contacts in California and within the City and County of San Francisco. Defendants intentionally availed themselves of the California and San Francisco County markets for PVC Coated Decorative String Lights. It is thus consistent with traditional notions of fair play and substantial justice for the San Francisco Superior Court to exercise jurisdiction over them.

12. Venue is proper in this Court because Defendants market their products in and around San Francisco and thus cause people to be exposed to lead and lead compounds while those people are physically present in San Francisco. Liability for Plaintiff's causes of action, or some parts thereof, has accordingly arisen in San Francisco during the times relevant to this Complaint.

FIRST CAUSE OF ACTION (Violations of Proposition 65)

- 13. Plaintiff realleges and incorporates by reference into this First Claim for Relief, as if specifically set forth herein, paragraphs 1 through 11, inclusive.
- 14. The People of the State of California have declared by referendum under Proposition 65 (California Health & Safety Code § 25249.5 et seq.) their right "[t]o be informed about exposures to chemicals that cause cancer birth defects, or other reproductive harm."
- 15. To effectuate this goal, Section 25249.6 of the Health and Safety Code mandates that persons who, in the course of doing business, knowingly and intentionally expose any individual to a chemical known to the State of California to cause cancer or birth defects must first provide a clear and reasonable warning to such individual prior to the exposure.
- 16. Since at least August 12, 1998, defendants have engaged in conduct which violates Health and Safety Code Section 25249.6 et seq. This conduct includes knowingly and intentionally exposing to the above mentioned toxic chemicals, California residents who handle and use PVC Coated Decorative String Lights. The normally intended use of PVC Coated Decorative String Lights causes exposure to lead and lead compounds, which are chemicals known to the State of California to cause cancer, birth defects and other reproductive harm. Defendants have not provided clear and reasonable warnings, within the meaning of Health & Safety Code Sections 25249.6 and 25249.11.
- 17. At all times relevant to this action, Defendants knew that the PVC Coated Decorative String Lights they manufactured, distributed or marketed were causing exposures to lead and lead compounds. Defendants intended that residents of California handle and use PVC Coated Decorative String Lights in such ways as would lead to significant exposures to these

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18. By the above described acts, Defendants, are liable and should be liable, pursuant to Health & Safety Code § 25249.7(b), for a civil penalty of \$2,500.00 per day for each individual exposed to lead and lead compounds from the handling or use of Defendants' PVC Coated Decorative String Lights.

SECOND CAUSE OF ACTION

(Violations of Business & Professions Code §§ 17200 et seq.)

- 19. Plaintiff realleges and incorporates by reference into this Second Claim for Relief. as if specifically set forth herein, paragraphs 1 through 18.
- 20. Defendants, at all times relevant to this action, have knowingly and intentionally exposed to lead and lead compounds residents of California who handle and use PVC Coated Decorative String Lights. Defendants have not provided clear and reasonable warnings within the meaning of Health & Safety Code Sections 25249.6 and 25249.11 to these exposed individuals.
- 21. By intentionally causing such exposures without first providing clear and reasonable warnings, Defendants have violated Proposition 65, Section 25249 et seq. of the California Health & Safety Code. These violations thus constitute unlawful business practices as defined by Business & Professions Code Section 17200. By marketing PVC Coated Decorative String Lights that cause exposures to lead, Defendants actions also constitute unfair competition because such marketing practices are unfair and fraudulent in that members of the public may be mislead to believe the lights do not cause an exposure to lead.
- 22. An action for injunctive relief under the Unfair Competition Act is specifically authorized herein pursuant to Business & Professions Code § 17203.
- 23. Plaintiff, in bringing this action, acts within the public interest for the protection of all citizens of the State of California in attempting to obtain injunctive relief for the purpose of deterring and preventing Defendants from failing to warn about possible future exposures to the above mentioned carcinogenic and teratogenic substances.

PRAYER FOR RELIEF

Wherefore, plaintiff prays for judgment against Defendants, as follows:

- A. Pursuant to the First Claim for Relief, that Defendants be assessed a civil penalty in an amount equal to \$2,500.00 per day per individual exposed, in violation of Section 25249.6 of the California Health & Safety Code, to lead and lead compounds as the result of Defendants' manufacturing, distributing or marketing of PVC Coated Decorative String Lights.
- B. Pursuant to the Second Claim for Relief, that all Defendants be enjoined, restrained, and ordered to comply with the provisions of Section 25249.5, et seq. of the California Health & Safety Code, and not commit any further unlawful or unfair business practices;
- C. Pursuant to the Second Claim for Relief, that all defendants be required to notify or otherwise inform all persons who purchased any PVC Coated Decorative String Lights over the last four years that the PVC Coated Decorative String Lights cause an exposure to lead, a chemical known to the State of California to cause cancer and birth defects, that certain actions can be taken to minimize that exposure, and that they may return any such purchase for a full refund.
- D. Pursuant to the Second, Third, and Fourth Claims for Relief, that all DEFENDANTS be assessed reasonable attorney's fees, and for costs of suit actually incurred by plaintiff for the preparation and pursuit of this action, and
 - E. For such other relief as this Court deems just and proper.

