

NOTICE OF VIOLATION OF HEALTH AND SAFETY CODE SECTION 25249.6

This is notice that MASERATI NORTH AMERICA, INC. (hereinafter, "the Violator") has been violating Health and Safety Code section 25249.6 by exposing California consumers (consumer product exposure) to motor vehicle door keys (hereinafter, the "Products") containing lead and lead compounds (hereinafter, the "Chemicals"), carcinogens and reproductive toxins, without first warning them that the Products contain chemicals known to the State of California to cause cancer and reproductive toxicity. The exposures have taken place during the preceding year and continue to this date. This notice is given by Julie Mehrban, c/o Law Offices of Morse Mehrban, A.P.C., 15233 Ventura Blvd., Suite 304, Sherman Oaks, CA 91403; 424-274-1237 (hereinafter, the "Noticing Party"). The Noticing Party's attorney is Morse Mehrban, 15233 Ventura Blvd., Suite 304, Sherman Oaks, CA 91403; 424-274-1237; morse@mehrban.com. The route of exposure to the Chemicals in the Products is dermal contact. The consumer product exposures occur through the foreseeable and intended use of the Products, *i.e.*, handling the Products while locking and unlocking their motor vehicles.

Dated: 9/29/2014

LAW OFFICES OF MORSE MEHRBAN, A.P.C.

By:



Morse Mehrban

CERTIFICATE OF MERIT

Health and Safety Code Section 25249.7(d)


I, Morse Mehrban, hereby declare:

- (1) This Certificate of Merit accompanies the attached sixty-day notice 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: 9/29/2014

LAW OFFICES OF MORSE MEHRBAN, A.P.C.

By:



Morse Mehrban

CERTIFICATE OF SERVICE


I am employed in Los Angeles County, California. My business address is 15233 Ventura Blvd., Suite 304, Sherman Oaks, CA 91403. I am over the age of 18 years and not a party to the within cause. On this date, I served true and correct copies of NOTICE OF VIOLATION OF HEALTH AND SAFETY CODE SECTION 25249.6; CERTIFICATE OF MERIT; THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY (only sent to those on the service list marked with an asterisk); and this CERTIFICATE OF SERVICE by uploading them to the website of the California Attorney General at <https://oag.ca.gov/prop65/add-60-day-notice> and by depositing fully prepaid and sealed envelopes containing them with the United States Postal Service, addressed as follows:

City Attorney San Francisco City 1 Dr. Carlton B. Goodlett Pl Rm 234 San Francisco, CA 94102-4682	District Attorney Contra Costa County 900 Ward St Martinez, CA 94553	District Attorney Napa County P.O. Box 720 Napa, CA 94559
District Attorney Monterey County 230 Church Street, Bldg. 2 & 3 Salinas, CA 93901	District Attorney Sonoma County 600 Administration Dr, Rm 212J Santa Rosa, CA 95403	District Attorney Santa Clara County 70 West Hedding St, West Wing San Jose, CA 95110
District Attorney Tulare County 221 S Mooney Blvd, Rm 224 Visalia, CA 93291	District Attorney Riverside County 3960 Orange Street Riverside, CA 92501	District Attorney Ventura County 800 S. Victoria Avenue, Suite 314 Ventura, CA 93009
District Attorney Alameda County 1225 Fallon Street, Suite 900 Oakland, CA 94612	District Attorney Kern County 1215 Truxtun Avenue, 4th Floor Bakersfield, CA 93301	District Attorney Orange County 401 Civic Center Drive West Santa Ana, CA 92701
District Attorney Alpine County P.O. Box 248 Markleeville, CA 96120	District Attorney Kings County 1400 W Lacey Blvd Hanford CA 93230	District Attorney Placer County 10810 Justice Center Dr, Suite #240 Roseville, CA 95678
District Attorney Amador County 708 Court Street Jackson, CA 95642	District Attorney Lake County 255 North Forbes St Lakeport, CA 95453	District Attorney Plumas County 520 Main Street, Room 404 Quincy, California 95971
District Attorney Butte County 25 County Center Drive, Suite 245 Oroville, California 95965	District Attorney Lassen County 220 S Lassen St Susanville, CA 96130	District Attorney Sacramento County 901 G Street Sacramento, CA 95814
District Attorney Calaveras County 891 Mountain Ranch Road San Andreas, CA 95249	District Attorney Los Angeles County 210 W Temple St, Suite 18000 Los Angeles, CA 90012-3210	District Attorney San Benito County 419 4th St. Hollister, CA 95023-3801
District Attorney Colusa County 346 5th St # 101 Colusa, CA 95932	District Attorney Madera County 209 W. Yosemite Ave Madera, CA 93637	District Attorney San Bernardino County 316 N. Mt. View Ave. San Bernardino, CA 92415-0004
District Attorney Del Norte County 450 H Street, Room 171 Crescent City, CA 95531	District Attorney Marin County 3501 Civic Center Drive San Rafael, CA 94903	District Attorney San Diego County 330 W. Broadway San Diego, CA 92101
District Attorney El Dorado County 515 Main St Placerville CA 95667	District Attorney Mariposa County 5101 Jones St Mariposa, CA 95338	District Attorney San Francisco County 850 Bryant St, 3rd Floor San Francisco CA 94103

