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April 11, 2014

VIA CERTIFIED MAIL

Current CEO or President
Lumber Liquidators, Inc.
3000 John Deere Road
Toana, VA 23168

Corporation Service Company
dba CSC - Lawyers Incorporating Service
2710 Gateway Oaks Dr., Suite 150N
Sacramento, CA 95833
(Lumber Liquidators, Inc.'s
Registered Agent for Service of Process)

Current CEO or President
Lumber Liquidators Holdings, Inc.
3000 John Deere Road
Toano, VA 23168

Corporation Service Company
dba CSC - Lawyers Incorporating Service
2711 Centerville Road, Suite 400,
Wilmington, DE 19808
(Lumber Liquidators Holdings, Inc.'s
Registered Agent for Service of Process in
Delaware)

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

VIA PRIORITY MAIL

District Attorneys of All California Counties
and Select City Attorneys
(See Attached Certificate of Service)

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

Dear Addressees:

I represent the Global Community Monitor ("GCM") and Sunshine Park LLC ("SP") in connection with this Notice of Violations of California's Safe Drinking Water and Toxic Enforcement Act of 1986, which is codified at California Health & Safety Code Section 25249.5 *et seq.* and also referred to as Proposition 65.

GCM is a California non-profit corporation, founded in 2001, that trains and supports communities in the use of environmental monitoring tools to understand the impact of air and water pollution on their health and the environment, and to take legal and community-based action to reduce that pollution.

SP is a California limited liability company established, among other things, to promote awareness of exposures to toxic chemicals in certain products sold in California and, if possible,

to improve public health and safety by reducing the hazardous substances contained in such items.

The name of the companies covered by this notice that violated Proposition 65 (hereinafter "the Violators") are:

Lumber Liquidators, Inc.
Lumber Liquidators Holdings, Inc.

The products that are the subject of this notice and the chemicals in those products identified as exceeding allowable levels are:

Product	Chemical
8 mm Bristol County Cherry Laminate Flooring	Formaldehyde (gas)
8 mm Dream Home Nirvana French Oak Laminate Flooring	Formaldehyde (gas)
12 mm Dream Home Kensington Manner Antique Bamboo Laminate Flooring	Formaldehyde (gas)
12 mm Dream Home St. James Oceanside Plank Bamboo Laminate Flooring	Formaldehyde (gas)
12 mm Dream Home Kensington Manner Warm Springs Chestnut Laminate Flooring	Formaldehyde (gas)
15 mm Dream Home St. James Sky Lakes Pine Laminate Flooring	Formaldehyde (gas)
12 mm Dream Home Ispiri Chimney Tops Smoked Oak Laminate Flooring	Formaldehyde (gas)
12 mm Dream Home Kensington Manner Imperial Teak Laminate Flooring	Formaldehyde (gas)
12 mm Dream Home St. James Vintner's Reserve Laminate Flooring	Formaldehyde (gas)
12 mm Dream Home Kensington Manor Cape Doctor Laminate Flooring	Formaldehyde (gas)
12 mm Dream Home St. James Cumberland Mountain Oak	Formaldehyde (gas)

On January 1, 1988, the State of California officially listed Formaldehyde (gas) as a chemical known to cause cancer.

This letter is a notice to each of the Violators and the appropriate governmental authorities of the Proposition 65 violations concerning the listed products. This notice covers all violations of Proposition 65 involving the Violators currently known to GCM and SP from the information now available. GCM and SP may continue to investigate other products that may reveal further violations. A summary of Proposition 65, prepared by the Office of Environmental Health Hazard Assessment, is attached to this letter sent to each of the Violators.

Each of the Violators has manufactured, marketed, distributed, and/or sold the listed products, which have exposed and continue to expose numerous individuals within California to the identified chemicals. The consumer exposures that are the subject of this notice result from

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*
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the purchase, acquisition, handling and/or recommended use of these products by consumers. The primary route of exposure to these chemicals has been through inhalation. Proposition 65 requires that a clear and reasonable warning be provided prior to exposure to the identified chemicals. The method of warning should be a warning that appears on the product's label. Each of the Violators violated Proposition 65 because they failed to provide an appropriate warning to persons using and/or handling these products that they are being exposed to the identified chemicals. Each of these ongoing violations has occurred on every day since April 11, 2011, 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.

Pursuant to Section 25249.7(d) of the statute, GCM and SP intend to file a citizen enforcement action sixty days after effective service of this notice unless each of the Violators agrees in an enforceable written instrument to: (1) provide legally sufficient warnings to past, current, and future purchasers of the products; (2) where requested by previous purchasers, fund the removal and replacement of flooring sold without the requisite warning; (3) reformulate the listed products so as to eliminate further exposures to the identified chemicals; and (4) pay an appropriate civil penalty. Consistent with the public interest goals of Proposition 65 and my clients' objectives in pursuing this notice, GCM and SP are interested in seeking a constructive resolution to this matter. Such resolution will avoid both further unwarned consumer exposures to the identified chemicals and expensive and time consuming litigation.

