

LAW OFFICES OF
ANDREW L. PACKARD

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April 6, 2012

VIA CERTIFIED MAIL

Mr. Ron Teegarden
President & Chief Executive Officer
RON TEEGUARDEN ENTERPRISES, INC.
315 Wilshire Boulevard
Santa Monica, CA 90401

Re: Notice of Violations of California Health & Safety Code § 25249.5 *et seq.*

Dear Sir,

This firm represents Stephen D. Gillett in connection with this notice of violations of California's Safe Drinking Water & Toxic Enforcement Act of 1986, codified at Health & Safety Code § 25249.5 *et seq.* (also referred to as "Proposition 65"). This letter serves to provide notification of these violations to you and to the public enforcement agencies.

Pursuant to § 25249.7(d) of the statute, Mr. Gillett intends to bring an enforcement action sixty (60) days after effective service of this notice unless the public enforcement agencies have commenced and are diligently prosecuting an action to rectify these violations. A summary of the statute and its implementing regulations, which was prepared by the lead agency designated under the statute, is enclosed with the copy of this notice served upon the violator. The specific details of the violations that are the subject of this notice are provided below.

The name of the violator covered by this notice is RON TEEGUARDEN ENTERPRISES, INC. (hereafter, the "Violator"). The Violator manufactures, markets, distributes and/or sells in California herbal dietary supplements. These ongoing violations arise out of exposures to lead and lead compounds from herbal dietary supplement products listed on **Exhibit A**, attached hereto. On February 27, 1987, the State of California officially listed lead as a substance known to cause reproductive toxicity. On October 1, 1992, the State of California officially listed lead and lead compounds as a substance known to cause cancer.

Route of exposure. The consumer exposures that are the subject of this notice result from the purchase, acquisition, handling and recommended use of these products by consumers. Accordingly, consumer exposures have occurred and continue to occur primarily through the ingestion route, but also may occur through the inhalation and/or dermal contact routes of exposure.

Notice of Violations

April 6, 2012

Page 2

Duration of violations. Each of these ongoing violations has occurred on every day since at least April 6, 2009, as well as every day since the products were introduced in the California marketplace, and will continue every day until clear and reasonable warnings are provided to product purchasers and users.

In keeping with the public interest goals of the statute and my client's objectives in issuing this notice, Mr. Gillett is interested in seeking a constructive resolution of this matter. Such resolution will avoid both further unwarned consumer exposures to lead and additional fees and costs incurred by the parties. Mr. Gillett's address is Post Office Box 170142, San Francisco, California 94117. Tel. (415) 850-5233. However, he has retained this firm in this matter; all communications regarding this Notice of Violation may be directed to my attention at the above-listed firm address and telephone number.

Very Truly Yours,



Andrew L. Packard

Attachments:

Exhibit A Product List

OEHHA Summary

Certificate of Merit (w/o AG attachments)

Certificate of Service

Exhibit A -- Product List

Code	Product Name	Year 2012
010	22 Reishis	2012
030	Antler Reishi Drops	2012
105	Ron Teeguarden's Super Pill No. 2	2012
503	Super Ant	2012
505	Wild Siberian Chaga	2012
600	Hangover Prevention Formula	2012
604	Skinless Walnuts	2012
606	Walnut Oil-La Nogalera	2012
612	Curing Pill	2012
613	Yunnan Baiyao Capsules	2012
614	Yunnan Baiyao Powder	2012
615	999 Gastro Capsules	2012
616	999 Gastro Granules	2012
617	Watermelon Frost	2012
617P	Watermelon Frost Powder	2012
662	Loquat and Fritillary Cough Syrup	2012
679	Aloe 22	2012
683	Beauty Bonbon 1pc	2012
684	Beauty Bonbon - 9pcs	2012
686P	Tonic Alchemy Packet	2012
687	Xylitol 1 lb.	2012
689	Rice - Black Dragon	2012
692	Rice - Red Bhutanese	2012
695	Heaven Mountain Goji Pack 1 oz.	2012
697	Amolo Tea	2012
701	Tibetan Magic	2012
702	Magu's Beauty Tea	2012
704	Healer's Tea	2012
711	Zen Shen	2012
713	Fritillary Lung	2012
737	Pearl Shen Elixir	2012
743	Goji Pouch	2012
811	Schizandra Tea eeTee in jar	2012
813	Green eeTee in jar	2012
815	Chrysanthemum eeTee in jar	2012
816	He Shou Wu eeTee 30 Stick Pack	2012
817	He Shou Wu eeTee in jar	2012
819	Astragalus eeTee in jar	2012
821	Ginseng eeTee in Jar	2012
823	Longan eeTee in Jar	2012
976	Argentyn 23 2 oz Bottle	2012

