



P H Y S I C I A N S  
C O M M I T T E E  
F O R  
R E S P O N S I B L E  
M E D I C I N E

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July 13, 2006

To: California Attorney General -- Proposition 65 Coordinator

This letter serves as a supplement to the sixty day notice by the Physicians Committee for Responsible Medicine (PCRM) of its intent to sue Applebee's International, Inc. (Applebee's); Brinker International, Inc., owners of Chili's Grill & Bar (Chili's); Burger King Corporation (Burger King); Chick-fil-A, Inc. (Chick-fil-A); McDonald's Corporation (McDonald's); OSI Restaurant Partners, Inc., owners of Outback Steakhouse (Outback); and TGI Friday's, Inc. (TGI Friday's), a wholly owned subsidiary of Carlson Restaurants Worldwide, Inc., for violations of Proposition 65, the California Safe Drinking Water and Toxic Enforcement Act of 1986, Cal. Health & Safety Code § 25249.6 (2006). PCRM reserves all rights created by issuance of the sixty day notices, delivered to the abovementioned intended defendants, with a copy to your office, on May 1, 2006. A certificate of service regarding those notices is enclosed herein.

I, Daniel Kinburn, am the responsible individual within the Physicians Committee for Responsible Medicine (PCRM), for purposes of this notice and the intended lawsuit. My contact information is set forth above.

Please take notice that Applebee's, Burger King, Chick-fil-A, Chili's, McDonald's, Outback, and TGI Friday's (collectively "intended defendants") have failed to warn consumers that they are exposing them to the chemical compound "PhIP," or 2-AMINO-1-METHYL-6-PHENYLIMIDAZO[4,5-*b*]PYRIDINE through sale and service of grilled chicken in their food service establishments. On October 1, 1994, PhIP was added to the Office of Environmental Health Hazard's assessment list of chemicals known to the State of California to cause cancer or reproductive toxicity, and the intended defendants were required to provide a warning of the dangers of PhIP beginning on October 1, 1995, with respect to any grilled chicken served or sold after that date.

From the time each of the intended defendants began offering menu items containing grilled chicken after October 1, 1995, through the present and ongoing, the intended defendants have been exposing their customers at all of their California locations to consumer product exposure of PhIP by ingestion, without providing clear and reasonable warnings to these customers of a risk of exposure to that chemical.

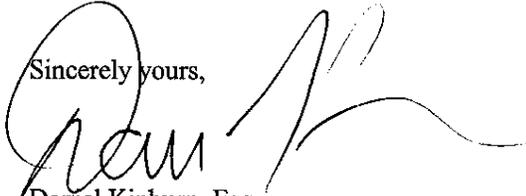
Attachment A lists the products and restaurant locations from which grilled chicken was purchased and subjected to laboratory testing for the presence of PhIP. All tested products at all locations were proven to contain high levels of PhIP, also detailed in the attachment.

The products in Attachment A represent a random sampling of grilled chicken products offered by the intended defendants at a variety of their locations throughout the state of California.

Based on the results of this extensive and random testing, PCRМ maintains that the chemical PhIP is present in all grilled chicken products sold by the intended defendants at all California locations. The intended defendants are not providing adequate warnings to their consumers about their exposure to PhIP.

In accordance with Cal. Health & Safety Code § 25249.7, I am providing as Attachment B a Certificate of Merit outlining the basis of our complaint.

Sincerely yours,



Daniel Kinburn, Esq.

DK:jk

attachments

Attachment A

<b>Location</b>	<b>Product Sampled</b>	<b>Ng/g</b>
Applebee's Alhambra store 21 E. Main St. Alhambra, CA 91801	Grilled Italian Chicken Caesar Salad	9.03
Applebee's Alhambra store 21 E. Main St. Alhambra, CA 91801	Honey Grilled Chicken	10.0
Applebee's Montebello store 1493 N. Montebello Blvd. Montebello, CA 90640	Grilled Italian Chicken Caesar Salad	10.4
Applebee's Montebello store 1493 N. Montebello Blvd. Montebello, CA 90640	Honey Grilled Chicken	6.96
Applebee's Natomas store 3601 Truxel Rd. Sacramento, CA 95833	Grilled Italian Chicken Caesar Salad	3.04
Applebee's Natomas store 3601 Truxel Rd. Sacramento, CA 95833	Honey Grilled Chicken	4.42
Applebee's Roseville store 6700 Stanford Ranch Road Sacramento, CA 95678	Grilled Italian Chicken Caesar Salad	11.6
Applebee's Roseville store 6700 Stanford Ranch Road Sacramento, CA 95678	Honey Grilled Chicken	20.0
Applebee's San Marcos store 573 Grand Ave. San Marcos, CA 92069	Grilled Italian Chicken Caesar Salad	0.73
Applebee's San Marcos store 573 Grand Ave. San Marcos, CA 92069	Honey Grilled Chicken	17.7
Applebee's Oceanside store 2146 Vista Way Oceanside, CA 92054	Grilled Italian Chicken Caesar Salad	2.06
Applebee's Oceanside store 2146 Vista Way Oceanside, CA 92054	Honey Grilled Chicken	5.84
Applebee's Union City store 30980 Dyer St. Union City, CA 95487	Grilled Italian Chicken Caesar Salad	0.27
Applebee's Union City store 30980 Dyer St. Union City, CA 95487	Honey Grilled Chicken	0.31
Applebee's Fremont store 39139 Farwell Dr. Fremont, CA 94538	Grilled Italian Chicken Caesar Salad	10.3

<b>Location</b>	<b>Product Sampled</b>	<b>Ng/g</b>
Applebee's Fremont store 39139 Farwell Dr. Fremont, CA 94538	Honey Grilled Chicken	10.9
Applebee's Milpitas store 84 Ranch Drive Milpitas, CA 95035	Grilled Italian Chicken Caesar Salad	7.23
Applebee's Milpitas store 84 Ranch Drive Milpitas, CA 95035	Honey Grilled Chicken	5.07
Applebee's Saratoga store 555 Saratoga Ave. San Jose, CA 95129	Grilled Italian Chicken Caesar Salad	10.8
Applebee's Saratoga store 555 Saratoga Ave. San Jose, CA 95129	Honey Grilled Chicken	5.77

<b>Location</b>	<b>Product Sampled</b>	<b>Ng/g</b>
Burger King 9772 13221 Jamboree Tustin, CA 92782	Tendergrill Chicken Sandwich	0.32
Burger King 5596 7079 Sunset Blvd. Hollywood, CA 92782	Tendergrill Chicken Sandwich	0.14
Burger King 9218 1742 S. La Cienega Los Angeles, CA 90035	Tendergrill Chicken Sandwich	0.20
Burger King 7469 2714 El Centro Road Sacramento, CA 95833	Tendergrill Chicken Sandwich	0.49
Burger King 11790 6000 J Street, Student Union Building, CSUS Sacramento, CA 95819	Tendergrill Chicken Sandwich	0.43
Burger King 11790 6000 J Street, Student Union Building, CSUS Sacramento, CA 95819	Tendergrill Chicken Sandwich	0.15
Burger King 5245 5245 Mowry Ave. Fremont, CA 94538	Tendergrill Chicken Sandwich	0.17
Burger King 3788 1801 Decoto R. Union City, CA 94587	Tendergrill Chicken Sandwich	0.39
Burger King 5147 39156 Paseo Padre Pkwy. Fremont, CA 94538	Tendergrill Chicken Sandwich	0.09
Burger King 3546 261 Race Street San Jose, CA 95126	Tendergrill Chicken Sandwich	0.15

<b>Location</b>	<b>Product Sampled</b>	<b>Ng/g</b>
Chick-fil-A South Bay Galleria 1815 Hawthorne Boulevard Redondo Beach, CA 90278	Chargrilled Sandwich	0.63
Chick-fil-a Los Cerritos Center 123 Los Cerritos Center Cerritos, CA 90703	Chargrilled Sandwich	0.28
Chick-fil-a Del Amo Fashion Center 3 Del Amo Fashion Center Torrance, CA 90503	Chargrilled Sandwich	1.10
Chick-fil-a Chino Hills FSU 3640 Grand Avenue Chino Hills, CA 91709	Chargrilled Sandwich	0.16
Chick-fil-a Bristol & MacArthur 3601 S. Bristol Street Santa Ana, CA 92704	Chargrilled Sandwich	0.22
Chick-fil-a The Market Place FSU 13490 Jamboree Road Irvine, CA 92602	Chargrilled Sandwich	0.48
Chick-fil-a Pleasant Grove FSU 912 Pleasant Grove Blvd. Roseville, CA 95678	Chargrilled Sandwich	0.15
Chick-fil-a Westfield Shoppingtown Solano 1350 Travis Blvd. Fairfield, CA 94533	Chargrilled Sandwich	0.18
Chick-fil-a Eastlake Terraces FSU 2089 Olympic Parkway Chula Vista, CA 91915	Chargrilled Sandwich	0.3
Chick-fil-a Quarry Creek FSU 3475 Marron Road Oceanside, CA 92056	Chargrilled Sandwich	0.09

