ENVIRONMENTAL WORLD WATCH, INC.
8707-D LINDLEY AVENUE, SUITE 124
NORTHRIDGE, CALIFORNIA 91325

APRIL 4, 2003

NOTICE OF VIOLATION OF THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986
(California Health and Safety Code §25249.5*et seq.*)

TO
KRAFT FOODS INC.
KRAFT FOODS NORTH AMERICA, INC.

First Class Mail-Proof of Service Attached

TO THE PARTIES LISTED ON THE
ATTACHED DISTRIBUTION LIST

Re: **Post Cereal Products**
- Honey-Comb

Dear Sir or Madam:

Environmental World Watch, Inc. (the "Noticing Party") serves this Notice of Violation ("Notice") upon Kraft Foods Inc. and Kraft Foods North America, Inc. (hereinafter "Kraft Foods") pursuant to and in compliance with California Health and Safety Code ("H&S Code") §25249.7(d) and 22 California Code of Regulations ("CCR") §12903. This Notice satisfies a prerequisite for Noticing Party to commence an action against General Mills to enforce the Safe Drinking Water and Toxic Enforcement Act of 1986. The violations addressed by this Notice occur in every county and city in California. This Notice is being served upon each violator, the California Attorney General, the district attorney of every California county and the city attorney of every California city with a population (according to the most recent decennial census) of over 750,000. If Kraft Foods has a current registration with the California Secretary of State that identifies a Chief Executive Officer, President, or General Counsel, this Notice is being addressed to, and served upon, one of those persons.

Attached as Exhibit A to this Notice is a copy of "The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary." The attached Summary was prepared by the California EPA and provides general information about the Safe Drinking Water and Toxic Enforcement Act of 1986. Copies of the Summary are not required to be, and are not being, provided to the public enforcement agencies.

Description of the Noticing Party, the Alleged Violator, and the Alleged Violations Addressed by this Notice:

- This Notice is provided by Environmental World Watch, Inc. Environmental World Watch, Inc. (hereinafter "EWW"), is based in Los Angeles and is registered as a Delaware corporation with the office of the California Secretary of State. EWW is acting in the public interest pursuant to H&S Code §25249.7(d), and is dedicated to protecting the environment, improving human health and supporting environmentally sound practices.

- The violators' names and addresses are: Kraft Foods Inc.
  Kraft Foods North America, Inc.
  Three Lakes Drive
  Northfield, IL 60093

- The violations addressed by this Notice began on or after January 1, 1991, have occurred on numerous occasions each and every day since January 1, 1991, and are ongoing and continuing.

- This Notice of Violation covers the "warning provision" of Proposition 65, which is found at H&S Code §25249.6.

- The name of each chemical that is listed pursuant to the Safe Drinking Water and Toxic Enforcement Act of 1986 involved in the violations addressed by this Notice is Acrylamide; (the "Listed Chemical"). The Listed Chemical is listed (and has been so listed for more than twelve months) by the Governor of the State of California as being a chemical known to the State of California to cause cancer or reproductive toxicity, or both cancer and reproductive toxicity. See Exhibit B attached hereto.

- The route of exposure for the violations addressed by this Notice is ingestion. There is also a danger of a dermal exposure while preparing the product for consumption.

- The type of consumer products causing the exposures addressed by this Notice are breakfast cereals, including but not limited to, the following illustrative products:

TABLE A

Post Honey-Comb Cereal

- There are numerous sources of the exposures addressed in this Notice. These exposures occur in homes, the workplace and everywhere else in California where these products are consumed. These exposures occur principally off the property of the Noticed Company.

- In the course of doing business, Kraft Foods has knowingly and intentionally exposed, and continues to expose, individuals (especially pregnant and post-partum women) to the Listed Chemical. No clear and reasonable warning is or has been provided by Kraft Foods to individuals regarding exposure to the Listed Chemical or regarding the fact that the Listed Chemical is known to the State of California to be a carcinogen, reproductive toxicant, or both a carcinogen and reproductive toxicant.

- These exposures have gone on from 1991 and are ongoing and continuing as EWW believes and so alleges that Kraft Foods has tolled the statute of limitations by fraudulent concealment of the constituents of the ingredients in their products from those persons that required warning in the stores where Kraft Foods products are sold for consumer consumption in California. The labels on these products are further absent any warning that would meet the definition delineated at Title 22 CCR §12601(b)(1)(A), nor do they comply with section (b)(3) and (b)(4)(B) of that regulation.

