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11 Walnut Creek, CA 94598  
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14 Attorneys for Plaintiff,  
15 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION

16  
17 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
18 COUNTY SAN FRANCISCO  
19 (Unlimited Jurisdiction)

20 MATEEL ENVIRONMENTAL  
21 JUSTICE FOUNDATION,

CASE NO.

CGC-18-565912

22 Plaintiff,

23 v.

COMPLAINT FOR INJUNCTIVE RELIEF  
AND CIVIL PENALTIES

24 WILLIAMS SONOMA, INC.,

TOXIC TORT/ENVIRONMENTAL

25 Defendant.

26 MATEEL ENVIRONMENTAL JUSTICE FOUNDATION alleges as follows:

27 INTRODUCTION

28 1. This Complaint seeks civil penalties and an injunction to remedy the continuing failure of defendant WILLIAMS SONOMA, INC. (hereinafter "Defendant"), to give clear and reasonable warnings to those residents of California, who drink from leaded crystal glassware that Defendant sells in California. Defendant sells leaded crystal wine glasses, high ball glasses, cocktail glasses, decanters and other glassware that is made from leaded crystal and contains lead at high levels. When beverages are stored in or served from this leaded crystal, some of the lead leaches out of the crystal into the drink. A person who drinks from this crystal thus ingests lead, a

ENDORSED  
FILED  
San Francisco County Superior Court  
APR 19 2018  
CLERK OF THE COURT  
KALENE APOLONIO  
Deputy Clerk

BY FAX  
JUL 10 2018

1 chemical known to the State of California to cause reproductive toxicity. This causes an exposure  
2 to lead within the meaning of Health and Safety Code Section 25249.6.

3         2. Defendant sells leaded crystal throughout California, including in San Francisco.  
4 Defendant's leaded crystal imparts lead to beverages that are stored in or served from it. This  
5 causes exposure to lead, a chemical listed pursuant to 27 Cal. Code Regs. § 27001 as known to  
6 cause male and female reproductive toxicity, as well as developmental toxicity.

7         3. Plaintiff seeks injunctive relief pursuant to Health & Safety Code Section 25249.7  
8 to compel Defendant to bring its business practices into compliance with section 25249.5 et seq.  
9 by providing a clear and reasonable warning to each individual who has been and who in the  
10 future may be exposed to lead by drinking from Defendant's leaded crystal.

11         4. In addition to injunctive relief, plaintiff seeks civil penalties to remedy the failure  
12 of Defendant to provide clear and reasonable warnings regarding exposure to a chemical known to  
13 cause male and female reproductive toxicity, as well as developmental toxicity.

#### 14 PARTIES

15         5. Plaintiff MATEEL ENVIRONMENTAL JUSTICE FOUNDATION ("Mateel") is  
16 a non-profit organization dedicated to, among other causes, the protection of the environment,  
17 promotion of human health, environmental education, and consumer rights. Mateel is based in  
18 Eureka, California, and is incorporated under the laws of the State of California. Mateel is a  
19 "person" pursuant to Health & Safety Code Section 25118. Mateel brings this enforcement action  
20 in the public interest pursuant to Health & Safety Code §25249.7(d).

21         6. Defendant is a person doing business within the meaning of Health & Safety Code  
22 Section 25249.11. Defendant is a business that sells leaded crystal in California, including in San  
23 Francisco County. Exposures to lead that are at issue in this case occur in San Francisco County.

24         7. Plaintiff brings this enforcement action against Defendants pursuant to Health &  
25 Safety Code Section 25249.7(d). Attached hereto and incorporated by reference is a copy of the  
26 Notice of Violation letter, dated January 18, 2018, which Mateel sent to California's Attorney  
27 General. A substantively identical letter was sent to the District Attorney of San Francisco County  
28 as well as to district attorneys for each of California's 58 counties and to the city attorneys for

1 every California city with a population greater than 750,000. Attached to the Notice of Violation  
2 Letter sent to each defendant was a summary of Proposition 65 that was prepared by California's  
3 Office of Environmental Health Hazard Assessment. In addition, each Notice of Violation Letter  
4 plaintiff sent was accompanied by a Certificate of Service attesting to the service of the Notice of  
5 Violation Letter on each entity that received it. Pursuant to California Health & Safety Code  
6 Section 25249.7(d), a Certificate of Merit attesting to the reasonable and meritorious basis for the  
7 action was also sent with each Notice of Violation Letter. Factual information sufficient to  
8 establish the basis of the Certificate of Merit was enclosed with the Notice of Violation letter  
9 Mateel sent to the Attorney General.

