

ENDORSED
FILED
SAN FRANCISCO COUNTY
SUPERIOR COURT

2008 JUL -9 PM 4:35
GORDON PARK-LI, CLERK

BY: _____
DEPUTY CLERK

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10 Attorneys for Plaintiff,
11 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 COUNTY OF SAN FRANCISCO
14 (Unlimited Jurisdiction)

15 MATEEL ENVIRONMENTAL
16 JUSTICE FOUNDATION,

CASE NO. 08 - 476369

17 Plaintiff,

AMENDED COMPLAINT FOR
INJUNCTIVE RELIEF AND CIVIL
PENALTIES

18 v.

19 THE VOLLRATH COMPANY a.k.a. TVCI
20 HOLDING, INC.

TOXIC TORT/ENVIRONMENTAL

21 Defendant.

22 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION alleges as follows:

23 INTRODUCTION

24 1. This Complaint seeks civil penalties and an injunction to remedy the continuing
25 failure of defendant THE VOLLRATH COMPANY a.k.a. TVCI HOLDING, INC. (hereinafter
26 "Defendant"), to give clear and reasonable warnings to those residents of California, who handle,
27 use, and consume beverages and food made in or served from stainless steel coffee urns that
28

1 utilize leaded brass valves and stopcocks (hereinafter referred to as “brass-valved coffee urns”),
2 that handling, use of and consumption of food prepared in or served from these brass-valved
3 coffee urns causes those residents to be exposed to lead and lead compounds, lead acetate, lead
4 phosphate, and lead subacetate (hereinafter, collectively, “lead”). The types of products to which
5 this Complaint pertains are those types described in the Proposition 65 60-Day Notice Letter that
6 is attached to and incorporated by reference into this Complaint. Lead is known to the State of
7 California to cause cancer, birth defects and male and female reproductive toxicity. Defendant
8 distributes, and/or markets brass-valved coffee urns. These products cause exposures to lead and
9 lead compounds, which are chemicals known to the State of California to cause cancer, birth
10 defects and other reproductive harm.

11 2. Defendant markets, and/or distributes brass-valved coffee urns. Defendant intends
12 that residents of California handle, use and consume food prepared in or served from the brass-
13 valved coffee urns that Defendant markets, and/or distributes. When these products are handled
14 and used in their normally intended manner and, thus, when people consume food prepared in or
15 served from, these brass-valved coffee urns, they are exposed to lead. In spite of knowing that
16 residents of California were and are being exposed to these chemicals when they handle, use and
17 consume food prepared in or served from brass-valved coffee urns, Defendant did not and does
18 not provide clear and reasonable warnings that these products cause exposure to chemicals
19 known to cause cancer, birth defects and other reproductive harm.

20 3. Plaintiff seeks injunctive relief pursuant to Health & Safety Code Section 25249.7
21 to compel Defendant to bring its business practices into compliance with Health & Safety Code
22 Section 25249.5 et seq. by providing a clear and reasonable warning to each individual who has
23 been and who in the future may be exposed to the above mentioned toxic chemicals from the use
24 of Defendant’s products. Plaintiff seeks an order that Defendant identify and locate each
25 individual person who in the past has purchased brass-valved coffee urns and to provide to each
26 such purchaser a clear and reasonable warning that the brass-valved coffee urns will cause
27 exposures to chemicals known to cause birth defects.

28 4. In addition to injunctive relief, plaintiff seeks civil penalties to remedy the failure

1 of Defendant to provide clear and reasonable warnings regarding exposure to chemicals known
2 to cause cancer, birth defects and other reproductive harm.

3 PARTIES

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

13 6. Defendant is a person doing business within the meaning of Health & Safety Code
14 Section 25249.11. Defendant is a businesses that distributes, and/or markets brass-valved coffee
15 urns in California, including in the City and County of San Francisco. Distribution and/or
16 marketing of these products in the City and County of San Francisco and/or to people who live in
17 San Francisco, causes people to be exposed to lead and lead compounds while they are physically
18 present in the City and County of San Francisco.

19 7. Plaintiff brings this enforcement action against Defendant pursuant to Health &
20 Safety Code Section 25249.7(d). Attached hereto and incorporated by reference is a copy of a
21 60-day Notice letter, dated March 12, 2008, which Mateel sent to California's Attorney General.
22 Substantively identical letters were sent to every District Attorney in the state, to the City
23 Attorneys for every California city with a population greater than 750,000, and to each of the
24 Defendants. Attached to the 60-Day Notice Letter sent to each Defendant was a summary of
25 Proposition 65 that was prepared by California's Office of Environmental Health Hazard
26 Assessment. In addition, each 60-Day Notice Letter plaintiff sent was accompanied by a
27 Certificate of Service attesting to the service of the 60-Day Notice Letter on each entity which
28 received it. Pursuant to California Health & Safety Code Section 25249.7(d), a Certificate of

1 Merit attesting to the reasonable and meritorious basis for the action was also sent with each 60-
2 Day Notice Letter. Factual information sufficient to establish the basis of the Certificate of Merit
3 was enclosed with the 60-Day Notice letter Mateel sent to the Attorney General.

4 8. Defendant employs more than ten people.

