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Counsel for Plaintiff  
ECOLOGICAL RIGHTS FOUNDATION

ELECTRONICALLY  
**FILED**  
Superior Court of California,  
County of San Francisco

**10/28/2021**  
**Clerk of the Court**  
BY: LAURA SIMMONS  
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SAN FRANCISCO

ECOLOGICAL RIGHTS FOUNDATION,

Plaintiff,

v.

WOLF & ASSOCIATES, INC. DBA AIRWOLF  
3D, 3D SYSTEMS, INC., INGRAM MICRO  
INC., AMAZON.COM INC., & DOES 1 through  
10, inclusive,

Defendants.

Case No.

**CGC-21-596304**

COMPLAINT FOR INJUNCTIVE  
RELIEF AND CIVIL PENALTIES

Health & Safety Code § 25249.5 et seq.

(Other)

Plaintiff, Ecological Rights Foundation (“EcoRights”), in the public interest, based on  
information and belief, and knowledge and investigation of counsel allege as follows:

**INTRODUCTION**

1. This Complaint seeks civil penalties and an injunction against WOLF & ASSOCIATES, INC. DBA AIRWOLF 3D, 3D SYSTEMS, INC., INGRAM MICRO INC., AMAZON.COM INC., and DOES 1 through 10, inclusive (collectively “Defendants”) to remedy continuing failure to provide clear and reasonable warnings to individuals in California about exposures to styrene, a chemical known to the State of California to cause cancer.

1        2. Such exposures have occurred and continue to occur, through the use of (1) filaments -  
2        incorporating a styrene monomer including acrylonitrile-butadiene-styrene (ABS) filaments,  
3        polycarbonate ABS (PC-ABS) filaments, and high impact polystyrene (HIPS) filaments - intended  
4        to be used in the operation of 3D printers and 3D pens, as well as (2) 3D printers intended to be  
5        used with filaments incorporating a styrene monomer – which Defendants manufacture, distribute,  
6        market and/or sell in the State (3D printers and filaments incorporating a styrene monomer and  
7        hereinafter collectively referred to as “Products”).

8        3. When people use filaments incorporating a styrene monomer with 3D printers or 3D pens,  
9        the filaments are heated by the 3D printers or 3D pens and thus release styrene into the air. People  
10       using the filaments incorporating a styrene monomer with 3D printers or 3D pens, and others  
11       present nearby, inhale styrene in the normal course of use.

12       4. Likewise, when people use 3D printers with filaments incorporating a styrene monomer,  
13       the filaments are heated by the 3D printers and thus release styrene into the air. People using the  
14       3D printers in this manner, and others present nearby, inhale styrene in the normal course of use.

15       5. Under California’s Proposition 65, California Health & Safety Code § 25249.5, *et seq.*, it is  
16       unlawful for businesses to knowingly and intentionally expose individuals in California to  
17       chemicals known to the State to cause cancer, birth defects, or other reproductive harm without  
18       providing clear and reasonable warnings to individuals prior to their exposure. Defendants  
19       introduce Products into the California marketplace, exposing Product users to styrene. Despite the  
20       fact that Defendants expose consumers and individuals to styrene, Defendants provide no clear and  
21       reasonable warnings about the exposures to styrene, a listed carcinogen. Defendants’ conduct thus  
22       violates the warning provision of Proposition 65. Health & Safety Code § 25249.6.

23       6.        Plaintiff seeks injunctive relief pursuant to Health & Safety Code Section 25249.7  
24       to compel each Defendant to bring its business practices into compliance with Proposition 65 by  
25       providing a clear and reasonable warning to each individual who has been exposed to styrene from  
26       use of the Products since August 4, 2018, and to those who in the future may be exposed to styrene  
27       from use of the Products. Plaintiff seeks an order that each Defendant identify and locate each  
28       person to whom it conveyed Products since August 4, 2018 and to provide to each such individual,

as well as new purchasers and Product users, a clear and reasonable warning that use of the Products causes exposure to a chemical known to cause cancer.

7. In addition to injunctive relief, Plaintiff seeks civil penalties to remedy Defendants' failure to provide clear and reasonable warnings regarding exposure to a chemical known to cause cancer.

### **PARTIES**

8. Plaintiff Ecological Rights Foundation is a non-profit public benefit organization dedicated to, among other causes, protecting California residents from toxic exposures, environmental and human health education, and consumer rights. Ecological Rights Foundation is incorporated under the laws of the State of California and is a "person" pursuant to Health & Safety Code §25249.11(a). EcoRights brings this enforcement action in the public interest pursuant to Health & Safety Code §25249.7(d).

9. WOLF & ASSOCIATES, INC. DBA AIRWOLF 3D is a person in the course of doing business within the meaning of Health & Safety Code §25249.11(b). WOLF & ASSOCIATES, INC. DBA AIRWOLF 3D manufactures, markets, distributes, and/or sells for use in the State of California filaments incorporating a styrene monomer - including acrylonitrile-butadiene-styrene (ABS) filaments, polycarbonate ABS (PC-ABS) filaments, and high impact polystyrene (HIPS) filaments - intended to be used in the operation of 3D printers and 3D pens.

10. 3D SYSTEMS, INC. is a person in the course of doing business within the meaning of Health & Safety Code §25249.11(b). 3D SYSTEMS, INC. manufactures, markets, distributes, and/or sells for use in the State of California filaments incorporating a styrene monomer - including acrylonitrile-butadiene-styrene (ABS) filaments, polycarbonate ABS (PC-ABS) filaments, and high impact polystyrene (HIPS) filaments - intended to be used in the operation of 3D printers and 3D pens.

