

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Maureen Duffy-Lewis

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9 Attorneys for Plaintiff  
10 The Chemical Toxin Working Group Inc. doing  
11 business as Healthy Living Foundation Inc.

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
13 **COUNTY OF LOS ANGELES**

14 THE CHEMICAL TOXIN WORKING  
15 GROUP INC., a California non-profit  
16 corporation, doing business as HEALTHY  
17 LIVING FOUNDATION INC.

18 Plaintiff,

19 vs.

20 MAINE LOBSTER NOW LLC, a Maine  
21 limited liability company; and DOES 1-10,

22 Defendants.

CASE NO. **21STCV36382**

**COMPLAINT FOR INJUNCTIVE  
RELIEF, CIVIL PENALTIES, AND  
OTHER RELIEF UNDER HEALTH  
AND SAFETY CODE SECTION 25249.5,  
et seq (PROPOSITION 65)**

23 Plaintiff The Chemical Toxin Working Group Inc. doing business as Healthy Living  
24 Foundation Inc. (“Plaintiff” or “HLF”) hereby alleges the following on information and belief:

25 **INTRODUCTION**

26 1. This action seeks injunctive and declaratory relief and civil penalties to remedy  
27 the continuing failure of Defendant MAINE LOBSTER NOW LLC, a Maine limited liability  
28 company (“Defendant”) to warn consumers in California that they are being exposed to Lead, a

1 chemical known to the State of California to cause cancer and reproductive toxicity found in (1)  
2 Maine Lobster Now Marshall Cove Maine Mussels Fresh and (2) Maine Lobster Now Steamer  
3 Clams Fresh (together herein “Product” or “Products”).

4 2. This action is brought in the public interest and is based on The Safe Drinking  
5 Water and Toxic Enforcement Act of 1986 (Health and Safety Code § 25249.6 et seq.) also  
6 known as “Proposition 65.” This statute mandates that any person in the course of doing business  
7 must provide a clear and reasonable warning prior to exposing any individual to a chemical  
8 known to the state to cause cancer, birth defects or other reproductive harm.

9 **PARTIES**

10 3. HLF is a California non-profit public benefit corporation dedicated to, among  
11 other causes, reducing the amount of chemical toxins in consumer products, the promotion of  
12 human health, environmental safety, and improvement of worker and consumer safety.

13 4. HLF is a person within the meaning of Health and Safety Code section 25249.11,  
14 subdivision (a). HLF, acting as a private attorney general, brings this action in the public interest  
15 as defined under Health and Safety Code section 25249.7, subdivision (d).

16 5. Defendant is a Maine limited liability company, doing business in the State of  
17 California at all relevant times herein.

18 6. Plaintiff is presently unaware of the true names and capacities of defendants  
19 DOES 1-10, and therefore sues these defendants by such fictitious names. Plaintiff will amend  
20 this complaint to allege their true names and capacities when ascertained. Plaintiff is informed,  
21 believes, and thereon alleges that each fictitiously named defendant is responsible in some  
22 manner for the occurrences herein alleged and the violations caused thereby. DOES 1-10 are  
23 each a person in the course of doing business within the meaning of Health and Safety Code §§  
24 25249.6 and 25249.11.

25 7. At all times mentioned herein, the term “Defendants” includes Defendant and  
26 DOES 1-10.



1 **STATUTORY BACKGROUND**

2 14. The Safe Drinking Water and Toxic Enforcement Act of 1986 is an initiative  
3 statute passed as “Proposition 65” by close to a two-to-one voting margin. Proposition 65 is  
4 referred to as a “right-to-know” law intended to inform consumers of the potential for exposure  
5 to toxic chemicals and thereby empower them with the information needed to avoid the  
6 exposure.

7 15. Proposition 65 requires that individuals be provided with a “clear and reasonable  
8 warning” before being exposed to substances listed by the State of California as causing cancer  
9 or reproductive toxicity. The warning requirement of Proposition 65 is contained in Health &  
10 Safety Code § 25249.6, which provides,

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

14 16. In this case, the exposures are caused by consumer products. “Consumer  
15 product” means any article, or component part thereof, including food, that is produced,  
16 distributed, or sold for the personal use, consumption or enjoyment of a consumer. (27  
17 California Code of Regulations § 25600.1(d)) “Consumer product exposure” means an exposure  
18 that results from a person's acquisition, purchase, storage, consumption, or any reasonably  
19 foreseeable use of a consumer product, including consumption of a food. (27 California Code of  
20 Regulations § 25600.1(e)).

