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|---|--|--|--|--|
| ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) Anne Barker, SBN 253824 Environmental Research Center, Inc. 3111 Camino Del Rio North, Suite 400 San Diego, CA 92108 TELEPHONE NO: 619-500-3090 | | Ryan Hoffman SBN 283297 Michael Freund & Associates 1919 Addison Street, Suite 105 Berkeley, CA 94704 FAX NO: 706-858-0326 | | FOR COURT USE ONLY ENDORSED FILED Superior Court of California County of San Francisco JAN 26 2015 CLERK OF THE COURT BY: ROSSALY DE LA VEGA Deputy Clerk 060-15-543826 |
| ATTORNEY FOR (Name): Plaintiff Environmental Research Center, Inc. | | SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Francisco STREET ADDRESS: 400 McAllister Street MAILING ADDRESS: 400 McAllister Street CITY AND ZIP CODE: San Francisco, CA 94102 BRANCH NAME: | | |
| CASE NAME: Environmental Research Center, Inc. v Sabre Sciences, Inc. | | | | |
| CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) | | <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less) | | CASE NUMBER: |
| <input type="checkbox"/> Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402) | | JUDGE: DEPT: | | 15-543826 |

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

| | | |
|--|---|---|
| Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) | Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (08) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) | Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input checked="" type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (11) |
| Other PII/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (15) <input type="checkbox"/> Other PII/PD/WD (23) | Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) | Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) |
| Non-PII/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PII/PD/WD tort (35) | Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) | Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) |
| Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15) | Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39) | Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43) |

2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive
4. Number of causes of action (specify): 2
5. This case is is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: January 13, 2015
Anne Barker

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete Items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

| | | |
|---|---|---|
| Auto Tort | Contract | Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403) |
| Auto (22)—Personal Injury/Property Damage/Wrongful Death | Breach of Contract/Warranty (06) | Antitrust/Trade Regulation (03) |
| Uninsured Motorist (46) (<i>if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto</i>) | Breach of Rental/Lease Contract (<i>not unlawful detainer or wrongful eviction</i>) | Construction Defect (10) |
| Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort | Contract/Warranty Breach—Seller Plaintiff (<i>not fraud or negligence</i>) | Claims Involving Mass Tort (40) |
| Asbestos (04) | Negligent Breach of Contract/Warranty | Securities Litigation (28) |
| Asbestos Property Damage | Other Breach of Contract/Warranty | Environmental/Toxic Tort (30) |
| Asbestos Personal Injury/Wrongful Death | Collections (e.g., money owed, open book accounts) (09) | Insurance Coverage Claims (<i>arising from provisionally complex case type listed above</i>) (41) |
| Product Liability (<i>not asbestos or toxic/environmental</i>) (24) | Collection Case—Seller Plaintiff | Enforcement of Judgment |
| Medical Malpractice (45) | Other Promissory Note/Collections Case | Enforcement of Judgment (20) |
| Medical Malpractice—Physicians & Surgeons | Insurance Coverage (<i>not provisionally complex</i>) (18) | Abstract of Judgment (Out of County) |
| Other Professional Health Care Malpractice | Auto Subrogation | Confession of Judgment (<i>non-domestic relations</i>) |
| Other PI/PD/WD (23) | Other Coverage | Sister State Judgment |
| Premises Liability (e.g., slip and fall) | Other Contract (37) | Administrative Agency Award (<i>not unpaid taxes</i>) |
| Intentional Bodily Injury/PD/WD (e.g., assault, vandalism) | Contractual Fraud | Petition/Certification of Entry of Judgment on Unpaid Taxes |
| Intentional Infliction of Emotional Distress | Other Contract Dispute | Other Enforcement of Judgment Case |
| Negligent Infliction of Emotional Distress | Real Property | Miscellaneous Civil Complaint |
| Other PI/PD/WD | Eminent Domain/Inverse Condemnation (14) | RICO (27) |
| Non-PI/PD/WD (Other) Tort | Wrongful Eviction (33) | Other Complaint (<i>not specified above</i>) (42) |
| Business Tort/Unfair Business Practice (07) | Other Real Property (e.g., quiet title) (26) | Declaratory Relief Only |
| Civil Rights (e.g., discrimination, false arrest) (<i>not civil harassment</i>) (08) | Writ of Possession of Real Property | Injunctive Relief Only (<i>non-harassment</i>) |
| Defamation (e.g., slander, libel) (13) | Mortgage Foreclosure | Mechanics Lien |
| Fraud (16) | Quiet Title | Other Commercial Complaint Case (<i>non-tort/non-complex</i>) |
| Intellectual Property (19) | Other Real Property (<i>not eminent domain, landlord/tenant, or foreclosure</i>) | Other Civil Complaint (<i>non-tort/non-complex</i>) |
| Professional Negligence (25) | Unlawful Detainer | Miscellaneous Civil Petition |
| Legal Malpractice | Commercial (31) | Partnership and Corporate Governance (21) |
| Other Professional Malpractice (<i>not medical or legal</i>) | Residential (32) | Other Petition (<i>not specified above</i>) (43) |
| Other Non-PI/PD/WD Tort (35) | Drugs (38) (<i>if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential</i>) | Civil Harassment |
| Employment | Judicial Review | Workplace Violence |
| Wrongful Termination (36) | Asset Forfeiture (05) | Elder/Dependent Adult Abuse |
| Other Employment (15) | Petition Re: Arbitration Award (11) | Election Contest |
| | Writ of Mandate (02) | Petition for Name Change |
| | Writ—Administrative Mandamus | Petition for Relief From Late Claim |
| | Writ—Mandamus on Limited Court Case Matter | |
| | Writ—Other Limited Court Case Review | |
| | Other Judicial Review (39) | |
| | Review of Health Officer Order | |
| | Notice of Appeal—Labor Commissioner Appeals | |

