

60-DAY NOTICE OF VIOLATION

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

DATE: June 4, 2015

TO: PlumbingSupply Group, LLC, and the public prosecutors listed on the service list accompanying the attached proof of service.

FROM: Scott Sprankle

I. INTRODUCTION

I, Scott Sprankle, am a citizen of the State of California acting in the interest of the general public. I am dedicated to protecting the environment, improving human health and the health of ecosystems, and supporting environmentally sound practices. This Notice is provided to the public agencies listed above pursuant to California Health & Safety Code §25249.6 et seq. ("Proposition 65"). As noted above, notice is also being provided to the violator, PlumbingSupply Group, LLC (the "Violator").

II. NATURE OF THE VIOLATION

- A. Violator: PlumbingSupply Group, LLC, 994 E 20th Street, Chico, CA 95928.
- B. Time Period of Exposure: Violations have been occurring since at least June 4, 2014, and continue to occur to this day.
- C. Listed Chemical: Lead and lead compounds.
- D. Types of Harm: Carcinogen; birth defects and other reproductive harm.
- E. Types of Products: The specific types of products causing the violations are brass plumbing fittings. A non-exclusive example of this type of product is the Brass Pipe Fitting 3/4" Coupling. These products are being sold by the Violator throughout California. All products within the type covered by this Notice shall be hereinafter referred to as the "products."
- F. Routes of Exposure: Ingestion and dermal contact.
- G. Description of Exposure: The sales of these products in California dating as far back as June 4, 2014 are subject to this notice. As a result of the sales of these products, exposures to the listed chemical have been occurring without clear and reasonable 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, California citizens 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. California consumers, including children, through the act of buying, acquiring or using the products, are exposed to the listed chemical. By way of example but not limitation, exposures occur when California

citizens use, display, clean, pack, unpack, arrange, store, install, drink downstream from, or otherwise handle the products. These actions cause consumers to be exposed directly or indirectly through the routine touching of the parts or portions of the products containing readily available surface amounts of the listed chemical. Additionally, exposure can occur through the routine touching and ingesting of other materials that are contaminated with the listed chemical from the products as a result of these tasks. People likely to be exposed include both children and adults.

III. CONTACT INFORMATION

Please direct all questions concerning this notice to me through my attorney's office at the following address:

Lucas T. Novak, Esq.
Law Offices of Lucas T. Novak
8335 W Sunset Blvd., Suite 217
Los Angeles, CA 90069
Tel: (323) 337-9015
Email: lucas.nvk@gmail.com

IV. PROPOSITION 65 INFORMATION

For the Violator's reference, attached is a copy of "Proposition 65: A Summary" which has been prepared by Office of Environmental Health Hazard Assessment ("OEHHA"). For more information concerning the provisions of Proposition 65, contact OEHHA at (916) 445-6900.

V. RESOLUTION OF NOTICED CLAIMS

Based on the allegations set forth in this Notice, the noticing party intends to file a Private Enforcer lawsuit against the alleged Violator 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 who have received such products; (2) provide clear and reasonable warnings for products sold in the future or reformulate such products to eliminate the lead exposures; and (3) pay an appropriate civil penalty based on the factors enumerated in California Health & Safety Code §25249.7(b). If the alleged Violators are interested in resolving this dispute without resorting to expensive and time-consuming litigation, please feel free to contact counsel identified above. It should be noted that a Private Enforcer cannot: (1) finalize any settlement until after the 60-day notice period has expired; or (2) speak for the Attorney General or any District or City Attorney who received this Notice. Therefore, while reaching an agreement with me will resolve my claims, such agreement may not satisfy the public prosecutors.

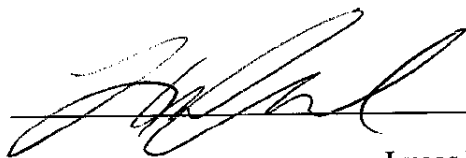
CERTIFICATE OF MERIT

Health and Safety Code Section 25249.7(d)

I, Lucas Novak, Esq. hereby declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged the parties identified in the notice have violated Health and Safety Code §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 this 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 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. 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 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: June 4, 2015



Lucas Novak, Esq.