<b>Location</b>	<b>Product Sampled</b>	<b>Ng/g</b>
Chili's Chino Hills 3670 Grand Ave. Chino Hills, CA 91709	Grilled Caribbean Chicken Salad	1.31
Chili's Chino Hills 3670 Grand Ave. Chino Hills, CA 91709	Guiltless Chicken Platter	0.75
Chili's Torrance 21835 Hawthorne Blvd. Torrance, CA 90503	Grilled Caribbean Chicken Salad	0.29
Chili's Torrance 21835 Hawthorne Blvd. Torrance, CA 90503	Guiltless Chicken Platter	0.87
Chili's Sacramento 2100 Ardenway, Ste. 185 Sacramento, CA 95825	Grilled Caribbean Chicken Salad	0.90
Chili's Sacramento 2100 Ardenway, Ste. 185 Sacramento, CA 95825	Guiltless Chicken Platter	1.20
Chili's Sacramento 2100 Ardenway, Ste. 185 Sacramento, CA 95825	Grilled Caribbean Chicken Salad	0.77
Chili's Sacramento 2100 Ardenway, Ste. 185 Sacramento, CA 95825	Guiltless Chicken Platter	0.70
Chili's Encinitas 1004 N. El Camino Real Encinitas, CA 92024	Grilled Caribbean Chicken Salad	0.24
Chili's Encinitas 1004 N. El Camino Real Encinitas, CA 92024	Guiltless Chicken Platter	0.73
Chili's Oceanside 2627 Vista Way Oceanside, CA 92054	Grilled Caribbean Chicken Salad	8.83
Chili's Oceanside 2627 Vista Way Oceanside, CA 92054	Guiltless Chicken Platter	2.30
Chili's Union City 32120 Dyer St. Union City, CA 94587	Grilled Caribbean Chicken Salad	0.13
Chili's Union City 32120 Dyer St. Union City, CA 94587	Guiltless Chicken Platter	2.86
Chili's Fremont 39131 Fremont Blvd. Fremont, CA 94538	Grilled Caribbean Chicken Salad	0.24
Chili's Fremont	Guiltless Chicken Platter	0.72

<b>Location</b>	<b>Product Sampled</b>	<b>Ng/g</b>
39131 Fremont Blvd. Fremont, CA 94538		
Chili's Blossom Hill 5650 Almaden Expwy. San Jose, CA 91558	Grilled Caribbean Chicken Salad	7.01
Chili's Blossom Hill 5650 Almaden Expwy. San Jose, CA 91558	Guiltless Chicken Platter	0.52
Chili's Santa Clara 3591 El Camino Real Santa Clara, CA 95051	Grilled Caribbean Chicken Salad	0.54
Chili's Santa Clara 3591 El Camino Real Santa Clara, CA 95051	Guiltless Chicken Platter	0.20

<b>Location</b>	<b>Product Sampled</b>	<b>Ng/g</b>
McDonald's Burbank 1127 North San Fernando Blvd Burbank, CA 91504	Caesar Salad with Grilled Chicken	0.31
McDonald's Los Angeles 6345 Wilshire Blvd Los Angeles, CA 90048	Caesar Salad with Grilled Chicken	0.36
McDonald's Montebello 2020 West Beverly Blvd Montebello, CA 90640	Caesar Salad with Grilled Chicken	0.34
McDonald's Sacramento 200 Richards Blvd. Sacramento, CA 95814	Caesar Salad with Grilled Chicken	0.32
McDonald's Vacaville 541 Davis St Vacaville, CA 95688	Caesar Salad with Grilled Chicken	0.12
McDonald's Encinitas 1064 N. El Camino Real Encinitas, CA 92024	Caesar Salad with Grilled Chicken	1.23
McDonald's Encinitas 1271 Encinitas Blvd. Encinitas, CA 92024	Caesar Salad with Grilled Chicken	0.08
McDonald's Fremont 38860 Fremont Blvd. Fremont, CA 94536	Caesar Salad with Grilled Chicken	0.50
McDonald's Fremont 4318 Thornton Ave. Fremont, CA 94536	Caesar Salad with Grilled Chicken	0.40
McDonald's San Jose 2040 N 1 <sup>st</sup> St San Jose, CA 95131	Caesar Salad with Grilled Chicken	0.14

<b>Location</b>	<b>Product Sampled</b>	<b>Ng/g</b>
Outback Burbank 1761 N. Victory Place Burbank, CA 91504	Chicken on the Barbie	1.71
Outback Torrence 21880 Hawthorne Blvd. Torrence, CA 90503	Chicken on the Barbie	14.7
Outback Buena Park 7575 Beach Blvd. Buena Park, CA 90622	Chicken on the Barbie	10.2
Outback Vacaville 521 Davis St. Vacaville, CA 95688	Chicken on the Barbie	6.14
Outback Howe Avenue 1340 Howe Ave. Sacramento, CA 95825	Chicken on the Barbie	1.17
Outback Oceanside 2485 Vista Way Oceanside, CA 92054	Chicken on the Barbie	3.05
Outback Oceanside 2485 Vista Way Oceanside, CA 92054	Chicken on the Barbie	5.73
Outback Fremont 5525 Stevenson Blvd. Fremont, CA 94538	Chicken on the Barbie	6.04
Outback Almaden 694 Blossom Hill Rd. San Jose, CA 95123	Chicken on the Barbie	10.8
Outback Milpitas 124 Great Mall Dr. Milpitas, CA 95035	Chicken on the Barbie	5.61

<b>Location</b>	<b>Product Sampled</b>	<b>Ng/g</b>
TGI Friday's Knott's Berry Farm 8039 Beach Blvd Buena Park, CA 90620	Cobb Salad with Grilled Chicken	30.6
TGI Friday's Knott's Berry Farm 8039 Beach Blvd Buena Park, CA 90620	Grilled Chicken Flavor Shots	17.5
TGI Friday's Cerritos 12721 Towne Center Dr. Cerritos, CA 90703	Cobb Salad with Grilled Chicken	43.2
TGI Friday's Cerritos 12721 Towne Center Dr. Cerritos, CA 90703	Grilled Chicken Flavor Shots	11.3
TGI Friday's Torrance 23420 Hawthorne Blvd. Torrance, CA 90505	Cobb Salad with Grilled Chicken	19.2
TGI Friday's Torrance 23420 Hawthorne Blvd. Torrance, CA 90505	Grilled Chicken Flavor Shots	3.65
TGI Friday's Sacramento 1229 Howe Ave. Sacramento, CA 95825	Cobb Salad with Grilled Chicken	12.0
TGI Friday's Sacramento 1229 Howe Ave. Sacramento, CA 95825	Grilled Chicken Flavor Shots	8.58
TGI Friday's Roseville 1168 Galleria Blvd. Roseville, CA 95678	Cobb Salad with Grilled Chicken	5.69
TGI Friday's Roseville 1168 Galleria Blvd. Roseville, CA 95678	Grilled Chicken Flavor Shots	9.38
TGI Friday's San Diego Gaslamp 403 Camino Del Rio San Diego, CA 92010	Cobb Salad with Grilled Chicken	3.77
TGI Friday's San Diego Gaslamp 403 Camino Del Rio San Diego, CA 92010	Grilled Chicken Flavor Shots	19.9
TGI Friday's Carlsbad 890 Palomar Airport Rd. Carlsbad, CA 92008	Cobb Salad with Grilled Chicken	9.93
TGI Friday's Carlsbad 890 Palomar Airport Rd. Carlsbad, CA 92008	Grilled Chicken Flavor Shots	15.2
TGI Friday's Pleasanton 3999 Santa Rita Rd. Pleasanton, CA 94588	Cobb Salad with Grilled Chicken	41.5
TGI Friday's Pleasanton	Grilled Chicken Flavor Shots	16.1

<b>Location</b>	<b>Product Sampled</b>	<b>Ng/g</b>
3999 Santa Rita Rd. Pleasanton, CA 94588		
TGI Friday's Union City 31900 Dyer St. Union City, CA 94587	Cobb Salad with Grilled Chicken	10.5
TGI Friday's Union City 31900 Dyer St. Union City, CA 94587	Grilled Chicken Flavor Shots	16.1
TGI Friday's Cupertino 10343 N. Wolfe Rd. Cupertino, CA 95014	Cobb Salad with Grilled Chicken	6.75
TGI Friday's Cupertino 10343 N. Wolfe Rd. Cupertino, CA 95014	Grilled Chicken Flavor Shots	1.15

## CERTIFICATE OF SERVICE

I, Jennifer Kaplan, declare that I am over the age of eighteen years. I am not a party in my individual capacity to the intended lawsuit to be brought pursuant to Cal. Health & Safety Code § 25249.5 *et seq.* (2006) (“Proposition 65”), described in the materials that accompany this certificate. My business address is Physicians Committee For Responsible Medicine, 5100 Wisconsin Avenue, N.W., Suite 400, Washington, D.C. 20016.

1. On April 28, 2006, I caused 60 day notices of violation of Proposition 65 to be served on each of the individuals and entities listed in Exhibit A.

2. The seven prospective defendants for this lawsuit were each served with a 60 day notice letter, which included both a copy of the summary of Proposition 65 required to be provided by 22 CCR § 12903 and the certificate of merit required by Cal. Health & Safety Code § 25249.7. Copies of the notices served on the prospective defendants are attached as Exhibit B.

3. Each of the identified public enforcement agencies listed in Exhibit A also received a copy of the letters sent to each of the seven intended defendants. The notice to the California Attorney General additionally included factual information sufficient to establish the basis of the certificate of merit, consistent with the requirements of Cal. Health & Safety Code § 25249.7.

4. The documents identified above were served by sending them via Federal Express to the addresses listed in Exhibit A. Each package of documents was placed in a sealed mailer provided by Federal Express, a pre-paid air bill was affixed to each package and each package was then deposited in a box designated and regularly maintained by Federal Express. The date and the times of the delivery of the package to each of the entities listed in Exhibit A are set forth in Exhibit C.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and was executed on July 13, 2006.