**SUMMONS
(CITACION JUDICIAL)**

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**

SABRE SCIENCES, INC., a California Corporation

**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

ENVIRONMENTAL RESEARCH CENTER, INC. a non-profit
California corporation

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response of this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for unpaid fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **(AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.**

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandado. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le queda más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar los cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desecher el caso.

The name and address of the court is:
(El nombre y dirección de la corte es): San Francisco Superior Court
400 McAllister Street
San Francisco, CA 94102

CASE NUMBER:
(Número del Caso): 000 15-543826

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Anne Barker, ERC, Inc. 3111 Camino Del Rio North, Suite 400, San Diego, CA 92108, 619-500-3090; (Att 1)

CLERK OF THE COURT

Clark, by
(Secretario) DE LA VEGA-NAVARRO, Ross Deputy
(Adjunto)

DATE:
(Fecha) JAN 26 2015

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons; (POS-010)).

[SEAL]

- NOTICE TO THE PERSON SERVED: You are served**
- as an individual defendant.
 - as the person sued under the fictitious name of (specify):
 - on behalf of (specify):
under: CCP 416.10 (corporation) CCP 416.60 (minor)
 CCP 416.20 (defunct corporation) CCP 416.70 (conservatee)
 CCP 416.40 (association or partnership) CCP 416.90 (authorized person)
 other (specify):
 - by personal delivery on (date):

| | |
|--|--------------|
| SHORT TITLE: Environmental Research, Inc. v. Sabre Sciences, Inc. | CASE NUMBER: |
|--|--------------|

ATTACHMENT (Number): 1*(This Attachment may be used with any Judicial Council form.)*

Additional Attorneys for Plaintiff:

Michael Freund SBN 99687

Ryan Hoffman SBN 283297

Michael Freund & Associates

1919 Berkeley, CA 94704

Telephone: 510-540-1992

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page _____ of _____
(Add pages as required)

1 Anne Barker SBN 253824
Environmental Research Center, Inc.
2 3111 Camino Del Rio North, Suite 400
San Diego, CA 92108
3 Telephone: (619) 500-3090
Facsimile: (706) 858-0326

4 Michael Freund SBN 99687
5 Ryan Hoffman SBN 283297
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6 1919 Addison Street, Suite 105
Berkeley, CA 94704
7 Telephone: (510) 540-1992
Facsimile: (510) 540-5543

8 Attorneys for Plaintiff Environmental Research Center, Inc.
9

ENDORSED
FILED
Superior Court of California
County of San Francisco

JAN 26 2015
CLERK OF THE COURT
BY: ROSSALY DE LA VEGA
Deputy Clerk

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF SAN FRANCISCO

12 ENVIRONMENTAL RESEARCH
13 CENTER, INC. a California non-profit
corporation,

14 Plaintiff,

15 v.

16 SABRE SCIENCES, INC. and
17 DOES 1-100

18 Defendants.
19

CASE NO. CGC-15-543826

COMPLAINT FOR INJUNCTIVE
AND DECLARATORY RELIEF AND
CIVIL PENALTIES

[Miscellaneous Civil Complaint (42)]
Proposition 65, Health & Safety Code
Section 25249.5 et seq.]

20 Plaintiff Environmental Research Center, Inc. hereby alleges:

21 I

22 INTRODUCTION

23 1. Plaintiff Environmental Research Center, Inc. (hereinafter "Plaintiff" or "ERC") brings
24 this action as a private attorney general enforcer and in the public interest pursuant to Health &
25 Safety Code section 25249.7, subdivision (d). This complaint seeks injunctive and declaratory
26 relief and civil penalties to remedy the continuing failure of Defendants Sabre Sciences, Inc.
27 ("Sabre Sciences") and Does 1-100 (hereinafter individually referred to as "Defendant" or
28 collectively as "Defendants") to warn consumers that they have been exposed to lead from one of

1 Sabre Sciences' nutritional health products. Lead is a chemical known to the State of California to
2 cause cancer, birth defects and other reproductive harm. Based on the Safe Drinking Water and
3 Toxic Enforcement Act of 1986 (Health & Safety Code section 25249.5 *et seq.*) also known as
4 "Proposition 65," businesses with ten or more employees must provide a "clear and reasonable
5 warning" prior to exposing persons to these chemicals.