11. INGRAM MICRO INC. is a person in the course of doing business within the meaning of Health & Safety Code §25249.11(b). INGRAM MICRO INC. manufactures, markets, distributes, and/or sells for use in the State of California filaments incorporating a styrene monomer - including acrylonitrile-butadiene-styrene (ABS) filaments, polycarbonate ABS (PC-ABS) filaments, and high impact polystyrene (HIPS) filaments - intended to be used in the operation of

1 3D printers and 3D pens.

2 12. AMAZON.COM INC. is a person in the course of doing business within the meaning of  
3 Health & Safety Code §25249.11(b). AMAZON.COM INC. manufactures, markets, distributes,  
4 and/or sells for use in the State of California filaments incorporating a styrene monomer -  
5 including acrylonitrile-butadiene-styrene (ABS) filaments, polycarbonate ABS (PC-ABS)  
6 filaments, and high impact polystyrene (HIPS) filaments - intended to be used in the operation of  
7 3D printers and 3D pens. AMAZON.COM INC. also manufactures, markets, distributes, and/or  
8 sells for use in the State of California 3D printers intended to be used with filaments incorporating  
9 a styrene monomer.

10 13. EcoRights is unaware of the true names and capacities of Defendants DOES 1 through 10,  
11 inclusive, and therefore sues said Defendants under fictitious names. EcoRights will amend its  
12 petition and complaint to show the true names and capacities of Does 1 through 10 when the same  
13 have been ascertained. Each of the Doe Defendants is the agent and/or employee of one of the  
14 other Defendants, and each performed acts on which this action is based within the course and  
15 scope of such Defendants' agency and/or employment. EcoRights is informed and believes and  
16 therefore alleges that each of the Defendants are legally responsible in some manner for the events  
17 and happenings referred to herein.

### 18 **JURISDICTION**

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

24 15. This Court also has jurisdiction over Defendants because each Defendant business has  
25 sufficient minimum contacts in California and within the County of San Francisco. Defendants  
26 intentionally availed itself of the California and San Francisco County markets. It is thus consistent  
27 with traditional notions of fair play and substantial justice for the San Francisco County Superior  
28 Court to exercise jurisdiction over Defendants.

1 16. Venue is proper in San Francisco County Superior Court because one or more of the  
2 violations arise in the County of San Francisco.

3 **BACKGROUND**

4 17. The People of the State of California have declared by initiative under Proposition 65 their  
5 right “[t]o be informed about exposures to chemicals that cause cancer, birth defects, or other  
6 reproductive harm.” Proposition 65, § 1(b). To effectuate this goal, Proposition 65 prohibits  
7 exposing people to chemicals listed by the State of California as known to cause cancer, birth  
8 defects, or other reproductive harm without a “clear and reasonable warning” unless the business  
9 responsible for the exposure can prove that it fits within a statutory exemption. Health & Safety  
10 Code Section 25249.6 states, in pertinent part:

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 18. On April 22, 2016, the State of California officially listed styrene as a chemical known to  
15 cause cancer. On April 22, 2017, styrene exposures became subject to the clear and reasonable  
16 warning requirements under Proposition 65. 27 C.C.R. § 27001(b); Health & Safety Code Section  
25249.10(b).

17 19. Plaintiff brings this enforcement action against Defendants pursuant to Health & Safety  
18 Code Section 25249.7(d). Attached hereto and incorporated by reference is a copy of the Notice of  
19 Violations dated August 4, 2021, (“Notice of Violation”), the date on which EcoRights sent to  
20 California's Attorney General (AG Notice # 2021-01895), every county District Attorney in  
21 California, and to the City Attorneys of every California City with a population greater than  
22 750,000. On the same day, Plaintiff sent a substantively identical letter to each of the Defendants.  
23 In compliance with Health & Safety Code § 25249.7(d) and 27 C.C.R. § 25903(b), each Notice of  
24 Violation included the following information: (1) the name and address of each violator; (2) the  
25 statute violated; (3) the time period during which violations occurred; (4) specific descriptions of  
26 the violations, including (a) the routes of exposure to styrene from the Products, and (b) specific  
27 examples of Products sold and used in violation of Proposition 65; and (5) the name of the specific  
28

1 Proposition 65-listed chemical that is the subject of the violations described in each Notice of  
2 Violation.

3 20. Accompanying each Notice of Violation sent to each Defendant was a summary of  
4 Proposition 65 that was prepared by California's Office of Environmental Health Hazard  
5 Assessment. In addition, the Notices of Violation were accompanied by a Certificate of Service  
6 attesting to the service of the Notice of Violation on each entity which received it. Pursuant to  
7 Health & Safety Code Section 25249.7(d) and 11 C.C.R. § 3101, Plaintiff also sent a Certificate of  
8 Merit with the Notices of Violation attesting to the reasonable and meritorious basis for the action.  
9 Plaintiff enclosed factual information sufficient to establish the basis of the Certificate of Merit  
10 with the Notice of Violation letters sent to the Attorney General.

11 21. None of the public prosecutors with the authority to prosecute violations of Proposition 65  
12 has commenced and/or is diligently prosecuting a cause of action against Defendants under Health  
13 & Safety Code Section 25249.5 *et seq.*, based on the claims asserted in EcoRights' Notice of  
14 Violation.