21 17. Proposition 65 requires the State to publish a list of chemicals known to cause  
22 cancer or birth defects or other reproductive harm (Health and Safety Code §25249.8.) This list  
23 now comprises over 800 chemicals.

24 18. 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 25249.8.)



1 enforcement officials do not file a timely Complaint, this enables a citizen suit to be filed  
2 pursuant to Health & Safety Code section 25249.7, subdivisions (c) and (d).

3 **FACTUAL BACKGROUND**

4 24. Defendants are businesses that develop, manufacture, package, distribute, market,  
5 offer for sale and/or sell the Products in the State of California.

6 25. Plaintiff hired a well-respected and accredited testing laboratory to test  
7 Defendant's Products for Lead. The results of the testing show that the Products contain Lead.

8 26. Individuals are exposed to the Lead from ingestion of the Products.

9 27. The Products continue to be offered for sale, sold and/or otherwise made available  
10 for use and/or handling to persons in California.

11 28. At all times relevant to this action, Defendants, therefore, have knowingly and  
12 intentionally exposed the users of the Products to Lead without first giving a clear and  
13 reasonable warning to such individuals. The Products continue to be distributed and sold in  
14 California without providing the requisite warning, and thus the violations are ongoing and  
15 continuous and will continue to occur into the future.

16 29. As a proximate result of acts by Defendants, persons in the course of doing  
17 business within the meaning of Health & Safety Code § 25249.11(b), individuals throughout the  
18 State of California, including in the County of Los Angeles, have been exposed to Lead without  
19 a clear and reasonable warning.

20 **SATISFACTION OF 60 DAY NOTICE**

21 30. On February 12, 2021, Plaintiff served Defendant and each appropriate public  
22 enforcement agency with a Proposition 65 Notice, a document entitled "Sixty-Day Notice of  
23 Intent to Sue for Violation of the Safe Drinking Water and Toxic Enforcement Act of 1986"  
24 ("Notice of Violation") that provided Defendant and the public enforcement agency with notice  
25 that Defendant was in violation of Proposition 65 for failing to warn purchasers and consumers  
26 of the Products that ingestion of the Products exposes them to Lead, a chemical known to the

1 State of California to cause cancer and reproductive toxicity. The Notice of Violation is  
2 designated with Attorney General number 2021-00334. The Notice of Violation constitutes  
3 adequate notice to Defendant because it provided adequate information to allow Defendant to  
4 assess the nature of the alleged violations. A certificate of merit and a certificate of service  
5 accompanied the Notice of Violation, and both certificates comply with Proposition 65 and its  
6 implementing regulations. A true and correct copy of the Notice of Violation is attached here as  
7 Exhibit A and is incorporated herein by reference.

8 31. More than 60 days have passed since Plaintiff served the Notice of Violation and  
9 no public enforcement entity has filed a Complaint in this case.

10 32. Plaintiff is commencing this action more than sixty (60) days from the date that  
11 Plaintiff served the Notice of Violation on the Defendants and the public prosecutors referenced  
12 in the paragraphs above.

13 33. Plaintiff is informed, believes, and thereon alleges that neither the Attorney  
14 General, nor any applicable district attorney or city attorney has commenced an action or is  
15 diligently prosecuting an action against either of the Defendants.

16 **FIRST CAUSE OF ACTION**

17 **(Violation of Health & Safety Code § 25249.6, Failure to Provide Clear and Reasonable**  
18 **Warning under Proposition 65 – Against all Defendants)**

19 34. Plaintiff re-alleges and incorporates by reference Paragraphs 1 through 33,  
20 inclusive, as if superficially set forth herein.

