



May 7, 1998

**TO: Service List Attached**

**Re: 60-Day Notice under Proposition 65 for Failure to Warn About Chemicals  
Listed Pursuant to Health and Safety Code Section 25249.6**

Dear Prosecutor:

This firm represents The Working Group on Carcinogens and Immune Suppressing Chemicals ("CISC"). This letter is to serve as notification that the companies on the attached list have violated the warning requirement of Proposition 65.

By manufacturing, and/or distributing, and/or selling fluorescent light bulbs, these companies have exposed and continue to expose numerous individuals within the surrounding area to the following chemicals: Mercury, Methylmercury, and/or other Mercury Compounds. Methylmercury has been listed as a Proposition 65 carcinogen since May 1, 1996. Mercury and Mercury Compounds (which include Methylmercury) have been listed as a Proposition 65 as a developmental toxin since July 1, 1990. As such, violations of Proposition 65 are ongoing and continuous.

As to workers, the exposed individuals include, but are not limited to, maintenance and/or custodial employees at facilities who dispose of fluorescent lights, as well as other individuals who work in such facilities in other capacities, and all workers who come in contact with fluorescent lights from the time they are disposed of until after they reach a landfill or other waste repository.

As to Consumers, fluorescent lights expose individuals to Mercury and Methylmercury compounds when a fluorescent light is intentionally or accidentally broken.

While in the course of doing business, these companies have in the past, and continue to, knowingly and intentionally expose members of the public to mercury without first giving clear and reasonable warning to such persons pursuant to Health & Safety Code §25249.6. The routes of exposure are ingestion, inhalation, and dermal contact.



May 7, 1998

Page 2 of 2

Flourescent lights also cause Mercury and Methylmercury Compounds to be released into drinking water in violation of Proposition 65 (Health & Safety Code §25249.5). Flourescent bulbs are deposited in landfills. Upon breakage of the bulb, mercury is discharged into the environment, thereby causing contamination of numerous sources of drinking water which sources are specified in Attachment "A" to this notice. This Company has known and continues to know of such discharge.

Proposition 65 requires that notice of intent to sue be given to violator 60 days prior to the filing of the suit. Accordingly, as the listed companies have been served with notices separately, this letter will serve as CISC's notice of alleged violations to the appropriate governmental authorities. This notice covers all violations of Proposition 65 that are currently known to CISC from information available at this time.

Notice is given to appropriate city, county and state agencies, as well as the specific companies listed herein. If you should have any comments or questions regarding this matter, please do not hesitate to contact our offices.

Very truly yours,

LAW OFFICES OF SHAWN KHORRAMI

By:  \_\_\_\_\_  
SHAWN KHORRAMI

## LIST OF COMPANIES

Osram Sylvania Products  
Inc.  
c/o CT Corporation System  
Registered Agent  
818 West Seventh Street  
Los Angeles, CA 90017

Dean T. Langford  
Chairman  
Osram Sylvania Inc.  
100 Endicott Street  
Danvers, MA 01923

CT Corporation System  
Registered Agent  
Osram Sylvania Inc.  
818 West Seventh Street  
Los Angeles, CA 90017

Dean T. Langford  
Chairman  
Sylvania Lighting Services  
Corp.  
100 Endicott Street  
Danvers, MA 01923

CT Corporation System  
Registered Agent  
Sylvania Lighting Services  
Corp.  
818 West Seventh Street  
Los Angeles, CA 90017

John P. Welch, Jr.  
Chairman  
General Electric Company  
3135 Easton Turnpike  
Fairfield, CT 06431

CT Corporation System  
Registered Agent  
General Electric Company  
818 West Seventh Street  
Los Angeles, CA 90017

General Electric Company  
Lighting Headquarters  
1975 Noble Road  
Cleveland, OH 44112

Stephen C. Tumminello  
Chairman  
Philips Electronics North  
America Corporation  
100 E. 42<sup>nd</sup> Street  
New York, NY 10017

CT Corporation System  
Registered Agent  
Philips Electronics North  
America Corporation  
818 West Seventh Street  
Los Angeles, CA 90017

Westinghouse Electric  
Corporation  
c/o CT Corporation System  
Registered Agent  
818 West Seventh Street  
Los Angeles, CA 90017

Usman Vakil  
Chairman  
Lights of America, Inc.  
611 Reyes Drive  
Walnut, CA 91789

Rona Singer  
Registered Agent  
Lights of America, Inc.  
Pueente Hills Business  
Center  
17890 Castleton Street,  
Suite 350  
City of Industry, CA 91748

Ron Richard  
Chairman  
Panasonic Technologies,  
Inc.  
2 Research Way 3<sup>rd</sup> Floor  
Princeton, NJ 08540

CT Corporation System  
Registered Agent  
Panasonic Technologies,  
Inc.  
818 West Seventh Street  
Los Angeles, CA 90017

General Counsel  
Panasonic USA  
One Panasonic Way  
Secaucus, NJ 07094

Aaron Feit  
Chairman  
Feit Electric Company, Inc.  
4901 Gregg Road  
Pico Rivera, CA 90660

ATTN: General Counsel  
Candex Company  
1928 Tyler Avenue, Unit N  
South El Monte, CA 91733

William B. Willruth  
Chairman  
Specialty Lamp  
International West, Inc.  
1419 West Newport Center  
Drive  
Deerfield Beach, FL 33442

ATTN: General Counsel  
AAMSCO Lighting  
P.O. Box 15119  
Jersey City, New Jersey  
07305

Raymond Angelo  
Chairman  
Angelo Brothers Co.  
12401 McNulty Road  
Philadelphia, PA 19154

Carl Thon  
Registered Agent  
14911 Valley View Drive  
Santa Fe Springs, CA 90630

Registered Agent  
Angelo Brothers Company  
International  
10981 Decatur Road  
Philadelphia, PA 19154

ATTN: General Counsel  
Literonics International Inc.  
4101 West 123rd Street  
Alsip, IL 60658

ATTN: General Counsel  
Interlectric Corporation  
1401 Lexington Avenue  
Warren, PA 16365

ATTN: General Counsel  
Verilux, Inc.  
9 Viaduct Road  
Stamford, CT 06907

Atsuo Iino  
Chairman and Registered  
Agent  
Ushio America, Inc.  
10550 Camden Drive  
Cypress, CA 90630

ATTN: General Counsel  
Promolux, div MG V Inc.  
PO Box 40  
Shawnigan Lake, BC V0R  
2W0  
Canada

ATTN: General Counsel  
Voltarc Technologies Inc.  
400 Captain Neville Drive  
Waterbury, CT 06705

**LIST OF COMPANIES**

Roger E. Peterson  
Chairman  
Ace Hardware Corporation  
2200 Kensington Court  
Oak Brook, IL 60521

Allan P. Sherman  
Chairman  
HomeBase, Inc.  
3345 Michelson Dr.  
Irvine, CA 92612

Daniel A. Cotter  
CEO  
TruServ Corporation  
8600 W. Bryn Mawr Ave.  
Chicago, IL 60631

CT Corporation System  
Registered Agent  
Ace Hardware Corporation  
818 West Seventh Street  
Los Angeles, CA 90017

CT Corporation System  
Registered Agent  
HomeBase, Inc.  
818 West Seventh Street  
Los Angeles, CA 90017