15 22. Defendants knowingly and intentionally expose individuals to styrene. Under Proposition  
16 65, an exposure is "knowing" where the party responsible for such exposure has "knowledge of the  
17 fact that a[n] . . . exposure to a chemical listed pursuant to [Health & Safety Code § 25249.8(a)] is  
18 occurring. No knowledge that . . . exposure is unlawful is required." 27 C.C.R. § 25102(n). This  
19 knowledge may be either actual or constructive. *See, e.g.*, Final Statement of Reasons Revised  
20 (November 4, 1988) (pursuant to former 22 C.C.R. Division 2, § 12201). At all times since April  
21 22, 2016, the date styrene was listed by the State of California as known to cause cancer,  
22 Defendants have possessed actual and constructive knowledge that the Products contain and cause  
23 exposures to styrene. As a company that manufactures, markets, distributes and/or sells Products  
24 for use in the State of California, each Defendant knows or should know that styrene exposures to  
25 users of the Products are a natural and foreseeable consequence of Defendants' placing the  
26 Products into the stream of commerce. Defendants' knowledge and intent of exposure to styrene  
27 from ordinary use of the Products is also evidenced by Defendants' product manuals and by  
28 additional sources of information, including but not limited to: information provided by

1 Defendants' vendors and suppliers, such as Material Safety Data Sheets; ingredient lists and  
2 warnings; information obtained from industry and trade groups; information obtained from its  
3 consultants and legal counsel; and information obtained from Plaintiff, including the 60-Day  
4 Notice of Violations.

5 23. Any person "violating or threatening to violate" Proposition 65 may be enjoined in any  
6 court of competent jurisdiction. Health & Safety Code § 25249.7. "Threaten to violate" is defined  
7 to mean "to create a condition in which there is a substantial probability that a violation will  
8 occur." Health & Safety Code § 25249.11(e). Proposition 65 provides for civil penalties not to  
9 exceed \$2,500 per day for each violation of the statute.

10 24. EcoRights has engaged in good faith efforts to resolve the claims alleged herein prior to  
11 filing this complaint.

### 12 13 **FIRST CAUSE OF ACTION**

#### 14 **(Violations of Health & Safety Code §25249.6)**

15 25. EcoRights realleges and incorporates the facts and allegations contained in the above  
16 paragraphs as though specifically set forth herein.

17 26. That each Defendant is a person in the course of doing business within the meaning of  
18 Health & Safety Code § 25249.11(b) who, by manufacturing, marketing, distribution, sale or  
19 otherwise placing the Products into the stream of commerce, violated, violates or threatens to  
20 violate Proposition 65.

21 27. Styrene is a chemical listed by the State of California as known to cause cancer.

22 28. Defendants have knowledge and intent that typical use of the Products will expose users of  
23 the Products to styrene.

24 29. Defendants have failed and continue to fail, to provide clear and reasonable warnings  
25 regarding the carcinogenicity of styrene to users of the Products.

26 30. Since August 4, 2018, Defendants have violated Proposition 65 by knowingly and  
27 intentionally exposing individuals to styrene without first giving clear and reasonable warnings to  
28 such individuals regarding the carcinogenicity of styrene.

PRAYER FOR RELIEF

Wherefore, Plaintiff prays for judgment against Defendants as follows:

1. Pursuant to the First Cause of Action, that Defendants be enjoined, restrained, and ordered to comply with the provisions of Section 25249.6 of the California Health & Safety Code;
2. That Defendants be ordered to make best efforts to identify and locate each individual in California to whom it, or its customers or agents, distributed or sold Products since August 4, 2018, and to provide a warning to each such person that use of the Product will expose that person to a chemical known to cause cancer;
3. That Defendants be assessed a civil penalty in an amount equal to \$2,500.00 per day per individual exposed to styrene in violation of Section 25249.6 of the California Health & Safety Code, as the result of Defendants' marketing, distributing, and/or selling the Products for use in California.
4. That, pursuant to Civil Procedure Code § 1021.5, Defendants be ordered to pay to Plaintiff the attorneys' fees and costs it incurred in bringing this enforcement action; and
5. For such other relief as this court deems just and proper.

Dated: October 28, 2021

LAW OFFICES OF BRIAN GAFFNEY APC



Brian Gaffney  
Attorney for Plaintiff  
ECOLOGICAL RIGHTS FOUNDATION



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August 4, 2021

Notice of Violations  
Safe Drinking Water and Toxic Enforcement Act

By Certified Mail, Return Receipt Requested to Violators in U.S.A.  
By Registered Mail to Violators Located Outside U.S.A.  
By First Class U.S. Mail to Public Enforcement Agencies

Dear Public Enforcement Agencies / Violators:

This office and Ecological Rights Foundation (“ERF”) gives you notice that, since at least August 4, 2018 the businesses listed on Attachment A and Attachment C have been, and continue to be, in violation of California Health & Safety Code §25249.6. ERF is a California non-profit corporation dedicated to protecting human and environmental health, including raising awareness of, and reducing exposures to, toxic chemicals.

ERF intends to bring an enforcement action 60 days after effective service of this notice unless the public enforcement agencies have commenced and are diligently prosecuting an action to rectify the violations discussed in this notice letter. The public enforcement agencies that have been served with copies of this notice of violations are identified on the attached Certificate of Service.

This Notice is broken into Section I Filaments and Section II 3D Printers. The remainder of this Notice applies to Filaments and 3D Printers.

**I. FILAMENTS**

The above referenced violations occur when California residents use filaments incorporating a styrene monomer, including acrylonitrile-butadiene-styrene (ABS) filaments, polycarbonate ABS (PC-ABS) filaments, and high impact polystyrene (HIPS) filaments in the operation of 3d printers or 3d pens. These filaments, used in the operation of 3d printers or 3d pens, expose people to styrene, a chemical known to the State of California to cause cancer. Filaments sold by the businesses listed on **Attachment A - Filament Violators** expose consumers and workers to styrene via inhalation.

Examples of particular filament products manufactured, sold, distributed and/or marketed by the violators are attached as **Attachment B - Filaments**. All of the filaments at issue in this notice

can be used with 3d printers or 3d pens. When people use filaments incorporating a styrene monomer with 3d printers or 3d pens, the filaments are heated by the 3D printers or 3d pens and thus release styrene into the air. People using the filaments incorporating a styrene monomer with 3d printers or 3d pens, and others in the same room where such filaments are being used, inhale styrene in the normal course of use.

