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ENDORSED
FILED
ALAMEDA COUNTY

DEC 10 2014

CLERK OF THE SUPERIOR COURT
By Lynetta M. Irvin, Deputy

7 Attorneys for Plaintiff
8 ENVIRONMENTAL RESEARCH CENTER, INC.

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF ALAMEDA

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

13 Plaintiff,

14 v.

15 CALIFORNIA NATURAL VITAMIN LABS,
16 INC., a California Corporation,

17 Defendant.

Case No. _____

RG14751537

**COMPLAINT FOR INJUNCTIVE
RELIEF AND CIVIL PENALTIES**

Health & Safety Code §25249.5, *et seq.*

18 Plaintiff ENVIRONMENTAL RESEARCH CENTER, INC. (“Plaintiff” or “ERC”)
19 brings this action in the interests of the general public and, on information and belief, hereby
20 alleges:

INTRODUCTION

21 1. This action seeks to remedy the continuing failure of Defendant CALIFORNIA
22 NATURAL VITAMIN LABS, INC., a California Corporation (“CNVL” or “Defendant”) to
23 warn consumers in California that they are being exposed to lead, a substance known to the
24 State of California to cause cancer, birth defects, and other reproductive harm.

25 2. Defendant manufactures, packages, distributes, markets, and/or sells in California
26 certain products containing lead, including each of the following products (“PRODUCTS”):

- a. California Natural Vitamin Labs California Natural California Greens;
- b. Holistic Fitness Inc. Super Vegan Protein +plus Delicious Vanilla;
- c. California Natural Vitamin Labs California Natural Malibu Daily Detox;
- d. California Natural Vitamin Labs California Natural Triple Action Advanced;
- e. Joint Formula;
- f. California Natural Vitamin Labs California Natural Special Formula Wild;
- g. Tibetan Natural Sun Dried Goji Berry;
- h. California Natural Vitamin Labs Pure Garcinia Cambogia Extract;
- i. California Natural Vitamin Labs Pure Maca.

3. Lead and lead compounds (hereinafter, the “LISTED CHEMICAL”) is a substance known to the State¹ of California to cause cancer, birth defects, and other reproductive harm.

4. The use and/or handling of the PRODUCTS causes exposures to the LISTED CHEMICAL at levels requiring a “clear and reasonable warning” under California's Safe Drinking Water and Toxic Enforcement Act of 1986, Health & Safety Code (“H&S Code”) §25249.5, *et seq.* (also known as “Proposition 65”). Defendant has failed to provide the health hazard warnings required by Proposition 65.

5. Defendant’s continued manufacturing, packaging, distributing, marketing and/or sales of the PRODUCTS without the required health hazard warnings, causes individuals to be involuntarily and unwittingly exposed to levels of the LISTED CHEMICAL that violate Proposition 65.

6. Plaintiff seeks injunctive relief enjoining Defendant from the continued manufacturing, packaging, distributing, marketing and/or sales of the PRODUCTS in

¹ All statutory and regulatory references herein are to California law, unless otherwise specified.

1 California without provision of clear and reasonable warnings regarding the risks of cancer,
2 birth defects, and other reproductive harm posed by exposure to the LISTED CHEMICAL
3 through the use and/or handling of the PRODUCTS. Plaintiff seeks an injunctive order
4 compelling Defendant to bring its business practices into compliance with Proposition 65 by
5 providing a clear and reasonable warning to each individual who has been and who in the
6 future may be exposed to the LISTED CHEMICAL from the use of the PRODUCTS. Plaintiff
7 also seeks an order compelling Defendant to identify and locate each individual person who in
8 the past has purchased the PRODUCTS, and to provide to each such purchaser a clear and
9 reasonable warning that the use of the PRODUCTS will cause exposures to the LISTED
10 CHEMICAL.

11 7. In addition to injunctive relief, Plaintiff seeks an assessment of civil penalties in
12 excess of \$15 million to remedy Defendant's failure to provide clear and reasonable warnings
13 regarding exposures to the LISTED CHEMICAL.

14 **JURISDICTION AND VENUE**

15 8. This Court has jurisdiction over this action pursuant to California Constitution
16 Article VI, Section 10, which grants the Superior Court "original jurisdiction in all causes
17 except those given by statute to other trial courts." The statute under which this action is
18 brought does not specify any other basis for jurisdiction.