  
\_\_\_\_\_  
Jennifer Kaplan

**ATTACHMENT B**

## Certificate of Merit

This is to certify that Columbia Analytical Services, conducted tissue analysis on behalf of the Physicians Committee for Responsible Medicine (PCRM). In a blind study, CAS analyzed the "PHiP," or 2-AMINO-1-METHYL-6-PHENYLMIDAZO[4,5-*b*]PYRIDINE, content of a variety of samples received from PCRM.

### Laboratory and Scientist Credentials

CAS is a full-service analytical laboratory specializing in environmental testing established in 1986. It has received the Seal of Excellence Award from the American Council on Independent Laboratories for outstanding integrity of data. Some of its major clients include:

- United States Department of Defense
- United States Environmental Protection Agency (EPA)
- United States Food and Drug Administration (FDA)
- United States Army Corps of Engineers
- New York State Watershed Assessment Bureau

CAS headquarters are located at 1317 South 13<sup>th</sup> St. Kelso, Washington 98626.

Michael Erickson, Supervisor of Hydrocarbons and High Performance Liquid Chromatography at CAS, performed the analysis. Mr. Erickson holds a Masters in Fisheries and Aquatic Sciences from the University of Washington at Seattle and a Baccalaureate in Biology. He has been performing research at CAS since 1998.

### Validation Method

The High Performance Liquid Chromatography/Double Mass Spectrometry method for the PHiP analysis was chosen because of its selectivity and sensitivity. Selectivity in the analytical procedure is maximized to effectively eliminate the possibility of false positives. This is accomplished through the use of a non-polar extraction solvent, liquid chromatographic separation, and ion filtering through two quadrapole mass analyzers. This elimination of the matrix background directly correlates to a ten fold increased in sensitivity from previously reported results. To prevent a low bias of the results due to ion suppression, deuterated PHiP is added as an internal standard to all extracts prior to analysis. The method was validated by adding a small amount of PHiP to a clean chicken matrix then extracting and analyzing under the prescribed method conditions. The recoveries of the spiked samples were excellent and significantly higher than data previously reported in scientific literature. Finally, with the main sampling event of 100 samples, 10 clean chicken samples were spiked with PHiP as Laboratory Control Samples (LCS), five field samples were spiked in duplicate with PHiP as Matrix Spike/Duplicate Matrix Spike samples (MS/DMS), five field samples were extracted and analyzed in duplicate (DUP), and five clean chicken samples were analyzed as Method Blanks (MB). This allowed for spike recovery to be evaluated, precision of analytical

results to be calculated (MS/DMS and DUP), and absence of lab introduced PHiP to be confirmed (MB).

Based on the foregoing, it was determined that the following method was an acceptable means of determining the PHiP content of cooked tissue samples.

### **Method of Analysis**

Samples of cooked tissue were purchased by PCR/M and sent to the laboratory. They were identified only by a code system developed by the PCR/M scientists, which was blinded to the laboratory. The samples were homogenized prior to lyophilization. Dried samples were then saponified to produce an alkaline solution which was mixed with a diatomaceous earth material. This mixture was extracted with methylene chloride then evaporated with nitrogen to dryness. The extract was then brought to volume with a methanol/water solution containing PHiP-d3 as an internal standard. A linear calibration curve with concentrations of PHiP between 0.05-5.0ng/mL produced a calibration curve with a coefficient of 0.9999. The limit of quantification was determined to be 0.1ng/g in prepared tissue samples. An accuracy and precision study was performed by spiking clean tissue samples prior to extraction with various levels of PHiP. The analytical procedure as described showed an overall accuracy of >95% recovery, and an overall precision of 8.1% RSD.

### **Results**

Using the method described above, CAS found the PHiP present in the samples tested as follows:

Code	
01-02-a	
01-02-b	
01-03-a	
01-03-b	
01-04-a	
01-04-b	
01-05-a	
01-05-b	
01-06-a	
01-06-b	
01-07-a	
01-07-b	
01-08-a	
01-08-b	
01-09-a	
01-09-b	
01-10-a	
01-10-b	
01-01-a	

01-01-b	
02-02-a	
02-03a	
02-04-a	
02-05-a	
02-06-a	
02-10-a	
02-01-a	
02-07-a	
02-08-a	
02-09-a	
03-01-a	
03-02-a	
03-03-a	
03-04-a	
03-05-a	
03-06-a	
03-07-a	
03-08-a	
03-09-a	
03-10-a	
04-02-a	
04-02-b	
04-03-a	
04-03-b	
04-04-a	
04-04-b	
04-09-a	
04-09-b	
04-05-a	
04-05-b	
04-06-a	
04-06-b	
04-07-a	
04-07-b	
04-08-a	
04-08-b	
04-01-a	
04-01-b	
04-10-a	
04-10-b	
05-02-a	
05-03-a	
05-04-a	
05-05-a	
05-06-a	
05-01-a	



## Certificate of Merit

This is to certify that the Physicians Committee for Responsible Medicine (PCRM) has commissioned an analysis of specific chicken products sold at the following chain restaurants: Applebee's, Burger King, Chick-fil-a, Chili's, McDonald's, Outback, and T.G.I. Friday's in good faith and has found that each of these products contained "PhIP," or 2-AMINO-1-METHYL-6-PHENYLIMIDAZO[4,5-*b*]PYRIDINE. PhIP is on the Governor's list of chemicals known to the State of California to cause cancer, birth defects, or reproductive harm, and each of these restaurants at all its locations thus has a duty to warn consumers of the risk of ingestion of PhIP.

### Study Authors

The protocol for this study was designed by Kristie Stoick and Chad Sandusky. Dr. Sandusky is PCRM's Director of Research and Toxicology. He received a Ph.D in toxicology from Emory University in 1975. Ms. Stoick is a research analyst with a background in toxicology. She graduated from the University of Michigan at Ann Arbor with a Masters in Public Health in 2003.

### Collection Method

Fast food outlets and restaurants were chosen based on information regarding cooking practices of chicken dishes, collected by telephone calls to company headquarters and/or referrals to specific restaurant locations. Samples that were reportedly cooked on a flat or slatted grill and at high grill or internal temperatures were chosen. The sampling was conducted in the major metropolitan areas of Sacramento, Los Angeles, San Diego, and the greater San Francisco Bay Area, to determine whether these chains were selling products with PhIP at all their locations statewide.

Persons who were chosen to purchase samples were given a detailed Standard Operating Procedure to follow (Exhibit A hereto), and recorded activities on an internal chain of custody form. Samples were ordered plain and the chicken only was immediately bagged and cooled using frozen blue ice gel packs in Styrofoam coolers. The identity of the franchise where purchased was blinded from the analytical lab by using a standardized code system developed by the study authors. They were frozen overnight at 0° C or below, and shipped to the laboratory the next day, on frozen blue ice gel packs in Styrofoam coolers.

Below is a table detailing where, when, and what was sampled, by whom the samples were purchased, and the code assigned to each sample. The levels of PhIP corresponding to these codes are detailed in the accompanying certificate submitted by the laboratory that tested the samples.

Date	Location	Product Sampled	Purchaser	Code
3/31/06	Applebee's Alhambra store 21 E. Main St. Alhambra, CA 91801	Grilled Italian Chicken Caesar Salad	Kristie Stoick	01-02-a

3/31/06	Applebee's Alhambra store 21 E. Main St. Alhambra, CA 91801	Honey Grilled Chicken	Kristie Stoick	01-02-b
3/31/06	Applebee's Montebello store 1493 N. Montebello Blvd. Montebello, CA 90640	Grilled Italian Chicken Caesar Salad	Kristie Stoick	01-03-a
3/31/06	Applebee's Montebello store 1493 N. Montebello Blvd. Montebello, CA 90640	Honey Grilled Chicken	Kristie Stoick	01-03-b
4/3/06	Applebee's Natomas store 3601 Truxel Rd. Sacramento, CA 95833	Grilled Italian Chicken Caesar Salad	Boris Zdravkovic	01-04-a
4/3/06	Applebee's Natomas store 3601 Truxel Rd. Sacramento, CA 95833	Honey Grilled Chicken	Boris Zdravkovic	01-04-b
4/3/06	Applebee's Roseville store 6700 Stanford Ranch Road Sacramento, CA 95678	Grilled Italian Chicken Caesar Salad	Boris Zdravkovic	01-05-a
4/3/06	Applebee's Roseville store 6700 Stanford Ranch Road Sacramento, CA 95678	Honey Grilled Chicken	Boris Zdravkovic	01-05-b
4/5/06	Applebee's San Marcos store 573 Grand Ave. San Marcos, CA 92069	Grilled Italian Chicken Caesar Salad	Ronnie Steinau	01-06-a
4/5/06	Applebee's San Marcos store 573 Grand Ave. San Marcos, CA 92069	Honey Grilled Chicken	Ronnie Steinau	01-06-b
4/5/06	Applebee's Oceanside store 2146 Vista Way Oceanside, CA 92054	Grilled Italian Chicken Caesar Salad	Ronnie Steinau	01-07-a
4/5/06	Applebee's Oceanside store 2146 Vista Way	Honey Grilled Chicken	Ronnie Steinau	01-07-b