In addition, exposures in the environmental context occur in the homes, businesses, schools and public locations where the people use filaments incorporating a styrene monomer with 3d printers or 3d pens. Exposures to styrene occur within the consumer and environmental contexts.

The businesses listed on **Attachment A – Filaments** did not and do not provide clear and reasonable warnings to people who use filaments incorporating a styrene monomer, that use of these products in 3d printers or 3d pens will expose them to chemicals known to cause cancer. The above violations have occurred every day since at least August 4, 2018, and will continue every day until clear and reasonable warnings are given.

**Attachment B – Filaments** is a non-exclusive list of examples of these types of filament products. Though specific models or product numbers are given as examples, this Notice also pertains to all models and all variations of filaments incorporating a styrene monomer sold in California. Attachment B is for the recipient's benefit and is not meant to be an exhaustive or comprehensive identification of each specific offending product. It is ERF's position that the alleged Violators are obligated to conduct a good faith investigation into other specific products within the identified category or type that may have been manufactured, distributed, sold, shipped, stored (or otherwise within the notice recipient's custody or control) during the past three years, to ensure that clear and reasonable warnings are provided to California citizens prior to purchase, or retroactively if necessary.

These violations and threatened violations will continue to occur everyday until these businesses either provide clear and reasonable warnings, reformulate their so as not to contain styrene, or stop selling these filaments in California. These violations occur in all of California's 58 counties, both on and off of these businesses' properties.

## II. 3D PRINTERS

The above referenced violations occur when California residents use 3D printers utilizing filaments incorporating a styrene monomer, including acrylonitrile-butadiene-styrene (ABS) filaments, polycarbonate ABS (PC-ABS) filaments, and high impact polystyrene (HIPS) filaments. Use of 3D printers with the above identified filaments expose people to styrene, a chemical known to the State of California to cause cancer. 3D printers sold by the businesses listed on **Attachment C - 3D Printer Violators** expose consumers and workers to styrene via inhalation.

Examples of particular 3D Printers manufactured, sold, distributed and/or marketed by the violators are attached as **Attachment D - 3D Printers**. All of the 3D Printers at issue in this notice can be used with filaments incorporating a styrene monomer, including acrylonitrile-butadiene-styrene (ABS) filaments, polycarbonate ABS (PC-ABS) filaments, and high impact

polystyrene (HIPS) filaments. When people use these 3D printers, the above filaments are heated by the 3D printers and thus release styrene into the air. People using 3D printers utilizing filaments incorporating a styrene monomer, and others in the same room where such 3D printers are being used, inhale styrene in the normal course of use.

In addition, exposures in the environmental context occur in the homes, businesses, schools and public locations where the people use either 3D printers utilizing filaments incorporating a styrene monomer. Exposures to styrene occur within the consumer and environmental contexts.

The businesses listed on **Attachment C - 3D Printer Violators** did not and do not provide clear and reasonable warnings to people who use 3D printers utilizing filaments incorporating a styrene monomer, that use of these products will expose them to chemicals known to cause cancer. The above violations have occurred every day since at least August 4, 2018, and will continue every day until clear and reasonable warnings are given.

**Attachment D – 3D Printers** is a non-exclusive list of examples of these types of products. Though specific models or product numbers are given as examples, this Notice also pertains to all models and all variations of 3D Printers utilizing filaments incorporating a styrene monomer sold in California. Attachment B is for the recipient's benefit and is not meant to be an exhaustive or comprehensive identification of each specific offending product. It is ERF's position that the alleged Violators are obligated to conduct a good faith investigation into other specific products within the identified category or type that may have been manufactured, distributed, sold, shipped, stored (or otherwise within the notice recipient's custody or control) during the past three years, to ensure that clear and reasonable warnings are provided to California citizens prior to purchase, or retroactively if necessary.

These violations and threatened violations will continue to occur everyday until these businesses either provide clear and reasonable warnings, reformulate their 3D printers so as not to use filaments incorporating a styrene monomer, or stop selling these 3D printers in California. These violations occur in all of California's 58 counties, both on and off of these businesses' properties.

### III. Settlement and Responsible Individuals

In keeping with its public interest mission and to expeditiously rectify these ongoing violations of California law, ERF is interested in seeking a constructive resolution of this matter without engaging in costly and protracted litigation.

The following individual is the responsible individual within ERF for purposes of this Notice:

Fredric Evenson  
Ecological Rights Foundation  
P.O. Box 1000  
Santa Cruz, California 95061  
Telephone: (831) 454-8216  
Email: [evenson@ecologylaw.com](mailto:evenson@ecologylaw.com)

ERF has retained the following counsel to represent it in this matter. **Please direct communications to counsel.**

Brian Gaffney  
LAW OFFICES OF BRIAN GAFFNEY APC  
446 Old County Road, Suite 100-310  
Pacifica, California 94044  
(650) 219 3187  
[brian@gaffneylegal.com](mailto:brian@gaffneylegal.com)

IV. Resolution of Noticed Claims:

ERF is interested in seeking a constructive resolution of this matter that advances the public interest without engaging in costly and protracted litigation. ERF is willing to settle this matter to the extent legally possible prior to the commencement of any enforcement action. Settlement terms would require that the unwarned exposures described in this Notice of Violation be stopped. That would require at least the following: 1) a potential recall of products already sold; 2) that either warnings be given to all future purchasers in California of the products subject to this Notice, that the products be reformulated to eliminate the exposures described in the Notice, or that you stop marketing, distributing or selling the products in California; 3) that you locate and provide a warning compliant with 27 Cal. Code Regs Section 25601 to each person who has been subject to the unwarned exposures described in the Notice to the extent those exposures are caused by products that were sold in California during the past three years; and 4) that you pay an appropriate civil penalty based on the factors enumerated in California Health and Safety Code Section 25249(b). It should be noted that ERF cannot finalize any settlement of this matter until 70 days have elapsed since the sending of the Notice and unless no public enforcer has begun an enforcement action concerning the violations described in the Notice. Any settlement on behalf of the public interest must be approved by the California Superior Court on noticed motion with 45 days' notice to the California Attorney General. The Attorney General may appear at any approval hearing and oppose a settlement if he or she believes the proposed settlement is not in the public interest. If you wish to discuss settlement of this matter before ERF files suit, please promptly contact ERF's counsel.