Ву______

David H. Williams Attorney for Plaintiff

Mateel Environmental Justice Foundation

COMPLAINT FOR INJUNCTION AND CIVIL PENALTIES

Dated: August 12, 2002

L. NOFFICE OF DAVID H. WILLIAMS

2070 ALLSTON WAY, SUITE 300 BERKELEY, CALIFORNIA 94704 TELEPHONE (510) 647-1900 FAX (510) 647-1905

January 13, 2002

BY MAIL

CRAIG C. THOMPSON SUPERVISING DEPUTY ATTORNEY GENERAL CALIFORNIA DEPARTMENT OF JUSTICE 1300 "I" STREET P.O. BOX 94255 SACRAMENTO, CA 95814

Dear Mr. Thompson:

This office and the Mateel Environmental Justice Foundation ("Mateel") give you notice that since at least January 11, 2001, the business listed on Exhibit A have been, are, will be, and threaten to be in violation of Cal. Health and Safety Code § 25249.6. Both this office and Mateel are private enforcers of Proposition 65, both may be contacted at the below listed address and telephone number, and I am a responsible individual with both Mateel and this office. The above referenced violations occur when California residents handle and/or use Christmas lights, string lights, swag lights, icicle lights and other similar types of light sets that consist of a series of light bulbs connected by a plastic coated wire (collectively "holiday lights"). Examples of particular products manufactured and/or sold by the businesses in question are attached as Exhibit B. The plastic coating on the wires of these holiday lights contains lead and lead compounds ("lead"). When people handle these wires, when they install them, when they string them up on windows, Christmas trees, on their houses or in their gardens, or whenever they run the wires through their hands, lead that is in and on the plastic coating on these wires comes off on their hands. This lead is then ingested and/or inhaled through hand-to-mouth, hand-to-food-to-mouth, and hand-tocigarette-to-mouth-to-lungs behavior. This lead is also absorbed through the skin, enters the body via cuts and abrasions, and through mucous membranes when people with lead on their hands touch these mucous membranes. Holiday lights sold by these businesses thus expose consumers and workers to lead via the dermal, ingestion, inhalation and subcutaneous routes. These businesses do not provide clear and reasonable warnings to people who install or use holiday lights that these lights will expose them to chemicals known to cause cancer and birth defects. These violations and threatened violations will continue to occur everyday until these businesses either provides clear and reasonable warnings, reformulate their lights so as not to contain lead, or stop selling them. These exposures occur within the consumer, environmental, and occupational contexts. Mateel does not, however, allege occupational exposures as to lights manufactured outside of California, excepts as to the workplaces that these businesses maintain in California. These violations occur in all of California's 58 counties and both on and off of these businesses properties.