	Oceanside, CA 92054			
4/5/06	Applebee's Union City store 30980 Dyer St. Union City, CA 95487	Grilled Italian Chicken Caesar Salad	Lauren McCutcheon	01- 08-a
4/5/06	Applebee's Union City store 30980 Dyer St. Union City, CA 95487	Honey Grilled Chicken	Lauren McCutcheon	01- 08-b
4/5/06	Applebee's Fremont store 39139 Farwell Dr. Fremont, CA 94538	Grilled Italian Chicken Caesar Salad	Lauren McCutcheon	01- 09-a
4/5/06	Applebee's Fremont store 39139 Farwell Dr. Fremont, CA 94538	Honey Grilled Chicken	Lauren McCutcheon	01- 09-b
3/29/06	Applebee's Milpitas store 84 Ranch Drive Milpitas, CA 95035	Grilled Italian Chicken Caesar Salad	Boris Zdravkovic	01- 10-a
3/29/06	Applebee's Milpitas store 84 Ranch Drive Milpitas, CA 95035	Honey Grilled Chicken	Boris Zdravkovic	01- 10-b
3/29/06	Applebee's Saratoga store 555 Saratoga Ave. San Jose, CA 95129	Grilled Italian Chicken Caesar Salad	Boris Zdravkovic	01- 01-a
3/29/06	Applebee's Saratoga store 555 Saratoga Ave. San Jose, CA 95129	Honey Grilled Chicken	Boris Zdravkovic	01- 01-b
3/29/06	Burger King 9772 13221 Jamboree Tustin, CA 92782	Tendergrill Chicken Sandwich	Kristie Stoick	02- 02-a
3/30/06	Burger King 5596 7079 Sunset Blvd. Hollywood, CA 92782	Tendergrill Chicken Sandwich	Kristie Stoick	02- 03a
3/30/06	Burger King 9218 1742 S. La Cienega Los Angeles, CA 90035	Tendergrill Chicken Sandwich	Kristie Stoick	02- 04-a
4/3/06	Burger King 7469 2714 El Centro Road Sacramento, CA 95833	Tendergrill Chicken Sandwich	Boris Zdravkovic	02- 05-a
4/3/06	Burger King 11790 6000 J Street, Student Union Building, CSUS	Tendergrill Chicken Sandwich	Boris Zdravkovic	02- 06-a

	Sacramento, CA 95819			
4/4/06	Burger King 11790 6000 J Street, Student Union Building, CSUS Sacramento, CA 95819	Tendergrill Chicken Sandwich Tendergrill Chicken Sandwich	Boris Zdravkovic	02- 10-a
4/5/06	Burger King 5245 5245 Mowry Ave. Fremont, CA 94538	Tendergrill Chicken Sandwich	Lauren McCutcheon	02- 01-a
4/5/06	Burger King 3788 1801 Decoto R. Union City, CA 94587	Tendergrill Chicken Sandwich	Lauren McCutcheon	02- 07-a
4/5/06	Burger King 5147 39156 Paseo Padre Pkwy. Fremont, CA 94538	Tendergrill Chicken Sandwich	Lauren McCutcheon	02- 08-a
3/29/06	Burger King 3546 261 Race Street San Jose, CA 95126	Tendergrill Chicken Sandwich	Kristie Stoick	02- 09-a
3/30/06	Chick-fil-a South Bay Galleria 1815 Hawthorne Boulevard Redondo Beach, CA 90278	Chargrilled Sandwich	Kristie Stoick	03- 01-a
3/30/06	Chick-fil-a Los Cerritos Center 123 Los Cerritos Center Cerritos, CA 90703	Chargrilled Sandwich	Kristie Stoick	03- 02-a
3/30/06	Chick-fil-a Del Amo Fashion Center 3 Del Amo Fashion Center Torrance, CA 90503	Chargrilled Sandwich	Kristie Stoick	03- 03-a
3/29/06	Chick-fil-a Chino Hills FSU 3640 Grand Avenue Chino Hills, CA 91709	Chargrilled Sandwich	Kristie Stoick	03- 04-a
3/29/06	Chick-fil-a Bristol & MacArthur 3601 S. Bristol Street Santa Ana, CA 92704	Chargrilled Sandwich	Kristie Stoick	03- 05-a
3/29/06	Chick-fil-a The Market Place FSU 13490 Jamboree Road Irvine, CA 92602	Chargrilled Sandwich	Kristie Stoick	03- 06-a
4/3/06	Chick-fil-a Pleasant	Chargrilled Sandwich	Boris	03-

	Grove FSU 912 Pleasant Grove Blvd. Roseville, CA 95678		Zdravkovic	07-a
4/3/06	Chick-fil-a Westfield Shoppingtown Solano 1350 Travis Blvd. Fairfield, CA 94533	Chargrilled Sandwich	Boris Zdravkovic	03-08-a
4/5/06	Chick-fil-a Eastlake Terraces FSU 2089 Olympic Parkway Chula Vista, CA 91915	Chargrilled Sandwich	Ronnie Steinau	03-09-a
4/5/06	Chick-fil-a Quarry Creek FSU 3475 Marron Road Oceanside, CA 92056	Chargrilled Sandwich	Ronnie Steinau	03-10-a
3/29/06	Chili's Chino Hills 3670 Grand Ave. Chino Hills, CA 91709	Grilled Caribbean Chicken Salad	Kristie Stoick	04-02-a
3/29/06	Chili's Chino Hills 3670 Grand Ave. Chino Hills, CA 91709	Guiltless Chicken Platter	Kristie Stoick	04-02-b
3/29/06	Chili's Torrance 21835 Hawthorne Blvd. Torrance, CA 90503	Grilled Caribbean Chicken Salad	Kristie Stoick	04-03-a
3/29/06	Chili's Torrance 21835 Hawthorne Blvd. Torrance, CA 90503	Guiltless Chicken Platter	Kristie Stoick	04-03-b
4/4/06	Chili's Sacramento 2100 Ardenway, Ste. 185 Sacramento, CA 95825	Grilled Caribbean Chicken Salad	Boris Zdravkovic	04-04-a
4/4/06	Chili's Sacramento 2100 Ardenway, Ste. 185 Sacramento, CA 95825	Guiltless Chicken Platter	Boris Zdravkovic	04-04-b
4/4/06	Chili's Sacramento 2100 Ardenway, Ste. 185 Sacramento, CA 95825	Grilled Caribbean Chicken Salad	Boris Zdravkovic	04-09-a
4/4/06	Chili's Sacramento 2100 Ardenway, Ste. 185 Sacramento, CA 95825	Guiltless Chicken Platter	Boris Zdravkovic	04-09-b
4/5/06	Chili's Encinitas 1004 N. El Camino Real Encinitas, CA 92024	Grilled Caribbean Chicken Salad	Ronnie Steinau	04-05-a
4/5/06	Chili's Encinitas 1004 N. El Camino Real Encinitas, CA 92024	Guiltless Chicken Platter	Ronnie Steinau	04-05-b
4/5/06	Chili's Oceanside 2627 Vista Way	Grilled Caribbean Chicken Salad	Ronnie Steinau	04-06-a

	Oceanside, CA 92054			
4/5/06	Chili's Oceanside 2627 Vista Way Oceanside, CA 92054	Guiltless Chicken Platter	Ronnie Steinau	04-06-b
4/5/06	Chili's Union City 32120 Dyer St. Union City, CA 94587	Grilled Caribbean Chicken Salad	Lauren McCutcheon	04-07-a
4/5/06	Chili's Union City 32120 Dyer St. Union City, CA 94587	Guiltless Chicken Platter	Lauren McCutcheon	04-07-b
4/5/06	Chili's Fremont 39131 Fremont Blvd. Fremont, CA 94538	Grilled Caribbean Chicken Salad	Lauren McCutcheon	04-08-a
4/5/06	Chili's Fremont 39131 Fremont Blvd. Fremont, CA 94538	Guiltless Chicken Platter	Lauren McCutcheon	04-08-b
3/30/06	Chili's Blossom Hill 5650 Almaden Expwy. San Jose, CA 91558	Grilled Caribbean Chicken Salad	Boris Zdravkovic	04-01-a
3/30/06	Chili's Blossom Hill 5650 Almaden Expwy. San Jose, CA 91558	Guiltless Chicken Platter	Boris Zdravkovic	04-01-b
3/29/06	Chili's Santa Clara 3591 El Camino Real Santa Clara, CA 95051	Grilled Caribbean Chicken Salad	Boris Zdravkovic	04-10-a
3/29/06	Chili's Santa Clara 3591 El Camino Real Santa Clara, CA 95051	Guiltless Chicken Platter	Boris Zdravkovic	04-10-b
3/30/06	McDonald's Burbank 1127 North San Fernando Blvd Burbank, CA 91504	Caesar Salad with Grilled Chicken	Kristie Stoick	05-02-a
3/30/06	McDonald's Los Angeles 6345 Wilshire Blvd Los Angeles, CA 90048	Caesar Salad with Grilled Chicken	Kristie Stoick	05-03-a
3/30/06	McDonald's Montebello 2020 West Beverly Blvd Montebello, CA 90640	Caesar Salad with Grilled Chicken	Kristie Stoick	05-04-a
4/3/06	McDonald's Sacramento 200 Richards Blvd. Sacramento, CA 95814	Caesar Salad with Grilled Chicken	Boris Zdravkovic	05-05-a
4/3/06	McDonald's Vacaville 541 Davis St Vacaville, CA 95688	Caesar Salad with Grilled Chicken	Boris Zdravkovic	05-06-a
4/5/06	McDonald's Encinitas 1064 N. El Camino Real Encinitas, CA 92024	Caesar Salad with Grilled Chicken	Ronnie Steinau	05-01-a