GCM's address is P.O. Box 1784, El Cerrito, CA 94530. Denny Larson is the responsible individual for GCM in regard to this matter and he can be telephoned at (510) 233-1870. SP's address is 2019 Century Park E, Suite 2400, Los Angeles, California, 90067. I, Richard Drury, am the responsible individual for SP in regard to this matter and I can be telephoned at (510) 836-4200. GCM and SP have retained Lozeau Drury LLP in connection with this matter. Please also direct all communications regarding this Notice of Violations to my attention at the above listed law office address and telephone number.

Sincerely,



Richard Drury
Lozeau Drury LLP on behalf of the Global
Community Monitor and Sunshine Park
LLC

Attachments

- Certificate of Merit
- Certificate of Service
- OEHHA Proposition 65 Summary
- Additional Supporting Information for Certificate of Merit (to AG only)

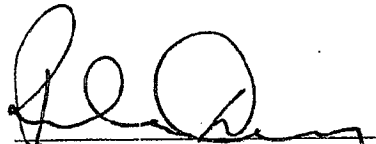
CERTIFICATE OF MERIT

**Re: Global Community Monitor and Sunshine Park LLC's Notice of Proposition
65 Violations by Lumber Liquidators, Inc. and Lumber Liquidators
Holdings, Inc.**

I, Richard Drury, declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged the party identified in the notice violated California Health & Safety Code Section 25249.6 by failing to provide clear and reasonable warnings.
2. I am an attorney for the noticing parties.
3. I have consulted with one or more persons with relevant and appropriate experience or expertise who have reviewed facts, studies, or other data regarding the exposure to the listed chemical that is the subject of the notice.
4. Based on the information obtained through those consultants, and on 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 that the information did not prove that the alleged violators will be able to establish any of the affirmative defenses set forth in the statute.
5. Along with the copy of this Certificate of Merit served on the Attorney General is attached additional factual information sufficient to establish the basis for this certificate, including the information identified in California Health & 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 11, 2014


Richard Drury

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 410 12th Street, Suite 250, Oakland, California 94607. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Oakland, California.

On April 11, 2014, I served the following documents: **NOTICE OF VIOLATIONS OF CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; "THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): 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 with the postage fully prepaid for delivery by First Class, Certified Mail:

Current CEO or President
Lumber Liquidators, Inc.
3000 John Deere Road
Toana, VA 23168

Current CEO or President
Lumber Liquidators Holdings, Inc.
3000 John Deere Road
Toano, VA 23168

Corporation Service Company
dba CSC - Lawyers Incorporating Service
2710 Gateway Oaks Dr., Suite 150N
Sacramento, CA 95833
(Lumber Liquidators, Inc.'s
Registered Agent for Service of Process)

Corporation Service Company
2711 Centerville Road, Suite 400
Wilmington, DE 19808
(Lumber Liquidators Holdings, Inc.'s
Registered Agent for Service of Process in
Delaware)


On April 11, 2014, I served the following documents: **NOTICE OF VIOLATION, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; ADDITIONAL SUPPORTING INFORMATION FOR CERTIFICATE OF MERIT AS REQUIRED BY CALIFORNIA HEALTH & SAFETY CODE §25249.7(d)(1)** 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 with the postage fully prepaid for delivery by First Class, 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 11, 2014, 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 with the U.S. Postal Service with the postage fully prepaid for delivery by First Class Mail.

Executed on April 11, 2014, in Oakland, California.