6 **II**

7 **PARTIES**

8 2. Plaintiff ERC is a California non-profit corporation dedicated to, among other causes,
9 helping safeguard the public from health hazards by reducing the use and misuse of hazardous and
10 toxic chemicals, facilitating a safe environment for consumers and employees and encouraging
11 corporate responsibility.

12 3. Defendant Sabre Sciences is a business that manufactures, distributes and/or sells the
13 nutritional health product that has exposed users to lead in the State of California within the
14 relevant statute of limitations period. This "Covered Product" is: "Sabre Sciences Inc. Ultra D.

15 4. Sabre Sciences is a company subject to Proposition 65 as it employs ten or more
16 persons, and has employed ten or more persons at all times relevant to this action.

17 5. Defendants Does 1-100, are named herein under fictitious names, as their true names
18 and capacities are unknown to ERC. ERC is informed and believes, and thereon alleges, that each
19 of said Does is responsible, in some actionable manner, for the events and happenings hereinafter
20 referred to, either through said Defendant's conduct, or through the conduct of its agents, servants
21 or employees, or in some other manner, causing the harms alleged by ERC in this complaint.
22 When said true names and capacities of Does are ascertained, ERC will seek leave to amend this
23 complaint to set forth the same.

24 **III**

25 **JURISDICTION AND VENUE**

26 6. This Court has jurisdiction pursuant to California Constitution Article VI, Section 10
27 which grants the Superior Court original jurisdiction in all causes except those given by statute to
28 other trial courts. The statute under which this action is brought does not specify any other basis for

1 jurisdiction.

2 7. The Complaint is based on allegations contained in a Notice of Violation dated
3 September 26, 2014, served on the California Attorney General, other public enforcers and
4 Sabre Sciences. The Notice of Violation constitutes adequate notice to Sabre Sciences because
5 it provided adequate information to allow Sabre Sciences to assess the nature of the alleged
6 violation, consistent with Proposition 65 and its implementing regulations. Each copy of the
7 Notice of Violation was accompanied by a certificate of merit and a certificate of service, both
8 of which comply with Proposition 65 and its implementing regulations. The Notice of
9 Violation served on Sabre Sciences also included a copy of "The Safe Drinking Water and
10 Toxic Enforcement Act of 1986 (Proposition 65): A Summary". Service of the Notice of
11 Violation and accompanying documents complied with Proposition 65 and its implementing
12 regulations. A true and correct copy of this Notice of Violation and associated documents is
13 attached hereto as Exhibit A. More than 60 days have passed since the Notice of Violation was
14 mailed and no public enforcement entity has filed a complaint in this case.

15 8. This Court has jurisdiction over Sabre Sciences because, based on information and
16 belief, Sabre Sciences is a business having sufficient minimum contacts with California, or
17 otherwise intentionally availing itself of the California market through the distribution and sale
18 of the Covered Product in the State of California to render the exercise of jurisdiction over it by
19 the California courts consistent with traditional notions of fair play and substantial justice.

20 9. This Court is the proper venue for the action because the causes of action have arisen in
21 the County of San Francisco where some of the violations of law have occurred. Furthermore, this
22 Court is the proper venue under Code of Civil Procedure section 395.5 and Health & Safety Code
23 section 2524.

24 IV

25 STATUTORY BACKGROUND

26 10. The Safe Drinking Water and Toxic Enforcement Act of 1986 is an initiative statute
27 passed as "Proposition 65" by an overwhelming majority vote of the people in November of 1986.
28

1 11. The warning requirement of Proposition 65 is contained in Health & Safety Code
2 section 25249.6, which provides:

3 No person in the course of doing business shall knowingly and intentionally expose
4 any individual to a chemical known to the state to cause cancer or reproductive
5 toxicity without first giving clear and reasonable warning to such individual, except
as provided in Section 25249.10.

6 12. Implementing regulations for Proposition 65 define expose as “to cause to ingest,
7 inhale, contact via body surfaces or otherwise come into contact with a listed chemical.” An
8 individual may come into contact with a listed chemical through water, air, food, consumer
9 products and any other environmental exposure as well as occupational exposures.” (Cal. Code
10 Regs., tit. 27, § 25102, subd. (i).)

11 13. In this case, the exposures at issue are caused by consumer products. Implementing
12 regulations for Proposition 65 define a consumer product exposure as “an exposure which results
13 from a person’s acquisition, purchase, storage, consumption, or other reasonably foreseeable use
14 of a consumer good, or any exposure that results from receiving a consumer service.” (Cal. Code
15 Regs., tit. 27, § 25602, subd. (b).)