10 8. Defendant employs more than ten people.

11 JURISDICTION

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  
15 of the Health & Safety Code, which contains the statutes under which this action is brought, does  
16 not 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 contacts in California and within San Francisco County. Defendant intentionally  
19 availed itself of the legal protections offered by California and by San Francisco County by  
20 marketing its leaded crystal for use in San Francisco, California. It is thus consistent with  
21 traditional notions of fair play and substantial justice for the San Francisco Superior Court to  
22 exercise jurisdiction over Defendant.

23 11. Venue is proper in this Court because exposures to lead caused by Defendant's  
24 leaded crystal occur in San Francisco. Liability for Plaintiff's causes of action, or some parts  
25 thereof, has accordingly arisen in San Francisco during the times relevant to this Complaint and  
26 Plaintiff seeks civil penalties imposed by statute.

27 FIRST CAUSE OF ACTION  
28 (Claim for Injunctive Relief)

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

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

14. To effectuate this goal, Section 25249.6 of the Health and Safety Code mandates that businesses that knowingly and intentionally expose any individual to a chemical known to the State of California to cause cancer or developmental toxicity must first provide a clear and reasonable warning to such individual prior to the exposure.

15. Since at least three years prior to the Notice of Violation Letter, Defendants has engaged in conduct that violates Health and Safety Code Section 25249.6 et seq. This conduct includes knowingly and intentionally exposing to lead, those California residents who drink beverages that have been stored in or served from leaded crystal that Defendant sells at its retail stores throughout California. Defendant has not provided clear and reasonable warnings of the exposure within the meaning of Health & Safety Code Sections 25249.6 and 25249.11.

16. At all times relevant to this action, Defendant knew that its leaded crystal was causing exposures to lead. In spite of this knowledge, Defendant sold leaded crystal, the intended use for which caused the lead exposures Defendant knew would occur.

17. By the above described acts, Defendant has violated Cal. Health & Safety Code § 25249.6 and is therefore subject to an injunction ordering it to stop violating Proposition 65, to provide warnings to all present and future customers who buy leaded crystal Defendant sells in California.

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

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

19. By the above described acts, Defendant is liable and should be liable pursuant to Health & Safety Code § 25249.7(b), for a civil penalty of \$2,500 per day for each individual

1 exposed without proper warning to lead when these individuals drank lead-contaminated  
2 beverages from Defendant's leaded crystal.

3 PRAYER FOR RELIEF

4 Wherefore, plaintiff prays for judgment against DEFENDANT, as follows:

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

7 2. Pursuant to the Second Cause of Action, that Defendant be assessed a civil penalty  
8 in an amount equal to \$2,500.00 per day per individual exposed, in violation of Section 25249.6  
9 of the California Health & Safety Code, to lead when they drank lead-contaminated beverages  
10 from Defendant's leaded crystal;

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

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

14 Dated: April 10, 2018

KLAMATH ENVIRONMENTAL LAW CENTER

15  
16  
17 By 

William Verick

Attorney for Plaintiff

Mateel Environmental Justice Foundation



January 18, 2018

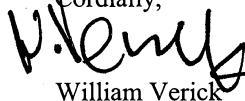
PROPOSITION 65 ENFORCEMENT REPORTING  
ATTENTION: PROP 65 COORDINATOR  
1515 CLAY STREET, SUITE 2000  
P.O. BOX 70550  
OAKLAND CA 94612-0550

ATTORNEY GENERAL COPY  
CONTAINS OFFICIAL  
INFORMATION PURSUANT TO  
EVIDENCE CODE §1040

Greetings:

This office and the Mateel Environmental Justice Foundation ("Mateel") hereby provide notice that Williams-Sonoma, Inc. ("Williams Sonoma") has been, is, will be and threatens to be in violation of Cal. Health & Safety Code §25249.6. This office and Mateel are both private enforcers of Proposition 65, both organizations may be reached at the below-listed address and telephone number, I may be considered a "responsible individual" at both organizations, and I may be contacted at the same address and telephone number. The above referenced violations occur when Williams Sonoma markets leaded crystal vessels such as decanters, tumblers, wine glasses, highball glasses, champagne flutes, and cocktail glasses (as for martinis) (collectively hereinafter "leaded crystal vessels"). Handling of, contact with, drinking from, and cleaning up broken glass from leaded crystal vessels exposes people to lead and lead compounds, (hereinafter, collectively, "lead"). Lead leaches from the vessel into the food or beverage stored in, or served from, the vessel. The food or beverage is then consumed and the accompanying lead ingested. These exposures occur via the ingestion route of exposure. These violations have occurred every day since at least January 18, 2015, and will continue every day until reasonable warnings are given to those people exposed or until Williams Sonoma stops selling leaded crystal.

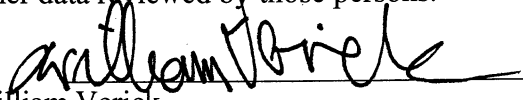
Cordially,

  
William Verick

### CERTIFICATE OF MERIT

I, William Verick, hereby declare: This Certificate of Merit accompanies the attached notice(s) of violation in which it is alleged the parties identified in the notices have violated Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings. I am the attorney for the noticing party. I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the exposure to the listed chemical that is the subject of the action. Based on the information obtained through those consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiffs' case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute. The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health and Safety Code section 25249.7(h)(2), i.e., (1) the identity of the person(s) consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: January 18, 2018


  
William Verick

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### CERTIFICATE OF SERVICE

I, Matt Lang, declare:

If called, I could and would testify as follows: I am over eighteen. My business address is 1125 Sixteenth Street, Suite 204, Arcata, California, 95521. On January 18, 2018, I caused the attached NOTICE OF VIOLATION LETTER, or a letter identical in substance, to be served by U.S. Mail on those public enforcement agencies listed on the attached SERVICE LIST; in addition on the same date and by U.S. Mail I caused the attached NOTICE OF VIOLATION and PROPOSITION 65: A SUMMARY to be sent by Certified U.S. Mail to the private business entities also listed on the attached SERVICE LIST. I deposited copies of these documents in envelopes, postage pre-paid, with the U.S. Postal Service on the day on which the mail is collected. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on January 18, 2018, at Arcata, California.

  
Matt Lang

## SERVICE LIST

PROPOSITION 65 ENFORCEMENT REPORTING  
ATTENTION: PROP 65 COORDINATOR  
1515 CLAY STREET, SUITE 2000  
POST OFFICE BOX 70550  
OAKLAND, CA 94612-0550

OAKLAND CITY ATTORNEY  
CITY HALL 6TH FLOOR  
1 FRANK OGAWA PLAZA  
OAKLAND, CA 94612

OFFICE OF THE CITY ATTORNEY  
CITY OF SAN FRANCISCO  
CITY HALL, ROOM 234  
1 DR. CARLTON B. GOODLETT PLACE  
SAN FRANCISCO, CA 94102-4682

OFFICE OF THE CITY ATTORNEY  
CITY OF SACRAMENTO  
915 I STREET, 4TH FLOOR  
SACRAMENTO, CA 95814-2608

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

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

OFFICE OF THE CITY ATTORNEY  
CITY OF SAN DIEGO CONSUMER &  
ENVIRONMENTAL PROTECTION  
1200 THIRD AVENUE, SUITE 700  
SAN DIEGO, CA 92101

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF ALAMEDA  
1225 FALLON STREET ROOM 900  
OAKLAND, CA 94612

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF ALPINE  
P.O. BOX 248  
MARKLEEVILLE, CA 96120

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF AMADOR  
708 COURT STREET  
JACKSON, CA 95642

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF BUTTE  
25 COUNTY CENTER DR.  
OROVILLE, CA 95965

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF CALAVERAS  
GOVERNMENT CENTER  
891 MOUNTAIN RANCH ROAD  
SAN ANDREAS, CA 95249

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF COLUSA  
547 MARKET STREET  
COLUSA, CA 95932

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF CONTRA COSTA  
P.O. BOX 670  
MARTINEZ, CA 94553

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF DEL NORTE  
450 H ST #171  
CRESCENT CITY, CA 95531

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF EL DORADO  
515 MAIN ST.  
PLACERVILLE, CA 95667

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF FRESNO  
2220 TULARE ST #1000  
FRESNO, CA 93721