21 35. By committing the acts alleged above, Defendants have, in the course of doing  
22 business, knowingly and intentionally exposed users of the Products to Lead, a chemical known  
23 to the State of California to cause cancer and reproductive toxicity without first giving clear and  
24 reasonable warning to such individuals within the meaning of Health & Safety Code § 25249.6  
25 and continue to violate the statute as the Products continue to make their way to individuals in  
26 California through the chain of commerce.





# **EXHIBIT A**

# HEALTHY LIVING FOUNDATION

**VIA CERTIFIED FIRST CLASS MAIL**

Julian Klenda  
Chief Executive Officer  
Maine Lobster Now LLC  
58 City Line Drive  
Portland, Maine 04102

Current Chief Executive Officer  
Maine Lobster Now LLC  
% Paul D. Weinstein  
431 Main Street  
Saco, Maine 04072

**VIA ELECTRONIC FILING**

State of California Department of Justice  
Office of Attorney General of California  
Filing link: [oag.ca.gov/prop65](http://oag.ca.gov/prop65)

**VIA FIRST CLASS MAIL**

District Attorneys of California Counties and  
City Attorneys, as in the Certificate of  
Service

**VIA E-MAIL**

District Attorneys of California Counties and  
City Attorneys, as in the Certificate of  
Service

# HEALTHY LIVING FOUNDATION

February 12, 2021

## 60-DAY NOTICE

*Of intent to sue  
for violations of the Safe Drinking Water and Toxic Enforcement Act of 1986*

The Safe Drinking Water and Toxic Enforcement Act of 1986, codified in the California Health & Safety Code sections 25249.5, *et seq.* (referred to as “Proposition 65”), requires that a 60-day notice of intent to sue be provided to a violator of CAL. HEALTH & SAFETY CODE § 25249.6.

Chemical Toxin Working Group, Inc., a California non-profit corporation, doing business as Healthy Living Foundation (“HLF,” “Noticing Party”), is a non-profit consumer health organization engaged in activities supporting public health, implementing measures reducing the amount of chemical toxins in consumer products, improvement of worker and consumer safety from chemical exposures.

HLF has prosecuted a large number of CAL. HEALTH & SAFETY CODE violations in the public interest. These cases have resulted in significant public benefit, including reformulation of hundreds of products to remove toxic chemicals to make them safer, removal of heavily contaminated products containing lead, cadmium, acrylamide, dioxane, from the market in California and in the US.

CTWG’s Chief Officer David Steinman is a publisher, a health journalist and an author of a bestseller DIET FOR A POISONED PLANET (Crown ed., 1990, Ballantine 2d ed., 1992, Running Press 3d ed., 2007); his major books also include THE SAFE SHOPPER’S BIBLE (Macmillan ed., 1995, Wiley 2d ed., 2000), THE BREAST CANCER PREVENTION PROGRAM (Macmillan ed., 1997), LIVING HEALTHY IN A TOXIC WORLD (Perseus ed., 1996), SAFE TRIP TO EDEN:TEN STEPS TO SAVE THE PLANET EARTH FROM THE GLOBAL WARMING MELTDOWN (Running Press ed., 2007), along with many publications as the publisher of *Healthy Living* magazine and its associated websites, periodicals and other medias.

In its role as a public enforcer acting on behalf of California Attorney General, HLF buys foods and other consumer products through ordinary consumers’ channels, tests them in independent accredited laboratories and reports results of both positive and negative nature to the public through the various news outlets and its own platforms and periodicals. Over the last 20 years, HLF has developed an extensive expertise in prosecuting manufacturers and distributors of food and consumer products for most egregious violations of health laws and consumer safety.

With this notice of violation (NOV), HLF gives a written notice of the alleged violation, bringing this action in the public interest as defined under the CAL. HEALTH & SAFETY CODE § 25249.7(d), seeking to prosecute the continuing and repeated noncompliance and to reduce and/or eliminate consumer exposures to violative

chemical(s) from seafood and shellfish (collectively, the “Specified Products” and each a “Specified Product”) listed in the table below, which are manufactured, distributed and/or sold by Maine Lobster Now LLC (referred to as the “Noticed Party”).

This NOV covers the violations of Proposition 65 that are currently known to the Noticing Party from information now available as specifically related to the violating products listed below and manufactured, distributed or/and sold by and through the Noticed Parties. HLF is continuing its investigation that may reveal further violations.

