

ENDORSED
FILED
San Francisco County Superior Court

MAY 18 2007

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OCT 19 2007 -9⁰⁰AM

DEPARTMENT 212

9 Attorneys for Plaintiff,
MATEEL ENVIRONMENTAL JUSTICE FOUNDATION

10
11 SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 COUNTY OF SAN FRANCISCO
13 (Unlimited Jurisdiction)

14 MATEEL ENVIRONMENTAL
JUSTICE FOUNDATION,

CASE NO. **CGC-07-463540**

15 Plaintiff,

COMPLAINT FOR INJUNCTIVE RELIEF
AND CIVIL PENALTIES

16 v.

18 NEWELL RUBBERMAID, INC.,
THERMADYNE INDUSTRIES, INC.,
19 HOME DEPOT U.S.A., INC., THE
STANLEY WORKS, FORNEY
20 INDUSTRIES, INC., WAL-MART STORES,
INC.,

BUSINESS TORT

21 Defendants.

22
23 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION alleges as follows:

24 INTRODUCTION

25 1. This Complaint seeks civil penalties and an injunction to remedy the continuing
26 failure of defendants NEWELL RUBBERMAID, INC., THERMADYNE INDUSTRIES, INC.,
27 THE HOME DEPOT, INC., THE STANLEY WORKS, FORNEY INDUSTRIES, INC., and
28 WAL-MART STORES, INC.,(hereinafter "Defendants"), to give clear and reasonable warnings

1 to those residents of California, who handle and use products that are made of, or incorporate
2 parts made of, brass and/or bronze (hereinafter referred to as "brass products"), that handling and
3 use of these products causes those residents to be exposed to lead and lead compounds, lead
4 acetate, lead phosphate, and lead subacetate (hereinafter, collectively, "lead"). Lead is known to
5 the State of California to cause cancer, birth defects and male and female reproductive toxicity.
6 Defendants manufacture, distribute, and/or market brass products. These products cause
7 exposures to lead and lead compounds, which are chemicals known to the State of California to
8 cause cancer, birth defects and other reproductive harm.

9 2. Defendants are businesses that manufacture, market, and/or distribute brass
10 products. Defendants intend that residents of California handle and use brass products that
11 Defendants manufacture, market, and/or distribute. When these products are handled and used in
12 their normally intended manner, they expose people to lead. In spite of knowing that residents of
13 California were and are being exposed to these chemicals when they handle and use brass
14 products, Defendants did not and do not provide clear and reasonable warnings that these
15 products cause exposure to chemicals known to cause cancer, birth defects and other
16 reproductive harm.

17 3. Plaintiff seeks injunctive relief pursuant to Health & Safety Code Section 25249.7
18 to compel Defendants to bring their business practices into compliance with section 25249.5 et
19 seq. by providing a clear and reasonable warning to each individual who has been and who in the
20 future may be exposed to the above mentioned toxic chemicals from the use of Defendants'
21 products.

22 4. In addition to injunctive relief, plaintiff seeks civil penalties to remedy the failure
23 of Defendants to provide clear and reasonable warnings regarding exposure to chemicals known
24 to cause cancer, birth defects and other reproductive harm. Plaintiff also seeks an order that
25 defendants identify and locate each individual person who in the past has purchased brass
26 products and to provide to each such purchaser a clear and reasonable warning that the brass
27 products will cause exposures to chemicals known to cause birth defects.

PARTIES

1
2 5. Plaintiff MATEEL ENVIRONMENTAL JUSTICE FOUNDATION ("Mateel")
3 is a non-profit organization dedicated to, among other causes, the protection of the environment,
4 promotion of human health, environmental education, and consumer rights. Mateel is based in
5 Eureka, California, and is incorporated under the laws of the State of California. Mateel is a
6 "person" pursuant to Health & Safety Code Section 25118. Mateel brings this enforcement
7 action in the public interest pursuant to Health & Safety Code §25249.7(d). Residents of
8 California are regularly exposed to lead and lead compounds from brass products manufactured,
9 distributed or marketed by Defendants and are so exposed without a clear and reasonable
10 Proposition 65 warning.