Sincerely,

/S/Brian Gaffney  
Brian Gaffney

Enclosure to Violators "The Safe Drinking Water and Toxic Enforcement Act of 1986: A Summary." A Certificate of Merit is also attached.

### **Attachment A – Filament Violators**

IC3D, Inc.  
Wolf & Associates, Inc. DBA Airwolf 3D  
3DP Unlimited, LLC  
3D Systems, Inc.  
Ingram Micro Inc.  
Amazon.com Inc.

### **Attachment B – Filaments**

<b><u>Proposition 65 Violators - Filaments</u></b>	<b><u>Examples of Products Manufactured, Sold, Distributed and/or Marketed</u></b>
IC3D, Inc.	IC3D 1.75MM ABS 3D PRINTER FILAMENT 2LB GREEN; # X000JJ7J6L
Wolf & Associates, Inc. DBA Airwolf 3D	FLAME RETARDENT ABS, SKU# F25902, UPC # 857842005928
Wolf & Associates, Inc. DBA Airwolf 3D	HIPS, SKU# F09903, UPC # 857842005355
Wolf & Associates, Inc. DBA Airwolf 3D	MG94 ABS, SKU# F06101, UPC # 852971061012
3DP Unlimited, LLC	KIMYA 1.75MM, UPC# 3112539716325, FIL-ABSCF03-175BK
3DP Unlimited, LLC	HIPS 2.85MM, FIL-HIPS01-285BU2-02
3DP Unlimited, LLC	MABS 2.85MM, FIL-MABS01-285RD1-0
3DP Unlimited, LLC	ABSX 2.85MM, FIL-ABSX01-285GYB-0
3D Systems, Inc.	CUBE INDUSTRIAL GRADE, UPC# 840846 100911, LPN N 72019 2606 X11052417-2ABS WHT 401406-01
Ingram Micro Inc.	Airwolf PREMIUM MG94 ABS SERIES FILAMENT 2.88MM NATURAL VPN: F06203SKU: 8XC012
Amazon.com Inc.	Cube 3D Systems, Inc. INDUSTRIAL GRADE, UPC# 840846 100911, LPN N 72019 2606 X11052417-2ABS WHT 401406-01

**Attachment C – 3D Printer Violators**

Robert Bosch Tool Corp

Amazon.com Inc.

**Attachment D – 3D Printers**

<b><u>Proposition 65 Violators -3D Printers</u></b>	<b><u>Examples of Products Manufactured, Sold, Distributed and/or Marketed</u></b>
Robert Bosch Tool Corporation	Dremel Digilab 3D20 3D Printer, Idea Builder for Brand New Hobbyists and Tinkerers, UPC# 080596 053246; catalog# DF45-ECO-W; PART # 26153D01BA
Amazon.com Inc.	Robert Bosch Tool Corporation Dremel Digilab 3D20 3D Printer Idea Builder for Brand New Hobbyists and Tinkerers, UPC# 080596 053246; catalog# DF45-ECO-W; PART # 26153D01BA

### **Certificate of Merit - Health & Safety Code Section 25249.7(d)**

I, Brian Gaffney, hereby declare:

(1) This Certificate of Merit accompanies the attached sixty-day notice(s) 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.

(2) I am the attorney for the noticing party.

(3) 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 alleged exposure to the listed chemical that is the subject of the action.

(4) 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 plaintiff's 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.

(5) 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 persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Date: August 4, 2021

By:

/S/Brian Gaffney  
Brian Gaffney

27 CCR Appendix A  
Appendix A

OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT  
CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY  
THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986  
(PROPOSITION 65): A SUMMARY

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

The text of Proposition 65 (Health and Safety Code Sections 25249.5 through 25249.13) is available online at: <http://oehha.ca.gov/prop65/law/P65law72003.html>. Regulations that provide more specific guidance on compliance, and that specify procedures to be followed by the State in carrying out certain aspects of the law, are found in Title 27 of the California Code of Regulations, sections 25102 through 27001. These implementing regulations are available online at: <http://oehha.ca.gov/prop65/law/P65Regs.html>.

**WHAT DOES PROPOSITION 65 REQUIRE?**

**The "Proposition 65 List."** Under Proposition 65, the lead agency (OEHHA) publishes a list of chemicals that are known to the State of California to cause cancer and/or reproductive toxicity. Chemicals are placed on the Proposition 65 list if they are known to cause cancer and/or birth defects or other reproductive harm, such as damage to female or male reproductive systems or to the developing fetus. This list must be updated at least once a year. The current Proposition 65 list of chemicals is available on the OEHHA website at: [http://www.oehha.ca.gov/prop65/prop65\\_list/Newlist.html](http://www.oehha.ca.gov/prop65/prop65_list/Newlist.html).

Only those chemicals that are on the list are regulated under Proposition 65. Businesses that produce, use, release or otherwise engage in activities involving listed chemicals must comply with the following:

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

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

**DOES PROPOSITION 65 PROVIDE ANY EXEMPTIONS?**

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

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

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

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

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

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

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

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

**HOW IS PROPOSITION 65 ENFORCED?**

Enforcement is carried out through civil lawsuits. These lawsuits may be brought by the Attorney General, any district attorney, or certain city attorneys. Lawsuits may also be brought by private parties acting in the public interest, but only after providing notice of the alleged violation to the Attorney General, the appropriate district attorney and city attorney, and the business accused of the violation. The notice must provide adequate information to allow the recipient to assess the nature of the alleged violation. The notice must comply with the information and procedural requirements specified in Section 25903 of Title 27 and sections 3100-3103 of Title 11. A private party may not pursue an independent enforcement action under Proposition 65 if



one of the governmental officials noted above initiates an enforcement action within sixty days of the notice.

