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13 Attorneys for Plaintiff
MATEEL ENVIRONMENTAL JUSTICE FOUNDATION

14
15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **MENDOCINO COUNTY**

ENDORSED-FILED
FEB 20 2018
CLERK OF MENDOCINO COUNTY
SUPERIOR COURT OF CALIFORNIA
KAREN CRUTCHER

17 MATEEL ENVIRONMENTAL JUSTICE
18 FOUNDATION, a non-profit corporation,

19 Plaintiff,

20 vs.

21 UKIAH RIFLE AND PISTOL CLUB,

22 Defendants.

Case No.

SCUK- CVG- 18-70419

**COMPLAINT FOR INJUNCTIVE RELIEF
AND CIVIL PENALTIES**

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24
25
26 MATEEL ENVIORNMENTAL JUSTICE FOUNDATION ("Mateel") brings this action in
27 the interests of the general public and, on information and belief, alleges as follows:
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INTRODUCTION

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2 1. This Complaint seeks injunctive relief and civil penalties to remedy the continuing
3 discharge of lead by defendant UKIAH RIFLE AND PISTOL CLUB (“Gun Club”) onto or into land
4 and/or water where that lead will pass, or probably will pass, into a source of drinking water. The
5 Gun Club operates a shooting range at 2300 Vichy Springs Road, in Ukiah California, on land
6 owned by the City of Ukiah. As part of the business activities of the Gun Club, rifles, pistols and
7 shotguns discharge projectiles, including bullets and shotgun pellets, onto and into land at the Gun
8 Club. Many of these projectiles are made of lead. Pursuant to Health & Safety Code § 25249.8, the
9 State of California has listed lead as a substance known to cause male and female reproductive
10 toxicity, developmental toxicity and cancer.¹ This reproductive toxin and carcinogen is therefore
11 present at the Gun Club shooting range as the direct and immediate result of business activities that
12 the Gun Club conducts there.

13 2. The projectiles made of lead fired from guns at the Gun Club are deposited on and in
14 the soil there. When rain falls, rain water contacts this lead, dissolves some of it, and carries that
15 lead into Sulphur Creek, which then flows into the Russian River. Both Sulphur Creek and the
16 Russian River are designated as sources of domestic and municipal water supply in the current Basin
17 Plan adopted by California’s North Coast Regional Water Quality Control Board. In addition, the
18 Russian River is a present source of domestic and municipal drinking water.

19 3. Plaintiff seeks injunctive relief pursuant to Health & Safety Code § 25249.7 to
20 compel the Gun Club to bring its business activities into compliance with Health & Safety Code §
21 25249.5 by terminating the discharge of guns at the Gun Club shooting range to the extent discharge
22 of leaded projectiles fall onto or into land at the Gun Range where rain will fall on those projectiles.
23 Plaintiff also seeks an order requiring that the Gun Club remove spent lead projectiles from the soil
24

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

1 at its gun range to the extent that rain can fall on that lead, or to the extent that rain water can
2 percolate through the soil to contact leaded projectiles that have penetrated the surface of the soil and
3 are thus buried at the gun range.

4 4. In addition to injunctive relief, plaintiff seeks civil penalties to remedy the continuing
5 discharge of leaded projectiles at the Gun Club each day from February 2, 2017 up to and including
6 the issuance of a final judgment in this case.

7 **PARTIES**

8 5. Plaintiff Mateel is a non-profit organization dedicated to, among other causes, the
9 protection of the environment, promotion of human health, and environmental education. Mateel is
10 based in Eureka, California, and is incorporated under the laws of the State of California.

11 6. Mateel is a "person" pursuant to Health & Safety Code § 25118. Mateel brings this
12 enforcement action in the public interest pursuant to Health & Safety Code § 25249.7(d). The lead
13 that Gun Club patrons discharge at the Gun Club's shooting range is carried by storm water run-off
14 and enters Sulphur Creek and the Russian River, both of which are designated sources of drinking
15 water within the meaning of Health & Safety Code § 25249.5.

