



Klamath

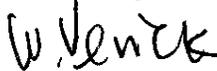
May 24, 2007

EDWARD G. WEIL
DEPUTY ATTORNEY GENERAL
OFFICE OF THE ATTORNEY GENERAL
P.O. BOX 70550
OAKLAND CA 94612-0550

Greetings:

This office and the Mateel Environmental Justice Foundation (“Mateel”) give you notice that the private businesses listed on the attached service list have been, are, will be and threaten to be in violation of Cal. Health & Safety Code § 25249.6. Both this office and Mateel are private enforcers of Proposition 65, both may be contacted at the below listed address and telephone number, and I am a responsible individual at both Mateel and this office. The above referenced violations occur when California residents come into contact with brass padlocks. A list of specific examples of the specific types of products at issue is attached. The bodies of these brass locks are made from leaded brass, which contains lead and lead compounds (“lead”), which are chemicals known to cause cancer, birth defects and other reproductive harm. California residents are exposed to lead when they handle these locks while using them to secure their property, or when they are unlocking them to gain access to their property. Lead is transferred from the brass locks to their hands and to other parts of their skin. This lead is then absorbed through the skin, taken into cuts and abrasions, absorbed through mucous membranes, and transferred from the skin to the mouth via oral contact either directly with the brass, from oral contact with the lead-contaminated skin, and when lead is transferred from contaminated skin to cigarettes and food and the contaminated cigarettes and food are smoked and/or eaten. These lead exposures thus occur via the dermal absorption, subcutaneous, mucous membrane, ingestion and inhalation routes. The listed private businesses did not and do not provide people with clear and reasonable warnings before they expose them to lead. These violations have occurred every day since at least May 24, 2004, and will continue every day until the lead is removed from the brass locks, or until clear and reasonable warnings are given. The above-referenced violations are alleged for occupational exposures as well as for consumer and environmental exposures. We do not, however, allege occupational exposure violations as to any brass locks made outside of California, except as to workplaces the private businesses themselves maintain in California. Exposures constituting Proposition 65 environmental exposure violations occur both on and off the private businesses' property and in each of California's 58 counties.

Cordially,

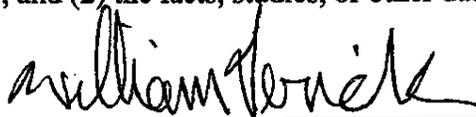


William Verick

CERTIFICATE OF MERIT

I, William Verick, hereby declare: 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. I am the attorney for the noticing party. 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 that is the subject of the action. 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. 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 person(s) consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: May 24, 2007



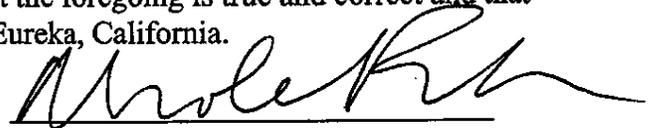
William Verick

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 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 compliances 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.

CERTIFICATE OF SERVICE

I, Nicole Frank, declare:

If called, I could and would testify as follows: I am over eighteen. My business address is 424 First Street, Eureka, California, 95501. On May 24, 2007, I caused the attached 60-DAY NOTICE LETTER, or a letter identical in substance, to be served by U.S. Mail on those public enforcement agencies listed on the attached SERVICE LIST; in addition on the same date and by U.S. Mail I caused the attached 60-DAY NOTICE LETTER and PROPOSITION 65: A SUMMARY to be sent by Certified U.S. Mail to the private business entities also listed on the attached SERVICE LIST. I deposited copies of these documents in envelopes, postage pre-paid, with the U.S. Postal Service on the day on which the mail is collected. 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 May 24, 2007, at Eureka, California.