16 14. Whenever a clear and reasonable warning is required under Health & Safety Code
17 section 25249.6, the “method employed to transmit the warning must be reasonably calculated
18 considering the alternative methods available under the circumstances, to make the warning
19 message available prior to exposure.” (Cal. Code Regs., tit. 27, § 25601.) The warning
20 requirement may be satisfied by a warning that appears on a product’s label or other labeling, shelf
21 labeling, signs, a system of signs, public advertising identifying the system and toll-free
22 information services, or any other, system, that provides clear and reasonable warnings. (Cal.
23 Code Regs., tit. 27, § 25603.1, subd. (a)-(d).)

24 15. Proposition 65 establishes a procedure by which the State is to develop a list of
25 chemicals “known to the State to cause cancer or reproductive toxicity.” (Health & Safety
26 Code, § 25249.8.) There is no duty to provide a clear and reasonable warning until 12-months
27 after the chemical was published on the State list. (Health & Safety Code, § 25249.10, subd. (b).)
28 Lead was listed as a chemical known to the State of California to cause developmental toxicity in

1 the fetus and male and female reproductive toxicity on February 27, 1987. Lead was listed as a
2 chemical known to the State of California to cause cancer on October 1, 1992. (Cal. Code Regs.,
3 tit. 27, § 27001.)

4 16. The Maximum Allowable Dose Level for lead as a chemical known to cause
5 developmental toxicity is 0.5 micrograms per day. (Cal. Code Regs., tit. 27, § 25805.) The No
6 Significant Risk Level for lead as a carcinogen is 15 micrograms per day. (Cal. Code Regs., tit.
7 27, § 25705.)

8 17. Proposition 65 may be enforced by any person in the public interest who provides
9 notice sixty days before filing suit to both the violator and designated law enforcement officials.
10 The failure of law enforcement officials to file a timely complaint enables a citizen suit to be filed
11 pursuant to Health & Safety Code section 25249.7, subdivisions (c) and (d).

12 18. Proposition 65 provides that any person “violating or threatening to violate”
13 Proposition 65 may be enjoined in any court of competent jurisdiction. (Health & Safety Code, §
14 25249.7, subd. (a).) To “threaten to violate” means “to create a condition in which there is a
15 substantial probability that a violation will occur.” (Health & Safety Code, § 25249.11, subd. (e).)
16 Furthermore, violators are subject to a civil penalty of up to \$2,500 per day for each violation.
17 (Health & Safety Code, § 25249.7, subd. (b)(1).)

18 V

19 STATEMENT OF FACTS

20 19. Sabre Sciences has manufactured, distributed and/or sold the Covered Product
21 containing lead to Consumers in the State of California. Consumers have been ingesting this
22 product for many years, without any knowledge of their exposure to lead, a very dangerous
23 chemical.

24 20. For many years, Sabre Sciences has knowingly and intentionally exposed numerous
25 persons to lead, without providing a Proposition 65 warning. Prior to ERC’s Notice of Violation,
26 Sabre Sciences failed to provide a warning on the label of the Covered Product. Sabre Sciences
27 has at all times relevant hereto been aware that the Covered Product contained lead and that
28 persons using this product have been exposed to the chemical.

1 1. On the First Cause of Action, for civil penalties for each and every violation according
2 to proof;

3 2. On the First Cause of Action, and pursuant to Health & Safety Code section 25249.7,
4 subdivision (a), for such temporary restraining orders, preliminary and permanent injunctive
5 orders, or other orders, prohibiting Sabre Sciences from exposing persons to lead without
6 providing clear and reasonable warning;

7 3. On the Second Cause of Action, for a declaratory judgment pursuant to Code of Civil
8 Procedure section 1060 declaring that Sabre Sciences has exposed individuals to a chemical
9 known to the State of California to cause, birth defects and other reproductive harm without
10 providing clear and reasonable warning; and

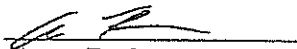
11 4. On all Causes of Action, for reasonable attorneys' fees pursuant to section 1021.5 of the
12 Code of Civil Procedure or the substantial benefit theory;

13 5. For costs of suit herein; and

14 6. For such other relief as the Court may deem just and proper.

15
16 Dated: January 13, 2015

17
18 By

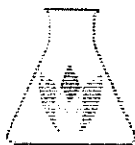


19 Anne Barker

20 Attorney for Environmental Research Center, Inc.

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EXHIBIT A



Environmental Research Center

3111 Camino Del Rio North, Suite 400
San Diego, CA 92108
619-500-3090

September 26, 2014

NOTICE OF VIOLATIONS OF CALIFORNIA HEALTH & SAFETY CODE SECTION 25249.5 *ET SEQ.* (PROPOSITION 65)

Dear Alleged Violator and the Appropriate Public Enforcement Agencies:

I am the Executive Director of Environmental Research Center, Inc. ("ERC"). ERC is a California non-profit corporation dedicated to, among other causes, helping safeguard the public from health hazards by bringing about a reduction in the use and misuse of hazardous and toxic chemicals, facilitating a safe environment for consumers and employees, and encouraging corporate responsibility.