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF GLENN  
P.O. BOX 430  
WILLOWS, CA 95988

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF HUMBOLDT  
825 5TH ST.  
EUREKA, CA 95501

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF IMPERIAL  
940 W. MAIN STREET, SUITE 102  
EL CENTRO, CA 92243-2880

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF INYO  
P.O. DRAWER D  
INDEPENDENCE, CA 93526

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF KERN  
1215 TRUXTUN AVE. FLOOR 4  
BAKERSFIELD, CA 93301

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF KINGS  
1400 W. LACEY BLVD.  
HANFORD, CA 93230

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF LAKE  
255 N. FORBES ST # 424  
LAKEPORT, CA 95453

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF LASSEN  
220 SOUTH LASSEN ST. STE 8  
SUSANVILLE, CA 96130

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF LOS ANGELES  
18000 CRIMINAL COURTS BUILDING  
210 W. TEMPLE ST.  
LOS ANGELES, CA 90012

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF MADERA  
209 W. YOSEMITE AVE.  
MADERA, CA 93637

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF MARIN  
HALL OF JUSTICE #183  
SAN RAFAEL, CA 94903

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF MARIPOSA  
P.O. BOX 730  
MARIPOSA, CA 95338

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF MENDOCINO  
PO BOX 1000  
UKIAH, CA 95482

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF MERCED  
2222 M ST.  
MERCED, CA 95340

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF MODOC  
204 SOUTH COURT STREET  
ALTURAS, CA 96101

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF MONO  
P.O. BOX 617  
BRIDGEPORT, CA 93517

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF MONTEREY  
240 CHURCH STREET  
P.O. BOX 1131  
SALINAS, CA 93902

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF NAPA  
931 PARKWAY MALL  
P.O. BOX 720  
NAPA, CA 94559-0720

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF NEVADA  
201 COMMERCIAL STREET  
NEVADA CITY, CA 95959

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF ORANGE  
401 CIVIC CENTER DR WEST  
SANTA ANA, CA 92701

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF PLACER  
10810 JUSTICE CENTER DR. STE 240  
ROSEVILLE, CA 95678

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF PLUMAS  
520 MAIN STREET #404  
QUINCY, CA 95971

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF RIVERSIDE  
3960 ORANGE ST.  
RIVERSIDE, CA 92501

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SACRAMENTO  
901 G STREET  
SACRAMENTO, CA 95814

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SAN BENITO  
419 4TH ST  
HOLLISTER, CA 95023

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SAN BERNARDINO  
316 MT. VIEW AVE.  
SAN BERNARDINO, CA 92415-0004

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SAN DIEGO  
330 W. BROADWAY, SUITE 1100  
SAN DIEGO, CA 92101

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SAN FRANCISCO  
850 BRYANT ST #322  
SAN FRANCISCO, CA 94103

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SAN JOAQUIN  
222 E. WEBER AVE #202  
STOCKTON, CA 95202

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SAN LUIS OBISPO  
COUNTY GOVERNMENT CENTER #450  
SAN LUIS OBISPO, CA 93408

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SAN MATEO  
HALL OF JUSTICE AND RECORDS  
REDWOOD CITY, CA 94063

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SANTA BARBARA  
1112 SANTA BARBARA ST.  
SANTA BARBARA, CA 93101

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SANTA CLARA  
70 W. HEDDING ST.  
SAN JOSE, CA 95110

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SANTA CRUZ  
701 OCEAN ST. #200  
SANTA CRUZ, CA 95060

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SHASTA  
1355 WEST STREET  
REDDING, CA 96001

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SIERRA  
P.O. BOX 457  
DOWNIEVILLE, CA 95936

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SISKIYOU  
P.O. BOX 986  
YREKA, CA 96097

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SOLANO  
600 UNION AVE  
FAIRFIELD, CA 94533

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SONOMA  
600 ADMINISTRATION DR. #212J  
SANTA ROSA, CA 95403

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF STANISLAUS  
1100 I ST. #200  
MODESTO, CA 95354

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF SUTTER  
1160 CIVIC CENTER BLVD. #A  
YUBA CITY, CA 95993

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF TEHAMA  
P.O. BOX 519  
REDBLUFF, CA 96080

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF TRINITY  
P.O. BOX 310  
WEAVERVILLE, CA 96093

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF TULARE  
COURTHOUSE #224  
VISALIA, CA 93291

