

July 23, 2015

PROPOSITION 65 ENFORCEMENT REPORTING
ATTENTION: PROP 65 COORDINATOR
1515 CLAY STREET, SUITE 2000
P.O. BOX 70550
OAKLAND CA 94612-0550

Greetings:

This office and the Mateel Environmental Justice Foundation ("Mateel") give you notice that the companies listed on the service list have been, are, will be and threaten to be in violation of Cal. Health & Safety Code § 25249.6. Both this office and Mateel are private enforcers of Proposition 65, both may be contacted at the below-listed address and telephone number, and I am a responsible individual at both Mateel and this office. The above referenced violations pertain to the areas in proximity to the go kart tracks at the company locations listed on the accompanying locations list. The areas at the go kart tracks subject to this notice include inside the go karts themselves, the areas where people wait in line to take their turn driving the go karts, the areas where people wait for their friends or family members to disembark from the go karts, and where people stand to watch or photograph their friends and family members drive the go karts. These areas are hereinafter referred to collectively as "go kart tracks." The go karts at these go kart tracks are powered by small gasoline engines. The gasoline engines that power the go karts expose people at the go kart tracks to gasoline engine exhaust (condensates/extracts), as well as many of the toxic components of gasoline engine exhaust. These toxic components are carbon monoxide, benzene, toluene, benzo(a)pyrene, formaldehyde, acetaldehyde, 1,3-butadiene, benz(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(j)fluoranthene, chrysene and indeno[1,2,3-cd] pyrene (collectively hereinafter "engine exhaust components"). Gasoline engine exhaust and the listed components are all chemicals known to the State to cause cancer and/or reproductive toxicity. Because the small gasoline-engine powered go karts expel these chemicals as exhaust into the air, the people operating the go karts, and those standing-nearby at the go kart tracks, inhale these chemicals. Their skin also comes into contact with these chemicals, and they ingest the chemicals. Exposure to these chemicals thus comes via the inhalation, dermal exposure and ingestion routes. The businesses subject to this notice -- the owners and operators of the go kart tracks -- did not and do not provide people with clear and reasonable warnings before it exposes them to engine exhaust components. Exposures that are the subject of this notice do not occur off the property of the businesses subject to this notice. These violations have occurred every day since July 21, 2012, and will continue every day until clear and reasonable warnings are provided to exposed people. The above-referenced violations are alleged for occupational exposures as well as for consumer and environmental exposures. This letter alleges environmental exposures that violate Section 25249.6. The common characteristic that all these sources of exposure share -- and which distinguishes these sources from other sources for which no violation is alleged -- is that the sources to which this letter pertains are the small gasoline-engines that power go karts and the operation of those go karts at the go kart tracks.

Cordially,

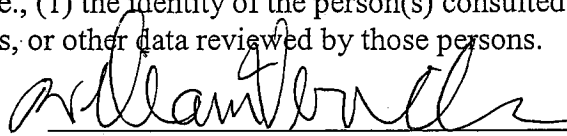
William Venick

424 First Street, Eureka, CA 95501 • 707.268.8900 (phone) 707.268.8901 (fax)

CERTIFICATE OF MERIT

I, William Verick, hereby declare: This Certificate of Merit accompanies the attached notice(s) of violation 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. I am the attorney for the noticing party. 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 chemical that is the subject of the action. 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. 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 person(s) consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: July 23, 2015

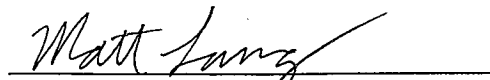

William Verick

This notice alleges the violation of Proposition 65 with respect to occupational exposures governed by the California State Plan for Occupational Safety and Health. The State Plan incorporates the provisions of Proposition 65, as approved by Federal OSHA on June 6, 1997. This approval specifically placed certain conditions on Proposition 65, including that it does not apply to the conduct of manufacturers occurring outside the State of California. The approval also provides that an employer may use the means of compliances in the general hazard communication requirements to comply with Proposition 65. It also requires that supplemental enforcement is subject to the supervision of the California Occupational Safety and Health Administration. Accordingly, any settlement, civil complaint, or substantive court orders in this matter must be submitted to the Attorney General.

CERTIFICATE OF SERVICE

I, Matt Lang, declare:

If called, I could and would testify as follows: I am over eighteen. My business address is 424 First Street, Eureka, California, 95501. On July 23, 2015, I caused the attached NOTICE OF VIOLATION LETTER, or a letter identical in substance, to be served by U.S. Mail on those public enforcement agencies listed on the attached SERVICE LIST; in addition on the same date and by U.S. Mail I caused the attached NOTICE OF VIOLATION and PROPOSITION 65: A SUMMARY to be sent by Certified U.S. Mail to the private business entities also listed on the attached SERVICE LIST. I deposited copies of these documents in envelopes, postage pre-paid, with the U.S. Postal Service on the day on which the mail is collected. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on July 23, 2015, at Eureka, California.


