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FILED
SAN FRANCISCO COUNTY
SUPERIOR COURT

2009 JAN 21 AM 12:58

GORDON PARK - LI, CLERK

BY: ~~ELIAS BUTI~~
DEPUTY CLERK

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JUN 26 2009 9:00 AM

DEPARTMENT 212

9 Attorneys for Plaintiff,
10 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 COUNTY OF SAN FRANCISCO
13 (Unlimited Jurisdiction)

14 MATEEL ENVIRONMENTAL
15 JUSTICE FOUNDATION,

CASE NO. CGC - 09 - 484 252

16 Plaintiff,

COMPLAINT FOR INJUNCTIVE RELIEF
AND CIVIL PENALTIES

17 v.

18 LA SPAZIALE U.S.A., INC.; and LA
19 SPAZIALE S.P.A.

TOXIC TORT/ENVIRONMENTAL

20 Defendant.

21 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION alleges as follows:

22 INTRODUCTION

23 1. This Complaint seeks civil penalties and an injunction to remedy the continuing
24 failure of defendants LA SPAZIALE U.S.A., INC.; and LA SPAZIALE S.P.A. (collectively
25 hereinafter "Defendant"), to give clear and reasonable warnings to those residents of California,
26 who handle, use, and drink beverages made in espresso machines that utilize leaded brass
27 components (hereinafter referred to as "espresso machines"), that handling and use of these
28

1 espresso machines causes those residents to be exposed to lead and lead compounds, lead acetate,
2 lead phosphate, and lead subacetate (hereinafter, collectively, "lead"). The types of products to
3 which this Complaint pertains are those types listed in the Product List appended to the
4 Proposition 65 60-Day Notice Letter that is attached to and incorporated by reference into this
5 Complaint. Lead is known to the State of California to cause cancer, birth defects and male and
6 female reproductive toxicity. Defendant distributes, and/or markets espresso machines. These
7 products cause exposures to lead and lead compounds, which are chemicals known to the State of
8 California to cause cancer, birth defects and other reproductive harm.

9 2. Defendant markets, and/or distributes espresso machines. Defendant intends that
10 residents of California handle, use and drink beverages made using the espresso machines that
11 Defendant markets, and/or distributes. When these products are handled and used in their
12 normally intended manner and when people drink beverages made from water that has been
13 heated in them, these espresso machines expose people to lead. In spite of knowing that residents
14 of California were and are being exposed to these chemicals when they handle, use and drink
15 beverages made using espresso machines, Defendant did not and does not provide clear and
16 reasonable warnings that these products cause exposure to chemicals known to cause cancer,
17 birth defects and other reproductive harm.

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

26 4. In addition to injunctive relief, plaintiff seeks civil penalties to remedy the failure
27 of Defendant to provide clear and reasonable warnings regarding exposure to chemicals known
28 to cause cancer, birth defects and other reproductive harm.

1 PARTIES

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 espresso machines
9 manufactured, distributed or marketed by Defendant and are so exposed without a clear and
10 reasonable Proposition 65 warning.

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

17 7. Plaintiff brings this enforcement action against Defendant 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 July 17, 2008, which Mateel sent to California's Attorney General.
20 Substantively identical letters 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, and to the Defendant.
22 Attached to the 60-Day Notice Letter sent to the Defendant was a summary of Proposition 65 that
23 was prepared by California's Office of Environmental Health Hazard Assessment. In addition,
24 each 60-Day Notice Letter plaintiff sent was accompanied by a Certificate of Service attesting to
25 the service of the 60-Day Notice Letter on each entity which received it. Pursuant to California
26 Health & Safety Code Section 25249.7(d), a Certificate of Merit attesting to the reasonable and
27 meritorious basis for the action was also sent with each 60-Day Notice Letter. Factual
28

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

3 8. Defendant employs 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 Defendant because it is a businesses that has
11 sufficient minimum contacts in California and within the City and County of San Francisco.
12 Defendant intentionally availed itself of the California and San Francisco County markets for
13 espresso machines. It is thus consistent with traditional notions of fair play and substantial
14 justice for the San Francisco Superior Court to exercise jurisdiction over Defendant.

15 11. Venue is proper in this Court because Defendant markets its products in and
16 around San Francisco and thus causes 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 imposed by statute.

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

22 12. Plaintiff realleges and incorporates by reference into this First Cause of Action, 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 businesses that knowingly and intentionally expose any individual to a chemical known to

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

3 15. Since at least July 17, 2005, Defendant has 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, use or drink beverages made using espresso machines. The normally intended use of
7 espresso machines causes exposure to lead and lead compounds, which are chemicals known to
8 the State of California to cause cancer, birth defects and other reproductive harm. Defendant has
9 not provided clear and reasonable warnings, within the meaning of Health & Safety Code
10 Sections 25249.6 and 25249.11.