Cordially,

David H. Williams

EXHIBIT A

KURT S. ADLER, INC. 1107 BROADWAY NEW YORK, NY 10010

KINDERMAN, J. & SONS, INC. 22 JACKSON ST PHILADELPHIA, PA 19148-0000

BIG LOTS STORES, INC. 300 PHILLIPI RD COLUMBUS, OH 43228

PNS STORES, INC. 300 PHILLIPI RD COLUMBUS, OH 43228

WEST COAST LIQUIDATORS, INC. 300 PHILLIPI RD COLUMBUS, OH 43228

IKEA U.S., INC. 496 WEST GERMANTOWN PIKE PLYMOUTH MEETING, PA 19462

IKEA U.S. WEST, INC. 496 W GERMANTOWN PIKE PLYMOUTH MEETING, PA 19462

IKEA U.S. GENERAL PARTNER, INC. 496 W GERMANTOWN PIKE PLYMOUTH MEETING, PA 19462

BED BATH & BEYOND INC. 650 LIBERTY AVENUE UNION, NJ 07083

SMART INNOVATIONS, INC. 11810 MAYFIELD AVE #101 LOS ANGELES, CA 90049

M. S. A. TRADING, INC. PRESIDENT: MARK KANE 5145 DOUGLAS FIR RD CALABASAS, CA 91302

THE KROGER CO.
PRESIDENT: JOSEPH A PICHLER
1014 VINE ST
CINCINNATI, OH 45202-1100

INTER AMERICAN PRODUCTS, INC. 1014 VINE ST CINCINNATI, OH 45202-1100

CALA FOODS, INC. 1100 WEST ARTESIA BLVD COMPTON, CA 90220

HOME DEPOT U.S.A., INC. 2455 PACES FERRY ROAD ATLANTA, GA 30339

TRADE ASSOCIATES GROUP, LTD. 1730 W WRIGHTWOOD CHICAGO, ILL 60614-6143

SAFEWAY INC. 5918 STONERIDGE MALL ROADQ PLEASANTON, CA 94588-3229

ALBERTSON'S, INC. 250 PARKCENTER BLVD BOISE, ID 83706

GRANDRICH CORPORATION 16215 MARQUARDT AVE CERRITOS, CA 90703

ROMAN, INC. 555 LAWRENCE AVE. ROSELLE, IL 60172-1599

FITZ AND FLOYD, INC. 501 E CORPORATE DR LEWISVILLE, TEXAS 75057

FFSC, INC. 501 E CORPORATE DR LEWISVILLE, TEXAS 75057

GE WIRING DEVICES & SPECIALTY PRODUCTS, INC.
PO BOX 2216
SCHENECTADY, NY 12301-2216

NEW ENGLAND POTTERY CO 1000 WASHINGTON ST FOXBORO, MA 02035-1330

GKI DIVISION OF NEW ENGLAND POTTERY CO 230 SPRING ST NW ATLANTA, GA 30303

TARGET CORPORATION 1000 NICOLLET MALL TPN9 MINNEAPOLIS, MN 55403

LINENS 'N THINGS, INC. 6 BRIGHTON RD STE 552 CLIFTON, NJ 07015

LNT, INC. 6 BRIGHTON RD STE 552 CLIFTON, NJ 07015 **EXHIBIT B**

	EXHIBIT B	
COMPANY	EXAMPLE HOLIDAY LIGHT	
KURT S. ADLER, INC.	Santa's World 50 Miniature Lights, Santa's World 10 Light Set, 10 Old Fashioned Streetlights UL1518, Cool To The Touch In/Outdoor C7 Style Light Set UL1310/GM, 3 Light Set UL1507R	
KINDERMAN, J. & SONS, INC.	Paulanne Industries 100 Orange Bulbs Fright Lites #DKO1-100/2SSB, Paulanne Industries Santa Trim Window-cicles 50 Lights, Paulanne Industries Brite Star Path-cicles, Santa Trim Window-Cicles 50 Multi Lights, Paulanne Industries Brite Star Path-cicles	
BIG LOTS STORES, INC., PNS STORES, INC., WEST COAST LIQUIDATORS, INC. IKEA U.S., INC., IKEA U.S. WEST, INC., IKEA U.S. GENERAL PARTNER, INC.	25 Christmas Outdoor Lights SKU # 10942347, 100 Miniature Christmas Lights Super Bright Item#23010159TC, 100 Net Miniature Light Set Model # TOL-100L/2W, 50 Indoor Clear Lights Item # ES 60-230, 100 Miniature Christmas Lights Super Bright Item#TOL-100/2WA, 300 Frosty Lights Illuminated Icicles Holiday Lighting System Model#CDF-150/3F, 100 Clear Frosty Lights Illuminated Icicles Item # TOL-100L/2WA Julfrid #19972 Paper lantern string lights	
BED BATH & BEYOND INC.	300 Patio Add-a-Set #8844X, Foremost 450 Icicle Add-a-Set #SSO-150/35	
SMART INNOVATIONS, INC., M. S. A. TRADING, INC.	Light Up America Red, White, and Blue Item #TZ-17	
THE KROGER CO., CALA FOODS, INC., INTER AMERICAN PRODUCTS, INC.	Holiday Home 300 Hang Straight Icicle Light Set-Clear, Holiday Home 16G 40 Frosted White Round Light Set, Holiday Home 100 Hang Straight Icicle Light Set-Multi, Holiday Home 100 Hang Straight Icicle Light Set Blue, Holiday Home 16G 40 Transparent MultiColor Round Light Set	
OME DEPOT U.S.A., INC.	Home Accents 150 Multi-Function Christmas Lights, Home Accents 35 G 20 Crystal Globe Christmas Lights, GE Indoor/Outdoor, Pro-Line 68ft150 Light Commercial Miniature Set, Pro- Line 150 Net Light #45302	
RADE ASSOCIATES GROUP, LTD.	Snowflake Lights	
FEWAY INC.	100 Indoor/Outdoor Miniature Christmas Lights	