District Attorney Fresno County 2220 Tulare Street, Suite 1000 Fresno, CA 93721	District Attorney Mendocino County PO Box 1000 Ukiah, CA 95482	District Attorney San Joaquin County 222 E. Weber Ave, 2nd Fl, Rm 202 Stockton, CA 95202
District Attorney Glenn County P.O. Box 430 Willows, CA 95988	District Attorney Merced County 550 W. Main Street Merced, CA 95340	District Attorney San Luis Obispo County County Government Center, 4th Fl San Luis Obispo, CA 93408
District Attorney Humboldt County 825 5th St #4 Eureka, CA 95501	District Attorney Modoc County 204 South Court Street, Suite 202 Alturas, CA 96101	District Attorney San Mateo County 400 County Center, 3rd Floor Redwood City, CA 94063
District Attorney Imperial County 940 West Main Street, Suite 102 El Centro, California 92243	District Attorney Mono County P.O. Box 617 Bridgeport, CA 93517	District Attorney Trinity County P.O. Box 310 Weaverville CA 96093
District Attorney Inyo County PO Box D Independence, CA 93526	District Attorney Nevada County 201 Commercial Street Nevada City, California 95959	District Attorney Santa Cruz County 701 Ocean Street, Rm. 200 Santa Cruz, CA 95060
District Attorney Santa Barbara County 1112 Santa Barbara Street Santa Barbara, CA 93101	District Attorney Tuolumne County 423 N. Washington St. Sonora, CA 95370	City Attorney San Jose City 200 E. Santa Clara St. San Jose, CA 95113
District Attorney Shasta County 1355 West St Redding, CA 96001	District Attorney Yolo County 301 Second Street Woodland, CA 95695	District Attorney Tehama county 444 Oak Street, Room L Red Bluff, CA 96080
District Attorney Sierra County P.O. Box 457 Downieville, CA 95936	District Attorney Yuba County 215 5th. St. Marysville, CA 95901	District Attorney Sutter County 446 2nd Street, Suite 102 Yuba City, CA 95991
District Attorney Siskiyou County 311 4th St Yreka, CA 96097	City Attorney Los Angeles City 800 City Hall E, 200 N Main St Los Angeles, CA 90012	District Attorney Stanislaus County 832 12th Street, Suite 300 Modesto, California 95354
District Attorney Solano County 675 Texas Street, Suite 4500 Fairfield CA 94533-6340	City Attorney San Diego City 1200 Third Ave., #1620 San Diego, CA 92101	* Peter M. Grady President Maserati North America, Inc. 4832 GOODISON PLACE DR ROCHESTER, MI 48306

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

Dated: 9/29/14


Morse Mehrban