ERC has identified violations of California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65"), which is codified at California Health & Safety Code §25249.5 *et seq.*, with respect to the products identified below. These violations have occurred and continue to occur because the alleged Violator identified below failed to provide required clear and reasonable warnings with this product. This letter serves as a notice of these violations to the alleged Violator and the appropriate public enforcement agencies. Pursuant to Section 25249.7(d) of the statute, ERC intends to file a private enforcement action in the public interest 60 days after effective service of this notice unless the public enforcement agencies have commenced and are diligently prosecuting an action to rectify these violations.

General Information about Proposition 65. A copy of a summary of Proposition 65, prepared by the Office of Environmental Health Hazard Assessment, is attached with the copy of this letter served to the alleged Violator identified below.

Alleged Violator. The name of the company covered by this notice that violated Proposition 65 (hereinafter the "Violator") is:

Sabre Sciences, Inc.

Consumer Products and Listed Chemicals. The product that is the subject of this notice and the chemical in that product identified as exceeding allowable levels are:

Sabre Sciences Inc. UltraD - Lead

On February 27, 1987, the State of California officially listed lead as a chemical known to cause developmental toxicity, and male and female reproductive toxicity. On October 1, 1992, the State of California officially listed lead and lead compounds as chemicals known to cause cancer.

It should be noted that ERC may continue to investigate other products that may reveal further violations and result in subsequent notices of violations.

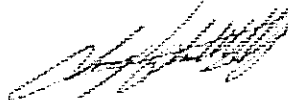
Route of Exposure. The consumer exposures that are the subject of this notice result from the purchase, acquisition, handling and recommended use of this product. Consequently, the primary route of exposure to this chemical has been and continues to be through ingestion, but may have also occurred and may continue to occur through inhalation and/or dermal contact.

Approximate Time Period of Violations. Ongoing violations have occurred every day since at least September 26, 2011, as well as every day since the product was introduced into the California marketplace, and will continue every day until clear and reasonable warnings are provided to product purchasers and users or until this known toxic chemical is either removed from or reduced to allowable levels in the product. Proposition 65 requires that a clear and reasonable warning be provided prior to exposure to the identified chemical. The method of warning should be a warning that appears on the product label. The Violator violated Proposition 65 because it failed to provide persons handling and/or using this product with appropriate warnings that they are being exposed to this chemical.

Consistent with the public interest goals of Proposition 65 and a desire to have these ongoing violations of California law quickly rectified, ERC is interested in seeking a constructive resolution of this matter that includes an enforceable written agreement by the Violator to: (1) reformulate the identified product so as to eliminate further exposures to the identified chemical, or provide appropriate warnings on the labels of this product; (2) pay an appropriate civil penalty; and (3) provide clear and reasonable warnings compliant with Proposition 65 to all persons located in California who purchased the above product in the last three years. Such a resolution will prevent further unwarned consumer exposures to the identified chemical, as well as an expensive and time consuming litigation.

Please direct all questions concerning this notice to ERC at the above listed address and telephone number.

Sincerely,



Chris Heptinstall
Executive Director
Environmental Research Center

Attachments

- Certificate of Merit
- Certificate of Service
- OEHHA Summary (to Sabre Sciences, Inc. and its Registered Agent for Service of Process only)
- Additional Supporting Information for Certificate of Merit (to AG only)

CERTIFICATE OF MERIT

Re: Environmental Research Center, Inc.'s Notice of Proposition 65 Violations by Sabre Sciences, Inc.

I, Chris Heptinstall, declare:

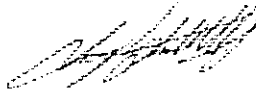
1. This Certificate of Merit accompanies the attached 60-day notice in which it is alleged the party identified in the notice violated California Health & Safety Code Section 25249.6 by failing to provide clear and reasonable warnings.

2. I am the Executive Director for the noticing party.

3. I have consulted with one or more persons with relevant and appropriate experience or expertise who have reviewed facts, studies, or other data regarding the exposure to the listed chemicals that are the subject of the notice.

4. Based on the information obtained through those consultants, and on 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 plaintiff's case can be established and that the information did not prove that the alleged Violator will be able to establish any of the affirmative defenses set forth in the statute.

5. Along with the copy of this Certificate of Merit served on the Attorney General is attached additional factual information sufficient to establish the basis for this certificate, including the information identified in California Health & Safety Code §25249.7(h)(2), i.e., (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.



Dated: September 26, 2014

Chris Heptinstall

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury under the laws of the State of California that the following is true and correct:

I am a citizen of the United States, over the age of 18 years of age, and am not a party to the within entitled action. My business address is 306 Joy Street, Fort Oglethorpe, Georgia 30742. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Fort Oglethorpe, Georgia.