16 7. Defendant is a non-profit corporation that operates a gun range at 2300 Vichy Springs
17 Road in Mendocino County, California. Defendant is a person doing business within the meaning of
18 Health & Safety Code Section 252495. There are more than ten persons who perform services at the
19 Gun Club. These include members of the Gun Club's board of directors, its secretary, a caretaker
20 and people who act as range safety officers or who teach various classes at the Gun Club's shooting
21 range. These Gun Club members are compensated for the services they perform by being given
22 complementary membership in the Gun Club. Plaintiff is informed and on that basis believes that
23 Gun Club membership costs \$125 per year and that people perform services for the Gun Club in
24 exchange for complementary membership, making them "employees" within the meaning of

1 California Labor Code § 3351 and California Code of Regulations, title 27, section 25102,
2 subparagraph (h).

3 8. Attached hereto as **Exhibit A** and incorporated by reference is a copy of the Notice of
4 Violation letter dated December 16, 2017 that plaintiff sent to California's Attorney General, the
5 Mendocino County District Attorney, the Sonoma County District Attorney, and the Secretary and
6 Agent for Service of Process for the Gun Club. Attached to the Notice of Violation sent to the Gun
7 Club was a summary of Proposition 65 that was prepared by California's Office of Environmental
8 Health Hazard Assessment ("OEHHA") (Cal. Code Regs., tit. 27, section 25903 Appendix A). In
9 addition, each Notice of Violation Letter plaintiff sent was accompanied by a Certificate of Service
10 attesting to the service of the Notice of Violation on each entity that received it.

11 **JURISDICTION AND VENUE**

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

17 10. This court also has jurisdiction over defendant because it is a business that has
18 sufficient minimum contacts in California and within Mendocino County. Defendant has availed
19 itself of the legal protections offered by California and by Mendocino County in operating its Vichy
20 Springs Road gun range. Lead-contaminated runoff from defendant's gun range pollutes sources of
21 drinking water that are located in Mendocino County. It is thus consistent with traditional notions of
22 fair play and substantial justice for the Mendocino Superior Court to exercise jurisdiction over
23 defendant. Venue is proper in this court because the locations at which lead-contaminated storm
24 water runoff from the Gun Club's shooting range enters Sulphur Creek and the Russian River are

1 located in Mendocino County.

2 **STATUTORY BACKGROUND**

3 11. The People of the State of California have declared in Proposition 65 their right “[t]o
4 protect themselves and the water they drink against chemicals that cause cancer, birth defects, or
5 other reproductive harm” and “[t]o secure strict enforcement of the laws controlling hazardous
6 chemicals and deter actions that threaten health and public safety.” (Sections 1(a) and (c) of
7 Initiative Measure, Proposition 65.)

8 12. To effect this goal, Proposition 65 prohibits the discharge of substances listed by the
9 State of California as causing cancer or reproductive toxicity to sources of drinking water. H&S
10 Code §25249.6 states, in pertinent part:

11 No person in the course of doing business shall knowingly discharge or release a
12 chemical known to the state to cause cancer or reproductive toxicity into water or
13 onto or into land where such chemical passes or probably will pass into any source of
drinking water....

14 14. Proposition 65 provides that any person “violating or threatening to violate” the
15 statute may be enjoined in a court of competent jurisdiction. (H&S Code §25249.7.) The phrase
16 “threatening to violate” is defined to mean creating “a condition in which there is a substantial
17 likelihood that a violation will occur.” (H&S Code §25249.11(e).) Violators are liable for civil
18 penalties of up to \$2,500 per day for each violation of the Act. (H&S Code §25249.7.)

19 **FACTUAL BACKGROUND**

20 15. On February 27, 1987, the State of California officially listed the toxic heavy metal,
21 lead, as a chemical known to cause reproductive toxicity. Lead became subject to the discharge
22 prohibition twenty months later, on October 27, 1988. (27 CCR § 25000, *et seq.*; H&S Code
23 §25249.9, *et seq.*)

24 16. On October 1, 1992, the State of California officially listed the chemicals lead and

1 lead compounds as chemicals known to cause cancer. Lead and lead compounds became subject to
2 the discharge prohibition twenty months later, on June 1, 1993. (27 CCR § 25000, *et seq.*; H&S
3 Code §25249.9, *et seq.*)

4 17. Plaintiff is informed and believes, and based on such information and belief alleges
5 the lead discharges at issue have been occurring for the past few decades and are continuing to
6 occur.

7 18. These unlawful discharges have occurred and are continuing to occur as a proximate
8 result of acts by defendant, as a person in the course of doing business within the meaning of Health
9 & Safety Code §25249.11.

