

60-DAY NOTICE OF VIOLATION

SENT IN COMPLIANCE WITH CALIFORNIA HEALTH & SAFETY CODE §25249.7(d)

DATE: January 16, 2014

To: Amazon.com, Inc.; Biotechnie Complex Inc.; Alkam, Inc.; Gunilla of Sweden; Skin Care Investments; Ultra Klean, Inc.; Survive Anything; Georgia Peach Products, Inc.; LAMARVI S.A.; Ienjoy Beauty; SALERM PROFESSIONAL COSMETICS OF CALIFORNIA,INC.; Milano Hair Products Inc.; Beauty Online Nutrine, LTD; Mid-States Beauty; Rottapharm SpA; Ziaja USA; Laboratorios Rivas; Lucky 11 Inc.; Resource Dynamics Inc.; Drugstore.com; First Natural Brands Ltd.; Walker's Apothocarey; Platinum Skin Care; Mario Badescu Skin Care, Inc.; Ron Robenson, Inc.; Rainbow USA Co. Inc.; Pettenon Cosmetics SpA; Black Beauty; CARME INTERNATIONAL, Inc; eVitamins.com; California Attorney General's Office; District Attorney's Office for 58 Counties; and City Attorney's Office for Los Angeles, San Diego, San Jose and San Francisco.

From: Shefa LMV, LLC

I. INTRODUCTION

Our name is Shefa LMV, LLC. We are citizens and a Limited Liability Company of the State of California acting in the interest of the general public. We seek to promote awareness of exposures to toxic chemicals in products sold in California and, if possible, to improve public health and safety by reducing the hazardous substances contained in such items. This Notice is provided to the parties listed above pursuant to California Health & Safety Code §25249.6, et seq. ("Proposition 65"). The violations alleged by this Notice consist of product exposures, routes of exposures, and types of harm that may potentially result from exposures to the toxic chemical ("listed chemical") identified below:

Product Exposure:	See Section VII, Exhibit A
Listed Chemical:	Coconut Oil Diethanolamine Condensate AKA Cocamide DEA;
Routes of Exposure:	Dermal absorption; Ingestion; and Inhalation
Types of Harm:	Carcinogen

II. NATURE OF ALLEGED VIOLATION (PRODUCT EXPOSURE)

The specific type of product that is causing consumer and occupational exposures in violation of Proposition 65, and which is the subject of this Notice, is listed under "Product Category/Type" in Exhibit A in Section VII below. All products within the type covered by this Notice shall be referred to hereinafter as the "products." The sales of these products in California dating at least as far back as

December 23, 2013 are subject to this Notice (and probably previously as the Noticed parties have tolled the statute of limitations by fraudulent concealment. Discovery continues.). As a result of the sales of these products, exposures to the listed chemical have been occurring without clear and responsible warnings as required by Proposition 65. Without proper warnings regarding the toxic effects of exposures to the listed chemical, resulting from contact with the products from dermal and ingestion exposure as well as inhalation, California citizenry lack the information necessary to make informed decisions on whether and how to eliminate (or reduce) the risk of exposure to the toxic chemical from the reasonably foreseeable use of the products.

Through the act of buying, acquiring and using the products, citizens of California are exposed to the listed chemical in homes, workplaces and elsewhere throughout California where these products are utilized. Exposure to consumers includes, but is not limited to, bathing their bodies, their pets or their children. Exposure in the line of occupation can be in a salon-type setting or pet grooming, or any similar occupation. Exposure to consumers includes, but is not limited to, when handling the product Cocamide DEA is absorbed through dermal, and other migration pathways, including but not limited to incidental ingestion after one touch's the chemical and then touch's food or otherwise places his hands on or near his lips where his tongue can or will continue this pathway to ingestion exposure. Exposure may continue to occur for a significant period after the initial contact. People likely to be exposed are women, men, infants and children. These violations and threatened violations pertain to Proposition 65 chemicals that are listed by the state as known to cause cancer.

III. CONTACT INFORMATION

Please direct all questions concerning this notice to us through our counsel's offices at the following address:

Daniel N. Greenbaum, Esq.
1467 South Holt Avenue #2
Los Angeles, CA 90035
Phone: 310.200.2631
Email: danielgreenbaumesq@gmail.com

IV. PROPOSITION 65 INFORMATION

For general information concerning the provisions of Proposition 65, please feel free to contact the Office of Environmental Health Hazard Assessment ("OEHHA") in the Proposition 65 Implementation Office at (916) 445-6900. For the alleged Violator(s), I have attached a copy of "Proposition 65 in Plain Language" which has been prepared by OEHHA.