PROOF OF SERVICE

I, Lucas Novak, Esq., declare under penalty of perjury:

I am an active member of the California State Bar, a citizen of the United States over the age of 18 years, and not a party to the within action; my business address is 8335 W Sunset Blvd., Suite 217, Los Angeles, CA 90069.

On June 4, 2015, I served the following documents:

60-DAY NOTICE OF VIOLATION SENT IN COMPLIANCE WITH HEALTH & SAFETY CODE §25249.7(d);

PROPOSITION 65: A SUMMARY (not sent to the public enforcement agencies);

CERTIFICATE OF MERIT; AND

CERTIFICATE OF MERIT ATTACHMENTS (served only on the Attorney General)

by placing a true copy thereof enclosed in a sealed envelope with postage for first class mail thereon fully prepaid in Los Angeles, California, in the United States mail addressed as follows, and to the public prosecutors listed in the attached service list:

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| PlumbingSupply Group, LLC Attn: Aden B. Cullens 994 E 20th Street Chico, CA 95928 | PlumbingSupply Group, LLC Attn: Current President or CEO 994 E 20th Street Chico, CA 95928 |
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Additionally, on this date, I uploaded the documents listed above to the California Attorney General via its website:

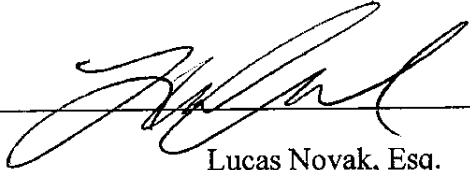
Office of the California Attorney General
Proposition 65 Enforcement Reporting
ATTN: Prop 65 Coordinator
1515 Clay Street, Suite 2000
P.O. Box 70550
Oakland, CA 94612-0550
<http://oag.ca.gov/prop65>

Also on this date, I transmitted via electronic mail the documents listed above to the electronic mail addresses as follows:

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| Stacey Grassini, Deputy District Attorney 900 Ward Street Martinez, CA 94553 sgrassini@contracostada.org | Dije Ndreu, Deputy District Attorney PO Box 1131 Salinas, CA 93902 Prop65DA@co.monterey.ca.us | Gary Lieberstein, District Attorney 931 Parkway Mall Napa, CA 94559 CEPD@countyofnapa.org |
| Paul E. Zellerbach, District Attorney 3072 Orange Street Riverside, CA 92501 Prop65@rivcoda.org | Yen Dang, Assistant District Attorney 70 W Hedding St San Jose, CA 95110 epu@da.sccgov.org | Stephan R. Passalacqua, District Attorney 600 Administration Dr Sonoma, CA 95403 jbarnes@sonoma-county.org |
| Phillip J. Cline, District Attorney 221 S Mooney Blvd Visalia, CA 95370 Prop65@co.tulare.ca.us | Gregory D. Totten, District Attorney 800 S Victoria Ave Ventura, CA 93009 daspecialops@ventura.org | Birgit Fladager, District Attorney of Stanislaus County 832 12th Street, Ste 300 Modesto, CA 95354 Prop65@standa.org |

The electronic transmissions were reported as sent and without error.

Executed on June 4, 2015, at Los Angeles, California.



Lucas Novak, Esq.