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

A private party may not file an enforcement action based on certain exposures if the alleged violator meets specific conditions. For the following types of exposures, the Act provides an opportunity for the business to correct the alleged violation:

- An exposure to alcoholic beverages that are consumed on the alleged violator's premises to the extent onsite consumption is permitted by law;
- An exposure to a Proposition 65 listed chemical in a food or beverage prepared and sold on the alleged violator's premises that is primarily intended for immediate consumption on- or off- premises. This only applies if the chemical was not intentionally added to the food, and was formed by cooking or similar preparation of food or beverage components necessary to render the food or beverage palatable or to avoid microbiological contamination;
- An exposure to environmental tobacco smoke caused by entry of persons (other than employees) on premises owned or operated by the alleged violator where smoking is permitted at any location on the premises;
- An exposure to listed chemicals in engine exhaust, to the extent the exposure occurs inside a facility owned or operated by the alleged violator and primarily intended for parking non-commercial vehicles.

If a private party alleges that a violation occurred based on one of the exposures described above, the private party must first provide the alleged violator a notice of special compliance procedure and proof of compliance form.

A private party may not file an action against the alleged violator for these exposures, or recover in a settlement any payment in lieu of penalties any reimbursement for costs and attorney's fees, if the notice was served on or after October 5, 2013, and the alleged violator has done *all* of the following within 14 days of being served notice:

- Corrected the alleged violation;
- Agreed to pay a civil penalty of \$500 (subject to change as noted below) to the private party within 30 days; and
- Notified the private party serving the notice in writing that the violation has been corrected.

The written notification to the private-party must include a notice of special compliance procedure and proof of compliance form completed by the alleged violator as directed in the notice. On April 1, 2019, and every five years thereafter, the dollar amount of the civil penalty will be adjusted by the Judicial Council based on the change in the annual **California** Consumer Price Index. The Judicial Council will publish the dollar amount of the adjusted civil penalty at each five-year interval, together with the date of the next scheduled adjustment.

An alleged violator may satisfy these conditions only one time for a violation arising from the same exposure in the same facility or on the same premises. The satisfaction of these conditions does not prevent the Attorney General, a district attorney, a city attorney of a city of greater than 750,000 population, or any full-time city prosecutor with the consent of the district attorney, from filing an enforcement action against an alleged violator. The amount of any civil penalty for a violation shall be reduced to reflect any payment made by the alleged violator for the same alleged violation to a private-party.

A copy of the notice of special compliance procedure and proof of compliance form is included with this notice and can be downloaded from OEHHA's website at: <http://oehha.ca.gov/prop65/law/p65law72003.html>. The notice is reproduced here:

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Date:

Name of Noticing Party or attorney for Noticing Party:

Address:

Phone number:

#### SPECIAL COMPLIANCE PROCEDURE

##### PROOF OF COMPLIANCE

You are receiving this form because the Noticing Party listed above has alleged that you are violating **California Health and Safety Code §25249.6** (Prop. 65).

The Noticing Party may not bring any legal proceedings against you for the alleged violation checked below if:

1. You have actually taken the corrective steps that you have certified in this form
2. The Noticing Party has received this form at the address shown above, accurately completed by you, postmarked within 14 days of your receiving this notice
3. The Noticing Party receives the required \$500 penalty payment from you at the address shown above postmarked within 30 days of your receiving this notice.
4. This is the first time you have submitted a Proof of Compliance for a violation arising from the same exposure in the same facility on the same premises.

#### PART 1: TO BE COMPLETED BY THE NOTICING PARTY OR ATTORNEY FOR THE NOTICING PARTY

The alleged violation is for an exposure to: (check one)

- ☐ Alcoholic beverages that are consumed on the alleged violator's premises to the extent on-site consumption is permitted by law.
- ☐ A chemical known to the state to cause cancer or reproductive toxicity in a food or beverage prepared and sold on the alleged violator's premises for immediate consumption on or off premises to the extent: (1) the chemical was not intentionally added; and (2) the chemical was formed by cooking or similar preparation of food or beverage components necessary to render the food or beverage palatable or to avoid microbiological contamination.
- ☐ Environmental tobacco smoke caused by entry of persons (other than employees) on premises owned or operated by the alleged violator where smoking is permitted at any location on the premises.
- ☐ Chemicals known to the State to cause cancer or reproductive toxicity in engine exhaust, to the extent the exposure occurs inside a facility owned or operated by the alleged violator and primarily intended for parking noncommercial vehicles.

#### IMPORTANT NOTES:

1. You have no potential liability under **California Health and Safety Code §25249.6** if your business has nine (9) or fewer employees.
2. Using this form will NOT prevent the Attorney General, a district attorney, a city attorney, or a prosecutor in whose jurisdiction the violation is alleged to have occurred from filing an action over the same alleged violations, and that in any such action, the amount of civil penalty shall be reduced to reflect any payment made at this time.

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Date :

Name of Noticing Party or attorney for Noticing Party:

Address:

Phone number:

#### PART 2: TO BE COMPLETED BY THE ALLEGED VIOLATOR OR AUTHORIZED REPRESENTATIVE

##### Certification of Compliance

Accurate completion of this form will demonstrate that you are now in compliance with **California Health and Safety Code §25249.6** for the alleged violation listed above. You must complete and submit the form below to the Noticing Party at the address shown above, postmarked within 14 days of you receiving

this notice.