Nicole Frank

SERVICE LIST

EDWARD G. WEIL DEPUTY ATTORNEY GENERAL OFFICE OF THE ATTORNEY GENERAL P.O. BOX 70550 OAKLAND CA 94612-0550	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF GLENN P.O. BOX 430 WILLOWS, CA 95988	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MONTEREY 240 CHURCH STREET P.O. BOX 1131 SALINAS, CA 93902	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SISKIYOU P.O. BOX 986 YREKA, CA 96097	ROBERT LYNCH, CEO ORCHARD SUPPLY HARDWARE CORPORATION 3333 BEVERLY ROAD, B2-130B HOFFMAN ESTATES, IL 60179
OFFICE OF THE CITY ATTORNEY CITY OF OAKLAND 505 14TH ST 12TH FLOOR OAKLAND, CA 94612	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF HUMBOLDT 825 5TH ST. EUREKA, CA 95501	COUNTY OF NAPA 931 PARKWAY MALL P.O. BOX 720 NAPA, CA 94559-0720	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SOLANO 600 UNION AVE FAIRFIELD, CA 94533	LYLE G. HEIDEMANN, CEO TRUE VALUE COMPANY 8600 W. BRYN MAWR AVE. CHICAGO, IL 60631-3505
OFFICE OF THE CITY ATTORNEY CITY OF SAN FRANCISCO CITY HALL ROOM 206 400 VAN NESS SAN FRANCISCO, CA 94102	COUNTY OF IMPERIAL COURTHOUSE, FLOOR 2 939 W. MAIN ST EL CENTRO, CA 92243	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF NEVADA COURTHOUSE ANNEX NEVADA CITY, CA 95959	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SONOMA 600 ADMINISTRATION DR. #212J SANTA ROSA, CA 95403	JEFFREY A REIN, CEO WALGREEN CO. 200 WILMONT RD DEERFIELD, IL 60015
OFFICE OF THE CITY ATTORNEY CITY OF SACRAMENTO 980 9 TH STREET, 10 TH FLOOR SACRAMENTO, CA 95814	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF INYO P.O. DRAWER D INDEPENDENCE, CA 93526	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF ORANGE 401 CIVIC CENTER DR WEST SANTA ANA, CA 92701	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF STANISLAUS 1100 I ST. #200 MODESTO, CA 95354	JAMES E WINNER JR, PRESIDENT WINNER INTERNATIONAL LLC WINNER INTERNATIONAL NEW YORK, INC. 32 W STATE STREET SHARON, PA 16146
OFFICE OF THE CITY ATTORNEY CITY OF SAN JOSE 151 W. MISSION ST. SAN JOSE, CA 95110	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF KERN 1215 TRUXTUN AVE. FLOOR 4 BAKERSFIELD, CA 93301	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF PLACER 11562 B AVE AUBURN, CA 95603-2687	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SUTTER 1160 CIVIC CENTER BLVD. #A YUBA CITY, CA 95993	
OFFICE OF THE CITY ATTORNEY CITY OF LOS ANGELES 200 N. MAIN ST. LOS ANGELES, CA 90012	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF KINGS 1400 W. LACEY BLVD. HANFORD, CA 93230	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF PLUMAS 520 MAIN STREET #404 QUINCY, CA 95971	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF TEHAMA P.O. BOX 519 REDBLUFF, CA 96080	
OFFICE OF THE CITY ATTORNEY CITY OF SAN DIEGO CONSUMER & ENVIRONMENTAL PROTECTION 1200 THIRD AVENUE, SUITE 700 SAN DIEGO, CA 92101	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF LAKE 255 N. FORBES ST # 424 LAKEPORT, CA 95453	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF RIVERSIDE 4075 MAIN ST. RIVERSIDE, CA 92501	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF TRINITY P.O. BOX 310 WEAVERVILLE, CA 96093	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF ALAMEDA 1225 FALLON STREET ROOM 900 OAKLAND, CA 94612	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF LASSEN 220 SOUTH LASSEN ST. STE 8 SUSANVILLE, CA 96130	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SACRAMENTO 901 G STREET SACRAMENTO, CA 95814	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF TULARE COURTHOUSE #224 VISALIA, CA 93291	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF ALPINE P.O. BOX 248 MARKLEEVILLE, CA 96120	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF LOS ANGELES 18000 CRIMINAL COURTS BUILDING 210 W. TEMPLE ST. LOS ANGELES, CA 90012	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN BERNARDINO 316 