- The carcinogen, contained in the ingredients of the products, and subject to the warning requirements of H&S Code §25249.6 and more specifically 22 CCR §12601(b) *et seq.* are listed below:

  1. Acrylamide

- The aforementioned carcinogen is on the Governor's list (Prop 65 List) as expressed at 22 CCR §12000. These chemicals are known to the State of California to cause carcinogenic harm to humans requiring special warning labels and care in handling and use. The concentrations of these toxins in the subject consumer food product exceed the No Significant Risk Level ("NSRL") threshold of 0.2 microgram per day and require a warning of the existence of this chemical danger by the manufacture.

- The principal route of exposure is through a "consumer products exposure" via ingestion and inhalation. There is a further danger of contacting these carcinogens via a dermal exposure while using the food product as intended by the manufacture. This exposure has gone on since January 1, 1991, and are ongoing and continuing at every place in California that the products listed in TABLE A are offered for sale and consumption. All references to "exposure" in this notice shall be understood to be exposures to the specific product lines in said TABLE and the ingredients of those products. The sale of these products constitutes a transfer of a known carcinogenic chemical into the populous and the normal consumption of the product by the purchaser or others will cause the exposure without a clear and reasonable warning.

- The location of these alleged exposures are many and varied while occurring within the 58 counties of the state of California as evidenced by the District Attorneys addressed in the enclosed distribution list. EWW believes and so alleges that at least one of the jurisdictions identified had Kraft Foods products sold within that county by a Kraft Foods retail distributor and that sale caused the utilization of the consumer food product and subsequent exposure. Further that usage caused exposures in that jurisdiction to the constituents of the consumer food product as identified herein, and those exposures by Kraft Foods were allowed to take place without the prerequisite warnings as delineated by the applicable statutes specified in this notice.

Please direct any inquiries regarding this notice or any communication with the responsible party William Dunlap for the noticing entity, Environmental World Watch, Inc. to:

Roger Lane Carrick, Esq.
The Carrick Law Group, P.C.
350 S. Grand Avenue, Suite 2930
Los Angeles, CA 90071
Tel.: (213) 346-7930
Fax: (213) 346-7931

EXHIBIT B
NOTICED PARTIES:

KRAFT FOODS INC.
KRAFT FOODS NORTH AMERICA, INC.

List Of Chemicals Contained In The Attached 60-Day Notice of Violation That Are Listed By The Governor Of The State Of California As Being Known To The State Of California To Cause Cancer Or Reproductive Toxicity

CARCINOGENS

Chemical	CAS No.	Date Added to List
Acrylamide	79061	January 1, 1990

REPRODUCTIVE TOXINS

Chemical	CAS No.	Date Added to List

CERTIFICATE OF MERIT

HEALTH AND SAFETY CODE SECTION 25249.7(d)

• ACRYLAMIDE

NOTICED PARTY:

KRAFT FOODS INC.
KRAFT FOODS NORTH AMERICA, INC.

I, Roger Lane Carrick, on behalf of Environmental World Watch, Inc. hereby declare:

This Certificate of Merit accompanies the attached sixty-day notice(s) in which it is alleged that the parties identified in the notices have violated California 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 exposure to the listed chemical(s) that is the subject of this action.

4. Based upon the information obtained through those consultations, and 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 private action" means that the information provides a credible basis that all the elements of the plaintiffs' case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute.

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 24249.7(h)(2), *i.e.*, (1) the identity of the person consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

CERTIFICATE OF SERVICE

I am over the age of 18 and not a party to this case. I am a resident of or employed in the county where the mailing occurred. My business address is 350 S. Grand Avenue, Suite 2930, Los Angeles, CA 90071-3406.