19 9. This Court has jurisdiction over Defendant because, based on information and
20 belief, Defendant is a business having sufficient minimum contacts with California, or
21 otherwise intentionally availing themselves of the California market through the distribution
22 and sale of the PRODUCTS in the State of California to render the exercise of jurisdiction over
23 them by the California courts consistent with traditional notions of fair play and substantial
24 justice.

25 10. Venue in this action is proper in the Alameda Superior Court because the Defendant
26 has violated California law in the County of Alameda.

1 **PARTIES**

2 11. Plaintiff ERC is a non-profit corporation organized under California’s Corporation
3 Law. ERC is dedicated to, among other causes, reducing the use and misuse of hazardous and
4 toxic substances, consumer protection, worker safety, and corporate responsibility.

5 12. ERC is a person within the meaning of H&S Code §25118 and brings this
6 enforcement action in the public interest pursuant to H&S Code §25249.7(d).

7 13. Defendant CNVL is a corporation organized under the laws of the State of
8 California and is a person doing business within the meaning of H&S Code §25249.11. CNVL
9 manufactures, packages, distributes, markets and/or sells the PRODUCTS for sale or use in
10 California and in Alameda County.

11 **STATUTORY BACKGROUND**

12 14. The People of the State of California have declared in Proposition 65 their right
13 “[t]o be informed about exposures to chemicals that cause cancer, birth defects, or other
14 reproductive harm.” Section 1(b) of Initiative Measure, Proposition 65.

15 15. To effect this goal, Proposition 65 requires that individuals be provided with a
16 “clear and reasonable warning” before being exposed to substances listed by the State of
17 California as causing cancer or reproductive toxicity. H&S Code §25249.6 states, in pertinent
18 part:

19 No person in the course of doing business shall knowingly and intentionally
20 expose any individual to a chemical known to the state to cause cancer or
21 reproductive toxicity without first giving clear and reasonable warning to such
22 individual....

23 16. “‘Knowingly’ refers only to knowledge of the fact that a discharge of, release of, or
24 exposure to a chemical listed pursuant to Section 25249.8(a) of the Act is occurring. No
25 knowledge that the discharge, release or exposure is unlawful is required.” 27 California Code
26 of Regulations (“CCR”) §25102(n).

17. Proposition 65 provides that any person “violating or threatening to violate” the
statute may be enjoined in a court of competent jurisdiction. H&S Code §25249.7. The phrase

1 “threatening to violate” is defined to mean creating “a condition in which there is a substantial
2 likelihood that a violation will occur.” H&S Code §25249.11(e). Violators are liable for civil
3 penalties of up to \$2,500 per day for each violation of the Act. H&S Code §25249.7.

4 **FACTUAL BACKGROUND**

5 18. On February 27, 1987, the State of California officially listed the chemical lead as a
6 chemical known to cause reproductive toxicity. Lead became subject to the warning
7 requirement one year later and was therefore subject to the “clear and reasonable” warning
8 requirements of Proposition 65 beginning on February 27, 1988. 27 California Code of
9 Regulations (“CCR”) §25000, *et seq.*; H&S Code §25249.5, *et seq.*. Due to the high toxicity
10 of lead, the maximum allowable dose level for lead is 0.5 ug/day (micrograms a day) for
11 reproductive toxicity. 27 CCR § 25805(b).

12 19. On October 1, 1992, the State of California officially listed the chemicals lead and
13 lead compounds as chemicals known to cause cancer. Lead and lead compounds became
14 subject to the warning requirement one year later and were therefore subject to the “clear and
15 reasonable” warning requirements of Proposition 65 beginning on October 1, 1993. 27 CCR
16 § 25102, *et seq.*; H&S Code §25249.6, *et seq.* Due to the carcinogenicity of lead, the no
17 significant risk level for lead is 15 ug/day (micrograms a day). 27 CCR § 25705(b)(1).

18 20. To test Defendant’s PRODUCTS for lead, Plaintiff hired a well-respected and
19 accredited testing laboratory that designed the testing protocol used and approved by the
20 California Attorney General years ago for testing heavy metals. The results of testing
21 undertaken by Plaintiff of Defendant’s PRODUCTS show that the PRODUCTS tested were in
22 violation of the 0.5 ug/day “safe harbor” daily dose limit set forth in Proposition 65’s
23 regulations. Very significant is the fact that people are being exposed to lead through ingestion
24 as opposed to other not as harmful methods of exposure such as dermal exposure. Ingestion of
25 lead produces much higher exposure levels and health risks than does dermal exposure to this
26 chemical.

1 21. At all times relevant to this action, Defendant, therefore, has knowingly and
2 intentionally exposed the users and/or handlers of the PRODUCTS to the LISTED
3 CHEMICAL without first giving a clear and reasonable warning to such individuals.