On September 26, 2014, I served the following documents: **NOTICE OF VIOLATIONS OF CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; "THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY"** on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to the party listed below and depositing it in a U.S. Postal Service Office with the postage fully prepaid for delivery by Certified Mail:

Current President or CEO
Sabre Sciences, Inc.
2233 Faraday Avenue, Suite K
Carlsbad, CA 92008

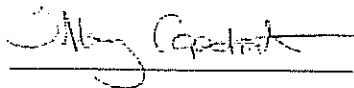
Victor J. Salerno
(Sabre Sciences, Inc.'s Registered Agent
for Service of Process)
2233 Faraday Avenue, Suite K
Carlsbad, CA 92008

On September 26, 2014, I electronically served the following documents: **NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; ADDITIONAL SUPPORTING INFORMATION FOR CERTIFICATE OF MERIT AS REQUIRED BY CALIFORNIA HEALTH & SAFETY CODE §25249.7(d)(1)** on the following party by uploading a true and correct copy thereof on the California Attorney General's website, which can be accessed at <https://oag.ca.gov/prop65/add-60-day-notice>:

Office of the California Attorney General
Prop 65 Enforcement Reporting
1515 Clay Street, Suite 2000
Post Office Box 70550
Oakland, CA 94612-0550

On September 26, 2014, I served the following documents: **NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT** on each of the parties on the Service List attached hereto by placing a true and correct copy thereof in a sealed envelope, addressed to each of the parties on the Service List attached hereto, and depositing it with the U.S. Postal Service with the postage fully prepaid for delivery by Priority Mail.

Executed on September 26, 2014, in Fort Oglethorpe, Georgia.



Tiffany Capehart

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*
September 26, 2014
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Service List

| | | | |
|--|--|---|---|
| District Attorney, Alameda County 1225 Fallon Street, Suite 900 Oakland, CA 94612 | District Attorney, Los Angeles County 210 West Temple Street, Suite 18000 Los Angeles, CA 90012 | District Attorney, San Diego County 330 West Broadway, Suite 1300 San Diego, CA 92101 | District Attorney, Tuolumne County 423 N. Washington Street Sonora, CA 95370 |
| District Attorney, Alpine County P.O. Box 248 Markleeville, CA 96120 | District Attorney, Madera County 209 West Yosemite Avenue Madera, CA 93637 | District Attorney, San Francisco County 850 Bryant Street, Suite 322 San Francisco, CA 94103 | District Attorney, Ventura County 800 South Victoria Ave, Suite 314 Ventura, CA 93009 |
| District Attorney, Amador County 708 Court Street Jackson, CA 95642 | District Attorney, Marin County 3501 Civic Center Drive, Room 130 San Rafael, CA 94903 | District Attorney, San Joaquin County 222 E. Weber Ave. Rm. 202 Stockton, CA 95202 | District Attorney, Yolo County 301 2 nd Street Woodland, CA 95695 |
| District Attorney, Butte County 25 County Center Drive, Suite 245 Oroville, CA 95965 | District Attorney, Mariposa County Post Office Box 730 Mariposa, CA 95338 | District Attorney, San Luis Obispo County 1035 Palm St, Room 450 San Luis Obispo, CA 93408 | District Attorney, Yuba County 215 Fifth Street, Suite 152 Marysville, CA 95901 |
| District Attorney, Calaveras County 891 Mountain Ranch Road San Andreas, CA 95249 | District Attorney, Mendocino County Post Office Box 1000 Ukiah, CA 95482 | District Attorney, San Mateo County 400 County Ctr., 3 rd Floor Redwood City, CA 94063 | Los Angeles City Attorney's Office City Hall East 200 N. Main Street, Suite 800 Los Angeles, CA 90012 |
| District Attorney, Colusa County 346 Fifth Street Suite 101 Colusa, CA 95932 | District Attorney, Merced County 550 W. Main Street Merced, CA 95340 | District Attorney, Santa Barbara County 1112 Santa Barbara Street Santa Barbara, CA 93101 | San Diego City Attorney's Office 1200 3rd Avenue, Ste 1620 San Diego, CA 92101 |
| District Attorney, Contra Costa County 900 Waid Street Martinez, CA 94553 | District Attorney, Modoc County 204 S Court Street, Room 202 Alturas, CA 96101-4020 | District Attorney, Santa Clara County 70 West Hedding Street San Jose, CA 95110 | San Francisco, City Attorney City Hall, Room 234 1 Dr Carlton B Goodlett PL San Francisco, CA 94102 |
| District Attorney, Del Norte County 450 H Street, Room 171 Crescent City, CA 95531 | District Attorney, Mono County Post Office Box 617 Bridgeport, CA 93517 | District Attorney, Santa Cruz County 701 Ocean Street, Room 200 Santa Cruz, CA 95060 | San Jose City Attorney's Office 200 East Santa Clara Street, 16 th Floor San Jose, CA 95113 |
| District Attorney, El Dorado County 515 Main Street Placerville, CA 95667 | District Attorney, Monterey County Post Office Box 1131 Salinas, CA 93902 | District Attorney, Shasta County 1355 West Street Redding, CA 96001 | |
| District Attorney, Fresno County 2220 Tulare Street, Suite 1000 Fresno, CA 93721 | District Attorney, Napa County Post Office Box 720 Napa, CA 94559 | District Attorney, Sierra County PO Box 457 Downieville, CA 95936 | |
| District Attorney, Glenn County Post Office Box 430 Willows, CA 95988 | District Attorney, Nevada County 201 Commercial Street Nevada City, CA 95959 | District Attorney, Siskiyou County Post Office Box 986 Yreka, CA 96097 | |
| District Attorney, Humboldt County 825 5th Street 4 th Floor Eureka, CA 95501 | District Attorney, Orange County 401 West Civic Center Drive Santa Ana, CA 92701 | District Attorney, Solano County 675 Texas Street, Ste 4500 Fairfield, CA 94533 | |
| District Attorney, Imperial County 940 West Main Street, Ste 102 El Centro, CA 92243 | District Attorney, Placer County 10810 Justice Center Drive, Ste 240 Roseville, CA 95678 | District Attorney, Sonoma County 600 Administration Drive, Room 212J Santa Rosa, CA 95403 | |
| District Attorney, Inyo County 230 W. Line Street Bishop, CA 93514 | District Attorney, Plumas County 520 Main Street, Room 404 Quincy, CA 95971 | District Attorney, Stanislaus County 832 12 th Street, Ste 300 Modesto, CA 95354 | |
| District Attorney, Kern County 1215 Truxtun Avenue Bakersfield, CA 93301 | District Attorney, Riverside County 3960 Orange Street Riverside, CA 92501 | District Attorney, Sutter County 446 Second Street Yuba City, CA 95991 | |
| District Attorney, Kings County 1400 West Lacey Boulevard Hanford, CA 93230 | District Attorney, Sacramento County 901 "G" Street Sacramento, CA 95814 | District Attorney, Tehama County Post Office Box 519 Red Bluff, CA 96080 | |
| District Attorney, Lake County 255 N. Forbes Street Lakeport, CA 95453 | District Attorney, San Benito County 419 Fourth Street, 2 nd Floor Hollister, CA 95023 | District Attorney, Trinity County Post Office Box 310 Weaverville, CA 96093 | |
| District Attorney, Lassen County 220 South Lassen Street, Ste. 8 Susanville, CA 96130 | District Attorney, San Bernardino County 316 N. Mountain View Avenue San Bernardino, CA 92415-0004 | District Attorney, Tulare County 221 S. Mooney Blvd., Room 224 Visalia, CA 93291 | |