Notice of Violations

April 6, 2012

Page 4

978	Argentyn 23 4 oz Bottle	2012
979	Argentyn 23 8 oz Bottle	2012
1011	Silkworm Cordyceps	2012
1012	Wuyi Red Mushroom	2012
2001	Bilberry Extract 60 caps	2012
2004	Borage Oil	2012
2005	Bromelain	2012
2006	Cats Claw (wildcrafted)	2012
2008	Colostrum	2012
2009	Complete EFA	2012
2010	Cranberry Extract	2012
2012	Echinacea	2012
2013	Echinacea w/ Goldenseal	2012
2015	Evening Primrose	2012
2017	FeverFew Extract	2012
2018	Fiber Clean Psyllium Husk Powder	2012
2019	Flax Oil	2012
2020	Garlic	2012
2021	Ginko Extract	2012
2022	Glucosamine/Chondroitin Plus	2012
2026	Hawthorne Extract	2012
2027	Horsechestnut Extract	2012
2028	Maca	2012
2032	Milk Thistle Liquid (organic) 2 fl oz	2012
2033	Olive Leaf	2012
2034	Papaya Enzyme	2012
2035	Pau D'Arco	2012
2036	Pycnogenol	2012
2038	Saw Palmetto/Pygeum 120	2012
2043	Spirulina	2012
2044	St. John's Wort	2012
2046	Superzymes	2012
2047	Suprema-Dophilus 120	2012
2050	Valerian Root Liquid (organic) 2oz.	2012
2052	Vinpocetine Plus	2012
2054	Organic Flax Oil High Lignan	2012
2055	Cod Liver Oil 8 oz	2012
2056	Fish Oil 8 oz	2012
2057	Complete EFA Liquid	2012
2058	Oregano Oil Veggie Caps 60	2012
2061	Tumeric Caps 120	2012
2063	Quicktein Vanilla	2012
2064	Quicktein Chocolate	2012
2072	Life Essentials 60	2012

Notice of Violations

April 6, 2012

Page 5

2090	CoQ10 50 mg 60 softgels	2012
2091	Calcium & Magnesium 250	2012
2092	Zinc Lozenges	2012
2094	L-OptiZinc	2012
2096	L-Lysine	2012
2097	PureWay-C	2012
2098	Children's Chewable Multi with Probiotics	2012
2099	Vanilla Whey Protein	2012
2100	Lecithin Granules	2012
2102	Peak Energy	2012
3106	Brain Tonic	2012
8021	Jasmine Dragon Pearl Tea (green tea)	2012
8025	A Dot of Red	2012
8026	Lily Star	2012
8027	Sun Shine	2012
8028	Five Jasmines	2012
8029	Lychee Black Tea	2012
8040	Moonlight White Tea	2012
8044	Butterfly Love	2012
8045	Lychee Carnation Blossom Tea	2012
8046	Snow Lotus	2012
8047	Double Happiness	2012
8048	Sunrise Blossom Tea	2012
A02	Super 8 Kidney Tonic	2012
A06	4 Sages Tonic	2012
A07	Zhi Bai Kidney Tonic	2012
A10	Body Yin Essence	2012
A16	Qi Ju Kidney Tonic	2012
A17	Vita Vision Kidney Tonic	2012
B03	Warm Soother	2012
B06	Liver Soother	2012
B07	Bupleurum Dragon Formula	2012
B08	Honey Licorice Formula	2012
B09	Licorice Wheat Date Formula	2012
B10	Stress Formula	2012
C01	Headache Relief Formula	2012
C02	Ten Wonders	2012
C03	Ginseng Detox Formula	2012
C05	Bupleurum Cold Remedy	2012
C07	Cinnamon Cold Formula	2012
C09	Headache Formula	2012
D03	Breathe Smooth	2012