The Specified Products subject to this NOV, the chemical in the Specified Product identified as exceeding allowable levels, and the Noticed Parties responsible for sale of the Specified Products, are as following:

<b>Specified Products</b>	<b>Violative chemical</b>	<b>Noticed Party</b>
Maine Lobster Now Marshall Cove Maine Mussels Fresh One Pound	Lead	Maine Lobster Now LLC
Maine Lobster Now Steamer Clams Fresh One Pound	Lead	Maine Lobster Now LLC

Noticed Parties have manufactured, marketed, distributed and/or sold the Specified Products which have exposed and continue to expose consumers within the State of California to lead.

Lead was listed pursuant to Proposition 65 as a chemical known to the State of California to cause developmental toxicity and reproductive toxicity on February 27, 1987, and as a chemical known to the State of California to cause cancer on October 1, 1992.

With respect to each Specified Product listed above, the violation commenced on the latter of the date that the Specified Product was first offered for sale in California or the date upon which California law codified the allowable level of the relevant chemical; has continued every day since the relevant date the violation commenced; and will continue every day henceforth until lead is removed from each Specified Product, reduced to allowable levels, or until a “clear and reasonable” warning is provided to consumers by the Noticed Parties, as applicable, in accordance with the law.

The primary route of exposure has been through ingestion.

CAL. HEALTH & SAFETY CODE § 25249.6 requires that a “clear and reasonable” warning be provided prior to exposure to chemicals listed under Proposition 65. The Noticed Parties are in violation of Proposition 65 because the Noticed Parties have failed to provide a warning to consumers that they are being exposed to lead. While in the course of doing business, the Noticed Parties are knowingly and intentionally exposing consumers to the violative chemical without first providing a “clear and reasonable” warning.

The method of warning should be a warning that appears on the product’s label. See Cal. Code Regs. tit. 27, § 25602, subd. (a)(3), and subd. (b) for internet purchases also at the point of sale, as applicable. The Noticed Parties have not provided any

Proposition 65 warnings as required by law or any other appropriate warnings that persons handling, ingesting and/or otherwise using the Specified Products are being exposed to lead.

Pursuant to Title 27, C.C.R. § 25903(b), copies of the documents entitled (i) “The Safe Drinking Water and Toxic Enforcement act of 1986 (Proposition 65): A Summary” and (ii) “The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): Special Compliance Procedure” are attached hereto for reference by the Noticed Parties.

Pursuant to Title 11, C.C.R. § 3100, the “Certificate of Merit” is attached hereto.

HLF is providing an option of a prompt resolution of this matter where the Noticed Parties would agree in writing to (1) eliminate or reduce the violative chemical(s) to an allowable level in the Specified Products or (2) as an alternative to (1), provide an appropriate warning on the label of the Specified Products and at the point of sale, as applicable; and (3) pay an appropriate civil penalties for each violation.

Such a resolution will prevent further unwarned consumer exposures by expeditiously rectifying these ongoing violations of the California law and afford the Noticed Parties to avoid litigation.

Please direct all communications regarding this NOV to my office.

Sincerely,

A handwritten signature in blue ink that reads "David Steinman". The signature is written in a cursive, flowing style.

David Steinman  
Chief Officer  
Tel: (310) 455-8952  
Info@HealthyLivingMagazine.US

## **ATTACHMENTS**

1. Certificate of Merit;
2. Confidential Factual Information supporting Certificate of Merit (to Attorney General only);
3. Certificate of Service (to Attorney General only);
4. Appendix "A" - "The Safe Drinking Water and Toxic Enforcement act of 1986 (Proposition 65): A Summary" (to the Noticed Parties only);
5. Appendix "B" - "The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): Special Compliance Procedure" (to the Noticed Parties only).

# HEALTHY LIVING FOUNDATION

To: California Attorney General  
Notice of Violation: February 12, 2021  
Noticing Party: Chemical Toxin Working Group/Healthy Living Foundation  
Noticed Parties: Maine Lobster Now LLC

*February 12, 2021*

## **CERTIFICATE OF MERIT**

### *To the Notice of Violation*

I, David Steinman, chief officer of the Noticing Party, hereby certify that I have reviewed the facts of this case and have consulted with one or more persons with relevant and appropriate experience and expertise who have reviewed facts, studies, and/or other data regarding the alleged exposures to the listed chemical that is the subject of the Notice of Violation dated February 12, 2021 (the "NOV").