On April 4, 2003, I served copies of the documents listed immediately hereafter by first class mail by placing same in sealed envelopes, fully preparing postage thereon, and depositing said envelopes in the U.S. Mail at Los Angeles, California. Said envelopes were addressed as follows:

SEE ATTACHED DISTRIBUTION LIST
(sent via certified mail with applicable postage to those parties listed with an asterisk)

Documents mailed:

1. **NOTICE OF VIOLATION OF THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (California Health and Safety Code §25249.5 et seq.)**

   TO: Kraft Foods Inc.
   Kraft Foods North America, Inc.
   Three Lakes Drive
   Northfield, IL 60093

2. **THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY (only sent to those parties listed with an asterisk)**

3. **CERTIFICATE OF MERIT – (attachments only sent to California Attorney General's Office)**

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 April 4, 2003, at Los Angeles, California.

Kimberly A.K. Burgo

DISTRIBUTION LIST

*Betsy D. Holden
Co-CEO - Kraft Foods
Pres. & CEO - Kraft Foods North America
or current CEO/Pres./Gen. Counsel
Kraft Foods Inc.
Kraft Foods North America, Inc.
Three Lakes Drive
Northfield, IL 60093

By Certified Mail –
Return Receipt Requested

*Roger K. Deromedi
Co-CEO
or current CEO/Pres./Gen. Counsel
Kraft Foods Inc.
Three Lakes Drive
Northfield, IL 60093

By Certified Mail –
Return Receipt Requested

*Calvin J. Collier
Senior VP, Gen. Counsel & Sec.
or current CEO/Pres./Gen. Counsel
Kraft Foods Inc.
Three Lakes Drive
Northfield, IL 60093

By Certified Mail –
Return Receipt Requested

*Registered Agent for Service of Process
CT Corporation System
818 W. Seventh Street
Los Angeles, CA 90017

By Certified Mail –
Return Receipt Requested

CALIFORNIA ATTORNEY GENERAL
CA Department of Justice
PROP. 65 ENFORCEMENT REPORTING
Attn: Prop 65 Coordinator
1515 Clay Street, Suite 2000
Post Office Box 70550
Oakland, CA 94612-0550

By Certified Mail –
Return Receipt Requested

*Registered Agent for Service of Process
CT Corporation System
208 S. LaSalle Street
Chicago, IL 60604-1136

By Certified Mail –
Return Receipt Requested

San Francisco City Attorney's Office
City Hall, Room 234
San Francisco, CA 94102

Los Angeles City Attorney's Office
1800 City Hall East
200 N. Main Street
Los Angeles, CA 90012

San Diego City Attorney's Office
Civic Center Plaza
1200 3rd Avenue, Suite 1200
San Diego, CA 92101

Office of the District Attorney of
Alameda County
1225 Fallon Street, Room 900
Oakland, CA 94612

San Jose City Attorney's Office
151 West Mission Street
San Jose, CA 95110

Office of the District Attorney of
Amador County
708 Court Street, Room 202
Jackson, CA 95642

Office of the District Attorney of
Butte County
Administration Building
25 County Center Drive
Oroville, CA 95965

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

Office of the District Attorney of
Colusa County
547 Market Street
Colusa, CA 95932

Office of the District Attorney of
Contra Costa County
PO Box 670
Martinez, CA 94553

Office of the District Attorney of
Calaveras County
County Government Center
891 Mountain Ranch Road
San Andreas, CA 95249

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

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

Office of the District Attorney of
Imperial County
County Courthouse, Rm. 202
939 W. Main Street
El Centro, CA 92243

Office of the District Attorney of
Kings County
Government Center
1400 West Lacey Boulevard
Hanford, CA 93230

Office of the District Attorney of
Los Angeles County
18000 Criminal Courts Building
210 W. Temple Street
Los Angeles, CA 90012

Office of the District Attorney of
Mariposa County
P.O. Box 748
Mariposa, CA 95338

Office of the District Attorney of
Modoc County
County Courthouse
P.O. Box 1171
Alturas, CA 96101

Office of the District Attorney of
Napa County
931 Parkway Mall
Napa, CA 94559

Office of the District Attorney of
Placer County
11562 "B" Avenue, DeWitt Center
Auburn, CA 95603

Office of the District Attorney of
Sacramento County
901 "G" Street
P.O. Box 749
Sacramento, CA 95814

Office of the District Attorney of
Del Norte County
County Courthouse
450 H Street, Suite 171
Crescent City, CA 95531

Office of the District Attorney of
Glenn County
540 W. Sycamore Street
P.O. Box 430
Willows, CA 95988

Office of the District Attorney of
Inyo County
168 N. Edwards Street
P.O. Drawer D
Independence, CA 93526