4 22. The PRODUCTS have allegedly been sold by Defendant for use in California
5 since at least October 3, 2011. The PRODUCTS continue to be distributed and sold in
6 California without the requisite warning information.

7 23. On October 3, 2014, Plaintiff sent a 60-Day Notice of Proposition 65 (“Notice”)
8 violations to the requisite public enforcement agencies, and to the Defendant. A true and
9 correct copy of the Notice is attached hereto as Exhibit A and incorporated by reference. The
10 Notice was issued pursuant to, and in compliance with, the requirements of H&S Code
11 §25249.7(d) and the statute's implementing regulations regarding the notice of the violations to
12 be given to certain public enforcement agencies and to the violator. The Notice included, *inter*
13 *alia*, the following information: the name, address, and telephone number of the noticing
14 individual; the name of the alleged violator; the statute violated; the approximate time period
15 during which violations occurred; and descriptions of the violations, including the chemicals
16 involved, the routes of toxic exposure, and the specific product or type of product causing the
17 violations, and was issued as follows:

- 18 a. Defendant was provided a copy of the Notice by Certified Mail.
- 19 b. Defendant was provided a copy of a document entitled “The Safe
20 Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A
21 Summary,” which is also known as Appendix A to Title 27 of CCR
22 §25903.
- 23 c. The California Attorney General was provided a copy of the Notice via
24 online submission.
- 25 d. The California Attorney General was provided with a Certificate of Merit
26 by the attorney for the noticing party, stating that there is a reasonable

1 and meritorious case for this action, and attaching factual information
2 sufficient to establish a basis for the certificate, including the identity of
3 the persons consulted with and relied on by the certifier, and the facts,
4 studies, or other data reviewed by those persons, pursuant to H&S Code
5 §25249.7(h) (2).

6 24. At least 60-days have elapsed since Plaintiff sent the Notice to the Defendant.
7 The appropriate public enforcement agencies have failed to commence and diligently
8 prosecute a cause of action under H&S Code §25249.5, *et seq.* against Defendant based
9 on the allegations herein.

10 25. As a proximate result of acts by Defendant, as persons in the course of doing
11 business within the meaning of Health & Safety Code §25249.11, individuals throughout the
12 State of California, including in the County of Alameda, have been exposed to the LISTED
13 CHEMICAL without a clear and reasonable warning. The individuals subject to the illegal
14 exposures include normal and foreseeable users of the PRODUCTS, as well as all other
15 persons exposed to the PRODUCTS.

16 **FIRST CAUSE OF ACTION**
17 **(Injunctive Relief for Violations of Health and Safety Code § 25249.5, *et seq.* concerning**
18 **the PRODUCTS described in the October 3, 2014 Prop. 65 Notice)**

19 26. Plaintiff realleges and incorporates by reference all preceding paragraphs as if
20 specifically set forth herein.

21 27. By committing the acts alleged in this Complaint, Defendant at all times relevant to
22 this action, and continuing through the present, has violated H&S Code §25249.6 by, in the
23 course of doing business, knowingly and intentionally exposing individuals who use or handle
24 the PRODUCTS set forth in the Notice to the LISTED CHEMICAL, without first providing a
25 clear and reasonable warning to such individuals pursuant to H&S Code §§ 25249.6 and
26 25249.11(f).

28. By the above-described acts, Defendant has violated H&S Code § 25249.6 and is

1 therefore subject to an injunction ordering Defendant to stop violating Proposition 65, to
2 provide warnings to all present and future customers, and to provide warnings to Defendant's
3 past customers who purchased or used the PRODUCTS without receiving a clear and
4 reasonable warning.

5 29. An action for injunctive relief under Proposition 65 is specifically authorized by
6 Health & Safety Code §25249.7(a).

7 30. Continuing commission by Defendant of the acts alleged above will irreparably
8 harm the citizens of the State of California, for which harm they have no plain, speedy, or
9 adequate remedy at law.

10 Wherefore, Plaintiff prays judgment against Defendant, as set forth hereafter.

11 **SECOND CAUSE OF ACTION**
12 **(Civil Penalties for Violations of Health and Safety Code § 25249.5, *et seq.* concerning the**
13 **PRODUCTS described in the October 3, 2014 Prop. 65 Notice)**

14 31. Plaintiff realleges and incorporates by reference all preceding paragraphs as if
15 specifically set forth herein.