Notice of Violations

April 6, 2012

Page 6

D05	Perilla Breathe Easy	2012
D06	No More Cough	2012
D07	Citrus & Pinella Formula	2012
D09	Trichosanthes Expectorant	2012
D10	Pinellia Headache Formula	2012
E01	Stomach Comfort	2012
E03	Combined Strength Stomach	2012
E07	Xiang Sha 6 Sages	2012
E08	Agastache G1 Tract Soother	2012
E10	Bao He Digestant	2012
E12	Pinella Stomach Formula	2012
E13	Pinella Magnolia Formula	2012
E14	Stomach Cleanser	2012
E16	Prunus Cheng Qi Formula	2012
E21	Medium Strength Cheng Qi Formula	2012
E22	Acid Away	2012
E23	Diarrhea Formula	2012
E25	Shen Ling Digestive Tonic	2012
E30	Zhen Wu Energy Formula	2012
F01	Angelica Joint Formula	2012
F02	All Purpose Joint Relief	2012
F03	Du Huo Joint Relief	2012
F05	Shu Jing Blood Flow	2012
F06	Muscle & Tendon Relaxant	2012
F07	Coix Joint Formula	2012
G03	Astragalus Super Five Formula	2012
G06	Pressure Reduce Formula	2012
H01	Angelica Peonia Blood Tonic	2012
H02	Angelica Menstrual Pain Formula	2012
H06	Menstrual Regulator	2012
H07	Leuko Relief	2012
H10	Super 13 Pregnancy Tonic	2012
H11	Sheng Hua Post Delivery Remedy	2012
I01	Energy & Blood Flow Formula	2012
I02	Trauma Injury Formula	2012
I03	Peony Licorice Abdominal Formula	2012
I04	Panax Pseudoginseng	2012
I07	Energy Flow Pain Relief Formula	2012
I08	Xue Fu Homeostasis Formula	2012
I09	Back Ease Formula	2012
J01	Diabetic Formula	2012
J05	Siler Skin Cleanser	2012
J06	Allergy Remedy Plus	2012

Notice of Violations

April 6, 2012

Page 7

J10	Grifolla Kidney Formula	2012
J11	Wu Lin Urinary Formula	2012
J12	Ba Zheng Urinary Formula	2012
J15	Hemorrhoid Formula Plus	2012
J17	Sore Throat Soother	2012
J18	Stop Smoking Detox Formula	2012
J19	Gall Stone Formula	2012
J20	Kidney Stone Formula	2012
J22	Tumor Cancer Fighter #1	2012
J24	Prostate Ease	2012
J25	Liver Guard	2012
J26	Ear Ringing Formula	2012
J28	Skin Detox Formula	2012
J29	Liver Cleanser	2012
J31	After-Itch Remedy	2012
L02	Clean Skin Detox Formula	2012
M01	Body Refresh Cooler	2012
N01	Artemisia Liver Formula	2012

CERTIFICATE OF MERIT

**(Re: Stephen D. Gillett's April 6, 2012 Notice of Proposition 65 Violations Issued to
RON TEEGUARDEN ENTERPRISES, INC.)**

I, Andrew L. Packard, declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged the party in the notice has violated Health & Safety Code §25249.6 by failing to provide clear and reasonable warnings.

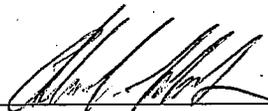
2. I am an attorney for the noticing party.

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 chemicals that are 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 plaintiff's case can be established and that 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 §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: April 6, 2012



Andrew L. Packard

Attachments (for Attorney General Copy only)

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury under the laws of the State of California that the following is true and correct:

I am a citizen of the United States, over the age of 18 years of age, and am not a party to the within entitled action. My business address is 100 Petaluma Boulevard North, Suite 301, Petaluma, California 94952.