10 19. The appropriate public enforcement agencies have failed to commence and diligently
11 prosecute a cause of action under H&S Code §25249.5, *et seq.* against Defendant based on the
12 allegations herein.

13 **FIRST CAUSE OF ACTION**
14 **(Claim for Injunctive Relief)**

15 20. Plaintiff realleges and incorporates by reference into this First Cause of Action, as if
16 specifically set forth herein, paragraphs 1 through 19 inclusive.

17 21. Since at least five years prior to the issuance of plaintiff's December 16, 2017 Notice
18 of Violation, defendant has engaged in conduct that violates Health & Safety Code § 25249.5. This
19 includes allowing Gun Club members to discharge leaded ammunition at the gun range that the Gun
20 Club knows will fall into or onto land where that leaded ammunition will be exposed to storm water
21 runoff that then enters Sulphur Creek and the Russian River.

22 22. At all times relevant to this action, defendant knew that its patrons were discharging
23 leaded ammunition into or onto land at the gun range.

24 23. By the above described acts, defendant has violated Health & Safety Code § 25249.6
and is therefore subject to an injunction ordering it to stop violating Proposition 65, to terminate

1 discharge of leaded ammunition into or onto land at the gun range to the extent that spent-leaded-
2 ammunition can come into contact with storm water which runs off the gun range and enters Sulphur
3 Creek.

4 **SECOND CAUSE OF ACTION**
5 **(Claim for Civil Penalties)**

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

8 25. By the above-described acts, defendant is liable and should be liable pursuant to
9 Health & Safety Code § 25249.7(b), for a civil penalty for \$2,500 per day on which leaded
10 ammunition has been discharged onto or into land at the Gun Club.

11 **PRAYER FOR RELIEF**

12 Wherefore, plaintiff prays for judgment against defendant as follows:

13 1. Pursuant to the First Cause of Action and Health & Safety Code § 25249.7(a), that
14 defendant be enjoined, restrained, and ordered to comply with the provisions of Section 25249.5 of
15 the California Health & Safety Code;

16 2. Pursuant to the Second Cause of Action and Health & Safety Code § 25249.7(b)(1),
17 that defendant be assessed a civil penalty in an amount equal to \$2,500 per day that defendant's
18 business has caused spent-leaded-ammunition to be deposited or discharged onto or into land at the
19 Gun Club;

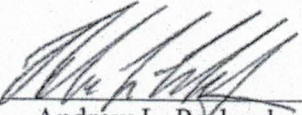
20 3. That pursuant to Civil Procedure Code § 1021.5 defendant be ordered to pay to
21 plaintiff the attorneys' fees and costs it incurred in bringing this enforcement action, as plaintiff shall
22 specify in further application to the Court; and,

23 ///

24 ///

1 4. For such other and further relief as this court deems just and proper.

2 Dated: February 19, 2018 LAW OFFICES OF ANDREW L. PACKARD

3
4 By:  _____
5 Andrew L. Packard
6 Attorneys for Plaintiff
7 MATEEL ENVIRONMENTAL
8 JUSTICE FOUNDATION

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EXHIBIT A

LAW OFFICES OF
ANDREW L. PACKARD

245 KENTUCKY STREET, SUITE B3, PETALUMA, CA 94952
PHONE (707) 782-4060 FAX (707) 782-4062
INFO@PACKARDLAWOFFICES.COM

December 16, 2017

VIA CERTIFIED MAIL

Ukiah Rifle and Pistol Club
P.O. Box 26
Ukiah, CA 95482

Chris L. Land
Agent for Service of Process and
Secretary
Ukiah Rifle and Pistol Club
560 Saratoga Court
Ukiah, CA 95482

Public Enforcement Agencies
(See attached Certificate of Service)

**NOTICE OF VIOLATION AND INTENT TO FILE SUIT UNDER HEALTH &
SAFETY CODE § 25249.5 *et seq.* (California Safe Drinking Water & Toxic
Enforcement Act, also referred to as "Proposition 65")**

Greetings:

The Mateel Environmental Justice Foundation ("Mateel") gives you notice that the Ukiah Rifle and Pistol Club ("URPC") is, has been, will be and threatens to be in violation of Cal. Health & Safety Code § 25249.5. This law firm represents Mateel in this matter and I can be reached at the address and telephone numbers set forth in the letterhead above. William Verick, who is a responsible person at Mateel, also represents Mateel, and he may be reached at 1125 Sixteenth Street, Suite 204, Arcata, California, 95521, (707) 630-5061.