16 32. By committing the acts alleged in this Complaint, Defendant at all times relevant to
17 this action, and continuing through the present, has violated H&S Code §25249.6 by, in the
18 course of doing business, knowingly and intentionally exposing individuals who use or handle
19 the PRODUCTS set forth in the Notice to the LISTED CHEMICAL, without first providing a
20 clear and reasonable warning to such individuals pursuant to H&S Code §§ 25249.6 and
21 25249.11(f).

22 33. By the above-described acts, Defendant is liable, pursuant to H&S Code
23 §25249.7(b), for a civil penalty of \$2,500 per day per violation for each unlawful exposure to the
24 LISTED CHEMICAL from the PRODUCTS, in an amount in excess of \$15 million.

25 Wherefore, Plaintiff prays judgment against Defendant, as set forth hereafter.

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1 **THE NEED FOR INJUNCTIVE RELIEF**

2 34. Plaintiff realleges and incorporates by this reference all preceding paragraphs as
3 if set forth below.

4 35. By committing the acts alleged in this Complaint, Defendant has caused
5 irreparable harm for which there is no plain, speedy or adequate remedy at law. In the absence
6 of equitable relief, Defendant will continue to create a substantial risk of irreparable injury by
7 continuing to cause consumers to be involuntarily and unwittingly exposed to the LISTED
8 CHEMICAL through the use and/or handling of the PRODUCTS.

9 **PRAYER FOR RELIEF**

10 Wherefore, Plaintiff accordingly prays for the following relief:

11 A. A preliminary and permanent injunction, pursuant to H&S Code §25249.7(b),
12 enjoining Defendant, its agents, employees, assigns and all persons acting in concert or
13 participating with Defendant, from distributing or selling the PRODUCTS in California
14 without first providing a clear and reasonable warning, within the meaning of Proposition 65,
15 that the users and/or handlers of the PRODUCTS are exposed to the LISTED CHEMICAL;

16 B. An injunctive order, pursuant to H&S Code §25249.7(b), compelling Defendant
17 to identify and locate each individual who has purchased the PRODUCTS since October 3,
18 2011, and to provide a warning to such person that the use of the PRODUCTS will expose the
19 user to chemicals known to cause cancer, birth defects, and other reproductive harm;

20 C. An assessment of civil penalties pursuant to Health & Safety Code §25249.7(b),
21 against Defendant in the amount of \$2,500 per day for each violation of Proposition 65, in an
22 amount in excess of \$15 million;

23 D. An award to Plaintiff of its reasonable attorney's fees and costs of suit pursuant
24 to California Code of Civil Procedure §1021.5, as Plaintiff shall specify in further application
25 to the Court; and

26 ///

1 E. Such other and further relief as may be just and proper.
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3 Dated: December 16, 2014

LAW OFFICE OF CHRISTINA M. CARO

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Christina M. Caro
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Exhibit A

LAW OFFICE OF CHRISTINA M. CARO

2506 Haste St.
Berkeley, CA 94704

Tel: (510) 387-8597
Fax: (510) 295-2649

christina@ccarolaw.com
www.ccarolaw.com

VIA CERTIFIED MAIL

Current CEO or President
California Natural Vitamin Labs, Inc.
23823 Malibu Road, Ste 600
Malibu, CA 90265

Current CEO or President
California Natural Vitamin Labs, Inc.
23374 Sandalwood Street
West Hills, CA 91307

Current CEO or President
California Natural Vitamin Labs, Inc.
9044 Independence Avenue
Canoga Park, CA 91304

Current CEO or President
California Natural Vitamin Labs, Inc.
21636 Marilla Street
Chatsworth, CA 91311

Current CEO or President
California Natural Vitamin Labs, Inc.
22236 Craggy View Street
Chatsworth, CA 91311

Gene George Arnold
(California Natural Vitamin Labs, Inc.'s
Registered Agent for Service of Process)
22236 Craggy View Street
Chatsworth, CA 91311

VIA ONLINE SUBMISSION

Office of the California Attorney General

Re: Notice of Violations of California Health & Safety Code Section 25249.5 *et seq.*

VIA PRIORITY MAIL

District Attorneys of All California Counties
and Select City Attorneys
(See Attached Certificate of Service)

Dear Addressees:

I represent the Environmental Research Center, Inc. (“ERC”) in connection with this Notice of Violations of California’s Safe Drinking Water and Toxic Enforcement Act of 1986, which is codified at California Health & Safety Code Section 25249.5 *et seq.* and also referred to as Proposition 65.

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.