SERVICE LIST

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| District Attorney of Alameda County 1225 Fallon Street, Rm 900 Oakland, CA 94612 | District Attorney of Alpine County 270 Laramie St., P.O. Box 248 Markleeville, CA 96120 | District Attorney of Amador County 708 Court Street, Suite 202 Jackson, CA 95642 |
| District Attorney of Butte County Administration Building 25 County Center Drive Oroville, CA 95965 | District Attorney of Calaveras County 891 Mountain Ranch Road San Andreas, CA 95249 | District Attorney of Colusa County 547 Market Street, Ste 102 Colusa, CA 95932 |
| District Attorney of Del Norte County 450 H Street, Ste 171 Crescent City, CA 95531 | District Attorney of El Dorado County 515 Main Street Placerville, CA 95667 | District Attorney of Fresno County 2220 Tulare Street, Ste 1000 Fresno, CA 93721 |
| District Attorney of Glenn County P.O. Box 430 Willows, CA 95988 | District Attorney of Humboldt County 825 5 th Street Eureka, CA 95501 | District Attorney of Imperial County 940 W. Main Street, Ste 102 El Centro, CA 92243 |
| District Attorney of Inyo County P.O. Drawer D Independence, CA 93526 | District Attorney of Kern County 1215 Truxtun Avenue Bakersfield, CA 93301 | District Attorney of Kings County 1400 West Lacey Blvd. Hanford, CA 93230 |
| District Attorney of Lake County 255 N. Forbes Street Lakeport, CA 95453 | District Attorney of Lassen County 220 S. Lassen Street, Ste 8 Susanville, CA 96130 | District Attorney of Los Angeles County 210 W. Temple Street, Ste 18000 Los Angeles, CA 90012-3210 |
| District Attorney of Madera County 209 West Yosemite Avenue Madera, CA 93637 | District Attorney of Marin County 3501 Civic Center Drive, Rm. 130 San Rafael, CA 94903 | District Attorney of Mariposa County 5101 Jones St., P.O. Box 730 Mariposa, CA 95338 |
| District Attorney of Mendocino County P.O. Box 1000 Ukiah, CA 95482 | District Attorney of Merced County 2222 "M" Street Merced, CA 95340 | District Attorney of Modoc County 204 S. Court Street, Rm. 202 Alturas, CA 96101-4020 |
| District Attorney of Mono County P.O. Box 617 Bridgeport, CA 93517 | District Attorney of Nevada County 110 Union Street Nevada City, CA 95959 | District Attorney of Orange County 401 Civic Center Drive West Santa Ana, CA 92701 |
| District Attorney of Placer County 10810 Justice Center Drive, Ste 240 Roseville, CA 95678 | District Attorney of Plumas County 520 Main Street, Rm. 404 Quincy, CA 95971 | District Attorney of Sacramento County 901 "G" Street Sacramento, CA 95814 |
| District Attorney of San Benito County 419 Fourth Street, 2 nd Floor Hollister, CA 95023 | District Attorney of San Bernardino County 316 N. Mountain View Avenue San Bernardino, CA 92415 | District Attorney of San Diego County 330 West Broadway San Diego, CA 92101 |
| District Attorney of San Francisco County 850 Bryant Street, Rm 322 San Francisco, CA 94103 | District Attorney of San Joaquin County P.O. Box 990 Stockton, CA 95201 | District Attorney of San Luis Obispo County 1050 Monterey Street, Rm 450 San Luis Obispo, CA 93408 |
| District Attorney of San Mateo County 400 County Center, 3 rd Floor Redwood City, CA 94063 | District Attorney of Santa Barbara County 1112 Santa Barbara Street Santa Barbara, CA 93101 | District Attorney of Santa Cruz County 701 Ocean Street, Rm. 200 Santa Cruz, CA 95060 |
| District Attorney of Shasta County 1355 West Street Redding, CA 96001 | District Attorney of Sierra County Courthouse 100 Courthouse Sq., 2 nd Floor Downieville, CA 95936 | District Attorney of Siskiyou County P.O. Box 986 Yreka, CA 96097 |
| District Attorney of Solano County 675 Texas Street, Ste 4500 Fairfield, CA 94533 | District Attorney of Sutter County 446 Second Street Yuba City, CA 95991 | District Attorney of Tuolumne County 423 N. Washington Street Sonora, CA 95370 |
| District Attorney of Tehama County P.O. Box 519 Red Bluff, CA 96080 | District Attorney of Trinity County P.O. Box 310 Weaverville, CA 96093 | Los Angeles City Attorney's Office 800 City Hall East 200 N. Main Street Los Angeles, CA 90012 |
| District Attorney of Yolo County 301 Second Street Woodland, CA 95695 | District Attorney of Yuba County 215 Fifth Street Marysville, CA 95901 | San Jose City Attorney's Office 200 East Santa Clara Street San Jose, CA 95113 |
| San Diego City Attorney's Office 1200 Third Avenue, Ste 1620 San Diego, CA 92101 | San Francisco City Attorney's Office City Hall, Room 234 1 Dr. Carlton B. Goodlett Place San Francisco, CA 94102 | |