11 6. Defendants are each a person doing business within the meaning of Health &
12 Safety Code Section 25249.11. Defendants are businesses that manufacture, distribute, and/or
13 market brass products in California, including the City and County of San Francisco.
14 Manufacture, distribution and/or marketing of these products in the City and County of San
15 Francisco and/or to people who live in San Francisco, causes people to be exposed to lead and
16 lead compounds while they are physically present in the City and County of San Francisco.

17 7. Plaintiff brings this enforcement action against Defendants pursuant to Health &
18 Safety Code Section 25249.7(d). Attached hereto and incorporated by reference is a copy of a
19 60-day Notice letter dated October 19, 2006, which Mateel sent to California's Attorney General.
20 Letters identical in substance were sent to every District Attorney in the state, and to the City
21 Attorneys of every California city with a population greater than 750,000. On that same day,
22 Mateel sent identical 60-Day Notice letters to each defendant. Attached to the 60-Day Notice
23 Letters sent to each defendant was a summary of Proposition 65 that was prepared by
24 California's Office of Environmental Health Hazard Assessment. In addition, each 60-Day
25 Notice Letter plaintiff sent was accompanied by a Certificate of Service attesting to the service of
26 the 60-Day Notice Letter on each entity which received it. Pursuant to California Health & Safety
27 Code Section 25249.7(d), a Certificate of Merit attesting to the reasonable and meritorious basis
28 for the action was also sent with each 60-Day Notice Letter. Factual information sufficient to

1 establish the basis of the Certificate of Merit was enclosed with the 60-Day Notice letter Mateel
2 sent to the Attorney General.

3 8. Defendants are all businesses that employ more than ten people.

4 JURISDICTION

5 9. The Court has jurisdiction over this action pursuant to California Health & Safety
6 Code Section 25249.7. California Constitution Article VI, Section 10 grants the Superior Court
7 "original jurisdiction in all causes except those given by statute to other trial courts." Chapter 6.6
8 of the Health & Safety Code, which contains the statutes under which this action is brought, does
9 not grant jurisdiction to any other trial court.

10 10. This Court also has jurisdiction over Defendants because they are businesses that
11 have sufficient minimum contacts in California and within the City and County of San Francisco.
12 Defendants intentionally availed themselves of the California and San Francisco County markets
13 for brass products. It is thus consistent with traditional notions of fair play and substantial justice
14 for the San Francisco Superior Court to exercise jurisdiction over them.

15 11. Venue is proper in this Court because Defendants market their brass products in
16 and around San Francisco and thus cause people to be exposed to lead and lead compounds while
17 those people are physically present in San Francisco. Liability for Plaintiff's causes of action, or
18 some parts thereof, has accordingly arisen in San Francisco during the times relevant to this
19 Complaint and Plaintiff seeks civil penalties and forfeitures imposed by statutes.

20 FIRST CAUSE OF ACTION
21 (Claim for Injunctive Relief)

22 12. Plaintiff realleges and incorporates by reference into this First Claim for Relief, as
23 if specifically set forth herein, paragraphs 1 through 11, inclusive.

24 13. The People of the State of California have declared by referendum under
25 Proposition 65 (California Health & Safety Code § 25249.5 et seq.) their right "[t]o be informed
26 about exposures to chemicals that cause cancer, birth defects, and reproductive harm."

27 14. To effectuate this goal, Section 25249.6 of the Health and Safety Code mandates
28 that persons who, in the course of doing business, knowingly and intentionally expose any

1 individual to a chemical known to the State of California to cause cancer or birth defects must
2 first provide a clear and reasonable warning to such individual prior to the exposure.

3 15. Since at least October 19, 2003, Defendants have engaged in conduct that violates
4 Health and Safety Code Section 25249.6 et seq. This conduct includes knowingly and
5 intentionally exposing to the above mentioned toxic chemicals, those California residents who
6 handle and use brass products. The normally intended use of brass products causes exposure to
7 lead and lead compounds, which are chemicals known to the State of California to cause cancer,
8 birth defects and other reproductive harm. Defendants have not provided clear and reasonable
9 warnings, within the meaning of Health & Safety Code Sections 25249.6 and 25249.11.

10 16. At all times relevant to this action, Defendants knew that the brass products they
11 manufactured, distributed or marketed were causing exposures to lead and lead compounds.
12 Defendants intended that residents of California handle and use brass products in such ways as
13 would lead to significant exposures to these chemicals.