The chemicals at issue in this Notice are lead and lead compounds ("lead"). The above-referenced violations occur when people shoot guns at URPC's gun range located at 2300 Vichy Springs Road, Ukiah, California (the "gun range"). Shooting guns at the gun range causes lead-based ammunition to land on the ground there. This lead-based ammunition is thus deposited onto land or into water at URPC as the direct and immediate result of the business activities conducted by URPC at the gun range. Lead from this lead-based ammunition is deposited onto land or into water such that it is likely to enter into a source of drinking water. When rain lands on the spent lead-based ammunition, the rainwater dissolves some of the lead and runs off carrying the dissolved lead into sources of drinking water.

Notice of Violation, Health & Safety Code §25249.5 *et seq.*

December 16, 2017

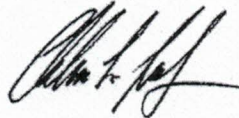
Page 2

The sources of drinking water at issue are the Sulphur Creek Hydrologic Subarea of the Russian River Hydrologic Unit and the Russian River Hydrologic Unit itself, both of which are designated as existing sources of municipal and domestic drinking water in the "*Water Quality Control Plan for the North Coast Region (Revised May 2011)*," generally referred to as the "Basin Plan." Basin Plan, 2-11.00.

A summary of the statute and its implementing regulations, which was prepared by the lead agency designated under the statute, is enclosed with the copy of this notice served upon URPC.

These violations have occurred every day since December 16, 2016 that people shot guns at the gun range using lead-based ammunition. These violations will continue every day into the future that people shoot guns at the gun range unless and until the ammunition they use ceases to be lead-based. If you wish to discuss a resolution of the issues raised herein, please contact the undersigned at your earliest convenience.

Sincerely,



Andrew L. Packard
Attorneys for Plaintiff
Mateel Environmental Justice Foundation



Proposition 65 in Plain Language

Office of Environmental Health Hazard Assessment
California Environmental Protection Agency

What is Proposition 65?

In 1986, California voters approved an initiative to address their growing concerns about exposure to toxic chemicals. That initiative became the Safe Drinking Water and Toxic Enforcement Act of 1986, better known by its original name of Proposition 65.

Proposition 65 requires the State to publish a list of chemicals known to cause cancer or birth defects or other reproductive harm. This list, which must be updated at least once a year, has grown to include over 800 chemicals since it was first published in 1987.

Proposition 65 requires businesses to notify Californians about significant amounts of chemicals in the products they purchase, in their homes or workplaces, or that are released into the environment. By providing this information, Proposition 65 enables Californians to make informed decisions about protecting themselves from exposure to these chemicals. Proposition 65 also prohibits California businesses from knowingly discharging significant amounts of listed chemicals into sources of drinking water.

The Office of Environmental Health Hazard Assessment (OEHHA) administers the Proposition 65 program. OEHHA, which is part of the California Environmental Protection Agency (Cal/EPA), also evaluates all currently available scientific information on substances considered for placement on the Proposition 65 list.

What types of chemicals are on the Proposition 65 list?

The list contains a wide range of naturally occurring and synthetic chemicals that are known to cause cancer or birth defects or other reproductive harm. These chemicals include additives or ingredients in pesticides, common household products, food, drugs, dyes, or solvents. Listed chemicals may also be used in manufacturing and construction, or they may be byproducts of chemical processes, such as motor vehicle exhaust.

How is a chemical added to the list?

There are four principal ways for a chemical to be added to the Proposition 65 list. A chemical can be listed if either of two independent committees of scientists and health professionals finds that the chemical has been clearly shown to cause cancer or birth defects or other reproductive harm. These two committees—the Carcinogen Identification Committee (CIC) and the Developmental and Reproductive Toxicant (DART) Identification Committee—are part of OEHHA's Science Advisory Board. The

committee members are appointed by the Governor and are designated as the "State's Qualified Experts" for evaluating chemicals under Proposition 65. When determining whether a chemical should be placed on the list, the committees base their decisions on the most current scientific information available. OEHHA staff scientists compile all relevant scientific evidence on various chemicals for the committees to review. The committees also consider comments from the public before making their decisions.