I have reviewed the laboratory testing results for the chemical subject to the NOV and rely on these results. The testing was conducted by a reputable accredited testing laboratory and by experienced scientists with doctoral and other degrees in relevant sciences. The facts, studies and other data derived through this investigation overwhelmingly demonstrate that the alleged violators have exposed persons to the listed chemical that is the subject of the NOV and is known to the State of California to cause reproductive harm and/or cancer.

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 Noticing Party's case will likely be established and that the information did not prove that the alleged violators will be able to prove any of affirmative defenses set forth in the statute.

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



David Steinman  
Chief Officer  
Tel: (310) 455-8952

CERTIFICATE OF SERVICE

I, Oliver Spector, am over the age of eighteen years and am not a party to the action, process or case related to or arising out of the Notice of Violation being served under this Certificate of Service. My address is 2027 Veteran Avenue, Westwood, CA 90025.

On February 12, 2021, between 11:00 a.m. and 5:00 p.m. Pacific Time, I served the following documents:

1. Notice of Violations of California Health & Safety Code Section 25249.5 et seq. by Maine Lobster Now LLC;
2. Certificate of Merit;
3. Appendix "A" - "The Safe Drinking Water and Toxic Enforcement act of 1986 (Proposition 65): A Summary;"
4. Appendix "B" - "The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): Special Compliance Procedure"

on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to the parties below, and causing it to be deposited at a United States Postal Service Office in Los Angeles County, California, for delivery by Certified Mail:

Julian Klenda Chief Executive Officer Maine Lobster Now LLC 58 City Line Drive Portland, Maine 04102	Current Chief Executive Officer Maine Lobster Now LLC % Paul D. Weinstein 431 Main Street Saco, Maine 04072
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On February 12, 2021, between 11:00 a.m. and 11:30 p.m. Pacific Time, I served the following documents:

1. Notice of Violations of California Health & Safety Code Section 25249.5 et seq. by Maine Lobster Now LLC;
2. Certificate of Merit;
3. Confidential Factual Information and Supporting Documentation Required by Title 11, C.C.R. § 3102

on the following parties by filing electronically a true and correct copy thereof as permitted through the website of the California Office of the Attorney General via link at [oag.ca.gov/prop65](http://oag.ca.gov/prop65):

State of California Department of Justice;  
Office of the Attorney General of California.

On February 12, 2021, between 11:00 a.m. and 5:00 p.m. Pacific Time, I served the following documents:

1. Notice of Violations of California Health & Safety Code Section 25249.5 et seq. by Maine Lobster Now LLC;
2. Certificate of Merit

on the following parties below by placing a true and correct copy thereof in a sealed envelope, addressed to each of the District Attorney and City Attorney offices listed



below, and causing each envelope to be deposited at a United States Postal Service mail box for delivery by First Class Mail:

District Attorney Alpine County PO Box 248 Markleeville, CA 96120	District Attorney Lake County 255 North Forbes Street Lakeport, CA 95453	District Attorney Sierra County PO Box 457 Downieville, CA 95936
District Attorney Amador County 708 Court Street, Suite 202 Jackson, CA 95642	District Attorney Los Angeles County Hall of Justice 211 West Temple St., Ste 1200 Los Angeles, CA 90012	District Attorney Siskiyou County Post Office Box 986 Yreka, CA 96097
District Attorney Butte County 25 County Center Drive, Suite 245 Oroville, CA 95965	District Attorney Madera County 209 West Yosemite Avenue Madera, CA 93637	District Attorney Solano County 675 Texas Street, Ste 4500 Fairfield, CA 94533
District Attorney Colusa County 310 6 <sup>th</sup> Street Colusa, CA 95932	District Attorney Marin County 3501 Civic Center Drive, Room 130 San Rafael, CA 94903	District Attorney Stanislaus County 832 12th Street, Ste 300 Modesto, CA 95354
District Attorney Del Norte County 450 H Street, Suite 171 Crescent City, CA 95531	District Attorney Mendocino County PO Box 1000 Ukiah, CA 95482	District Attorney Sutter County 446 Second Street Yuba City, CA 95991
District Attorney EL Dorado County 778 Pacific Street Placerville, CA 95667	District Attorney Modoc County 204 S Court Street, Room 202 Alturas, CA 96101-4020	District Attorney Tehama County PO Box 519 Red Bluff, CA 96080
District Attorney Fresno County 2220 Tulare Street Suite 1000 Fresno, CA 93721	District Attorney Orange County 401 West Civic Center Drive Santa Ana, CA 92701	District Attorney Trinity County Post Office Box 310 Weaverville, CA 96093
District Attorney Glenn County Post Office Box 430 Willows, CA 95988	District Attorney San Benito County 419 4 <sup>th</sup> Street Hollister, CA 95023	District Attorney Tuolumne County 423 North Washington St. Sonora, CA 95370
District Attorney Humboldt County 825 5th Street 4 <sup>th</sup> Floor Eureka, CA 95501	District Attorney San Bernardino County 316 No. Mountain View Avenue San Bernardino, CA 92415	District Attorney Yuba County 215 Fifth Street, Suite 152 Marysville, CA 95901
District Attorney Imperial County 940 West Main Street, Suite 102 El Centro, CA 92243	District Attorney San Mateo County 400 County Ctr., 3rd 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 Kern County 1215 Truxtun Avenue Bakersfield, CA 93301	District Attorney Shasta County 1355 West Street Redding, CA 96001	San Jose City Attorney's Office 200 East Santa Clara Street, 16 <sup>th</sup> Floor San Jose, CA 95113
District Attorney Kings County 1400 West Lacey Blvd. Hanford, CA 93230	District Attorney Mono County Post Office Box 617 Bridgeport, CA 93517	

On February 12, 2021, between 11:00 a.m. and 5:00 p.m. Pacific Time, I served the following documents:

1. Notice of Violations of California Health & Safety Code Section 25249.5 et seq. by Maine Lobster Now LLC;
2. Certificate of Merit

on each of the parties below, all of which have requested electronic service only via the following email addresses:

Alameda County District Attorney CEPDProp65@acgov.org	Calaveras County District Attorney Prop65Env@co.calaveras.ca.us
Contra Costa County District Attorney sgrassini@contracostada.org	Inyo County District Attorney inyoda@inyocounty.us
Lassen County District Attorney mlatimer@co.lassen.ca.us	Mariposa County District Attorney mceda@mariposacounty.org
Merced County District Attorney Prop65@countyofmerced.com	Monterey County District Attorney Prop65DA@co.monterey.ca.us
Napa County District Attorney CEPD@countyofnapa.org	Nevada County District Attorney DA.Prop65@co.nevada.ca.us
Placer County District Attorney Prop65@placer.ca.gov	Plumas County District Attorney davidhollister@countyofplumas.com
Riverside County District Attorney Prop65@rivcoda.org	Sacramento County District Attorney Prop65@sacda.org
San Diego City Attorney CityAttyProp65@sandiego.gov	San Diego County District Attorney SanDiegoDAProp65@sdcda.org
San Francisco County District Attorney alethea.sargent@sfgov.org	San Francisco City Attorney Valerie.Lopez@sfcityatty.org
San Joaquin County District Attorney DA DAConsumer.Environmental@sjcda.org	San Luis Obispo County District Attorney edobroth@co.slo.ca.us
Santa Barbara County District Attorney DAProp65@co.santa-barbara.ca.us	Santa Clara County District Attorney EPU@da.sccgov.org
Santa Cruz County District Attorney Prop65DA@santacruzcounty.us	Sonoma County District Attorney jbarnes@sonoma-county.org
Tulare County District Attorney Prop65@co.tulare.ca.us	Ventura County District Attorney daspecialops@ventura.org
Yolo County District Attorney cfepd@yolocounty.org	

I, Oliver Spector, declare under penalty of perjury that the foregoing is true and correct.



February 12, 2021

2027 Veteran Avenue, Westwood, CA 90025