V. RESOLUTION OF NOTICED CLAIMS

Based on the allegations set forth in this Notice, I intend to file a citizen enforcement lawsuit against the alleged Violator(s), unless such Violator enters into a binding written agreement to: (1) recall products already sold or undertake best efforts to ensure that the requisite health hazard warnings are

provided to those whom have received such products; (2) provide clear and reasonable warnings for products sold in the future, or reformulate such products to eliminate the Cocamide DEA exposures.

If the alleged Violator is interested in resolving this dispute without resorting to time-consuming and expensive litigation, please feel free to contact my counsel identified in Section III. It should be noted that neither my counsel nor I can: (1) finalize any settlement until after the 60-day Notice period elapses; nor (2) speak for the Attorney General or any District Attorney or City Attorney who received this Notice. Therefore, while reaching an agreement that will resolve my claims, such an agreement may not be approved by the Attorney General after referral to them, or by the court as the last voice on settlements.

VI. ADDITIONAL INFORMATION

Product

Shampoo/Soap

Retailer(s)

Amazon.com, Inc.;
eVitamins.com;
Drugstore.com;

Manufacturer(s)/Distributor(s)

Biotechno Complex Inc.; Alkam, Inc.; Gunilla of Sweden; Skin Care Investments; Ultra Klean, Inc.; Survive Anything; Georgia Peach Products, Inc.; LAMARVI S.A.; Ienjoy Beauty; SALERM PROFESSIONAL COSMETICS OF CALIFORNIA, INC.; Milano Hair Products Inc.; Beauty Online Nutrine, LTD; Mid-States Beauty; Rottapharm SpA; Ziaja USA; Laboratorios Rivas; Lucky 11 Inc.; Resource Dynamics Inc.; First Natural Brands Ltd.; Walker's Apothocarey; Platinum Skin Care; Mario Badescu Skin Care, Inc.; Ron Robenson, Inc.; Rainbow USA Co. Inc.; Pettenon Cosmetics SpA; Black Beauty; CARME International, Inc;

VII. EXHIBIT A

Identified below are named products which contain the alleged chemicals at issue, and this reference is supportive of the material facts that are a part of my counsels Certificate of Merit that is attached hereto as being available for purchase or use in California that is within the category or type of offending product covered by this Notice. Based on publicly available information, the retailers, distributors and/or manufacturers of the example within the category or type of product are also provided below. I believe and allege that the sale of the offending products also has occurred without the requisite Proposition 65 “clear and reasonable warnings” at one or more locations and/or via other means including, but not limited to, transactions made over-the-counter, business to business, through the internet, and/or via catalog by the alleged Violator(s) and other distributors and retailers of the product.

<u>Product Category</u>	<u>Specific Product</u> ¹	<u>UPC</u>	<u>Retailer</u>	<u>Manufacturer/Distributor</u>
Shampoo	Thymu Skin	PZN-3150970	Amazon.com	Biotechnie Complex Inc
Shampoo	Thymu Skin	PZN-3150970	Amazon.com	Alkam, Inc.
Face Wash	Gunilla of Sweden herbal face wash		Amazon.com	Gunilla of Sweden
Face Wash	Gunilla of Sweden herbal face wash		Amazon.com	Skin care investments
Shampoo	Ultra Cleanse	094922122353	Amazon.com	Ultra Klean, Inc.
Shampoo	Ultra Cleanse	094922122353	Amazon.com	Survive Anything
Shampoo	Ultra Cleanse	094922122353	Amazon.com	Georgia Peach Products, Inc.
Shampoo	Salerm Cosmetics Protein Shampoo	8420282010306	Amazon.com	LAMARVI S.A.
Shampoo	Salerm Cosmetics Protein Shampoo	8420282010306	Amazon.com	Ienjoy Beauty
Shampoo	Salerm Cosmetics Protein Shampoo	8420282010306	Amazon.com	SALERM PROFESSIONAL COSMETICS OF CALIFORNIA, INC.
Shampoo	Kismera Regenerating Shampoo	817125010254	Amazon.com	Milano Hair Products Inc
Shampoo	Kismera Regenerating Shampoo	817125010254	Amazon.com	Beauty Online
Shampoo	Garlic Shampoo	758283941021	Amazon.com	Nutrine, LTD
Shampoo	Garlic Shampoo	758283941021	Amazon.com	Nutrine, LTD
Shampoo	Garlic Shampoo	758283941021	Amazon.com	Mid-States Beauty

¹ We are identifying herein for all recipients’ benefit to assist in its investigation of, among other things, the magnitude of

our position that the alleged Violator(s) are obligated to continue to conduct in good faith an investigation into other specific products within the type or category described above that may have been manufactured, distributed, sold, shipped, stored (or otherwise within the alleged Violator(s)’ custody or control) during the relevant period so as to ensure that the requisite toxic warnings are provided to California citizens prior to purchase.