4/5/06	McDonald's Encinitas 1271 Encinitas Blvd. Encinitas, CA 92024	Caesar Salad with Grilled Chicken	Ronnie Steinau	05- 07-a
4/5/06	McDonald's Fremont 38860 Fremont Blvd. Fremont, CA 94536	Caesar Salad with Grilled Chicken	Lauren McCutcheon	05- 08-a
4/5/06	McDonald's Fremont 4318 Thornton Ave. Fremont, CA 94536	Caesar Salad with Grilled Chicken	Lauren McCutcheon	05- 09-a
3/29/06	McDonald's San Jose 2040 N 1 <sup>st</sup> St San Jose, CA 95131	Caesar Salad with Grilled Chicken	Boris Zdravkovic	05- 10-a
3/30/06	Outback Burbank 1761 N. Victory Place Burbank, CA 91504	Chicken on the Barbie	Kristie Stoick	06- 02-a
3/29/06	Outback Torrence 21880 Hawthorne Blvd. Torrence, CA 90503	Chicken on the Barbie	Kristie Stoick	06- 03-a
3/30/06	Outback Buena Park 7575 Beach Blvd. Buena Park, CA 90622	Chicken on the Barbie	Kristie Stoick	06- 04-a
4/3/06	Outback Vacaville 521 Davis St. Vacaville, CA 95688	Chicken on the Barbie	Boris Zdravkovic	06- 05-a
4/3/06	Outback Howe Avenue 1340 Howe Ave. Sacramento, CA 95825	Chicken on the Barbie	Boris Zdravkovic	06- 06-a
4/5/06	Outback Oceanside 2485 Vista Way Oceanside, CA 92054	Chicken on the Barbie	Ronnie Steinau	06- 01-a
4/5/06	Outback Oceanside 2485 Vista Way Oceanside, CA 92054	Chicken on the Barbie	Ronnie Steinau	06- 07-a
4/5/06	Outback Fremont 5525 Stevenson Blvd. Fremont, CA 94538	Chicken on the Barbie	Lauren McCutcheon	06- 08-a
3/30/06	Outback Almaden 694 Blossom Hill Rd. San Jose, CA 95123	Chicken on the Barbie	Boris Zdravkovic	06- 09-a
3/30/06	Outback Milpitas 124 Great Mall Dr. Milpitas, CA 95035	Chicken on the Barbie	Boris Zdravkovic	06- 10-a
3/30/06	T.G.I. Friday's Knott's Berry Farm 8039 Beach Blvd Buena Park, CA 90620	Cobb Salad with Grilled Chicken	Kristie Stoick	07- 01-a
3/30/06	T.G.I. Friday's Knott's	Grilled Chicken Flavor	Kristie Stoick	07-

	Berry Farm 8039 Beach Blvd Buena Park, CA 90620	Shots		01-b
3/30/06	T.G.I. Friday's Cerritos 12721 Towne Center Dr. Cerritos, CA 90703	Cobb Salad with Grilled Chicken	Kristie Stoick	07- 02-a
3/30/06	T.G.I. Friday's Cerritos 12721 Towne Center Dr. Cerritos, CA 90703	Grilled Chicken Flavor Shots	Kristie Stoick	07- 02-b
3/29/06	T.G.I. Friday's Torrance 23420 Hawthorne Blvd. Torrance, CA 90505	Cobb Salad with Grilled Chicken	Kristie Stoick	07- 03-a
3/29/06	T.G.I. Friday's Torrance 23420 Hawthorne Blvd. Torrance, CA 90505	Grilled Chicken Flavor Shots	Kristie Stoick	07- 03-b
4/3/06	T.G.I. Friday's Sacramento 1229 Howe Ave. Sacramento, CA 95825	Cobb Salad with Grilled Chicken	Boris Zdravkovic	07- 04-a
4/3/06	T.G.I. Friday's Sacramento 1229 Howe Ave. Sacramento, CA 95825	Grilled Chicken Flavor Shots	Boris Zdravkovic	07- 04-b
4/3/06	T.G.I. Friday's Roseville 1168 Galleria Blvd. Roseville, CA 95678	Cobb Salad with Grilled Chicken	Boris Zdravkovic	07- 05-a
4/3/06	T.G.I. Friday's Roseville 1168 Galleria Blvd. Roseville, CA 95678	Grilled Chicken Flavor Shots	Boris Zdravkovic	07- 05-b
4/5/06	T.G.I. Friday's San Diego Gaslamp 403 Camino Del Rio San Diego, CA 92010	Cobb Salad with Grilled Chicken	Ronnie Steinau	07- 06-a
4/5/06	T.G.I. Friday's San Diego Gaslamp 403 Camino Del Rio San Diego, CA 92010	Grilled Chicken Flavor Shots	Ronnie Steinau	07- 06-b
4/5/06	T.G.I. Friday's Carlsbad 890 Palomar Airport Rd. Carlsbad, CA 92008	Cobb Salad with Grilled Chicken	Ronnie Steinau	07- 07-a
4/5/06	T.G.I. Friday's Carlsbad 890 Palomar Airport Rd. Carlsbad, CA 92008	Grilled Chicken Flavor Shots	Ronnie Steinau	07- 07-b
4/5/06	T.G.I. Friday's Pleasanton 3999 Santa Rita Rd. Pleasanton, CA 94588	Cobb Salad with Grilled Chicken	Lauren McCutcheon	07- 08-a
4/5/06	T.G.I. Friday's	Grilled Chicken Flavor	Lauren	07-

	Pleasanton 3999 Santa Rita Rd. Pleasanton, CA 94588	Shots	McCutcheon	08-b
4/5/06	T.G.I. Friday's Union City 31900 Dyer St. Union City, CA 94587	Cobb Salad with Grilled Chicken	Lauren McCutcheon	07- 09-a
4/5/06	T.G.I. Friday's Union City 31900 Dyer St. Union City, CA 94587	Grilled Chicken Flavor Shots	Lauren McCutcheon	07- 09-b
3/29/06	T.G.I. Friday's Cupertino 10343 N. Wolfe Rd. Cupertino, CA 95014	Cobb Salad with Grilled Chicken	Boris Zdravkovic	07- 10-a
3/29/06	T.G.I. Friday's Cupertino 10343 N. Wolfe Rd. Cupertino, CA 95014	Grilled Chicken Flavor Shots	Boris Zdravkovic	-7- 10b

We have compared the laboratory report on the blinded samples they received with the above chart. Based upon the laboratory's analysis, the following restaurant products contained the following amounts of PhIP.

Location	Product Sampled	Code	Result (ng/g)
Applebee's Alhambra store 21 E. Main St. Alhambra, CA 91801	Grilled Italian Chicken Caesar Salad	01-02-a	9.03
Applebee's Alhambra store 21 E. Main St. Alhambra, CA 91801	Honey Grilled Chicken	01-02-b	10.0
Applebee's Montebello store 1493 N. Montebello Blvd. Montebello, CA 90640	Grilled Italian Chicken Caesar Salad	01-03-a	10.4
Applebee's Montebello store 1493 N. Montebello Blvd. Montebello, CA 90640	Honey Grilled Chicken	01-03-b	6.96
Applebee's Natomas store 3601 Truxel Rd. Sacramento, CA 95833	Grilled Italian Chicken Caesar Salad	01-04-a	3.04
Applebee's Natomas store 3601 Truxel Rd. Sacramento, CA 95833	Honey Grilled Chicken	01-04-b	4.42
Applebee's Roseville store 6700 Stanford Ranch Road Sacramento, CA 95678	Grilled Italian Chicken Caesar Salad	01-05-a	11.6

Applebee's Roseville store 6700 Stanford Ranch Road Sacramento, CA 95678	Honey Grilled Chicken	01-05-b	20.0
Applebee's San Marcos store 573 Grand Ave. San Marcos, CA 92069	Grilled Italian Chicken Caesar Salad	01-06-a	0.73
Applebee's San Marcos store 573 Grand Ave. San Marcos, CA 92069	Honey Grilled Chicken	01-06-b	17.7
Applebee's Oceanside store 2146 Vista Way Oceanside, CA 92054	Grilled Italian Chicken Caesar Salad	01-07-a	2.06
Applebee's Oceanside store 2146 Vista Way Oceanside, CA 92054	Honey Grilled Chicken	01-07-b	5.84
Applebee's Union City store 30980 Dyer St. Union City, CA 95487	Grilled Italian Chicken Caesar Salad	01-08-a	0.27
Applebee's Union City store 30980 Dyer St. Union City, CA 95487	Honey Grilled Chicken	01-08-b	0.31
Applebee's Fremont store 39139 Farwell Dr. Fremont, CA 94538	Grilled Italian Chicken Caesar Salad	01-09-a	10.3
Applebee's Fremont store 39139 Farwell Dr. Fremont, CA 94538	Honey Grilled Chicken	01-09-b	10.9
Applebee's Milpitas store 84 Ranch Drive Milpitas, CA 95035	Grilled Italian Chicken Caesar Salad	01-10-a	7.23
Applebee's Milpitas store 84 Ranch Drive Milpitas, CA 95035	Honey Grilled Chicken	01-10-b	5.07
Applebee's Saratoga store 555 Saratoga Ave. San Jose, CA 95129	Grilled Italian Chicken Caesar Salad	01-01-a	10.8
Applebee's Saratoga store 555 Saratoga Ave. San Jose, CA 95129	Honey Grilled Chicken	01-01-b	5.77
Burger King 9772 13221 Jamboree Tustin, CA 92782	Tendergrill Chicken Sandwich	02-02-a	0.32
Burger King 5596 7079 Sunset Blvd. Hollywood, CA 92782	Tendergrill Chicken Sandwich	02-03a	0.14
Burger King 9218 1742 S. La Cienega Los Angeles, CA 90035	Tendergrill Chicken Sandwich	02-04-a	0.20