I hereby agree to pay, within 30 days of completion of this notice, a civil penalty of \$500 to the Noticing Party only and certify that I have complied with Health and Safety Code §25249.6 by (check only one of the following):

- ☐ Posting a warning or warnings about the alleged exposure that complies with the law, and attaching a copy of that warning and a photograph accurately showing its placement on my premises;
- ☐ Posting the warning or warnings demanded in writing by the Noticing Party, and attaching a copy of that warning and a photograph accurately its placement on my premises; OR
- ☐ Eliminating the alleged exposure, and attaching a statement accurately describing how the alleged exposure has been eliminated.

**Certification**

My statements on this form, and on any attachments to it, are true, complete, and correct to the best of my knowledge and belief and are made in good faith. I have carefully read the instructions to complete this form. I understand that if I make a false statement on this form, I may be subject to additional penalties under the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65).

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Signature of alleged violator or authorized representative Date

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Name and title of signatory

*FOR FURTHER INFORMATION ABOUT THE LAW OR REGULATIONS...*

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

## CERTIFICATE OF SERVICE

I, Brian Gaffney, declare:

If so called, I could and would testify as follows: I am over eighteen. My business address is 446 Old County Road, Suite 100-310, Pacifica, CA 94044.

On August 4, 2021, I caused the attached

(1) Notice of Violations: California Safe Drinking Water and Toxic Enforcement Act, (2) Certificate of Merit: Health and Safety Code Section 25249.7(d), (3) Appendix A: The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary, (4) Certificate of Service to be served by CERTIFIED MAIL to each private business entity listed on the attached SERVICE LIST-Noticed Parties, except for each private business located outside of the U.S.A. which are served by REGISTERED MAIL. 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.

In addition, on the same date and I caused the attached

(1) Notice of Violations: California Safe Drinking Water and Toxic Enforcement Act, (2) Certificate of Merit: Health and Safety Code Section 25249.7(d), (3) Certificate of Merit (Attorney General Copy): Factual information sufficient to establish the basis of the Certificate of Merit (only sent to the Attorney General), (4) Certificate of Service by FIRST CLASS U.S. MAIL on those public enforcement agencies listed on the attached SERVICE LIST-Public Enforcers. 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, and

and by sending portable document format (PDF) files of the same to the electronic mail addresses to each of the public prosecutors identified by the California Attorney General as having authorized electronic service of notices. These public enforcement agencies appear on the attached Service List with their electronic mail addresses.

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 August 4, 2021, at Pacifica, California.

/S/Brian Gaffney  
Brian Gaffney

## **SERVICE LIST-Public Enforcers**

Alameda District Attorney  
7776 Oakport Street, Suite 650  
Oakland, CA 94621  
[CEPDProp65@acgov.org](mailto:CEPDProp65@acgov.org)

Alpine County District Attorney  
P.O. Box 248  
Markleeville, CA 96120

Amador County District Attorney  
708 Court Street, #202  
Jackson, CA 95642

Butte County District Attorney  
25 County Center Drive  
Oroville, CA 95965

Calaveras District Attorney  
891 Mountain Ranch Rd.  
San Andreas, CA 95249  
[Prop65Env@co.calaveras.ca.us](mailto:Prop65Env@co.calaveras.ca.us)

Colusa County District Attorney  
346 5th Street, Suite 101  
Colusa, CA 95932

Contra Costa Deputy District Attorney  
900 Ward Street  
Martinez, CA 94553  
[sgrassini@contracostada.org](mailto:sgrassini@contracostada.org)

Del Norte County District Attorney  
450 H Street, Room 171  
Crescent City, CA 95531

El Dorado County District Attorney  
515 Main Street  
Placerville, CA 95667

Fresno County District Attorney  
2220 Tulare Street, Suite 1000  
Fresno, CA 93721

Glenn County District Attorney  
P.O. Box 430  
Willows, CA 95988

Humboldt County District Attorney  
825 5th Street, 4th Floor  
Eureka, CA 95501

Imperial County District Attorney  
940 West Main Street, Suite 102  
El Centro, CA 92243

Inyo District Attorney  
168 North Edwards Street  
Independence, CA 93526  
[inyoda@inyocounty.us](mailto:inyoda@inyocounty.us)

Kern County District Attorney  
1215 Truxtun Avenue  
Bakersfield, CA 93301

Kings County District Attorney  
1400 West Lacey Blvd.  
Hanford, CA 93230

Lake County District Attorney  
255 N. Forbes Street  
Lakeport, CA 95453

Lassen Program Coordinator  
220 S. Lassen Street  
Susanville, CA 96130  
[mlatimer@co.lassen.ca.us](mailto:mlatimer@co.lassen.ca.us)

Los Angeles County District Attorney  
211 W. Temple Street, Suite 1200  
Los Angeles, CA 90012

City Attorney  
City of Los Angeles  
200 N. Main Street, Suite 800  
Los Angeles, CA 90012

Madera County District Attorney  
209 West Yosemite Avenue  
Madera, CA 93637

Marin County District Attorney  
3501 Civic Center Drive, Room 130  
San Rafael, CA 94903

Mariposa District Attorney  
P.O. Box 730  
Mariposa, CA 95338  
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Mendocino County District Attorney  
P.O. Box 1000  
Ukiah, CA 95482

Merced District Attorney  
550 West Main Street  
Merced, CA 95340  
[Prop65@countyofmerced.com](mailto:Prop65@countyofmerced.com)

Modoc County District Attorney  
204 S. Court Street Room 202  
Alturas, CA 96101

Mono County District Attorney  
P.O. Box 617  
Bridgeport, CA 93517

Monterey District Attorney  
1200 Aguajito Road  
Monterey , CA 93940  
[Prop65DA@co.monterey.ca.us](mailto:Prop65DA@co.monterey.ca.us)

Napa District Attorney  
1127 First Street, Suite C  
Napa , CA 94559  
[CEPD@countyofnapa.org](mailto:CEPD@countyofnapa.org)