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF TUOLUMNE  
2 S. GREEN ST.  
SONORA, CA 95370

VENTURA COUNTY DISTRICT ATTORNEY'S  
OFFICE  
800 SOUTH VICTORIA AVE  
VENTURA, CA 93009

OFFICE OF THE DISTRICT ATTORNEY  
COUNTY OF YOLO  
301 SECOND STREET  
WOODLAND, CA 95695

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

LAURA ALBER, CEO  
WILLIAMS SONOMA, INC.  
3250 VAN NESS AVE  
ATTN: LICENSES AND PERMITS  
SAN FRANCISCO, CA 94109



## COMPLIANCE WITH 11 CAL. CODE REGS. §3102

Over the past 20 years, Mateel has tested dozens of brands and models of leaded crystal drinkware to determine that it leaches lead into drinks and/or food that are served in or stored in, it. In every case, lead was determined to leach from the leaded crystal into food or beverages stored in it. Most recently, Mateel tested a brand and model of leaded crystal currently being sold at Williams-Sonoma, Inc.'s California stores. This test entailed the following: Crystal was purchased at a California Williams-Sonoma store. A 32 ounce bottle of Coca Cola was purchased. A portion of that bottle was poured directly into a sample jar to serve as a "blank." Another portion was poured into the leaded crystal, let sit, then poured into another sample jar. Both the blank and the sample taken from the crystal was sent to Exova, a state-certified food laboratory, for analysis to determine the concentration of lead in the Coke. In each case, lead had leached into the Coke in concentrations of hundreds of micrograms per liter. Analysis of the blank for the presence of lead showed no detect. The accompanying laboratory report reflects the concentration of lead that had leached from the crystal into the Coke. The contact information for the laboratory, Exova, is:

Exova  
9240 Santa Fe Springs Road  
Santa Fe Springs, CA 90670  
(562) 948-2225

Mateel sent investigators to virtually every Williams-Sonoma store in the state of California. At many, though not all, of the Williams-Sonoma stores investigated, leaded crystal was being sold without *any* Proposition 65-relevant warning. At some other stores, Mateel's investigators observed attempts made to warn consumers that leaded crystal would expose them to a chemical known to cause reproductive toxicity. At these stores, however, leaded crystal was displayed at multiple locations in the store and there would be only a single shelf sign provided at only one of the several locations where crystal was displayed. The sign read, "Warning: This Product Contains Lead, a Chemical Known . . . ." Finally, on November 23, 2004, Mateel sent Williams-Sonoma a Notice of Violation informing Williams-Sonoma that the leaded crystal it was selling exposed consumers to lead, a chemical listed by the State as known to cause reproductive toxicity.

Client: Law Offices of Brian Acree  
Job Number: 218955

Lead for CA Prop 65 by SOP 7130, Rev 8  
Inductively Coupled Plasma-Mass Spectrometry

Sample preparation: Each sample portion (10 g) was digested in 2 mL of nitric acid for 1 hour on a block digester set at 110°C. The samples were allowed to cool, and then 1 mL of 30% hydrogen peroxide was added. The digestion was then resumed until the samples were reduced to 2-3 mL. The digestates were cooled, internal standards were added, and then the digestates were diluted to a final mass of 100 g with high-purity water. The samples appear to have completely dissolved.

Parts Per Million (µg/g)

<u>Sample ID</u>	<u>Lead</u>
WS Blank	ND
Snooze	ND
Shake Shack	ND
Williams Sonoma #1	0.21
Williams Sonoma #1 Duplicate	0.21
Detection Limit:	0.001

Date Analyzed: 01-10-18

Quality Control Summary

Sample: Williams Sonoma #1

<u>Analyte</u>	<u>Sample Result</u>	<u>Duplicate Result</u>	<u>Sample RPD</u>	<u>Spike Conc</u>	<u>Spike Result</u>	<u>Spike % Rec</u>
Lead	0.213	0.215	1	0.100	0.311	NR

Date Analyzed: 01-10-18

NR - Not reported; sample result exceeds the amount spiked.

Sample: Laboratory Fortified Blank (LFB)

<u>Analyte</u>	<u>Sample Result</u>	<u>Spike Conc</u>	<u>Spike Result</u>	<u>Spike % Rec</u>
Lead	ND	0.100	0.097	97

Date Analyzed: 01-10-18