Burger King 7469 2714 El Centro Road Sacramento, CA 95833	Tendergrill Chicken Sandwich	02-05-a	0.49
Burger King 11790 6000 J Street, Student Union Building, CSUS Sacramento, CA 95819	Tendergrill Chicken Sandwich	02-06-a	0.43
Burger King 11790 6000 J Street, Student Union Building, CSUS Sacramento, CA 95819	Tendergrill Chicken Sandwich	02-10-a	0.15
Burger King 5245 5245 Mowry Ave. Fremont, CA 94538	Tendergrill Chicken Sandwich	02-01-a	0.17
Burger King 3788 1801 Decoto R. Union City, CA 94587	Tendergrill Chicken Sandwich	02-07-a	0.39
Burger King 5147 39156 Paseo Padre Pkwy. Fremont, CA 94538	Tendergrill Chicken Sandwich	02-08-a	0.09
Burger King 3546 261 Race Street San Jose, CA 95126	Tendergrill Chicken Sandwich	02-09-a	0.15
Chick-fil-a South Bay Galleria 1815 Hawthorne Boulevard Redondo Beach, CA 90278	Chargrilled Sandwich	03-01-a	0.63
Chick-fil-a Los Cerritos Center 123 Los Cerritos Center Cerritos, CA 90703	Chargrilled Sandwich	03-02-a	0.28
Chick-fil-a Del Amo Fashion Center 3 Del Amo Fashion Center Torrance, CA 90503	Chargrilled Sandwich	03-03-a	1.10
Chick-fil-a Chino Hills FSU 3640 Grand Avenue Chino Hills, CA 91709	Chargrilled Sandwich	03-04-a	0.16
Chick-fil-a Bristol & MacArthur 3601 S. Bristol Street Santa Ana, CA 92704	Chargrilled Sandwich	03-05-a	0.22
Chick-fil-a The Market Place FSU 13490 Jamboree Road Irvine, CA 92602	Chargrilled Sandwich	03-06-a	0.48

Chick-fil-a Pleasant Grove FSU 912 Pleasant Grove Blvd. Roseville, CA 95678	Chargrilled Sandwich	03-07-a	0.15
Chick-fil-a Westfield Shoppingtown Solano 1350 Travis Blvd. Fairfield, CA 94533	Chargrilled Sandwich	03-08-a	0.18
Chick-fil-a Eastlake Terraces FSU 2089 Olympic Parkway Chula Vista, CA 91915	Chargrilled Sandwich	03-09-a	0.3
Chick-fil-a Quarry Creek FSU 3475 Marron Road Oceanside, CA 92056	Chargrilled Sandwich	03-10-a	0.09
Chili's Chino Hills 3670 Grand Ave. Chino Hills, CA 91709	Grilled Caribbean Chicken Salad	04-02-a	1.31
Chili's Chino Hills 3670 Grand Ave. Chino Hills, CA 91709	Guiltless Chicken Platter	04-02-b	0.75
Chili's Torrance 21835 Hawthorne Blvd. Torrance, CA 90503	Grilled Caribbean Chicken Salad	04-03-a	0.29
Chili's Torrance 21835 Hawthorne Blvd. Torrance, CA 90503	Guiltless Chicken Platter	04-03-b	0.87
Chili's Sacramento 2100 Ardenway, Ste. 185 Sacramento, CA 95825	Grilled Caribbean Chicken Salad	04-04-a	0.90
Chili's Sacramento 2100 Ardenway, Ste. 185 Sacramento, CA 95825	Guiltless Chicken Platter	04-04-b	1.20
Chili's Sacramento 2100 Ardenway, Ste. 185 Sacramento, CA 95825	Grilled Caribbean Chicken Salad	04-09-a	0.77
Chili's Sacramento 2100 Ardenway, Ste. 185 Sacramento, CA 95825	Guiltless Chicken Platter	04-09-b	0.70
Chili's Encinitas 1004 N. El Camino Real Encinitas, CA 92024	Grilled Caribbean Chicken Salad	04-05-a	0.24
Chili's Encinitas 1004 N. El Camino Real Encinitas, CA 92024	Guiltless Chicken Platter	04-05-b	0.73
Chili's Oceanside 2627 Vista Way	Grilled Caribbean Chicken Salad	04-06-a	8.83

Oceanside, CA 92054			
Chili's Oceanside 2627 Vista Way Oceanside, CA 92054	Guiltless Chicken Platter	04-06-b	2.30
Chili's Union City 32120 Dyer St. Union City, CA 94587	Grilled Caribbean Chicken Salad	04-07-a	0.13
Chili's Union City 32120 Dyer St. Union City, CA 94587	Guiltless Chicken Platter	04-07-b	2.86
Chili's Fremont 39131 Fremont Blvd. Fremont, CA 94538	Grilled Caribbean Chicken Salad	04-08-a	0.24
Chili's Fremont 39131 Fremont Blvd. Fremont, CA 94538	Guiltless Chicken Platter	04-08-b	0.72
Chili's Blossom Hill 5650 Almaden Expwy. San Jose, CA 91558	Grilled Caribbean Chicken Salad	04-01-a	7.01
Chili's Blossom Hill 5650 Almaden Expwy. San Jose, CA 91558	Guiltless Chicken Platter	04-01-b	0.52
Chili's Santa Clara 3591 El Camino Real Santa Clara, CA 95051	Grilled Caribbean Chicken Salad	04-10-a	0.54
Chili's Santa Clara 3591 El Camino Real Santa Clara, CA 95051	Guiltless Chicken Platter	04-10-b	0.20
McDonald's Burbank 1127 North San Fernando Blvd Burbank, CA 91504	Caesar Salad with Grilled Chicken	05-02-a	0.31
McDonald's Los Angeles 6345 Wilshire Blvd Los Angeles, CA 90048	Caesar Salad with Grilled Chicken	05-03-a	0.36
McDonald's Montebello 2020 West Beverly Blvd Montebello, CA 90640	Caesar Salad with Grilled Chicken	05-04-a	0.34
McDonald's Sacramento 200 Richards Blvd. Sacramento, CA 95814	Caesar Salad with Grilled Chicken	05-05-a	0.32
McDonald's Vacaville 541 Davis St Vacaville, CA 95688	Caesar Salad with Grilled Chicken	05-06-a	0.12
McDonald's Encinitas 1064 N. El Camino Real Encinitas, CA 92024	Caesar Salad with Grilled Chicken	05-01-a	1.23
McDonald's Encinitas	Caesar Salad with Grilled Chicken	05-07-a	0.08

1271 Encinitas Blvd. Encinitas, CA 92024			
McDonald's Fremont 38860 Fremont Blvd. Fremont, CA 94536	Caesar Salad with Grilled Chicken	05-08-a	0.50
McDonald's Fremont 4318 Thornton Ave. Fremont, CA 94536	Caesar Salad with Grilled Chicken	05-09-a	0.40
McDonald's San Jose 2040 N 1 <sup>st</sup> St San Jose, CA 95131	Caesar Salad with Grilled Chicken	05-10-a	0.14
Outback Burbank 1761 N. Victory Place Burbank, CA 91504	Chicken on the Barbie	06-02-a	1.71
Outback Torrence 21880 Hawthorne Blvd. Torrence, CA 90503	Chicken on the Barbie	06-03-a	14.7
Outback Buena Park 7575 Beach Blvd. Buena Park, CA 90622	Chicken on the Barbie	06-04-a	10.2
Outback Vacaville 521 Davis St. Vacaville, CA 95688	Chicken on the Barbie	06-05-a	6.14
Outback Howe Avenue 1340 Howe Ave. Sacramento, CA 95825	Chicken on the Barbie	06-06-a	1.17
Outback Oceanside 2485 Vista Way Oceanside, CA 92054	Chicken on the Barbie	06-01-a	3.05
Outback Oceanside 2485 Vista Way Oceanside, CA 92054	Chicken on the Barbie	06-07-a	5.73
Outback Fremont 5525 Stevenson Blvd. Fremont, CA 94538	Chicken on the Barbie	06-08-a	6.04
Outback Almaden 694 Blossom Hill Rd. San Jose, CA 95123	Chicken on the Barbie	06-09-a	10.8
Outback Milpitas 124 Great Mall Dr. Milpitas, CA 95035	Chicken on the Barbie	06-10-a	5.61
T.G.I. Friday's Knott's Berry Farm 8039 Beach Blvd Buena Park, CA 90620	Cobb Salad with Grilled Chicken	07-01-a	30.6
T.G.I. Friday's Knott's Berry Farm	Grilled Chicken Flavor Shots	07-01-b	17.5