ALBERTSON'S, INC.	70 pearl lights #HSL-70P/2F(0.2), Expressions 100 mini lights red #4803, Forem 100 Icicle add-a-set #HL-1002
ROMAN, INC.	Bubble Lights item #176494
GRANDRICH CORPORATION	Dorm Room String Lights Geometric Cubes 12 lights, 12 ft wire
FITZ AND FLOYD, INC., FFSC, INC.	Silvestri 50 Miniature Lights For Indoor-Outdoo Use, 52 Series
GE WIRING DEVICES & SPECIALTY PRODUCTS, INC.	GE 50 Light Traditional Holiday Classics Se #OLX6-50CL, 100 Light String-A-Long #26984, 50 Light Traditional Holiday Classic Se #27016, Pro-Line 150 Net Light #45302, 100 Light String-A-Long #26984, 150 Light Blue & White Icicle #45321
NEW ENGLAND POTTERY CO., GKI DIVISION OF NEW ENGLAND POTTERY CO	Bethlehem Lighting White Frost 100 Commercial Grade Tangle-Free Lights Indoor/Outdoor, Halloween Bubble Lights #741760, C6 Faceted Holiday Lights #722701
TARGET CORPORATION	Dorm Room String Lights Geometric Cubes 12 lights, 12 ft wire, Garden Icicle Light Set
INENS N THINGS, LNT, INC	100 Decorative Trunk Lights

CERTIFICATE OF SERVICE

I, Anita Sarrett, declare:

If so called, I could and would testify as follows: I am over eighteen. My business address is 2070 Allston Way, Suite 300, Berkeley, California, 94704. On January 15, 2002, I caused the attached 60-DAY NOTICE LETTER, or a letter identical in substance, to be served by U.S. Mail on those public enforcement agencies listed on the attached SERVICE LIST; in addition on the same date and by Certified Mail I caused the attached 60-DAY NOTICE LETTER and PROPOSITION 65: A SUMMARY to be sent by Certified Mail to the private business entities also listed on the attached SERVICE LIST. I deposited copies of these documents in envelopes, postage pre-paid, with the U.S. Postal Service on the day on which the mail is collected. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on January 15, 2002, at Berkeley, California.

Anita Sarrett

This notice alleges the violation of Proposition 65 with respect to occupational exposures governed by the California State Plan for Occupational Safety and Health. The State Plan incorporated the provisions of Proposition 65, as approved by Federal OSHA on June 6, 1997. This approval specifically placed certain conditions on Proposition 65, including that it does not apply to the conduct of manufactures occurring outside the State of California. The approval also provides that an employer may use the means of compliances in the general hazard communication requirements to comply with Proposition 65. It also requires that supplemental enforcement is subject to the supervision of the California Occupational Safety and Health Administration. Accordingly, any settlement, civil complaint, or substantive court orders in this matter must be submitted to the Attorney General.

CERTIFICATE OF MERIT

I, Fredric Evenson, hereby certify that with regard to the allegations in the attached 60-Day Notice Letter, 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 exposure to the listed chemical that is the subject of the attached 60-Day Notice Letter (which is not yet an action and may never be an action) and, based on that information, I believe that there is a reasonable and meritorious case for anyone, including the Attorney General and any District Attorney or City Attorney, to bring an action based on the violations noticed in the attached 60-Day Notice Letter. Attached to the copy of the 60-Day Notice Letter sent to the California Attorney General, is a copy of the laboratory report that reflects, in part, the above referenced consultation. I swear under penalty of perjury that the foregoing is true and correct and that this certification was executed on January 15, 2002 at Berkeley, California

David Williams

CKAIG THOMPSON
SUPERVISING DEPUTY ATTORNEY
GENERAL
STATE OF CALIFORNIA
1300 "L" STREET
P O BOX 94255
SACRAMENTO CA 95814

OFFICE OF THE CITY ATTORNEY CITY OF OAKLAND 505 14TH STREET, 12TH FLOOR OAKLAND, CA 94612

OFFICE OF THE CITY ATTORNEY CITY OF SAN FRANCISCO CITY HALL ROOM 206 400 VAN NESS SAN FRANCISCO, CA 94102

OFFICE OF THE CITY ATTORNEY CITY OF SACRAMENTO 980 NINTH STREET, IDTH FLOOR SACRAMENTO, CA 95814-2736

OFFICE OF THE CITY ATTORNEY CITY OF SAN JOSE 151 W. MISSION ST. SAN JOSE, CA 95110

OFFICE OF THE CITY ATTORNEY CITY OF LOS ANGELES CIVIL AFFAIRS 200 N. MAIN ST. LOS ANGELES, CA 90012

OFFICE OF THE CITY ATTORNEY CITY OF SAN DIEGO 202 C ST FLOOR 3 SAN DIEGO. CA 92101

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF ALAMEDA 1225 FALLON ST. #900 OAKLAND, CA 94612