14 17. By the above described acts, Defendants have violated Cal. Health & Safety Code
15 § 25249.6 and are therefore subject to an injunction ordering them to stop violating Proposition
16 65, requiring them to provide warnings to their past customers who purchased defendants'
17 products without receiving a clear and reasonable warning, and to provide warnings to future
18 customers.

19 SECOND CAUSE OF ACTION
20 (Claim for Civil Penalties)

21 18. Plaintiff realleges and incorporates by reference into this First Claim for Relief, as
22 if specifically set forth herein, paragraphs 1 through 17, inclusive.

23 19. By the above described acts, Defendants are liable and should be liable pursuant
24 to Health & Safety Code § 25249.7(b), for a civil penalty of \$2,500.00 per day for each
25 individual exposed to lead and lead compounds from the handling or use of Defendants' brass
26 products.

27 ///

28 ///

1 PRAYER FOR RELIEF

2 Wherefore, plaintiff prays for judgment against DEFENDANTS, as follows:

3 A. Pursuant to the First Cause of Action, that all Defendants be enjoined, restrained,
4 and ordered to comply with the provisions of Section 25249.6 of the California Health & Safety
5 Code;

6 B. Pursuant to the Second Cause of Action, that Defendants be assessed a civil
7 penalty in an amount equal to \$2,500.00 per day per individual exposed, in violation of Section
8 25249.6 of the California Health & Safety Code, to lead and lead compounds as the result of
9 Defendants' manufacturing, distributing or marketing of brass products;


10 C. That Defendants be ordered to identify and locate each individual who purchased
11 Brass products and provide a warning to each such person that the brass products the person
12 purchased will expose that person to chemicals known to cause birth defects.

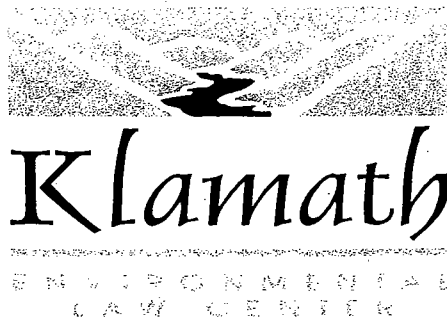
13 D. That Defendants be ordered to pay Mateel's attorney's fees and costs incurred in
14 prosecuting this action.

15 E. For such other relief as this court deems just and proper.

16 Dated: May 14, 2007

17 KLAMATH ENVIRONMENTAL LAW
18 CENTER

19 By 
20 William Verick
21 Attorney for Plaintiff
22 Mateel Environmental Justice Foundation
23
24
25
26
27
28



October 19, 2006

EDWARD G. WEIL
DEPUTY ATTORNEY GENERAL
OFFICE OF THE ATTORNEY GENERAL
P.O. BOX 70550
OAKLAND CA 94612-0550

Greetings:

This office and the Mateel Environmental Justice Foundation ("Mateel") give you notice that the private businesses on the attached service list have been, are, will be and threaten to be in violation of Cal. Health & 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 at both Mateel and this office. The above referenced violations occur when California residents come into contact with products that are made of, or incorporate parts made of, brass and/or bronze (collectively "brass products"). A list of examples of the specific types of products at issue is attached. Though the products on the attached list are listed with a product number or SKU, this Notice pertains to all products of the same specific type, not just to those products, the specific numbers for which are listed in the product list. The brass products are made in whole, or in part, from leaded brass, which contains lead and lead compounds ("lead"), which are chemicals known to cause cancer, birth defects and other reproductive harm. California residents are exposed to lead whenever they handle these brass products, such as when buying them, when handling them, or when using them. Lead is transferred from the brass products to their hands and to other parts of their skin. This lead is then absorbed through the skin, taken into cuts and abrasions, absorbed through mucous membranes, and transferred from the skin to the mouth via oral contact either directly with the lead-contaminated skin, and when lead is transferred from contaminated skin to cigarettes and food and the contaminated cigarettes and food are smoked and/or eaten. These lead exposures thus occur via the dermal absorption, subcutaneous, mucus membrane, ingestion and inhalation routes. The listed businesses did not and do not provide people with clear and reasonable warnings before they expose them to lead. These violations have occurred every day since at least October 19, 2003, and will continue every day until the lead is removed from the brass products, or until clear and reasonable warnings are given. The above-referenced violations are alleged for occupational exposures as well as for consumer and environmental exposures. We do not, however, allege occupational exposure violations as to any brass products made outside of California, except as to workplaces these companies themselves maintain in California. Exposures constituting Proposition 65 environmental exposure violations occur both on and off the companys' property and in each of California's 58 counties.