Nevada District Attorney  
201 Commercial Street  
Nevada City , CA 95959  
[DA.Prop65@co.nevada.ca.us](mailto:DA.Prop65@co.nevada.ca.us)

Orange County District Attorney  
401 Civic Center Drive West  
Santa Ana, CA 92701

Oakland City Attorney  
City Hall, 6th Floor  
1 Frank Ogawa Plaza  
Oakland, California 94612

Placer District Attorney  
10810 Justice Center Drive  
Roseville, CA 95678  
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Plumas District Attorney  
520 Main St.  
Quincy, CA 95971  
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Riverside District Attorney  
3072 Orange Street  
Riverside, CA 92501  
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Sacramento District Attorney  
901 G Street  
Sacramento, CA 95814  
[Prop65@sacda.org](mailto:Prop65@sacda.org)

Sacramento City Attorney  
915 I Street, 4th Floor  
Sacramento, CA 95814

San Benito County District Attorney  
419 4th Street  
Hollister, CA 95023

San Bernardino Co. District Attorney  
303 W. Third Street  
San Bernardino, CA 92415

San Diego District Attorney  
330 West Broadway  
San Diego, CA 92101  
[SanDiegoDAProp65@sdcdca.org](mailto:SanDiegoDAProp65@sdcdca.org)

San Diego Deputy City Attorney  
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[CityAttyProp65@sanidiego.gov](mailto:CityAttyProp65@sanidiego.gov)

San Francisco Deputy City Attorney  
1390 Market Street, 7th Floor  
San Francisco, CA 94102  
[Valerie.Lopez@sfcityatty.org](mailto:Valerie.Lopez@sfcityatty.org)

San Francisco Assistant District Attorney  
350 Rhode Island Street  
San Francisco, CA 94103  
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222 E. Weber Avenue, Room 202  
Stockton, CA 95202  
[DAConsumer.Environmental@sjcda.org](mailto:DAConsumer.Environmental@sjcda.org)

San Luis Obispo Deputy District Attorney  
County Government Center Annex, 4th Floor  
San Luis Obispo, CA 93408  
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San Mateo County District Attorney  
400 County Center, Third Floor  
Redwood City, CA 94063

San Jose City Attorney  
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[Proposition65notices@sanjoseca.gov](mailto:Proposition65notices@sanjoseca.gov)

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1112 Santa Barbara St.  
Santa Barbara, CA 93101  
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Santa Clara Supervising Deputy District Attorney  
70 W Hedding St  
San Jose, CA 95110  
[EPU@da.sccgov.org](mailto:EPU@da.sccgov.org)

Santa Cruz District Attorney  
701 Ocean Street  
Santa Cruz, CA 95060  
[Prop65DA@santacruzcounty.us](mailto:Prop65DA@santacruzcounty.us)

Shasta County District Attorney  
1355 West Street  
Redding, CA 96001

Sierra County District Attorney  
P.O. Box 457  
Downieville, CA 95936

Siskiyou County District Attorney  
P.O. Box 986  
Yreka, CA 96097

Solano County District Attorney  
675 Texas Street, Suite 4500  
Fairfield, CA 94533

Sonoma District Attorney  
600 Administration Dr  
Sonoma, CA 95403  
[jbarnes@sonoma-county.org](mailto:jbarnes@sonoma-county.org)

Stanislaus County District Attorney  
832 12th Street, Suite 300  
Modesto, CA 95354

Sutter County District Attorney  
446 Second Street, Suite 102  
Yuba City, CA 95991

Tehama County District Attorney  
P.O. Box 519  
Red Bluff, CA 96080

Trinity County District Attorney  
P.O. Box 310  
Weaverville, CA 96093

Tulare District Attorney  
221 S Mooney Blvd  
Visalia, CA 95370  
[Prop65@co.tulare.ca.us](mailto:Prop65@co.tulare.ca.us)



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423 N. Washington Street  
Sonora, CA 95370

Ventura District Attorney  
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Ventura, CA 93009  
[daspecialops@ventura.org](mailto:daspecialops@ventura.org)

Yolo District Attorney  
301 Second Street  
Woodland, CA 95695  
[cfepd@yolocounty.org](mailto:cfepd@yolocounty.org)

Yuba County District Attorney  
215 Fifth Street, Suite 152  
Marysville, CA 95901

California Attorney General  
<https://oag.ca.gov/prop65/add-60-day-notice>

## Service List – Noticed Violators

Jeffrey A. Graves, CEO  
3D Systems, Inc.  
333 Three D Systems Circle  
Rock Hill, SC 29730

President or CEO  
3DP Unlimited, LLC DBA 3D Platform  
6402 Rockton Road  
Roscoe, IL 61073-0000

President or CEO  
3DP Unlimited, LLC DBA 3D Platform  
1700 Lincoln St., #2000  
Denver, CO, 80203

President or CEO  
Amazon.com, Inc.  
410 Terry Ave. N.  
Seattle, WA 98109-5210

President or CEO  
IC3D, Inc.  
2450 Beverly Ave. Apt. 1  
Los Angeles, CA 90405

President or CEO  
IC3D, Inc.  
1697 Westbelt Dr.  
Columbus, OH 43228

Alain Monie, CEO  
Ingram Micro Inc.  
3351 Michelson Dr. Ste. 100  
Irvine, CA 92612

President or CEO  
Robert Bosch Tool Corporation  
2800 S. 25th Ave.  
Broadview, IL 60126

President or CEO  
Wolf & Associates, Inc. DBA Airwolf 3D  
11207 Young River Ave.  
Fountain Valley, CA 92708

President or CEO  
Wolf & Associates, Inc. DBA Airwolf 3D  
6580 Spencer St. #B4  
Las Vegas, NV 89119