Office of the District Attorney of
Lake County
255 N. Forbes Street, Ste. 424
Lakeport, CA 95453

Office of the District Attorney of
Madera County
209 W. Yosemite Avenue
Madera, CA 93637

Office of the District Attorney of
Mendocino County
County Courthouse
P.O. Box 1000
Ukiah, CA 95482

Office of the District Attorney of
Mono County
County Courthouse
P.O. Box 617
Bridgeport, CA 93517

Office of the District Attorney of
Nevada County
Courthouse Annex
201 Church Street, Suite 8
Nevada City, CA 95959-2504

Office of the District Attorney of
Plumas County
520 Main Street, Room 404
P.O. Box 10716
Quincy, CA 95971

Office of the District Attorney of
Humboldt County
825 Fifth Street
Eureka, CA 95501

Office of the District Attorney of
Kern County
1215 Truxtun Avenue, 4th Floor
Bakersfield, CA 93301

Office of the District Attorney of
Lassen County
County Courthouse
220 S. Lassen Street, Ste. 8
Susanville, CA 96130

Office of the District Attorney of
Marin County
Hall of Justice, Room 183
3501 Civic Center Drive
San Rafael, CA 94903

Office of the District Attorney of
Merced County
2222 "M" Street
Merced, CA 95340

Office of the District Attorney of
Monterey County
240 Church Street
Salinas, CA 93901

Office of the District Attorney of
Orange County
700 Civic Center Drive West, 2nd Floor
P.O. Box 808
Santa Ana, CA 92702

Office of the District Attorney of
Riverside County
4075 Main Street, 1st Floor
Riverside, CA 92501

Office of the District Attorney of
San Bernardino County
316 N. Mountain View Avenue
San Bernardino, CA 92415-0004

Office of the District Attorney of
San Diego County
330 West Broadway, Ste. 1320
San Diego, CA 92112

Office of the District Attorney of
San Luis Obispo County
1050 Monterey Street, Room 450
San Luis Obispo, CA 93408

Office of the District Attorney of
Santa Clara County
70 West Hedding Street, West Wing
San Jose, CA 95110

Office of the District Attorney of
Sierra County
County Courthouse
P.O. Box 457
Downieville, CA 95936

Office of the District Attorney of
Sonoma County
Hall of Justice
600 Administration Drive, Room 212-J
Santa Rosa, CA 95403

Office of the District Attorney of
Tehama County
County Courthouse
P.O. Box 519
Red Bluff, CA 96080-0519

Office of the District Attorney of
Tuolumne County
2 South Green Street
Sonora, CA 95370

Office of the District Attorney of
San Benito County
419 4th Street
Hollister, CA 95023-3801

Office of the District Attorney of
San Francisco County
Hall of Justice
880 Bryant Street
San Francisco, CA 94103

Office of the District Attorney of
San Mateo County
400 County Center, 3rd Floor
Redwood City, CA 94063

Office of the District Attorney of
Santa Cruz County
701 Ocean Street, Ste. 200
Santa Cruz, CA 95061

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

Office of the District Attorney of
Stanislaus County
1100 I Street, Room 200
P.O. Box 442
Modesto, CA 95353

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

Office of the District Attorney of
Yolo County
204 4th Street
Woodland, CA 95695

Office of the District Attorney of
San Joaquin County
222 E. Weber, Room 202
P.O. Box 990
Stockton, CA 95201

Office of the District Attorney of
Santa Barbara County
1105 Santa Barbara Street
Santa Barbara, CA 93101

Office of the District Attorney of
Shasta County
1525 Court Street, Third Floor
P.O. Box 1320
Redding, CA 96001-1632

Office of the District Attorney of
Solano County
600 Union Avenue
Fairfield, CA 94533

Office of the District Attorney of
Sutter County
Courthouse Annex Box 1555
446 Second Street
Yuba City, CA 95991

Office of the District Attorney of
Tulare County
County Civic Center
2350 Burrel Avenue, Room 224
Visalia, CA 93291-4593

Office of the District Attorney of
Ventura County
800 South Victoria Avenue, Rm. 314
Ventura, CA 93009

Office of the District Attorney of
Yuba County
County Courthouse
215 - 5th Street
Marysville, CA 95901