Toyer Grear

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

Service List

District Attorney, Alameda County 1225 Fallon Street, Room 900 Oakland, CA 94612	District Attorney, Los Angeles County 210 West Temple Street, Suite 18000 Los Angeles, CA 90012	District Attorney, San Diego County 330 West Broadway, Room 1300 San Diego, CA 92101	District Attorney, Tuolumne County 423 N. Washington Street Sonora, CA 95370
District Attorney, Alpine County P.O. Box 248 Markleeville, CA 96120	District Attorney, Madera County 209 West Yosemite Avenue Madera, CA 93637	District Attorney, San Francisco County 850 Bryant Street, Room 322 San Francisco, CA 94103	District Attorney, Ventura County 800 South Victoria Avenue Ventura, CA 93009
District Attorney, Amador County 708 Court Street, #202 Jackson, CA 95642	District Attorney, Marin County 3501 Civic Center Drive, Room 130 San Rafael, CA 94903	District Attorney, San Joaquin County Post Office Box 990 Stockton, CA 95201	District Attorney, Yolo County 301 2 nd Street Woodland, CA 95695
District Attorney, Butte County 25 County Center Drive Oroville, CA 95965	District Attorney, Mariposa County Post Office Box 730 Mariposa, CA 95338	District Attorney, San Luis Obispo County 1035 Palm St, Room 450 San Luis Obispo, CA 93408	District Attorney, Yuba County 215 Fifth Street, Suite 152 Marysville, CA 95901
District Attorney, Calaveras County 891 Mountain Ranch Road San Andreas, CA 95249	District Attorney, Mendocino County Post Office Box 1000 Ukiah, CA 95482	District Attorney, San Mateo County 400 County Ctr., 3 rd Floor Redwood City, CA 94063	Los Angeles City Attorney's Office City Hall East 200 N. Main Street, Rm 800 Los Angeles, CA 90012
District Attorney, Colusa County 547 Market Street Colusa, CA 95932	District Attorney, Merced County 2222 M Street Merced, CA 95340	District Attorney, Santa Barbara County 1112 Santa Barbara Street Santa Barbara, CA 93101	San Diego City Attorney's Office 1200 3 rd Avenue, Ste 1620 San Diego, CA 92101
District Attorney, Contra Costa County 900 Ward Street Martinez, CA 94553	District Attorney, Modoc County 204 S Court Street, Room 202 Alturas, CA 96101-4020	District Attorney, Santa Clara County 70 West Hedding Street San Jose, CA 95110	San Francisco City Attorney's Office City Hall, Room 234 1 Drive Carlton B Goodlett Place San Francisco, CA 94102
District Attorney, Del Norte County 450 H Street, Ste. 171 Crescent City, CA 95531	District Attorney, Mono County Post Office Box 617 Bridgeport, CA 93517	District Attorney, Santa Cruz County 701 Ocean Street, Room 200 Santa Cruz, CA 95060	San Jose City Attorney's Office 200 East Santa Clara Street, 16 th Floor San Jose, CA 95113
District Attorney, El Dorado County 515 Main Street Placerville, CA 95667	District Attorney, Monterey County Post Office Box 1131 Salinas, CA 93902	District Attorney, Shasta County 1355 West Street Redding, CA 96001	
District Attorney, Fresno County 2220 Tulare Street, #1000 Fresno, CA 93721	District Attorney, Napa County 931 Parkway Mall Napa, CA 94559	District Attorney, Sierra County PO Box 457 Downieville, CA 95936	
District Attorney, Glenn County Post Office Box 430 Willows, CA 95988	District Attorney, Nevada County 110 Union Street Nevada City, CA 95959	District Attorney, Siskiyou County Post Office Box 986 Yreka, CA 96097	
District Attorney, Humboldt County 825 5 th Street Eureka, CA 95501	District Attorney, Orange County 401 Civic Center Drive West Santa Ana, CA 92701	District Attorney, Solano County 675 Texas Street, Ste 4500 Fairfield, CA 94533	
District Attorney, Imperial County 940 West Main Street, Ste 102 El Centro, CA 92243	District Attorney, Placer County 10810 Justice Center Drive, Ste 240 Roseville, CA 95678	District Attorney, Sonoma County 600 Administration Drive, Room 212J Santa Rosa, CA 95403	
District Attorney, Inyo County 230 W. Line Street Bishop, CA 93514	District Attorney, Plumas County 520 Main Street, Room 404 Quincy, CA 95971	District Attorney, Stanislaus County 832 12 th Street, Ste 300 Modesto, CA 95353	
District Attorney, Kern County 1215 Truxtun Avenue Bakersfield, CA 93301	District Attorney, Riverside County 3960 Orange Street Riverside, CA 92501	District Attorney, Sutter County 446 Second Street Yuba City, CA 95991	
District Attorney, Kings County 1400 West Lacey Boulevard Hanford, CA 93230	District Attorney, Sacramento County 901 "G" Street Sacramento, CA 95814	District Attorney, Tehama County Post Office Box 519 Red Bluff, CA 96080	
District Attorney, Lake County 255 N. Forbes Street Lakeport, CA 95453	District Attorney, San Benito County 419 Fourth Street, 2 nd Floor Hollister, CA 95023	District Attorney, Trinity County Post Office Box 310 Weaverville, CA 96093	
District Attorney, Lassen County 220 South Lassen Street, Ste. 8 Susanville, CA 96130	District Attorney, San Bernardino County 316 N. Mountain View Avenue San Bernardino, CA 92415-0004	District Attorney, Tulare County 221 S. Mooney Avenue, Room 224 Visalia, CA 93291	