A second way for a chemical to be listed is if an organization designated as an "authoritative body" by the CIC or DART Identification Committee has identified it as causing cancer or birth defects or other reproductive harm. The following organizations have been designated as authoritative bodies: the U.S. Environmental Protection Agency, U.S. Food and Drug Administration (U.S. FDA), National Institute for Occupational Safety and Health, National Toxicology Program, and International Agency for Research on Cancer.

A third way for a chemical to be listed is if an agency of the state or federal government requires that it be labeled or identified as causing cancer or birth defects or other reproductive harm. Most chemicals listed in this manner are prescription drugs that are required by the U.S. FDA to contain warnings relating to cancer or birth defects or other reproductive harm.

A fourth way requires the listing of chemicals meeting certain scientific criteria and identified in the California Labor Code as causing cancer or birth defects or other reproductive harm. This method established the initial chemical list following voter approval of Proposition 65 in 1986 and continues to be used as a basis for listing as appropriate.

What requirements does Proposition 65 place on companies doing business in California?

Businesses are required to provide a "clear and reasonable" warning before knowingly and intentionally exposing anyone to a listed chemical. This warning can be given by a variety of means, such as by labeling a consumer product, posting signs at the workplace, distributing notices at a rental housing complex, or publishing notices in a newspaper. Once a chemical is listed, businesses have 12 months to comply with warning requirements.

Proposition 65 also prohibits companies that do business within California from knowingly discharging listed chemicals into sources of drinking water. Once a chemical is listed, businesses have 20 months to comply with the discharge prohibition.

Businesses with less than 10 employees and government agencies are exempt from Proposition 65's warning requirements and prohibition on discharges into drinking water sources. Businesses are also exempt from the warning requirement and discharge prohibition if the exposures they cause are so low as to create no significant risk of cancer or birth defects or other reproductive harm. Health risks are explained in more detail below.

What does a warning mean?

If a warning is placed on a product label or posted or distributed at the workplace, a business, or in rental housing, the business issuing the warning is aware or believes

that one or more listed chemicals is present. By law, a warning must be given for listed chemicals unless exposure is low enough to pose no significant risk of cancer or is significantly below levels observed to cause birth defects or other reproductive harm.

For chemicals that are listed as causing cancer, the "no significant risk level" is defined as the level of exposure that would result in not more than one excess case of cancer in 100,000 individuals exposed to the chemical over a 70-year lifetime. In other words, a person exposed to the chemical at the "no significant risk level" for 70 years would not have more than a "one in 100,000" chance of developing cancer as a result of that exposure.

For chemicals that are listed as causing birth defects or reproductive harm, the "no observable effect level" is determined by identifying the level of exposure that has been shown to not pose any harm to humans or laboratory animals. Proposition 65 then requires this "no observable effect level" to be divided by 1,000 in order to provide an ample margin of safety. Businesses subject to Proposition 65 are required to provide a warning if they cause exposures to chemicals listed as causing birth defects or reproductive harm that exceed $1/1000^{\text{th}}$ of the "no observable effect level."

To further assist businesses, OEHHA develops numerical guidance levels, known as "safe harbor numbers" (described below) for determining whether a warning is necessary or whether discharges of a chemical into drinking water sources are prohibited. However, a business may choose to provide a warning simply based on its knowledge, or assumption, about the presence of a listed chemical without attempting to evaluate the levels of exposure. Because businesses do not file reports with OEHHA regarding what warnings they have issued and why, OEHHA is not able to provide further information about any particular warning. The business issuing the warning should be contacted for specific information, such as what chemicals are present, and at what levels, as well as how exposure to them may occur.

What are safe harbor levels?

As stated above, to guide businesses in determining whether a warning is necessary or whether discharges of a chemical into drinking water sources are prohibited, OEHHA has developed safe harbor levels. A business has "safe harbor" from Proposition 65 warning requirements or discharge prohibitions if exposure to a chemical occurs at or below these levels. These safe harbor levels consist of No Significant Risk Levels for chemicals listed as causing cancer and Maximum Allowable Dose Levels for chemicals listed as causing birth defects or other reproductive harm. OEHHA has established over 300 safe harbor levels to date and continues to develop more levels for listed chemicals.

What if there is no safe harbor level?