Matt Lang

SERVICE LIST

PROPOSITION 65 ENFORCEMENT REPORTING
ATTENTION: PROP 65 COORDINATOR
1515 CLAY STREET, SUITE 2000
POST OFFICE BOX 70550
OAKLAND, CA 94612-0550

WILLIAM TY LARSON, CEO
SCANDIA FAMILY FUN CENTERS, INC.
4607 WARDMAN BULLOCK
ETIWANDA, CA 91739

OFFICE OF THE CITY ATTORNEY
CITY OF SAN DIEGO CONSUMER &
ENVIRONMENTAL PROTECTION
1200 THIRD AVENUE, SUITE 700
SAN DIEGO, CA 92101

JAMES W. RICHARDSON, CEO
KARTSCAPE, INC.
8123 MIRALANI DR
SAN DIEGO, CA, 92126

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF ALAMEDA
1225 FALLON STREET ROOM 900
OAKLAND, CA 94612

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF KERN
1215 TRUXTUN AVE. FLOOR 4
BAKERSFIELD, CA 93301

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF LOS ANGELES
18000 CRIMINAL COURTS BUILDING
210 W. TEMPLE ST.
LOS ANGELES, CA 90012

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF RIVERSIDE
3960 ORANGE ST.
RIVERSIDE, CA 92501

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF SACRAMENTO
901 G STREET
SACRAMENTO, CA 95814

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF SAN BERNARDINO
316 MT. VIEW AVE.
SAN BERNARDINO, CA 92415-0004

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF SAN DIEGO
330 W. BROADWAY, SUITE 1100
SAN DIEGO, CA 92101

OFFICE OF THE DISTRICT ATTORNEY
COUNTY OF STANISLAUS
1100 I ST. #200
MODESTO, CA 95354

VENTURA COUNTY DISTRICT ATTORNEY'S
OFFICE
800 SOUTH VICTORIA AVE
VENTURA, CA 93009

CURTIS PARKS, CEO
AMUSEMENT MANAGEMENT PARTNERS, LLC.
4446 HENDRICKS AVE #147
JACKSONVILLE, FL, 32207

JOHN ROBERT HARRIS, II, CEO
GO KART WORLD, INC.
13 ROCKINGHORSE ROAD
RANCHO PALOS VERDES, CA 90275

JOHN AND CHERRY TREBLE-PARKER
LEIGHTON RUFF, LLC, DBA LOLLIPOP PARK
PO BOX 3090
LAKE ARROWHEAD, CA 92352

JAMES STRATTON BUCK, CEO
UMIGO RACING, INC.
91 MACALVEY DR
MARTINEZ, CA 94553

W. ROSS BRILES, CEO
PUTT PUTT OF MODESTO, INC.
603 FLOYD AVE.
MODESTO, CA 95350

GEORGIA S. CLAESSENS
MULLIGAN LIMITED, A CALIFORNIA LIMITED
PARTNERSHIP
4281 KATELLA AVENUE # 215
CYPRESS, CA 90720

GEORGIA S. CLAESSENS
MULLIGAN LIMITED, A CALIFORNIA LIMITED
PARTNERSHIP
1313 WEST SEPULVEDA BLVD.
TORRANCE, CA 90501

GEORGE BRIMHALL, CEO
GNS DEVELOPMENT CORPORATION
9211 N MARTINGALE RD.
PARADISE VALLEY, AZ 85234

LOCATION LIST

Camelot Park (Bakersfield, Kern County) - Amusement Management Partners, LLC.

Go Kart World (Carson, Los Angeles County) - Go Kart World, Inc.

Lollipop Park (Lake Arrowhead, San Bernadino County) - Leighton Ruff, LLC, DBA Lollipop Park

Umigo Indoor Kart Racing (Livermore, Alameda County) - Umigo Racing, Inc.

Fun Works (Modesto, Stanislaus County) - Putt Putt of Modesto, Inc.

Mulligan Family Fun Center (Torrance, Los Angeles County; Palmdale, Los Angeles County) - Mulligan LTD, A California Limited Partnership

Golf N Stuff (Norwalk, Los Angeles County; Ventura, Ventura County) - GNS Development Corporation

Scandia (Ontario, San Bernadino County; Sacramento, Sacramento County; Victorville, San Bernadino County) - Scandia Family Fun Centers, Inc.

Miramar Speed Circuit (San Diego, San Diego County) - Kartscape, Inc.