11 16. At all times relevant to this action, Defendant knew that the espresso machines it
12 distributed or marketed were causing exposures to lead and lead compounds. Defendant
13 intended that residents of California handle, use and drink beverages made using espresso
14 machines in such ways as would lead to significant exposures to these chemicals.

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

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

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

24 19. By the above described acts, Defendant is liable and should be liable pursuant to
25 Health & Safety Code § 25249.7(b), for a civil penalty of \$2,500.00 per day for each individual
26 exposed without proper warning to lead and lead compounds from the handling, use of, or the
27 drinking of beverages made using Defendant's espresso machines.

1 PRAYER FOR RELIEF

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

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

6 2. Pursuant to the Second Cause of Action, that Defendant 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 Defendant's distributing or marketing of espresso machines;

10 3. That Defendant be ordered to identify and locate each individual who purchased
11 espresso machines and provide a warning to each such person that the espresso machines the
12 person purchased will expose that person to chemicals known to cause birth defects.

13 4. That, pursuant to Civil Procedure Code § 1021.5, Defendant be ordered to pay to
14 Plaintiff the attorneys fees and costs it incurred in bringing this enforcement action.

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

16 Dated: January 15, 2009

17 KLAMATH ENVIRONMENTAL LAW
18 CENTER

19 By 

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



Klamath

ENVIRONMENTAL
LAW CENTER

July 17, 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 La Spaziale S.P.A. and La Spaziale U.S.A., Inc. 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 leaded brass components (brass group heads, boilers, tubes, fittings, steam wands and porta filters, collectively hereinafter "leaded brass plumbing") in espresso and coffee machines ("espresso machines") and when they drink beverages, the water for which has flowed through the leaded brass plumbing in these machines. A list of specific examples of the specific types of products is: LA SPAZIALE S1 VIVALDI II MATR 254060 COD 0795. Though specific model and COD numbers are given as examples, this notice pertains to all similar types of espresso machines. The leaded brass plumbing through which water flows in these espresso machines is made 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 the leaded brass plumbing in these machines, such as when adjusting, maintaining or repairing the machines, or when drinking beverages (such as coffee drinks or tea) that are made from water that has flowed through the leaded brass plumbing. Lead is transferred from the brass 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 leaded brass plumbing into the water that flows through this plumbing and is then made into drinks that are drunk. These lead exposures thus occur via the dermal absorption, subcutaneous, mucous membrane, ingestion and inhalation routes. La Spaziale S.P.A. and La Spaziale U.S.A., Inc. 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 July 17, 2005, and will continue every day until the lead is removed from the brass plumbing in these machines, 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 espresso machine made outside of California, except as to workplaces La Spaziale S.P.A. and La Spaziale U.S.A., Inc. themselves maintain in California. Exposures constituting Proposition 65 environmental exposure violations occur both on and off La Spaziale S.P.A. and La Spaziale U.S.A., Inc.'s properties and in each of California's 58 counties.

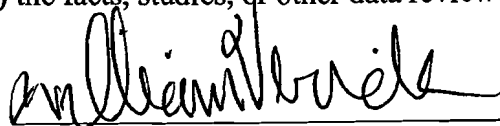
Cordially,

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: July 17, 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 July 17, 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 July 17, 2008, at Eureka, California.



Nicole Frank

SERVICE LIST

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CITY HALL ROOM 206
400 VAN NESS
SAN FRANCISCO, CA 94102

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CITY OF SACRAMENTO
PO BOX 1948
SACRAMENTO, CA 95812-1948

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CITY OF SAN JOSE
200 EAST SANTA CLARA STREET
SAN JOSE, CA 95113

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

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CITY OF SAN DIEGO CONSUMER &
ENVIRONMENTAL PROTECTION
1200 THIRD AVENUE, SUITE 700
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708 COURT STREET
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COUNTY OF BUTTE
25 COUNTY CENTER DR.
OROVILLE, CA 95965

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ATTORNEY
COUNTY OF CALAVERAS
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891 MOUNTAIN RANCH ROAD
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ATTORNEY
COUNTY OF GLENN
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WILLOWS, CA 95988

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825 5TH ST.
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EL CENTRO, CA 92243

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P.O. DRAWER D
INDEPENDENCE, CA 93526

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1400 W. LACEY BLVD.
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ATTORNEY
COUNTY OF LAKE
255 N. FORBES ST. # 424
LAKEPORT, CA 95453

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ATTORNEY
COUNTY OF LASSEN
220 SOUTH LASSEN ST. STE 8
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COURTHOUSE #224
VISALIA, CA 93291

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VENTURA, CA 93009

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301 SECOND STREET
WOODLAND, CA 95695

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF YUBA
215 5TH ST.
MARYSVILLE, CA 95901

ASSAAD BENABID, PRESIDENT
LA SPAZIALE USA, LLC
1172 POST ROAD
FAIRFIELD, CT 06824-6033

MAURIZIO MACCAGNANI, PRESIDENT
LA SPAZIALE S.P.A.
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BOLOGNA, ITALY