APPENDIX A

OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY

The following summary has been prepared by the California Office of Environmental Health Hazard Assessment (OEHHA), the lead agency for the implementation of the Safe Drinking Water and Toxic Enforcement Act of 1986 (commonly known as "Proposition 65"). A copy of this summary must be included as an attachment to any notice of violation served upon an alleged violator of the Act. The summary provides basic information about the provisions of the law, and is intended to serve only as a convenient source of general information. It is not intended to provide authoritative guidance on the meaning or application of the law. The reader is directed to the statute and OEHHA's implementing regulations (see citations below) for further information.

FOR INFORMATION CONCERNING THE BASIS FOR THE ALLEGATIONS IN THE NOTICE RELATED TO YOUR BUSINESS, CONTACT THE PERSON IDENTIFIED ON THE NOTICE.

Proposition 65 appears in California law as Health and Safety Code Sections 25249.5 through 25249.13. The statute is available online at: <http://oehha.ca.gov/prop65/law/P65law72003.html>. Regulations that provide more specific guidance on compliance, and that specify procedures to be followed by the State in carrying out certain aspects of the law, are found in Title 27 of the California Code of Regulations, sections 25102 through 27001.¹ These implementing regulations are available online at: <http://oehha.ca.gov/prop65/law/P65Regs.html>.

WHAT DOES PROPOSITION 65 REQUIRE?

The "Governor's List." Proposition 65 requires the Governor to publish a list of chemicals that are known to the State of California to cause cancer and/or reproductive toxicity. This means that chemicals are placed on the Proposition 65 list if they are known to cause cancer and/or birth defects or other reproductive harm, such as

¹ All further regulatory references are to sections of Title 27 of the California Code of Regulations unless otherwise indicated. The statute, regulations and relevant case law are available on the OEHHA website at: <http://www.oehha.ca.gov/prop65/law/index.html>.

damage to female or male reproductive systems or to the developing fetus. This list must be updated at least once a year. The current Proposition 65 list of chemicals is available on the OEHHA website at:
http://www.oehha.ca.gov/prop65/prop65_list/Newlist.html.