The name of the Company covered by this notice that violated Proposition 65 (hereinafter the “Violator”) is:

California Natural Vitamin Labs, Inc.

The products that are the subject of this notice and the chemicals in those products identified as exceeding allowable levels are:

- 1. California Natural Vitamin Labs California Natural California Greens - Lead**
- 2. Holistic Fitness Inc. Super Vegan Protein +plus Delicious Vanilla - Lead**
- 3. California Natural Vitamin Labs California Natural Malibu Daily Detox - Lead**
- 4. California Natural Vitamin Labs California Natural Triple Action Advanced Joint Formula - Lead**
- 5. California Natural Vitamin Labs California Natural Special Formula Wild Tibetan Natural Sun Dried Goji Berry - Lead**
- 6. California Natural Vitamin Labs Pure Garcinia Cambogia Extract - Lead**
- 7. California Natural Vitamin Labs Pure Maca - 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.

This letter is a notice to the Violator and the appropriate governmental authorities of the Proposition 65 violations concerning the listed products. This notice covers all violations of Proposition 65 involving the Violator currently known to ERC from the information now available. ERC may continue to investigate other products that may reveal further violations. A summary of Proposition 65, prepared by the Office of Environmental Health Hazard Assessment, is enclosed with the copy of this letter to the Violator.

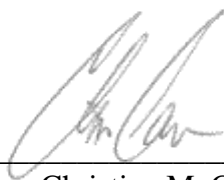
The Violator has manufactured, marketed, distributed, and/or sold the listed products, which have exposed and continue to expose numerous individuals within California to the identified chemical, lead. The consumer exposures that are the subject of this notice result from

the purchase, acquisition, handling and/or recommended use of these products by consumers. The primary route of exposure to lead has been through ingestion, but may have also occurred through inhalation and/or dermal contact. Proposition 65 requires that a clear and reasonable warning be provided prior to exposure to lead. The method of warning should be a warning that appears on the product's label. The Violator violated Proposition 65 because it failed to provide an appropriate warning to persons using and/or handling these products that they are being exposed to lead. Each of these ongoing violations has occurred on every day since October 3, 2011, as well as every day since the products were introduced in the California marketplace, and will continue every day until clear and reasonable warnings are provided to product purchasers and users.

Pursuant to Section 25249.7(d) of the statute, ERC intends to file a citizen enforcement action sixty days after effective service of this notice unless the Violator agrees in an enforceable written instrument to: (1) reformulate the listed products so as to eliminate further exposures to the identified chemicals; (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 products in the last three years. Consistent with the public interest goals of Proposition 65 and my client's objectives in pursuing this notice, ERC is interested in seeking a constructive resolution to this matter. Such resolution will avoid both further unwarned consumer exposures to the identified chemicals and expensive and time consuming litigation.

ERC's Executive Director is Chris Heptinstall, and is located at 3111 Camino Del Rio North, Suite 400, San Diego, CA 92108; Tel. 619-500-3090. ERC has retained me in connection with this matter. We suggest that communications regarding this Notice of Violations should be directed to my attention at the above listed law office address and telephone number.

Sincerely,



Christina M. Caro

Attachments

Certificate of Merit

Certificate of Service

OEHHA Summary (to California Natural Vitamin Labs, 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 California Natural Vitamin Labs, Inc.**

I, Christina Caro, declare:

1. This Certificate of Merit accompanies the attached sixty-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 an attorney 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 chemical that is 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: October 3, 2014



Christina M. Caro

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 October 3, 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 CEO or President
California Natural Vitamin Labs, Inc.
23823 Malibu Road, Ste 600
Malibu, CA 90265

Current CEO or President
California Natural Vitamin Labs, Inc.
21636 Marilla Street
Chatsworth, CA 91311

Current CEO or President
California Natural Vitamin Labs, Inc.
23374 Sandalwood Street
West Hills, CA 91307

Current CEO or President
California Natural Vitamin Labs, Inc.
22236 Craggy View Street
Chatsworth, CA 91311

Current CEO or President
California Natural Vitamin Labs, Inc.
9044 Independence Avenue
Canoga Park, CA 91304

Gene George Arnold
(California Natural Vitamin Labs, Inc.’s
Registered Agent for Service of Process)
22236 Craggy View Street
Chatsworth, CA 91311

On October 3, 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
Oakland, CA 94612-0550

On October 3, 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 First Class Mail.

Executed on October 3, 2014, in Fort Oglethorpe, Georgia.


Tiffany Capehart

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*

October 3, 2014

Page 6

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 Ward 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	