Shampoo	Biothymus Shampoo	8019561170116	Amazon.com	Rottapharm SpA
Shampoo	Biothymus Shampoo	8019561170116	Amazon.com	Rottapharm SpA
Shower Soap	Ziaja Goat's Milk Shower soap	5901887007241	zjashop.com	Ziaja USA
Kids Shampoo	Ziaja kids Shampoo Bubble Cola	5901887026471	zjashop.com	Ziaja USA
Shampoo	Avanti Silicon Mix	7464804101845	Amazon.com	Laboratorios Rivas
Body Wash	Cheer Chics	812210002107	drugstore.com	Lucky 11 Inc.
Body Wash	Cheer Chics	812210002107	drugstore.com	Resource Dynamics Inc.
Body Wash	Cheer Chics	812210002107	drugstore.com	drugstore.com
Body Wash	Tisserand Tea Tree +	5017402003800	drugstore.com	drugstore.com
Body Wash	Tisserand Tea Tree +	5017402003800	drugstore.com	First Natural Brands Ltd
Soap	Walker's Apothecary passio fruit		Amazon.com	Walker's Apothocarey
Soap	10% Glycolic Cleanser		Amazon.com	Platinum Skin Care
Soap	Mario Badescu Glycolic Foaming Cleanser	785364010291	Amazon.com	Mario Badescu Skin Care, Inc.
Soap	Mario Badescu Glycolic Foaming Cleanser	785364010291	Amazon.com	Ron Robenson, inc.
Shampoo	Brown Rice moisture Shampoo	8809038599874	Amazon.com	Rainbow USA Co. inc.
Shampoo	Alter Ego Shampoo Semi de Lino	8008277018195	Amazon.com	Pettenon Cosmetics SpA
Shampoo	Alter Ego Shampoo Semi de Lino	8008277018195	Amazon.com	Black Beauty
Shampoo	Mill Creek Sleepy Hollow Botanicals	079526007909	evitamins.com	CARME INTERNATIONAL, INC
Shampoo	Mill Creek Sleepy Hollow Botanicals	079526007909	evitamins.com	evitamins.com

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this case or action. My business address is:
1467 S Holt Ave #2 Los Angeles CA 90035

A True and Correct copy of the documents entitled **60 DAY NOTICE OF VIOLATION; CERTIFICATE OF MERIT; THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY** will be served or was served in the manner stated below:

I. Interested Parties (Served via Certified Mail): On January 16, 2014, I served the following persons and/or entities at the last known addresses by placing a true and correct copy thereof in a sealed envelope in the United States Mail, postage prepaid, and addressed as follows:

Amazon.com, Inc.	ATTN: CEO or President	1200 12th Avenue S Suite 1200, Seattle, WA 98144
Amazon.com, Inc.	ATTN: CEO or President	410 Terry Avenue N, Seattle, WA 98109
Corporation Service Company	c/o Amazon.com, Inc.	300 Deschutes Way SW, Suite 304, Seattle, WA 98501
Biotechne Complex Inc	ATTN: CEO or President	670-B East Kyle St., Cleveland, GA 30528
Alkam, Inc.	ATTN: CEO or President	172 Trade St., Lexington, KY 40511
Gunilla of Sweden	ATTN: CEO or President	6520 WEST 110TH ST, OVERLAND PARK, KS 66211
Skin care investments	ATTN: CEO or President	3837 Bay lake trail, Suite 115, N. Las Vegas, NV 89030
Ultra Klean, Inc.	ATTN: CEO or President	8022 S. Rainbow Blvd., Suite 346, Las vegas, NV 89139
Survive Anything	ATTN: CEO or President	2095 Siesta Dr. Unit B, Sarasota, FL 34239
Georgia Peach Products, Inc.	ATTN: CEO or President	595 Piedmont Ave., Suite #320-220, Atlanta, GA 30308
LAMARVI S.A.	ATTN: CEO or President	Ctra. Sabadell a Granollers Km.12,4 LLISSA DE VALL, Spain 08185
Ienjoy Beauty	ATTN: CEO or President	95 Cedar Lane, Suite 15, Englewood, NJ 07631
SALERM PROFESSIONAL COSMETICS OF CALIFORNIA, INC.	ATTN: CEO or President	9314 Norwalk Blvd., Santa Fe Springs, CA 90670
Milano Hair Products Inc	ATTN: CEO or President	11 Sheer Plaza, Plainview, NY 11803
Beauty Online	ATTN: CEO or President	995 Southern Blvd., Bronx, NY 10459
Nutrine, LTD	ATTN: CEO or President	568 WALT WHITMAN RD., HUNTINGTON STATION, NEW YORK, 11747
Nutrine, LTD	ATTN: CEO or President	30 Durham Rd, White Plains, NY 10605
Mid-States Beauty	ATTN: CEO or President	3837 Bay lake trail, Suite 115, N. Las Vegas, NV 89030
Rottapharm SpA	ATTN: CEO or President	Via Valosa di Sopra 9, 20900 – Monza – Italy
Rottapharm SpA	ATTN: CEO or President	Galleria dell'Unione 5, Milano 20122 Italy
Ziaja USA	ATTN: CEO or President	21177 W. Main St., Buckeye, AZ 85296
Ziaja USA	ATTN: CEO or President	21177 W. Main St., Buckeye, AZ 85296
Laboratorios Rivas	ATTN: CEO or President	Prol. Pte. Vasquez, Alma Rosa II, Santo Domingo, Dominican Republic
Lucky 11 Inc.	ATTN: CEO or President	12798 DAIMLER DRIVE, FRISCO, TX 75034
Resource Dynamics Inc.	ATTN: CEO or President	1549 Field Club Dr., Pittsburgh, PA 15237
drugstore.com	ATTN: CEO or President	12835 Old Virginia Rd., Reno, NV 89521
drugstore.com	ATTN: CEO or President	12835 Old Virginia Rd., Reno, NV 89521

First Natural Brands Ltd	ATTN: CEO or President	Unit 4 Clarkes Industrial Estate, Newtown Road Hove, Brighton, BN3 7BA U.K.
Walker's Apothocarey	ATTN: CEO or President	68 Mercer St, Jersey City, NJ 07302
Platinum Skin Care	ATTN: CEO or President	20556 Hall Road, Clinton Township, MI 48051
Platinum Skin Care	ATTN: CEO or President	48774 Gratiot ave., Chesterfield, MI 48051
Mario Badescu Skin Care, Inc.	ATTN: CEO or President	320 East 52nd Street, New York, NY 10022
Ron Robenson, inc.	ATTN: CEO or President	2500 S. La Cienega Blvd., Los Angeles, CA 90034
Rainbow USA Co. inc.	ATTN: CEO or President	5300 Beach Blvd., Suite 110, Buena Park, CA 90621
Pettenon Cosmetics SpA	ATTN: CEO or President	Via del Palù 7/D, 35018 San Martino di Lupari, Italy
Black Beauty	ATTN: CEO or President	PO Box 540, Ridgefield, NJ 07657
CARME INTERNATIONAL, INC	ATTN: CEO or President	831A Latour Ct, Napa, CA 94558
evitamins.com	ATTN: CEO or President	51260 Danview Technology, Shelby Township, MI 48315

II. California Attorney General (via website Portal): On January 16, 2014, I uploaded a true and correct copy thereof as a PDF file via the California Attorney General's website.

III. District and City Attorneys (via U.S. Mail): On January 16, 2014, I served the following persons and/or entities at the last known addresses by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and addressed as follows

See attached pages for full service list

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

January 16, 2014

Daniel N. Greenbaum, Esq.

Date

Printed Name



Signature

District Attorney
ALAMEDA COUNTY
1225 Fallon Street, Room 900
Oakland, CA 94612

District Attorney
ALPINE COUNTY
PO Box 248
Markleeville, CA 96120

District Attorney
AMADOR COUNTY
708 Court Street, #202
Jackson, CA 95642

District Attorney
BUTTE COUNTY
25 County Center Drive —
Administration Building
Oroville, CA 95965

District Attorney
CALAVERAS COUNTY
891 Mountain Ranch Road
San Andreas, CA 95249

District Attorney
COLUSA COUNTY
346 5th Street, Suite. 101
Colusa, CA 95932

District Attorney
CONTRA COSTA COUNTY
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Martinez, CA 94553

District Attorney
DEL NORTE COUNTY
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Crescent City, CA 95531

