VIA U.S. MAIL

60-Day Notice of Intent to Sue Under Health & Safety Code section 25249.6

Environmental World Watch, Inc. [Noticing Party] provides this notice, whose contact for the purpose of this notice is Reuben Yeroushalmi, Esq., Yeroushalmi & Associates, 3700 Wilshire Blvd. Ste. 480, Los Angeles, CA 90010, 213-382-3183 (a responsible individual within the noticing entity for purposes of Cal. Code Regs., tit. 22, § 12903(b)(2)(A)(1)). Environmental World Watch believes that **Swissport Cargo Services, Inc. (a.k.a. Swissport International Ltd.) (a.k.a. Swissport USA, Inc.),** (Violator") has violated The Safe Drinking Water and Toxic Enforcement Act (Health & Saf. Code, § 25249.5, et seq.) ("Proposition 65") during the period referenced below.

I. BACKGROUND AND ALLEGATIONS

Violator has exposed persons to jet engine exhaust, which contains the chemicals listed below and designated to cause cancer or reproductive toxicity ("Covered Chemicals"), pursuant to California Code of Regulations, title 22, section 12000, without first giving clear and reasonable warning of such to the exposed persons pursuant to Proposition 65.

PERIOD OF VIOLATION

From: October 27, 2001 Through October 27, 2005 and continuing thereafter.

Environmental Exposures

During the period referenced above, Violator exposed persons to jet engine exhaust. The exposures occurred when Violator landed its airplanes, during the process of refueling, while passengers exited the airplanes, while Violator maintained the airplanes, while passengers boarded Violator's airplanes, while the airplanes taxied, and during take-off. Exposed persons included people visiting and working at the airports listed in Exhibit A, including passengers, police and security personnel, catering personnel, and food service delivery personnel. Violator exposed these persons to the Covered Chemicals contained in jet engine exhaust without first giving clear and reasonable warning of such pursuant to Proposition 65. The sources of exposures included inhalation caused by the exposed persons inhaling and breathing the ambient air containing jet engine exhaust while traversing runway areas and jet bridges at the airports found in Exhibit A. Some of the exposures for which a warning is required occurred near the terminal where Violator docks its airplanes. Exposures occurred at each of the airports listed in Exhibit A.

Occupational Exposures

During the period referenced above, Violator exposed its employees to jet engine exhaust. The exposures occurred when Violator landed its airplanes, during the process of refueling, while passengers exited the airplanes, while the airplanes received maintenance, while passengers boarded Violator's airplanes, while the airplanes taxied, and during take-off, or any other time while Violator operated its airplanes on or near the ground. Exposed employees included baggage handlers, maintenance workers, pilots, flight attendants, and cleaning personnel. Violator exposed these employees to the Covered Chemicals contained in jet engine exhaust without first giving clear and reasonable warning of such pursuant to Proposition 65. The sources of exposures included inhalation caused by the exposed employees inhaling and breathing the ambient air, which contained jet engine exhaust, while the airplanes were on the runway, at the terminal, and while the airplanes were taxiing at the airports listed

in Exhibit A. Exposures occurred at each of the airports listed in Exhibit A.

This notice alleges the violation of Proposition 65 concerning occupational exposures governed by the California State Plan for Occupational Safety and Health. The State Plan incorporates the provisions of Proposition 65, as approved by Federal OSHA on June 6, 1997.

This notice alleges the violation of Proposition 65 with respect to occupational exposures governed by the California State Plan for Occupational Safety and Health. The State Plan incorporates the provisions of Proposition 65, as approved by Federal OSHA on June 6, 1997. This approval specifically placed certain conditions with regard to occupational exposures on Proposition 65, including that it does not apply to the conduct of manufacturers occurring outside the State of California. The approval also provides that an employer may use the means of compliance in the general hazard communication requirements to comply with Proposition 65. It also requires that supplemental enforcement is subject to the supervision of the California Occupational Safety and Health Administration. Accordingly, any settlement, civil complaint, or substantive court orders in this matter must be submitted to the Attorney General.