5 JURISDICTION

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

11 10. This Court also has jurisdiction over Defendant because it is a businesses that has
12 sufficient minimum contacts in California and within the City and County of San Francisco.
13 Defendant intentionally availed itself of the California and San Francisco County markets for
14 brass-valved coffee urns. It is thus consistent with traditional notions of fair play and substantial
15 justice for the San Francisco Superior Court to exercise jurisdiction over Defendant.

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

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

23 12. Plaintiff realleges and incorporates by reference into this First Cause of Action, as
24 if specifically set forth herein, paragraphs 1 through 11, inclusive.

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

28 14. To effectuate this goal, Section 25249.6 of the Health and Safety Code mandates

1 that businesses that knowingly and intentionally expose any individual to a chemical known to
2 the State of California to cause cancer or birth defects must first provide a clear and reasonable
3 warning to such individual prior to the exposure.

4 15. Since at least March 12, 2005, Defendant has engaged in conduct that violates
5 Health and Safety Code Section 25249.6 et seq. This conduct includes knowingly and
6 intentionally exposing to the above mentioned toxic chemicals, those California residents who
7 handle, use or consume food prepared in or served from brass-valved coffee urns. The normally
8 intended use of brass-valved coffee urns causes exposure to lead and lead compounds, which are
9 chemicals known to the State of California to cause cancer, birth defects and other reproductive
10 harm. Defendant has not provided clear and reasonable warnings, within the meaning of Health
11 & Safety Code Sections 25249.6 and 25249.11.

12 16. At all times relevant to this action, Defendant knew that the brass-valved coffee
13 urns it distributed or marketed were causing exposures to lead and lead compounds. Defendant
14 intended that residents of California handle, use and consume food prepared in or served from
15 brass-valved coffee urns in such ways as would lead to significant exposures to these chemicals.

16 17. By the above described acts, Defendant has violated Cal. Health & Safety Code
17 § 25249.6 and is therefore subject to an injunction ordering it to stop violating Proposition 65, to
18 provide warnings to all present and future customers and to provide warnings to its past
19 customers who purchased Defendant's products without receiving a clear and reasonable
20 warning.

21 SECOND CAUSE OF ACTION
22 (Claim for Civil Penalties)

23 18. Plaintiff realleges and incorporates by reference into this Second Cause of Action,
24 as if specifically set forth herein, paragraphs 1 through 17, inclusive.

25 19. By the above described acts, Defendant is liable and should be liable pursuant to
26 Health & Safety Code § 25249.7(b), for civil penalties of \$2,500.00 per day for each individual
27 exposed without proper warning to lead and lead compounds from the handling, use of, or the
28 consuming of food prepared in or served from Defendant's brass-valved coffee urns.



Klamath

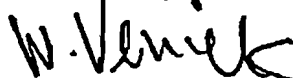
March 12, 2008

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 Vollrath Company has been, is, will be and threatens 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 lead alloys in the valves or stopcocks on coffee urns and stock pots (hereinafter "food and drink dispensers with leaded valves"), and when they drink beverages or consume food that has flowed through the leaded alloy valves/stopcocks. A specific example of the products to which this notice pertains is: Stainless Steel/Brass Spigot Coffee Urn Vol 46093; 40 Qt Stock Pot Item No: 68640. These product descriptions pertain not only to the specific models of the products listed, but also for all units of all models of food and drink dispensers with leaded valves. The valves or stopcocks on these food and drink dispensers are made from metal alloys which contain 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 the valves/stopcocks, such as when serving beverages from these products, when washing them, or when drinking beverages or consuming food that has flowed through the valves/stopcocks. Lead is transferred from the valves/stopcocks to peoples' 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. Lead also leaches from the valves/stopcocks into the beverages and food that flow through the valves/stopcocks and is then drunk or eaten. These lead exposures thus occur via the dermal absorption, subcutaneous, mucous membrane, ingestion and inhalation routes. The Vollrath Company did not and does not provide people with clear and reasonable warnings before it exposes them to lead. These violations have occurred every day since at least March 11, 2005, and will continue every day until the lead is removed from the brass valves/stopcocks, 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 food and drink dispensers with leaded valves made outside of California, except as to workplaces The Vollrath Company itself maintains in California. Exposures constituting Proposition 65 environmental exposure violations occur both on and off The Vollrath Company's property and in each of California's 58 counties.

Cordially,



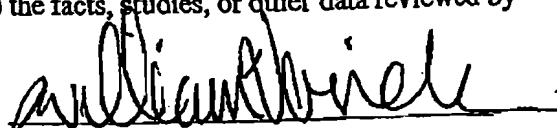
William Verick

424 First Street, Eureka, CA 95501 • 707.268.8900 (phone) 707.268.8901 (fax)

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: March 12, 2008

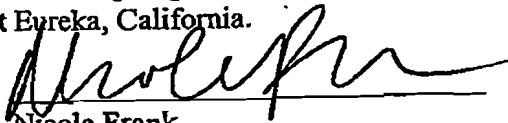

William Verick

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. On March 12, 2008, 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 March 12, 2008, at Eureka, California.


Nicole Frank

SERVICE LIST

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25 COUNTY CENTER DR.
GROVILE, CA 95963

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ATTORNEY
COUNTY OF CALAVERAS
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WOODLAND, CA 95695

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF YUBA
215 3TH ST.
MARYSVILLE, CA 95901

TOM BELOT, PRESIDENT
TERRY J. KOHLER, CEO
THE VOLLRATH COMPANY
1234 NORTH 18TH STREET
SHEBOYGAN, WI 53082-0611