Cordially,

William Verick

CERTIFICATE OF MERIT

I, William Verick, hereby declare: This Certificate of Merit accompanies the attached sixty-day notice(s) in which it is alleged the parties identified in the notices have violated Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings. I am the attorney for the noticing party. 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 action. Based on the information obtained through those consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiffs' case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute. The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health and Safety Code section 25249.7(h)(2), i.e., (1) the identity of the person(s) consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: October 19, 2006



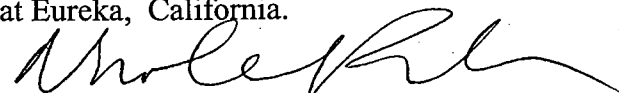
William Verick

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 incorporates 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 manufacturers 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 SERVICE

I, Nicole Frank, declare:

If called, I could and would testify as follows: I am over eighteen. My business address is 424 First Street, Eureka, California, 95501. October 19, 2006 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 U.S. Mail I caused the attached 60-DAY NOTICE LETTER and PROPOSITION 65: A SUMMARY to be sent by Certified U.S. 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 October 19, 2006, at Eureka, California.



Nicole Frank

PRODUCTS LIST

CFM CORPORATION

GRILL LIFE UNIVERSAL 4' HOSE & ADAPTOR #D600-8051 UPC: 060197 001037; GRILL LIFE UNIVERSAL P.O.L. REGULATOR AND HOSE ASSEMBLY #D600-8034 UPC: 060197 001020 This product description pertains not only to the specific models of the products listed, but also for all units of all models of the same types of products.

CHAPIN INTERNATIONAL, INC.

CHAPIN BRASS ADJUSTABLE SPRAY NOZZLE #6-6002 UPC: 023883 660024 This product description pertains not only to the specific model of the product listed, but also for all units of all models of the same types of products.

FORNEY INDUSTRIES, INC.

FORNEY T-STYLE COUPLER #75309 UPC: 032277 753099; 200-300 AMP LIGHT DUTY BRASS GROUND CLAMP "TOUGH & DURABLE FOR EVERYDAY USE" UPC: 032277 543003 This product description pertains not only to the specific models of the products listed, but also for all units of all models of the same types of products.

THE HOME DEPOT, INC.

HUSKY BRASS COUPLER W/3/8" HOSE BARB STYLE "U" 1/4" USA SKU 414-084 UPC 045564 605568 This product description pertains not only to the specific model of the product listed, but also for all units of all models of the same types of products.

NEWELL RUBBERMAID, INC.

BERNZOMATIC BASIC USE PENCIL FLAME TORCH #UL2317, #97497 UPC: 070042 192209 This product description pertains not only to the specific model of the product listed, but also for all units of all models of the same types of products.

SEA-DOG CORP

SEA DOG SAND CAST BRONZE OARLOCK #580770-1 UPC: 035514 580144; SEA DOG SAND CAST BRONZE OARLOCK #580791-1 UPC: 035514 580168; SEA DOG SAND CAST BRONZE OARLOCK #580790-1 UPC: 035514 580151; BRONZE OARLOCK ANGLE MOUNT #580820-1 UPC: 035514 580199 This product description pertains not only to the specific models of the products listed, but also for all units of all models of the same types of products.

THE STANLEY WORKS

STANLEY PROFESSIONAL GRADED 20 PC. ACCESSORY KIT FOR USE WITH AIR COMPRESSORS # 97-124 UPC: 076174 971248 This product description pertains not only to the specific model of the product listed, but also for all units of all models of the same types of products.

THERMADYNE INDUSTRIES, INC.

TURBOTORCH EXTREME MODEL A-8, PART NO. 0386-0103 UPC: 716352 011402 This product description pertains not only to the specific model of the product listed, but also for all units of all models of the same types of products.

WAL-MART STORES, INC.

OZARK TRAIL LANTERN LIGHTER #503A UPC: 056389 105034 This product description pertains not only to the specific model of the product listed, but also for all units of all models of the same types of products.

SERVICE LIST

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THE STANLEY WORKS
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