If there is no safe harbor level for a chemical, businesses that expose individuals to that chemical would be required to provide a Proposition 65 warning, unless the business can show that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm. OEHHA has adopted regulations that provide guidance for calculating a level in the absence of a safe harbor level. Regulations are available at

Article 7 and Article 8 of Title 27, California Code of Regulations. Determining anticipated levels of exposure to listed chemicals can be very complex. Although a business has the burden of proving a warning is not required, a business is discouraged from providing a warning that is not necessary and instead should consider consulting a qualified professional if it believes an exposure to a listed chemical may not require a Proposition 65 warning.

Who enforces Proposition 65?

The California Attorney General's Office enforces Proposition 65. Any district attorney or city attorney (for cities whose population exceeds 750,000) may also enforce Proposition 65. In addition, any individual acting in the public interest may enforce Proposition 65 by filing a lawsuit against a business alleged to be in violation of this law. Lawsuits have been filed by the Attorney General's Office, district attorneys, consumer advocacy groups, and private citizens and law firms. Penalties for violating Proposition 65 by failing to provide notices can be as high as \$2,500 per violation per day.

How is Proposition 65 meeting its goal of reducing exposure to hazardous chemicals in California?

Since it was passed in 1986, Proposition 65 has provided Californians with information they can use to reduce their exposures to listed chemicals that may not have been adequately controlled under other State or federal laws. This law has also increased public awareness about the adverse effects of exposures to listed chemicals. For example, Proposition 65 has resulted in greater awareness of the dangers of alcoholic beverage consumption during pregnancy. Alcohol consumption warnings are perhaps the most visible health warnings issued as a result of Proposition 65.

Proposition 65's warning requirement has provided an incentive for manufacturers to remove listed chemicals from their products. For example, trichloroethylene, which causes cancer, is no longer used in most correction fluids; reformulated paint strippers do not contain the carcinogen methylene chloride; and toluene, which causes birth defects or other reproductive harm, has been removed from many nail care products. In addition, a Proposition 65 enforcement action prompted manufacturers to decrease the lead content in ceramic tableware and wineries to eliminate the use of lead-containing foil caps on wine bottles.

Proposition 65 has also succeeded in spurring significant reductions in California of air emissions of listed chemicals, such as ethylene oxide, hexavalent chromium, and chloroform.

Although Proposition 65 has benefited Californians, it has come at a cost for companies doing business in the state. They have incurred expenses to test products, develop alternatives to listed chemicals, reduce discharges, provide warnings, and otherwise comply with this law. Recognizing that compliance with Proposition 65 comes at a price, OEHHA is working to make the law's regulatory requirements as clear as possible and ensure that chemicals are listed in accordance with rigorous science in an open public process.

Where can I get more information on Proposition 65?

For general information on the Proposition 65 list of chemicals, you may contact OEHHA's Proposition 65 program at (916) 445-6900, or visit <http://www.oehha.ca.gov/prop65.html>. For enforcement information, contact the California Attorney General's Office at (510) 873-6321, or visit <http://oag.ca.gov/prop65>.

Updated February 2013

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 245 Kentucky Street, Suite B3, Petaluma, California 94952.

On December 16, 2017, I served the following documents: **NOTICE OF VIOLATION, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; "THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986: 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 for delivery by Return Receipt, Certified First Class Mail:

Chris L. Land
Agent for Service of Process and Secretary
Ukiah Rifle and Pistol Club
560 Saratoga Court
Ukiah, CA 95482

Ukiah Rifle and Pistol Club
P.O. Box 26
Ukiah, CA 95482

Proposition 65 Enforcement Reporting
California Attorney General's Office
1515 Clay Street, Ste. 2000
Oakland, CA 94612

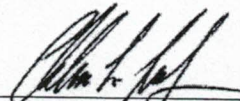
On December 16, 2017, I served the following documents: **NOTICE OF VIOLATION, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.;** on the following parties by placing a true and correct copy thereof in a sealed envelope, and depositing it in a U.S. Postal Service Office for delivery by Return Receipt, Certified First Class Mail:

The Honorable Xavier Becerra
Office of the Attorney General
1300 "I" Street
Sacramento, CA 95814-2919

The Honorable Charles David Eyster
Mendocino County District Attorney
100 North State Street, Room G-10
Ukiah, CA 95482

The Honorable Jill Ravitch
Sonoma County District Attorney
600 Administration Drive, Room 212 J
Santa Rosa, CA 95403

Executed on December 16, 2017, in Petaluma, California.



Andrew L. Packard