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF ALPINE P.O. BOX 248 MARKLEEVILLE, CA 96120

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF AMADOR 108 COURT ST. SUITE 202 JACKSON, CA 95642

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF BUTTE 25 COUNTY CENTER DR. OROVILLE, CA 95965

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF CALAVERAS GOVERNMENT CENTER 891 MOUNTAIN RANCH ROAD SAN ANDREAS, CA95249

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF COLUSA 547 MARKET ST. COLUSA, CA 95932

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF CONTRA COSTA P O. BOX 670 MARTINEZ, CA 94553

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF DEL NORTE 450 H ST #171 CRESCENT CITY, CA 95531

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF EL DORADO 515 MAIN ST. PLACERVILLE, CA 95667

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF FRESHO
220 TULARE ST #1000
RESNO, CA 93721

FFICE OF THE DISTRICT ATTORNEY OUNTY OF GLENN O BOX 430

O BOX 430
ILLOWS, CA 95988

FFICE OF THE DISTRICT ATTORNEY DUNTY OF HUMBOLDT 5 5TH ST. IREKA, CA 95501 OFFICE OF THE DIA
COUNTY OF IMPERIA
COURTHOUSE, FLOOR 2
939 W. MAIN ST
EL CENTRO, CA 92243

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF INYO P.O. DRAWER D INDEPENDENCE, CA 93526

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF KERN 1215 TRUXTUN AVE FLOOR 4 BAKERSFIELD, CA 93301

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF KINGS 1400 W. LACEY BLVD. HANFORD, CA 93230

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF LAKE 255 N. FORBES ST # 424 LAKEPORT, CA 95453

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF LASSEN COUNTY ADMINISTRATION BLDG. 707 NEVADA STREET SUSANVILLE, CA 96130

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF LOS ANGELES 18000 CRIMINAL COURTS BUILDING 210 W. TEMPLE ST. LOS ANGELES, CA 90012

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MADERA 209 W. YOSEMITE AVE. MADERA, CA 93637

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MARIN HALL OF JUSTICE #183 SAN RAFAEL, CA 94903

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MARIPOSA P.O. BOX 748 MARIPOSA, CA 95338

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MENDOCINO JOI S. STATE STREET UKIAH, CA 95482

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MERCED 2222 M ST. MERCED, CA 95340

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MODOC P.O. BOX 1171 ALTURAS, CA 96101

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MONO P.O. BOX 617 BRIDGEPORT, CA 93517

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MONTEREY 240 CHURCH ST. P.O. BOX 180 SALINAS, CA 93902

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF NAPA 931 PARKWAY MALL P.O. BOX 720 NAPA, CA 94559-0720

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF NEVADA COURTHOUSE ANNEX NEVADA CITY, CA 95959

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF ORANGE 700 CIVIC CENTER DR WEST #A-200 SANTA ANA, CA 92701

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF PLACER 11562 B AVE AUBURN, CA 95603-2687 OFFICE OF THE DISTRICT ATTORNEY COUNTY OF PLUMAS P.O. BOX 10716 QUINCY, CA 95971

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF RIVERSIDE 4075 MAIN ST. RIVERSIDE, CA 92501

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SACRAMENTO P.O. BOX 749 SACRAMENTO, CA 95804

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN BENITO 419 4TH ST HOLLISTER, CA 95023

OFFICE OF THE DISTRICT ATFORNEY COUNTY OF SAN BERNARDINO 316 MT. VIEW AVE. SAN BERNARDINO, CA 92415-0004

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF SAN DIEGO
101 W. BROADWAY, #1440
SAN DIEGO, CA 92101
OFFICE OF THE DISTRICT ATTORNEY

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN FRANCISCO 850 BRYANT ST #322 SAN FRANCISCO, CA 94103

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN JOAQUIN 222 E. WEBER AVE #202 STOCKTON, CA 95202

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN LUIS OBISPO COUNTY GOVERNMENT CENTER #450 SAN LUIS OBISPO, CA 93408

OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN MATEO HALL OF JUSTICE AND RECORDS REDWOOD CITY, CA 94063

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