8039 Beach Blvd Buena Park, CA 90620			
T.G.I. Friday's Cerritos 12721 Towne Center Dr. Cerritos, CA 90703	Cobb Salad with Grilled Chicken	07-02-a	43.2
T.G.I. Friday's Cerritos 12721 Towne Center Dr. Cerritos, CA 90703	Grilled Chicken Flavor Shots	07-02-b	11.3
T.G.I. Friday's Torrance 23420 Hawthorne Blvd. Torrance, CA 90505	Cobb Salad with Grilled Chicken	07-03-a	19.2
T.G.I. Friday's Torrance 23420 Hawthorne Blvd. Torrance, CA 90505	Grilled Chicken Flavor Shots	07-03-b	3.65
T.G.I. Friday's Sacramento 1229 Howe Ave. Sacramento, CA 95825	Cobb Salad with Grilled Chicken	07-04-a	12.0
T.G.I. Friday's Sacramento 1229 Howe Ave. Sacramento, CA 95825	Grilled Chicken Flavor Shots	07-04-b	8.58
T.G.I. Friday's Roseville 1168 Galleria Blvd. Roseville, CA 95678	Cobb Salad with Grilled Chicken	07-05-a	5.69
T.G.I. Friday's Roseville 1168 Galleria Blvd. Roseville, CA 95678	Grilled Chicken Flavor Shots	07-05-b	9.38
T.G.I. Friday's San Diego Gaslamp 403 Camino Del Rio San Diego, CA 92010	Cobb Salad with Grilled Chicken	07-06-a	3.77
T.G.I. Friday's San Diego Gaslamp 403 Camino Del Rio San Diego, CA 92010	Grilled Chicken Flavor Shots	07-06-b	19.9
T.G.I. Friday's Carlsbad 890 Palomar Airport Rd. Carlsbad, CA 92008	Cobb Salad with Grilled Chicken	07-07-a	9.93
T.G.I. Friday's Carlsbad 890 Palomar Airport Rd. Carlsbad, CA 92008	Grilled Chicken Flavor Shots	07-07-b	15.2
T.G.I. Friday's Pleasanton 3999 Santa Rita Rd. Pleasanton, CA 94588	Cobb Salad with Grilled Chicken	07-08-a	41.5
T.G.I. Friday's Pleasanton 3999 Santa Rita Rd. Pleasanton, CA 94588	Grilled Chicken Flavor Shots	07-08-b	16.1
T.G.I. Friday's Union City 31900 Dyer St.	Cobb Salad with Grilled Chicken	07-09-a	10.5

Union City, CA 94587			
T.G.I. Friday's Union City 31900 Dyer St. Union City, CA 94587	Grilled Chicken Flavor Shots	07-09-b	16.1
T.G.I. Friday's Cupertino 10343 N. Wolfe Rd. Cupertino, CA 95014	Cobb Salad with Grilled Chicken	07-10-a	6.75
T.G.I. Friday's Cupertino 10343 N. Wolfe Rd. Cupertino, CA 95014	Grilled Chicken Flavor Shots	07-10b	1.15

I hereby certify that the information above is truthful and complete.

*Kristie M Stoick*

4/28/06

\_\_\_\_\_  
Kristie Stoick, M.P.H.

\_\_\_\_\_  
date

*Chad B Sandusky*

4/28/06

\_\_\_\_\_  
Chad Sandusky, Ph.D.

\_\_\_\_\_  
date

## **PCRM CHICKEN STUDY: Standard Operating Procedures**

### **Materials**

- Blue ice (enough for each sampling trip and shipping) (please purchase)
- Freezer capable of holding 0° C temperature
- Small styrofoam cooler (please purchase)
- Box to hold shipping container (at shipping outlet when shipping)
- Small and large sized ziplock baggies (provided)
- Sample ID Cards (provided)
- Chain of Custody form—for analytical lab (provided)
- Chain of Custody form—for PCRM (provided)
- Latex gloves (If desired--provided)

### **Procedures**

- Identify local shipping outlet (FedEx, UPS, etc.)
- Obtain necessary supplies—box can be purchased from courier at time of shipping
- Review sampling locations and discuss any changes with PCRM
- Map out route to minimize driving time (maps provided)
- Prepare sample package by placing ID cards (one each) in a large ziplock baggie
- Place a small ziplock baggie (for sample) into each large ziplock baggie with ID card
- Place ziplock baggie combo in cooler with pre-frozen blue ice packs
- Visit sampling locations. For some longer-wait establishments, you may want to call and order ahead. At each location:
  - Note arrival time on PCRM chain of custody form
  - See Appendix A for specific name of dish to order
  - Order sample as plainly as possible (without condiments, cheese, sauces, toppings, etc.)
  - Get it “To Go”
  - In car, remove sample from wrapping
  - Place sample (meat only) in designated small ziplock baggie (within larger baggie). This is to ensure that the sample ID card and the sample do not touch.
  - Note time transferred on PCRM chain of custody form
- Continue sampling
- When finished for the day, return to freezer
- Remove sample bags from travel cooler and place in permanent freezer
- Determine next day sampling locations (if appropriate)

Sampling  
all in one  
day?  
Check  
here and  
continue.

- Prepare sample package by placing ID cards (one each) in a large ziplock baggie
- Place a small ziplock baggie (for sample) into each large ziplock baggie with ID card
- Place ziplock baggie combo in cooler with blue ice packs
- Visit sampling locations. For some longer-wait establishments, you may want to call and order ahead. At each location:
  - Note arrival time on PCRMR chain of custody form
  - See Appendix A for specific name of dish to order
  - Order sample as plainly as possible (without condiments, cheese, sauces, toppings, etc.)
  - Get it "To Go"
  - In car, remove sample from wrapping
  - Place sample (meat only) in designated small ziplock baggie (within larger baggie). This is to ensure that the sample ID card and the sample do not touch.
  - Note time transferred on PCRMR chain of custody form
- Continue day two sampling
- When finished for the day, return to freezer
- Remove sample bags from travel cooler and place in permanent freezer overnight
- The next day: Remove samples from all days and place in Styrofoam cooler with multiple packages of blue ice
- Include Columbia Analytical chain of custody forms for lab, with sample info filled out (**white and pink sheets only—keep yellow**)
- Take cooler to pre-established local shipping outlet
- Pack into shipping box
- Send overnight—to arrive next morning by 10 am.
  - Send to: Columbia Analytical Services  
1317 South 13<sup>th</sup> Ave.  
Kelso, WA 98626
- Call lab to tell them shipment has been sent and will arrive next day by 10 am
- Mail PCRMR chain of custody form to PCRMR, along with PCRMR's copy of Columbia Analytical chain of custody (yellow sheet), and a time/mileage/expense record, along with any receipts, to PCRMR.

I, \_\_\_\_\_, have followed this Standard Operating Procedure fully.  
and completely.

Date: \_\_\_\_\_ Signature: \_\_\_\_\_

**Appendix A: Restaurant sample names**

STORE	ITEM 1	ITEM 2
01-Applebees	Grilled Italian chicken Caesar salad	Honey-grilled chicken entrée
02-Burger King	Tendergrill chicken sandwich	N/A
03-Chick-fil-A	Chargrilled chicken sandwich	N/A
04-Chili's	Grilled Caribbean chicken salad	Guiltless chicken platter entrée
05-McDonald's	Caesar salad with grilled chicken	N/A
06-Outback	Chicken on the Barbie	N/A
07-TGI Friday's	Cobb salad with grilled chicken	Grilled chicken flavor shots entrée

**CERTIFICATE OF MERIT**  
Health and Safety Code Section 25249.7(d)

I, Daniel Kinburn, 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 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:

July 13, 2006



(Signature)

# **EXHIBIT A**

**Intended Defendants**

Restaurant/Owner	Recipient	Name	Street Address	City	State	Zip	Phone	Fed Ex number
Applebee's	Legal Department	Rebecca Tilden	4551 W. 107th Street	Overland Park	KS	66207	888-592-7753	8575 9729 6812
Burger King Corporation	Legal Department	Anne Chwat	5605 Blue Lagoon Drive	Miami	FL	33126	305-378-3000	8576 9729 5871
Chick-fil-A	Legal Department	Bureon Ledbetter	5200 Bufington Road	Atlanta	GA	30349	404-765-8038	8577 9729 6823
Chill's, Inc./Brinker International, Inc.	Legal Department	Roger Thomson	6820 LBJ Freeway	Dallas	TX	75240	972-980-9917	8578 9729 5860
McDonald's Corporation	Legal Department	Gloria Santona	2111 McDonald's Dr	Oak Brook	IL	60523	800-244-6227	8579 9729 6801
Outback Steakhouse/OSI Restaurant Partners, Inc.	Legal Department	Joseph Kadow	2202 N. West Shore Blvd	Tampa	FL	33607	813-282-1224	8580 9729 5850
TGI FRIDAY'S Inc./Carlson Restaurants Worldwide, Inc.	Legal Department	Leslie Sharnan	701 Carlson Parkway	Minnetonka	MN	55305	972-662-5400	8581 9729 5882