MT. VIEW AVE. SAN BERNARDINO, CA 92415-0004	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF TUOLUMNE 2 S. GREEN ST. SONORA, CA 95370	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF AMADOR 708 COURT STREET JACKSON, CA 95642	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MARIPOSA P.O. BOX 730 MARIPOSA, CA 95338	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN DIEGO 330 W. BROADWAY SAN DIEGO, CA 92101	VENTURA COUNTY DISTRICT ATTORNEY'S OFFICE 800 SOUTH VICTORIA AVE VENTURA, CA 93009	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF BUTTE 25 COUNTY CENTER DR. OROVILLE, CA 95965	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MADERA 209 W. YOSEMITE AVE. MADERA, CA 93637	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN FRANCISCO 850 BRYANT ST #322 SAN FRANCISCO, CA 94103	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF YOLO 301 SECOND STREET WOODLAND, CA 95695	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF CALAVERAS GOVERNMENT CENTER 891 MOUNTAIN RANCH ROAD SAN ANDREAS, CA 95249	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MARIN HALL OF JUSTICE #183 SAN RAFAEL, CA 94903	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN JOAQUIN 222 E. WEBER AVE #202 STOCKTON, CA 95202	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF YUBA 215 5TH ST. MARYSVILLE, CA 95901	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF COLUSA 547 MARKET STREET COLUSA, CA 95932	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MARIPOSA P.O. BOX 730 MARIPOSA, CA 95338	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN JOAQUIN 222 E. WEBER AVE #202 STOCKTON, CA 95202	THOMAS LAITALA, CEO ABUS LOCK, CO. P.O. BOX 2367 WOBURN, MA 01888	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF CONTRA COSTA P.O. BOX 670 MARTINEZ, CA 94553	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MENDOCINO PO BOX 1000 UKIAH, CA 95482	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN DIEGO 330 W. BROADWAY SAN DIEGO, CA 92101	ABUS AUGUST BREMICKER SOHNE KG ALTENHOFER WEG 25 58300 WETTER GERMANY	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF DEL NORTE 450 H ST #171 CRESCENT CITY, CA 95531	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MERCED 2222 M ST. MERCED, CA 95340	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SAN MATEO HALL OF JUSTICE AND RECORDS REDWOOD CITY, CA 94063	RAY A GRIFFITH, CEO ACE HARDWARE CORPORATION 2200 KENSINGTON CT OAK BROOK, IL 60523-2100	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF EL DORADO 515 MAIN ST. PLACERVILLE, CA 95667	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MODOC 204 SOUTH COURT STREET ALTURAS, CA 96101	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SANTA BARBARA 1112 SANTA BARBARA ST. SANTA BARBARA, CA 93101	JOHN PALKA, CEO BELWITH INTERNATIONAL, LTD 3100 BROADWAY AVE. SW GRANDVILLE, MI 49418-1581	
OFFICE OF THE DISTRICT ATTORNEY COUNTY OF FRESNO 2220 TULARE ST #1000 FRESNO, CA 93721	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF MONO P.O. BOX 617 BRIDGEPORT, CA 93517	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SANTA CLARA 70 W. HEDDING ST. SAN JOSE, CA 95110	JOHN PALKA, CEO HICKORY HARDWARE, INC. 3100 BROADWAY AVE. SW GRANDVILLE, MI 49418-1581	
	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SHASTA 1525 COURT ST. REDDING, CA 96001	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SIERRA P.O. BOX 457 DOWNEVILLE, CA 95936	DAVID MAUER, CEO E&B GIFTWARE LLC 4 EXECUTIVE PLAZA YONKERS, NY 10701-6803	
	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF SONOMA 600 ADMINISTRATION DR. #212J SANTA ROSA, CA 95403		WILLIAM SCHMIDT, PRESIDENT THE FAUCET QUEENS, INC. 650 FOREST EDGE DRIVE VERNON HILLS, IL 60061	
	OFFICE OF THE DISTRICT ATTORNEY COUNTY OF STANISLAUS 1100 I ST. #200 MODESTO, CA 95354		ERIC SCHIFFER, CEO 99 CENTS ONLY STORES 4000 UNION PACIFIC AVE COMMERCE, CA 90023	