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EL DORADO COUNTY
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Placerville, CA 95667

District Attorney
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Fresno, CA 93721

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PO Box 430
Willows, CA 95988

District Attorney
HUMBOLDT COUNTY
825 5th Street
Eureka, CA 95501

District Attorney
IMPERIAL COUNTY
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El Centro, CA 92243

District Attorney
INYO COUNTY
168 North Edwards
Independence, CA 93526

District Attorney
KERN COUNTY
1215 Truxtun Avenue
Bakersfield, CA 93301

District Attorney
KINGS COUNTY
1400 West Lacey Blvd.
Hanford, CA 93230

District Attorney
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255 N. Forbes Street
Lakeport, CA 95453

District Attorney
LASSEN COUNTY
220 S. Lassen Street, Suite. 8
Susanville, CA 96130

District Attorney
LOS ANGELES COUNTY
210 W. Temple Street
Los Angeles, CA 90012

District Attorney
MADERA COUNTY
209 West Yosemite Avenue
Madera, CA 93637

District Attorney
MARIN COUNTY
3501 Civic Center Drive, Room 130
San Rafael, CA 94903

District Attorney
MARIPOSA COUNTY
PO BOX 730
Mariposa, CA 95338

District Attorney
MENDOCINO COUNTY
PO BOX 1000
Ukiah, CA 95482

District Attorney
MERCED COUNTY
550 West Main Street
Merced, CA 95340

District Attorney
MODOC COUNTY
204 S. Court Street, Room 202
Alturas, CA 96101

District Attorney
MONO COUNTY
PO BOX 2053
Mammoth Lakes, CA 93546

District Attorney
MONTEREY COUNTY
PO BOX 1131
Salinas, CA 93902

District Attorney
NAPA COUNTY
PO BOX 720
Napa, CA 94559

District Attorney
NEVADA COUNTY
110 Union Street
Nevada City, CA 95959

District Attorney
ORANGE COUNTY
401 Civic Center Drive West
Santa Ana, CA 92701

District Attorney
PLACER COUNTY
10810 Justice Center Drive
Roseville, CA 95678

District Attorney
PLUMAS COUNTY
520 Main Street, Room 404
Quincy, CA 95971

District Attorney
RIVERSIDE COUNTY
3960 Orange Street
Riverside, CA 92501

District Attorney
SACRAMENTO COUNTY
901 G Street
Sacramento, CA 95812

District Attorney
SAN BENITO COUNTY
419 4th Street
Hollister, CA 95023

District Attorney
SAN BERNARDINO COUNTY
303 W. Third Street
San Bernardino, CA 92415

District Attorney
SAN DIEGO COUNTY
330 W. Broadway, Suite 1300
San Diego, CA 92101

District Attorney
SAN FRANCISCO COUNTY
880 Bryant Street, Third Floor
San Francisco, CA 94103

District Attorney
SAN JOAQUIN COUNTY
PO BOX 990
Stockton, CA 95202

District Attorney
SAN LUIS OBISPO COUNTY
Courthouse Annex, 4th Floor
San Luis Obispo, CA 93408

District Attorney
SAN MATEO COUNTY
400 County Center, Third Floor
Redwood City, CA 94063

District Attorney
SANTA BARBARA COUNTY
1112 Santa Barbara Street
Santa Barbara, CA 93101

District Attorney
SANTA CLARA COUNTY
70 West Hedding Street, West Wing
San Jose, CA 95110

District Attorney
SANTA CRUZ COUNTY
701 Ocean Street, Room 200
Santa Cruz, CA 95060

District Attorney
SHASTA COUNTY
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Redding, CA 96001

District Attorney
SIERRA COUNTY
100 Courthouse Square
Downieville, CA 95936

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SISKIYOU COUNTY
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Modesto, CA 95353

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Weaverville, CA 96093

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Visalia, CA 93291

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VENTURA COUNTY
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Ventura, CA 93009

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YOLO COUNTY
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Woodland, CA 95695

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Los Angeles, CA 90012

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City Attorney
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San Diego, CA 92101

Richard Doyle
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CITY OF SAN JOSE
200 East Santa Clara Street
San Jose, CA 95113

Dennis J. Herrera
City Attorney
CITY OF SAN FRANCISCO
City Hall, Room 234
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

CERTIFICATE OF MERIT

I, Daniel N. Greenbaum, 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.

January 16, 2014

Daniel N. Greenbaum, Esq.



Date

Printed Name

Signature