For each type and means of exposure, Violator has exposed the above referenced persons to:

CARCINOGENS

Benz[a]anthracene	Chrysene	Benzo[a]pyrene	Indeno[1,2,3-cd]pyrene
Formaldehyde (gas)	Acetaldehyde	Naphthalene	Benzene
Ethylbenzene	Benzo[b]fluoranthene	Benzo[k]fluoranthene	Dibenz[a,h]anthracene
1,3-Butadiene			

REPRODUCTIVE TOXINS

Toluene	Carbon Monoxide	1,3-Butadiene	Benzene

Proposition 65 requires that notice and intent to sue be given to the violator(s) 60 days before the suit is filed. With this letter, **Environmental World Watch** gives notice of the alleged violations to Violator and the appropriate governmental authorities. In absence of any action by the appropriate governmental authorities within 60 days of the sending of this notice, **Environmental World Watch** may file suit. This notice covers all violations of Proposition 65 that **Environmental World Watch** currently knows of from information now available to it. The copy of this notice submitted to Violator includes a copy of *The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary.*

Dated: 10-27-2005

By:

REUBEN YEROUSHALMI
Attorney for
Environmental World Watch, Inc.

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 mailin occurred. My business address is 3700 Wilshire Boulevard, Suite 480, Los Angeles, CA 90010.

I SERVED THE FOLLOWING:

1) 60-Day Notice of Intent to Sue Under Health & Safety Code Section 25249.6
2) Certificate of Merit: Health and Safety Code Section 25249.7(d)
3) Certificate of Merit: Health and Safety Code Section 25249.7(d) *Attorney General Copy* (*only sent to Attorn General*)
4) The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary

by enclosing a true copy of the same, along with an unsigned copy of this declaration, in a sealed envelope addressed to each person shown below and depositing the envelope in the United States mail with the postage fully prepaid.

Place of Mailing: Los Angeles, CA

NAME AND ADDRESS OF EACH VIOLATOR TO WHOM DOCUMENTS WERE MAILED:

Swissport Cargo Services, Inc. (a.k.a. Swissport International Ltd.) (a.k.a. Swissport USA, Inc.)
Joseph In Albon, President & CEO
Eric Bodenmann, President & CEO
Flughofstrasse 55, 2nd Floor
Glattbrugg 8152
Switzerland

NAME AND ADDRESS OF EACH PUBLIC PROSECUTOR TO WHOM DOCUMENTS WERE MAILED:

San Francisco City Attorney # 1 Dr. Carlton B. Goodlett Place, Suite 234 San Francisco, CA 94102	San Francisco County District Attorney 850 Bryant St, Rm 322 San Francisco, CA 94103	Office of the Attorney General P.O. Box 70550 Oakland, CA 94612-0550
San Diego County District Attorney 330 W. Broadway, Ste 1300 San Diego, CA 92101-3803	San Diego City Attorney City Center Plaza 1200 3rd Ave # 1100 San Diego, CA 92101	Los Angeles County District Attorney 210 W Temple St, 18th Floor Los Angeles, CA 90012
Los Angeles City Attorney 200 N Main St Ste 1800 Los Angeles CA 90012	Santa Clara County District Attorney 70 W Hedding St. San Jose, CA 95110	San Jose City Attorney 151 W. Mission St. San Jose, CA 95110
Alameda County District Attorney 1225 Fallon St, Room 900 Oakland, CA 94612	San Joaquin County District Attorney PO Box 990 Stockton, CA 95201 -0990	

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: 10-27-2005

By: _____

David P. Kashani

CERTIFICATE OF MERIT

Health and Safety Code Section 25249.7(d)

I, Reuben Yeroushalmi, hereby declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged the party identified in the notice has 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 at least one person with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the exposure to the listed chemical that is the subject of the action.

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 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 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.

Dated: 10-27-2005

By: REUBEN YEROUSHALMI

EXHIBIT A

Los Angeles International Airport
1 World Way
Los Angeles, CA 90045-5830
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

San Francisco International Airport
San Francisco, CA 94128-8097
Airport Latitude: 37-37-08.3000N ESTIMATED
Airport Longitude: 122-22-29.6000W

San Diego International Airport
3225 N HARBOR DRIVE
SAN DIEGO, CA 92101-1022
Airport Latitude: 32-44-00.8000N ESTIMATED
Airport Longitude: 117-11-22.8000W

Norman Y. Mineta San Jose International Airport
801 NORTH FIRST STREET
SAN JOSE, CA 95110
Airport Latitude: 37-21-45.6000N ESTIMATED
Airport Longitude: 121-55-44.8000W

Metropolitan Oakland International Airport
Oakland, CA 94621
Airport Latitude: 37-43-16.6000N ESTIMATED
Airport Longitude: 122-13-14.6000W

Stockton Metropolitan Airport
5000 S AIRPORT WAY
STOCKTON, CA 95206
Airport Latitude: 37-53-39.0000N ESTIMATED
Airport Longitude: 121-14-17.9000W