PRODUCT LIST

ABUS/ABUS LOCK CO.

DO IT 1 3/16" SOLID BRASS PADLOCK 219452 O/M 1-4-24 1830DDIB 50169; DO IT 1 1/2" SOLID BRASS PADLOCK 200492 O/M 1-4-24 1840DLJDIB 50176; DO IT 3/4" SOLID BRASS 219444 O/M 1-4-24 1820DDIB 50167 DO IT 1 1/2" SOLID BRASS 40MM PADLOCK 219460 O/M 1-4-24 1840DDIB 50171 This product description pertains not only to the specific models of the products listed, but also for all units of all models of brass padlocks.

ACE HARDWARE CORPORATION

ACE 2" PADLOCK SOLID BRASS BODY HIGH SECURITY ITEM# 54543 UPC# 082901; ACE 1-1/4" PADLOCK SOLID BRASS BODY RESETTABLE COMBINATION GENERAL SECURITY ITEM# 5094172 UPC# 082901 039075; ACE 3/4" LUGGAGE PADLOCKS SOLID BRASS BODY GENERAL SECURITY ITEM# 5021746 UPC# 082901 006909; ACE 2" UPC# 082901 006909; ACE 3/4" PADLOCK SOLID BRASS BODY RESETTABLE COMBINATION GENERAL SECURITY UPC# 082901 039068; ACE 3/4" PADLOCK SOLID BRASS BODY GENERAL SECURITY ITEM# 53077 UPC# 082901 530770; ACE 1" PADLOCK SOLID BRASS BODY GENERAL SECURITY ITEM#54539 UPC# 082901 545392; ACE MAXIMUM SECURITY PADLOCK 2 3/8 IN. ITEM# 5002217; ACE PADLOCK SOLID BRASS 1 3/4" MAXIMUM SECURITY ITEM# 5237433; ACE LUGGAGE PADLOCKS GENERAL SECURITY 3/4 IN. ITEM# 50321746 This product description pertains not only to the specific models of the products listed, but also for all units of all models of brass padlocks.

BELWITH INTERNATIONAL LTD/HICKORY HARDWARE, INC.

FIRST WATCH 2" COMBINATION PADLOCK 3175 This product description pertains not only to the specific model of the product listed, but also for all units of all models of brass padlocks.

E & B GIFTWARE LLC

SAMSONITE 4 DIAL BRASS COMBINATION LOCK SET OF 2 SM2106BS 021276 121060; SAMSONITE BRASS LOCK SET OF 4 SM0002FO UPC 021276 300205 This product description pertains not only to the specific models of the products listed, but also for all units of all models of brass padlocks.

THE FAUCET-QUEENS, INC.

HELPING HAND SOLID BRASS PADLOCK 40030 This product description pertains not only to the specific model of the product listed, but also for all units of all models of brass padlocks.

99 CENTS ONLY STORES

TUFF BUILT BRASS PADLOCK KEYED ALIKE 20MM SOLID BRASS Item no. S20X2 UPC: 691374 372208; STATE 50MM TOP SECURITY LOCK - "GOLDBIRD" STAMPED ON LOCK - ITEM# 46176 UPC: 032329 461767 This product description pertains not only to the specific models of the products listed, but also for all units of all models of brass padlocks.

TRUE VALUE COMPANY

TRUE VALUE 2" SOLID BRASS PADLOCK ITEM #245-217 501-50001 UPC: 052088 071687; RESETTABLE COMBINATION SOLID BRASS LOCK ITEM # 551-412 501-40051 UPC #0520880722110 ;RESETTABLE COMBINATION SOLID BRASS LOCK ITEM #553-412 501-40051 This product description pertains not only to the specific models of the products listed, but also for all units of all models of brass padlocks.

ORCHARD SUPPLY HARDWARE CORPORATION

2PC. BRASS PADLOCK -SIZE: 1-1/4" -WITH 3 KEYS ITEM# 6690580 UPC: 4897013 590156; 2 PIECE BRASS PADLOCK -WITH THREE KEYS -SIZE: 1-1/4" ITEM#73301SKU#6690580 MODEL# 25B3040 UPC: 732799 823200 This product description pertains not only to the specific models of the products listed, but also for all units of all models of brass padlocks.

WALGREEN CO.

LOCKAGE 40MM BRASS PADLOCK #832774 UPC: 049022 113756 This product description pertains not only to the specific model of the product listed, but also for all units of all models of brass padlocks.

WINNER INTERNATIONAL LLC

WINNER INTERNATIONAL NEW YORK, INC.

THE CLUB SECURITY SERIES SOLID BRASS PADLOCK #UTL815 This product description pertains not only to the specific model of the product listed, but also for all units of all models of brass padlocks