California County District Attorneys

County	Name	Street Address	City	State	Zip	Phone	Fed Ex number
Alameda County	Tom Orloff	1225 Fallon Street Room 900	Oakland	CA	94612	(510) 272-6222	8575 9729 6260
Alpine County	William Richmond	270 Laramie Street	Markleville	CA	96120	(530) 694-2971	8575 9729 6250
Amador County	Todd Riebe	708 Court Street	Jackson	CA	95642	(209) 223-6444	8575 9729 5930
Butte County	Michael Ramsey	25 County Center Drive	Oroville	CA	95965	(530) 538-7411	8575 9729 5941
Calaveras County	Jeffrey Tuttle	891 Mountain Ranch Road Calaveras County District Attorney	San Andreas	CA	95249	(209) 754-6330	8575 9729 5952
Colusa County	District Attorney Robert Kochly	547 Market Street	Colusa	CA	95932	(530) 456-0545	8575 9729 5780
Contra Costa County	Robert Kochly	725 Court Street, 4th floor	Martinez	CA	94553	(925) 646-2761	8575 9729 5963
Del Norte County	Mike Riese	450 H Street, Room 171	Crescent City	CA	95531	(707) 464-7210	8576 9729 5974
El Dorado County	Gary Lacy	515 Main Street	Placerville	CA	95667	(530) 621-6472	8575 9729 5985
Fresno County	Elizabeth Egan	Fresno County Plaza 2220 Tulare Street, Suite 1000	Fresno	CA	93721	(559) 488-3141	8575 9729 5996
Glenn County	Robert Holzapel	540 Sycamore Street	Willows	CA	95988	(530) 934-6525	8575 9729 6000
Humboldt County	Paul Gallegos	825 5th Street	Eureka	CA	95501	(707) 445-7411	8575 9729 6021
Inyo County	District Attorney Edward Jagels	168 North Edwards	Independence	CA	93526	(760) 878-0282	8577 9729 5790
Kern County	Edward Jagels	1215 Truxtun Avenue	Bakersfield	CA	93301	(661) 868-2340	8575 9729 6032
Kings County	Ronald Cathoun	1400 West Lacey Boulevard	Hanford	CA	93230	(559) 582-0326	8575 9729 6043
Lake County	District Attorney Robert Burns	255 N. Forbes Street	Lakeport	CA	95453	(707) 263-2251	8578 9729 5805
Lassen County	Robert Burns	220 South Lassen St., Ste. 8	Susanville	CA	96130	(530) 251-8283	8575 9729 6065
Los Angeles County	Steve Cooley	210 West Temple Street Suite 18000	Los Angeles	CA	90012	(213) 974-3512	8575 9729 6076
Madera County	District Attorney Edward Berberian	209 W. Yosemite Avenue	Madera	CA	93637	(559) 675-7726	8579 9729 5816
Marin County	Edward Berberian	3501 Civic Center Drive Room 130	San Rafael	CA	94903	(415) 499-6450	8575 9729 6087
Mariposa County	Robert Brown	5101 Jones Street Post Office Box 730	Mariposa	CA	95338	(209) 966-3626	8575 9729 6098
Mendocino County	Norman Vroman	100 N. State Street	Ukiah	CA	95482	(707) 463-4211	8575 9729 6157
Merced County	Gordon Spencer	2222 "W" Street	Merced	CA	95340	(209) 385-7381	8575 9729 6168
Monterey County	Dean Filippo	1200 Agualito Rd., Room 301	Salinas	CA	93940	(831) 647-7770	8575 9729 6180
Napa County	Gary Lieberstein	931 Parkway Mall	Napa	CA	94558	(707) 253-4211	8575 9729 6190
Nevada County	Michael Ferguson	201 Church Street, Suite 8	Nevada City	CA	95959	(530) 265-1301	8575 9729 6205
Orange County	Tony Rackaukas	401 Civic Center Drive	Santa Ana	CA	92701	(714) 834-3600	8575 9729 6249
Placer County	Bradford Fenocchio	11562 B Avenue	Auburn	CA	95603	(530) 889-7000	8575 9729 6238
Plumas County	Jeff Cunan	520 Main Street Room 404	Quincy	CA	95971	(530) 283-6303	8575 9729 6227
Riverside County	Grover Trask	4075 Main Street	Riverside	CA	92501	(951) 955-5400	8575 9729 6216
Sacramento County	Jan Scully	901 G Street	Sacramento	CA	95814	(916) 874-6218	8575 9729 6959
San Benito County	District Attorney Michael Ramos	419 4th Street, 2nd Floor	Hollister	CA	95023	(408) 636-4120	8580 9729 5827
San Bernardino County	Michael Ramos	316 N Mt View Ave	San Bernardino	CA	92415	(909) 387-8309	8575 9729 6960
San Diego County	Bonnie Dumanis	330 W. Broadway	San Diego	CA	92101	(619) 531-4040	8575 9729 6981

California County District Attorneys

County	Name	Street Address	City	State	Zip	Phone	Fed Ex number
San Francisco County	Kamala Harris	850 Bryant Street, Room 325	San Francisco	CA	94103	(415) 553-1752	8575 9729 5908
San Joaquin County	James Williett	222 E. Weber Ave PO Box 990	Stockton	CA	95201	(209) 468-2400	8575 9729 5919
San Luis Obispo County	Gerald Shea	County Government Center, 4th Floor	San Luis Obispo	CA	93408	(805) 781-5800	8575 9729 6937
San Mateo County	James Fox	400 County Center	Redwood City	CA	94063	(650) 363-4636	8575 9729 6948
Santa Barbara County	Tom Sneddon	1105 Santa Barbara Street	Santa Barbara	CA	93101	(805) 568-2300	8575 9729 6878
Santa Clara County	George Kennedy	70 West Hedding Street, West Wing	San Jose	CA	95110	(408) 299-7400	8575 9729 6889
Santa Cruz County	Bob Lee	701 Ocean Street	Santa Cruz	CA	95060	(831) 454-2400	8575 9729 6890
Shasta County	Gerald Benito	1525 Court Street 3rd floor	Redding	CA	96001	(530) 245-6300	8575 9729 6904
Sierra County	Larry Allen	100 Courthouse Square Post Office Box 457	Downsville	CA	95936	(530) 289-3269	8575 9729 6915
Siskiyou County	James Andrus	311 Fourth Street P. O. Box 986	Yreka	CA	96097	(530) 842-8125	8575 9729 6926
Solano County	David Paulson	675 Texas Street, Suite 4500	Fairfield	CA	94533	(707) 784-6800	8575 9729 7006
Sonoma County	Stephan Passalacqua	600 Administration Drive, Room 212-J	Santa Rosa	CA	95403	(707) 565-2311	8575 9729 7017
Stanislaus County	Carol Shipley	800 11th Street	Modesto	CA	95354	(209) 525-5550	8575 9729 7050
Sutter County	Carl Adams	446 2nd Street	Yuba City	CA	95991	(530) 822-7330	8575 9729 5893
Tehama County	Gregg Cohen	444 Oak Street, Room L	Red Bluff	CA	96080	(530) 527-3053	8575 9729 6102
Trinity County	David Cross	11 Court Street	Weaverville	CA	96093	(530) 623-1304	8575 9729 6113
Tulare County	Phil Cline	221 S. Mooney Boulevard	Visalia	CA	93291	(559) 733-6411	8575 9729 6124
Tuolumne County	District Attorney	2 South Green Street	Sonora	CA	95370	(209) 533-5655	8581 9729 5838
Ventura County	Gregory Totten	800 S. Victoria Avenue	Ventura	CA	93009	(805) 654-2500	8575 9729 6135
Yolo County	David Henderson	301 2nd Street	Woodland	CA	95695	(530) 666-8180	8575 9729 6146
Yuba County	Patrick McGrath	215 5th St.	Marysville	CA	95901	(530) 749-7770	8575 9729 6867

California City District Attorneys (population over 750,000) and California Attorney General

City	Population*	Name	Street Address	State	Zip	Phone	Fed Ex number
Los Angeles	3,694,820	Rocky Delgadillo	800 City Hall East 200 North Main Street Civic Center Plaza 1200 Third Avenue, Suite 1620	CA	90012	(213) 974-3512	8575 9729 6856
San Diego	1,223,400	Michael Aguirre	1620	CA	92101	(619) 236-6220	8576 9729 6845
San Francisco	776,733	Dennis Herrera	City Hall, Room 234	CA	94102	(415) 553-1752	8577 9729 6834
San Jose	894,943	Richard Doyle	200 East Santa Clara Street	CA	95113	(408) 792-2981	8578 9729 5849

\* 2000 Census results  
Released June 30,  
2005

Attorney General							
Proposition 65 Enforcement Reporting		Prop 65 Coordinator	1515 Clay Street, Suite 2000	Oakland	CA	94612	8578 9729 5920

1 **PROOF OF SERVICE**

2 I, Linda Pomatto declare:

3 I am a resident of the State of California and over the age of eighteen years, and  
4 not a party to the within action; my business address is Richards, Watson & Gershon, 355 South  
5 Grand Avenue, 40<sup>th</sup> Floor, Los Angeles, California 90071. On July 17, 2006, I served the within  
6 documents:

7 **SUPPLEMENTAL NOTICE LETTER**

- 8  by causing facsimile transmission of the document(s) listed above from (213) 626-  
9 0078 to the person(s) and facsimile number(s) set forth below on this date before  
10 5:00 P.M. This transmission was reported as complete and without error. A copy  
11 of the transmission report(s), which was properly issued by the transmitting  
12 facsimile machine, is attached. Service by facsimile has been made pursuant to a  
13 prior written agreement between the parties.
- 14  by placing the document(s) listed above in a sealed envelope with postage thereon  
15 fully prepaid, in the United States mail at Los Angeles, California addressed as set  
16 forth below. I am readily familiar with the firm's practice for collection and  
17 processing correspondence for mailing with the United States Postal Service.  
18 Under that practice, it would be deposited with the U.S. Postal Service on that  
19 same day with postage thereon fully prepaid in the ordinary course of business. I  
20 am aware that on motion of the party served, service is presumed invalid if postal  
21 cancellation date or postage meter date is more than one day after date of deposit  
22 for mailing contained in this affidavit.
- 23  by placing the document(s) listed above in a sealed envelope and affixing a pre-  
24 paid air bill, and causing the envelope to be delivered to a n agent for delivery, or  
25 deposited in a box or other facility regularly maintained by , in an envelope or  
26 package designated by the express service carrier, with delivery fees paid or  
27 provided for, addressed to the person(s) at the address(es) set forth below.
- 28  by personally delivering the document(s) listed above to the person(s) at the  
address(es) set forth below.
- by causing personal delivery by First Legal Support Services, 1511 West Beverly  
Boulevard, Los Angeles, California 90026 of the document(s) listed above to the  
person(s) at the address(es) set forth below.

Proposition 65 Coordinator  
1515 Clay Street  
Suite 2000  
Oakland, California 94612

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

Executed on July 17, 2006.

  
Linda Pomatto