On April 6, 2012, I served the following documents: **NOTICE OF VIOLATION, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; "SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986: A SUMMARY"**

on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to the party listed below and depositing it in a US Postal Service Office for delivery by Certified Mail:

Mr. Ron Teegarden
President & Chief Executive Officer
RON TEEGUARDEN ENTERPRISES, INC.
315 Wilshire Boulevard
Santa Monica, CA 90401

On April 6, 2012, I served the following documents: **NOTICE OF VIOLATION, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT (including supporting documentation required by Title 11 CCR §3102)** on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to the party listed below and depositing it in a US Postal Service Office for delivery by Certified Mail:

Office of the California Attorney General
Prop 65 Enforcement Reporting
1515 Clay Street, Suite 2000
Post Office Box 70550
Oakland, CA 94612-0550

On April 6, 2012, I served the following documents: **NOTICE OF VIOLATION, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT** on each of the parties on the Service List attached hereto by placing a true and correct copy thereof in a sealed envelope, addressed to each of the parties **on the Service List attached hereto**, and depositing it in a US Postal Service Office for delivery by First Class Mail.

Executed on April 6, 2012, in Petaluma, California.


Andrew L. Packard

SERVICE LIST (Page 1 of 2)

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

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

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

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

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

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

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

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

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

Office of the District Attorney
Fresno County
2220 Tulare St, #1000
Fresno, CA 93721

Office of the District Attorney
Glenn County
Post Office Box 430
Willows, CA 95988

Office of the District Attorney
Humboldt County
825 5th Street
Eureka, CA 95501

Office of the District Attorney
Imperial County
939 West Main St, # 102
El Centro, CA 92243

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Inyo County
Post Office Drawer D
Independence, CA 93526

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

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

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

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Lassen County
220 South Lassen Street, Ste. 8
Susanville, CA 96130

Office of the District Attorney
Los Angeles County
210 West Temple Street
Los Angeles, CA 90012

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209 West Yosemite Avenue
Madera, CA 93637

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San Rafael, CA 94903

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Mariposa, CA 95338

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Ukiah, CA 95482

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2222 M Street
Merced, CA 95340

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Alturas, CA 96101-4020

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Bridgeport, CA 93517

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240 Church Street
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931 Parkway Mall
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Napa, CA 94559

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110 Union Street
Nevada City, CA 95959

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401 Civic Center Drive West
Santa Ana, CA 92701

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10810 Justice Center Dr, #240
Roseville, CA 95678

SERVICE LIST (Page 2 of 2)

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Riverside County
4075 Main Street
Riverside, CA 92501

Office of the District Attorney
Sacramento County
901 G Street
Sacramento, CA 95814

Office of the District Attorney
San Benito County
419 Fourth Street
Hollister, CA 95023

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

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San Diego County
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San Diego, CA 92101

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San Francisco County
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San Francisco, CA 94103

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222 E. Weber Ave, #202
Stockton, CA 95202

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San Luis Obispo, CA 93408

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Hall of Justice and Records
Redwood City, CA 94063

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Santa Barbara County
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Santa Barbara, CA 93101

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Santa Clara County
70 West Hedding Street
San Jose, CA 95110

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Santa Cruz County
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Santa Cruz, CA 95060

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Shasta County
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Downieville, CA 95936

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Yreka, CA 96097

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Fairfield, CA 94533

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Sonoma County
600 Administration Dr., #212J
Santa Rosa, CA 95403

Office of the District Attorney
Stanislaus County
1100 I Street, #200
Modesto, CA 95353

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Sutter County
1160 Civic Center Blvd., #A
Yuba City, CA 95993

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Tehama County
Post Office Box 519
Red Bluff, CA 96080

Office of the District Attorney
Trinity County
Post Office Box 310
Weaverville, CA 96093

Office of the District Attorney
Tulare County
Courthouse, # 224
Visalia, CA 93291

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

Office of the District Attorney
Ventura County
800 South Victoria Ave
Ventura, CA 93009

Office of the District Attorney
Yolo County
301 Second Street
Woodland, CA 95695

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

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City of Los Angeles
200 N. Main Street
Los Angeles, CA 90012

Office of the City Attorney
City of San Diego
1200 Third Avenue, Ste.700
San Diego, CA 92101

Office of the City Attorney
City of San Francisco
City Hall, Room 206
400 Van Ness
San Francisco, CA 94102

Office of the City Attorney
City of San Jose City
200 East Santa Clara Street
San Jose, CA 95113

Office of the City Attorney
City of Sacramento
Post Office Box 1948
Sacramento, CA 95812

Office of the City Attorney
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1 Frank Ogawa Plaza
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