Only those chemicals that are on the list are regulated under this law. Businesses that produce, use, release or otherwise engage in activities involving listed chemicals must comply with the following:

Clear and reasonable warnings. A business is required to warn a person before "knowingly and intentionally" exposing that person to a listed chemical unless an exemption applies; for example, when exposures are sufficiently low (see below). The warning given must be "clear and reasonable." This means that the warning must: (1) clearly make known that the chemical involved is known to cause cancer, or birth defects or other reproductive harm and (2) be given in such a way that it will effectively reach the person before he or she is exposed. Some exposures are exempt from the warning requirement under certain circumstances discussed below.

Prohibition from discharges into drinking water. A business must not knowingly discharge or release a listed chemical into water or onto land where it passes or probably will pass into a source of drinking water. Some discharges are exempt from this requirement under certain circumstances discussed below.

DOES PROPOSITION 65 PROVIDE ANY EXEMPTIONS?

Yes. You should consult the current version of the statute and regulations (<http://www.oehha.ca.gov/prop65/law/index.html>) to determine all applicable exemptions, the most common of which are the following:

Grace Period. Proposition 65 warning requirements do not apply until 12 months after the chemical has been listed. The Proposition 65 discharge prohibition does not apply to a discharge or release of a chemical that takes place less than 20 months after the listing of the chemical.

Governmental agencies and public water utilities. All agencies of the federal, state or local government, as well as entities operating public water systems, are exempt.

Businesses with nine or fewer employees. Neither the warning requirement nor the discharge prohibition applies to a business that employs a total of nine or fewer employees. This includes all employees, not just those present in California.

Exposures that pose no significant risk of cancer. For chemicals that are listed as known to the State to cause cancer ("carcinogens"), a warning is not required if the business can demonstrate that the exposure occurs at a level that poses "no significant risk." This means that the exposure is calculated to result in not more than one excess case of cancer in 100,000 individuals exposed over a 70-year lifetime. The Proposition 65 regulations identify specific "No Significant Risk Levels" (NSRLs) for many listed carcinogens. Exposures below these levels are exempt from the warning requirement. See OEHHA's website at: <http://www.oehha.ca.gov/prop65/getNSRLs.html> for a list of NSRLs, and Section 25701 *et seq.* of the regulations for information concerning how these levels are calculated.

Exposures that will produce no observable reproductive effect at 1,000 times the level in question. For chemicals known to the State to cause reproductive toxicity, a warning is not required if the business can demonstrate that the exposure will produce no observable effect, even at 1,000 times the level in question. In other words, the level of exposure must be below the "no observable effect level" divided by a 1,000. This number is known as the Maximum Allowable Dose Level (MADL). See OEHHA's website at: <http://www.oehha.ca.gov/prop65/getNSRLs.html> for a list of MADLs, and Section 25801 *et seq.* of the regulations for information concerning how these levels are calculated.

Exposures to Naturally Occurring Chemicals in a Food. Certain exposures to chemicals that occur in foods naturally (i.e., that do not result from any known human activity, including activity by someone other than the person causing the exposure) are exempt from the warning requirements of the law. If the chemical is a contaminant² it must be reduced to the lowest level feasible. Regulations explaining this exemption can be found in Section 25501.

Discharges that do not result in a "significant amount" of the listed chemical entering into any source of drinking water. The prohibition from discharges into drinking water does not apply if the discharger is able to demonstrate that a "significant amount" of the listed chemical has not, does not, or will not pass into or probably pass into a source of drinking water, and that the discharge complies with all other applicable laws, regulations, permits, requirements, or orders. A "significant amount" means any detectable amount, except an amount that would meet the "no significant risk" level for chemicals that cause cancer or that is 1,000 times below the "no observable effect" level for chemicals that cause reproductive toxicity, if an individual were exposed to that amount in drinking water.

² See Section 25501(a)(4)

HOW IS PROPOSITION 65 ENFORCED?

Enforcement is carried out through civil lawsuits. These lawsuits may be brought by the Attorney General, any district attorney, or certain city attorneys. Lawsuits may also be brought by private parties acting in the public interest, but only after providing notice of the alleged violation to the Attorney General, the appropriate district attorney and city attorney, and the business accused of the violation. The notice must provide adequate information to allow the recipient to assess the nature of the alleged violation. The notice must comply with the information and procedural requirements specified in Section 25903 of the regulations and in Title 11, sections 3100-3103. A private party may not pursue an independent enforcement action under Proposition 65 if one of the governmental officials noted above initiates an action within sixty days of the notice.

A business found to be in violation of Proposition 65 is subject to civil penalties of up to \$2,500 per day for each violation. In addition, the business may be ordered by a court to stop committing the violation.

FOR FURTHER INFORMATION ABOUT THE LAW OR REGULATIONS...

Contact the Office of Environmental Health Hazard Assessment's Proposition 65 Implementation Office at (916) 445-6900 or via e-mail at P65Public.Comments@oehha.ca.gov.

Revised: July, 2012

NOTE: Authority cited: Section 25249.12, Health and Safety Code. Reference: Sections 25249.5, 25249.6, 25249.9, 25249.10 and 25249.11, Health and Safety Code.